

Broker-dealers are required to disclose any material arrangements with the venues listed in each section below, including, but not limited to, any internalization or payment for order flow arrangements.

# SEC-required report on routing of customer order

## Russell Investments Implementation Services, LLC.

### For quarter ending December 31, 2018

#### NYSE

Non-Directed Orders	100.00%
Market Orders	98.82%
Limit Orders	1.18%
Other Orders	0.00%

Orders routed to:	Percentage
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NYSE	19.37%
IEX Market	12.58%
Morgan Stanley ATS	7.23%
UBS PIN ATS	7.20%
ITG POSIT	5.59%
NASDAQ	5.04%
Credit Suisse AES CrossFinder	3.34%
Direct Edge ECN	3.22%
NYSE ARCA	3.02%
BATS Trading, Inc.	2.77%

#### NASDAQ

Non-Directed Orders	100.00%
Market Orders	99.60%
Limit Orders	0.40%
Other Orders	0.00%

Orders routed to:	Percentage
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NASDAQ	18.35%
IEX Market	14.24%
UBS PIN ATS	7.20%
Morgan Stanley ATS	6.35%
ITG POSIT	6.22%
Credit Suisse AES CrossFinder	3.78%
Direct Edge ECN	3.39%
NYSE ARCA	3.37%
OTC	3.00%
BIDS Trading L.P.	2.84%

**AMEX**

Non-Directed Orders	100.00%
Market Orders	100.00%
Limit Orders	0.00%
Other Orders	0.00%

**Orders routed to: Percentage**

IEX Market	14.43%
ITG POSIT	13.28%
UBS PIN ATS	7.05%
NYSE	6.58%
Direct Edge ECN	5.18%
NYSE ARCA	4.72%
NASDAQ	4.57%
BANK OF AMERICA - MERRILL LYNCH	4.36%
Deutsche Bank ATS	4.26%
Credit Suisse AES CrossFinder	4.18%

**Options****Orders routed to: Percentage**

\*\*NoDATA to REPORT\*\*