

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, 2019

NYSE

Non-Directed Orders	100.00%
Market Orders	99.9%
Limit Orders	0.10%
Other Orders	0.00%

Orders routed to:	Percentage
-------------------	------------

NYSE	25.70%
Fidelity CrossStream	5.94%
UBS PIN ATS	5.61%
NASDAQ	5.23%
IEX Market	4.47%
Virtu Matchit ATS	3.45%
ITG POSIT	3.31%
OTC	2.87%
NASDAQ OMX PX	2.87%
BATS Trading L.P.	2.42%

NASDAQ

Non-Directed Orders	100.00%
Market Orders	99.98%
Limit Orders	0.02%
Other Orders	0.00%

Orders routed to:	Percentage
-------------------	------------

NASDAQ	27.39%
NYSE	11.17%
Fidelity CrossStream	11.10%
Virtu Matchit ATS	9.70%
NASDAQ NMS GS	8.21%
Instinet BlockCross	7.64%
Credit Suisse AES CrossFinder	3.60%
Instinet BlockCross	3.03%
ITG POSIT	2.76%
IEX Market	2.15%

AMEX

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

Orders routed to: Percentage

UBS PIN ATS	9.20%
NASDAQ	8.38%
BIDS Trading L.P.	7.14%
Virtu Matchit ATS	6.16%
NYSE AMEX	4.42%
Goldman Sachs ATS	4.12%
IEX Market	4.05%
Credit Suisse AES CrossFinder	3.97%
BATS Trading, Inc.	3.87%
OTC	3.86%

Options

Orders routed to: Percentage

NoDATA to REPORT