

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 September 30, 2018

NYSE

Non-Directed Orders	100.00%
Market Orders	98.40%
Limit Orders	1.60%
Other Orders	0.00%

Orders routed to:	Percentage
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NYSE	13.96%
IEX Market	12.47%
ITG POSIT	6.89%
Morgan Stanley ATS	6.03%
UBS PIN ATS	5.79%
Credit Suisse AES CrossFinder	5.04%
Pulse Trading BlockCross	4.26%
NASDAQ	3.94%
Direct Edge ECN	3.58%
BIDS Trading L.P.	3.31%

NASDAQ

Non-Directed Orders	100.00%
Market Orders	99.59%
Limit Orders	0.41%
Other Orders	0.00%

Orders routed to:	Percentage
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NASDAQ	14.82%
IEX Market	12.28%
ITG POSIT	8.22%
UBS PIN ATS	6.25%
Credit Suisse AES CrossFinder	6.08%
Pulse Trading BlockCross	5.51%
Morgan Stanley ATS	5.21%
Direct Edge ECN	4.12%
NYSE ARCA	3.63%
BIDS Trading L.P.	3.36%

AMEX

Non-Directed Orders	100.00%
Market Orders	99.99%
Limit Orders	0.01%
Other Orders	0.00%

Orders routed to:	Percentage
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FINN	13.48%
IEX Market	11.73%
UBS PIN ATS	8.12%
NYSE ARCA	7.35%
NASDAQ	6.83%
Credit Suisse AES CrossFinder	5.49%
BIDS Trading L.P.	4.88%
JP Morgan ATS	4.01%
Goldman Sachs ATS	3.25%
Deutsche Bank ATS	2.87%

Options

Orders routed to:	Percentage
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NoDATA to REPORT