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ITG Inc. One Liberty Plaza New York, NY 10006 212-588-4000

# SEC-Required Report on Routing of Customer Orders For Quarter Ending March 31, 2019

ITG has prepared this report pursuant to a U.S. Securities and Exchange Commission rule requiring all brokerage firms to make publicly available quarterly reports on their order routing practices. The report provides information on the routing of "non-directed orders" - any order that the customer has not specifically instructed to be routed to a particular venue for execution. For these non-directed orders, ITG has selected the execution venue on behalf of its customers.

The report is divided into four sections: one for securities listed on the New York Stock Exchange and reported as Network A eligible securities; one for securities listed on The Nasdaq Stock Market; one for securities listed on the American Stock Exchange or regional exchanges and reported as Network B eligible securities; and one for exchange-listed options. For each section this report identifies the venues most often selected by ITG, sets forth the percentage of various types of orders routed to the venues, and discusses the material aspects of ITG relationship with the venues.

# Securities Listed on the New York Stock Exchange

#### **Summary Statistics:**

Non-Directed orders as a percentage of total customer orders	9.56%
Limit orders as a percentage of total non-directed orders	0.14%
Market orders as a percentage of total non-directed orders	0.07%
Other orders as a percentage of total non-directed orders	99.79%

#### Venues Receiving a Significant Percentage of Total Non-Directed Orders:

1	NASDAQ	32.56%
2	BATS	15.97%
3	BATS BYX	6.88%
4	PSX	5.59%
5	NASDAQ OMX BX	4.95%
6	ARCA	4.37%
7	POSIT	4.37%
8	NYSE	3.49%
9	IEX	3.00%
10	UBS ATS	2.75%

#### Information Concerning Significant Venues:

1. NASDAQ	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	28.31%
	Market orders as a percentage of total market orders	27.01%
	Other orders as a percentage of total other orders	32.57%

#### Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to NASDAQ, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from NASDAQ. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

2. BATS	Types of Orders Routed to Venue	

Limit orders as a percentage of total limit orders	11.10%
Market orders as a percentage of total market orders	7.27%
Other orders as a percentage of total other orders	15.99%

For orders routed by ITG Inc. to BATS, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from BATS. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

3. BATS BYX	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.11%
	Market orders as a percentage of total market orders	4.83%
	Other orders as a percentage of total other orders	6.89%

Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to BATS BYX, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from BATS BYX. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

4. PSX	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.20%
	Market orders as a percentage of total market orders	0.37%
	Other orders as a percentage of total other orders	5.60%

Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to NASDAQ PSX, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity

from NASDAQ PSX. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

5. NASDAQ OMX BX	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.37%
	Market orders as a percentage of total market orders	4.80%
	Other orders as a percentage of total other orders	4.96%

# Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to NASDAQ OMX BX, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from Nasdaq OMX BX. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

6. ARCA	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.23%
	Market orders as a percentage of total market orders	2.32%
	Other orders as a percentage of total other orders	4.38%

Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to NYSE Arca, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from NYSE Arca. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

7. POSIT	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	12.39%
	Market orders as a percentage of total market orders	13.18%
	Other orders as a percentage of total other orders	4.35%

POSIT is an alternative trading system owned and operated by ITG Inc. ITG Inc. receives a commission on a per share basis for orders executed within POSIT.

8. NYSE	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	31.35%
	Market orders as a percentage of total market orders	4.63%
	Other orders as a percentage of total other orders	3.45%

Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to NYSE, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from NYSE. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

9. IEX	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.86%
	Market orders as a percentage of total market orders	6.96%
	Other orders as a percentage of total other orders	3.00%

Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to IEX, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from IEX.

10. UBS ATS	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.66%
	Market orders as a percentage of total market orders	4.96%
	Other orders as a percentage of total other orders	2.75%

No material relationship exists between UBS and ITG Inc

# Securities Listed on the NASDAQ Stock Market, Inc.

#### **Summary Statistics:**

Non-Directed orders as a percentage of total customer orders	9.48%
Limit orders as a percentage of total non-directed orders	0.06%
Market orders as a percentage of total non-directed orders	0.08%
Other orders as a percentage of total non-directed orders	99.85%

#### Venues Receiving a Significant Percentage of Total Non-Directed Orders:

1	NASDAQ	44.60%
2	BATS	12.62%
3	ARCA	6.81%
4	BATS BYX	4.96%
5	POSIT	4.49%
6	UBS ATS	3.23%
7	NASDAQ OMX BX	2.87%
8	IEX	2.71%
9	DIRECT EDGE X	2.41%
10	PSX	2.14%

#### Information Concerning Significant Venues:

1. NASDAQ	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	41.53%
	Market orders as a percentage of total market orders	28.54%
	Other orders as a percentage of total other orders	44.61%

# Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to NASDAQ, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from NASDAQ. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

2. BATS	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	14.45%
	Market orders as a percentage of total market orders	11.97%
	Other orders as a percentage of total other orders	12.62%

For orders routed by ITG Inc. to BATS, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from BATS. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

3. ARCA	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.93%
	Market orders as a percentage of total market orders	4.95%
	Other orders as a percentage of total other orders	6.81%

# Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to NYSE Arca, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from NYSE Arca. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

4. BATS BYX	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.55%
	Market orders as a percentage of total market orders	4.06%
	Other orders as a percentage of total other orders	4.96%

Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to BATS BYX, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from BATS BYX. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

5. POSIT	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	12.00%
	Market orders as a percentage of total market orders	12.49%
	Other orders as a percentage of total other orders	4.47%

Material Aspects of Relationship with Venue:

POSIT is an alternative trading system owned and operated by ITG Inc. ITG Inc. receives a commission on a per share basis for orders executed within POSIT.

6. UBS ATS	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	2.64%
	Market orders as a percentage of total market orders	4.84%
	Other orders as a percentage of total other orders	3.23%

Material Aspects of Relationship with Venue:

No material relationship exists between UBS and ITG Inc

7. NASDAQ OMX BX	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.75%
	Market orders as a percentage of total market orders	2.85%
	Other orders as a percentage of total other orders	2.87%

For orders routed by ITG Inc. to NASDAQ OMX BX, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from Nasdaq OMX BX. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

8. IEX	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	2.87%
	Market orders as a percentage of total market orders	6.29%
	Other orders as a percentage of total other orders	2.70%

Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to IEX, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from IEX.

9. DIRECT EDGE X	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	10.84%
	Market orders as a percentage of total market orders	2.22%
	Other orders as a percentage of total other orders	2.40%

Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to Direct EdgeX, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from DirectEdgeX. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

10. PSX	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.39%
	Market orders as a percentage of total market orders	0.13%
	Other orders as a percentage of total other orders	2.14%

# Material Relationship with Venue

For orders routed by ITG Inc. to NASDAQ PSX, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from NASDAQ PSX. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

# Securities Listed on the American Stock Exchange

#### **Summary Statistics:**

Non-Directed orders as a percentage of total customer orders	9.65%
Limit orders as a percentage of total non-directed orders	0.21%
Market orders as a percentage of total non-directed orders	0.02%
Other orders as a percentage of total non-directed orders	99.77%

#### Venues Receiving a Significant Percentage of Total Non-Directed Orders:

1	ARCA	41.90%
2	NASDAQ	10.96%
3	KCG ETF	10.21%
4	INTL	4.29%
5	POSIT	3.47%
6	AMEX	3.36%
7	BATS	3.18%
8	IEX	2.09%
9	DIRECT EDGE A	2.05%
10	BRAZIL STOCK EXCHANGE	1.85%

#### **Information Concerning Significant Venues:**

1. ARCA	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	21.57%
	Market orders as a percentage of total market orders	7.92%
	Other orders as a percentage of total other orders	41.95%

#### Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to NYSE Arca, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from NYSE Arca. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

2. NASDAQ	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	12.47%
	Market orders as a percentage of total market orders	5.67%
	Other orders as a percentage of total other orders	10.96%

For orders routed by ITG Inc. to NASDAQ, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from NASDAQ. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

3. KCG ETF	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	1.46%
	Other orders as a percentage of total other orders	10.24%

Material Aspects of Relationship with Venue:

Please note Virtu Financial, Inc which owns KCG holdings Inc .completed acquisition of Investment Technology Group, Inc on March 1<sup>st</sup>, 2019.

4. INTL	1	Types of Orders Routed to Venue	
		Other orders as a percentage of total other orders	4.30%

Material Aspects of Relationship with Venue:

No material relationship between INTL FCS and ITG.

5. POSIT	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	21.11%

Market orders as a percentage of total market orders	13.68%
Other orders as a percentage of total other orders	3.43%

POSIT is an alternative trading system owned and operated by ITG Inc. ITG Inc. receives a commission on a per share basis for orders executed within POSIT.

6. AMEX	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.78%
	Market orders as a percentage of total market orders	9.42%
	Other orders as a percentage of total other orders	3.37%

Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to AMEX, ITG Inc. receives a cash payment or is charged a fee for order flow on a per share basis. The per share cash payment or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from AMEX.

7. BATS	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	3.85%
	Market orders as a percentage of total market orders	1.09%
	Other orders as a percentage of total other orders	3.18%

Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to BATS, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from BATS. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

8. IEX	Types of Orders Routed to Venue	

Limit orders as a percentage of total limit orders	3.83%
Market orders as a percentage of total market orders	4.43%
Other orders as a percentage of total other orders	2.08%

For orders routed by ITG Inc. to IEX, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from IEX.

9. DIRECT EDGE A	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	0.74%
	Market orders as a percentage of total market orders	2.98%
	Other orders as a percentage of total other orders	2.05%

Material Aspects of Relationship with Venue:

For orders routed by ITG Inc. to Direct EdgeA, ITG Inc may receive payment for order flow in the form of rebates, reductions of fees, or credits. The per share amount or fee is calculated based upon a variety of factors including, but not limited to, order size and whether an order provides liquidity or removes liquidity from DirectEdgeA. A portion of the orders routed to this exchange were sent via Morgan Stanley Speedway ("MS Speedway"). ITG Inc. incurs reduced execution costs when routing orders via MS Speedway.

10. BRAZIL STOCK EXCHANGE	Types of Orders Routed to Venue	
	Limit orders as a percentage of total limit orders	1.88%

Other orders as a percentage of total other orders	1.85%

No material relationship between Brazil Stock Exchange and ITG.