

## **EFG Asset Management (UK) Limited**

### **Order Execution Policy**

#### **1. Purpose of this Policy**

This Order Execution Policy (the “Policy”) applies to EFG Asset Management (UK) Limited (“EFGAM UK”). EFGAM UK is a full-scope Alternative Investment Fund Manager with MIFID top-up permissions to manage separately managed accounts and provide portfolio management services, investment advice and the receiving and transmitting of orders in relation to financial instruments.

This Policy explains EFGAM UKs set of steps that will be taken to obtain, when executing orders, the best possible result for its clients taking into account the execution factors as required by the Markets in Financial Instruments Directive 2014/65/EU (“MIFID II”).

We have established and implemented arrangements, including an This Policy, which are designed to allow us to meet our regulatory obligation to obtain the best possible result for our client orders (“best execution”).

Our commitment to provide you with best execution does not mean that we owe you any fiduciary responsibilities over and above the specific regulatory obligations placed upon us or as may be otherwise contracted between us.

The information on the execution principles is tailored to the respective class of financial instruments. Therefore, this Policy is supplemented by appendices which provide further details to our considerations as they relate to differing asset classes. The appendices should be read in conjunction with this Policy and cover the following products:

- Equities – Shares & depositary receipts;
- Debt instruments;
- Money-market instruments
- FX derivatives;
- Securitised derivatives;
- Structured notes; and
- Exchange traded products.

EFGAM UK is required to obtain the consent of each client to the Policy. By signing the terms of the Client Agreement, you, the client are deemed to have given consent and confirm acceptance of this Policy.

As set out in our Terms of Business we may decline to accept instructions and orders from you.

#### **2. Scope**

This Policy only applies to Professional Clients in accordance with the Financial Conduct Authority (“FCA”) client categorisations; and does not apply to business conducted with Eligible Counterparties. This Policy applies when EFGAM UK purchases or sells financial instruments in fulfilment of its obligations arising from a portfolio management mandate with its Clients.

In case EFGAM UK accepts a specific client instruction with respect to the execution of the order, we will follow the instruction to the extent it is possible for us to do so. EFGAM UK will have no responsibility for compliance with the Policy to the extent that EFGAM UK accepts and follows the specific client instruction.

### **3. Execution Factors**

Where we execute an order for you, in the absence of specific instructions from you as to how an order is to be executed, we will take into consideration all the following factors that allow us to deliver Best Execution:

Our obligation is to take all sufficient steps to obtain the best possible results for you. The best possible results means the best overall price - being the purchase price at which an order is executed (for a buy order) plus transaction costs passed on to you, or the sale price at which an order is executed (for a sell order) minus transaction costs passed on to you, across the execution venues on which we may execute orders.

In addition to best overall price, we may consider the following factors and give them precedence over the immediate price factors where they are instrumental in delivering the best possible results for you in terms of total cost to you:

- a) Liquidity of the financial instrument
- b) Costs;
- c) Speed;
- d) Likelihood of execution or settlement;
- e) Size of your order;
- f) Nature of your order;
- g) The execution venues available and their trading status; and
- h) Any other consideration relevant to the efficient execution of your order, including liquidity and market impact.

We will determine the relative importance of each factor and therefore there may be trade-offs where certain execution factors are considered as having higher importance over others in obtaining the best possible results for you.

Ordinarily, price will merit a high relative importance in obtaining the best possible outcome for clients. In certain circumstances, for some client orders, financial instruments or markets, we, in our absolute discretion, may decide that other factors are more important in determining the best possible results for you in accordance with our policy.

### **4. Execution Criteria**

The following execution criteria shall be considered when applying relative weights to the execution factors (see section 3):

- the characteristics of the client including your regulatory client categorisation;
- the characteristics and nature of your order, including whether any specific instructions are given;
- the characteristics of the financial instruments that are the subject of your order; and
- the characteristics of the execution venues to which your order can be directed.

In providing best execution, we will follow the same standards and apply the same processes to all markets and financial instruments. However, the relative importance of any one or several of the abovementioned criteria may vary on a case-by-case basis as a result of the diversity of the markets, financial instruments and orders types. For example, whereas price volatility may result in timely execution to be a priority in some markets, in other markets with low liquidity, the likelihood of execution of the order may alone constitute best execution. The nature of your order and any specific instruction linked to that order may also limit the choice in the selection of the execution venue.

## 5. Execution Venues

When executing your transactions, we will take all sufficient steps to obtain on a consistent basis the best possible result for you and therefore we may use one or more venue types, including but not limited to the following:

- Regulated broking firms (including affiliates);
- Regulated Markets;
- Other exchanges that are not Regulated Markets;
- Multilateral Trading Facilities (MTF's);
- Organised Trading Facilities (OTF's);
- Systematic Internalisers (SI's),
- Market Makers,
- Or other liquidity providers.

Execution venues by asset class are listed in Schedule A of this Policy Document.

EFGAM UK reserves the right to use other execution venues where deemed appropriate in accordance with our policy and EFGAM UK may add or remove any execution venue from this list.

We will undertake on-going assessments of the execution venues used to determine whether existing venues continue to provide for the best possible result for clients and also to review the suitability of new execution venues. In making this assessment we will utilise information derived from our own internal best execution monitoring tools and processes as well where applicable execution quality data reported by execution venues under MiFID II and its implementing measures.

The list will be updated, where necessary, following such assessment.

## 6. Order Management and Handling

Where we handle client's orders either on a client's behalf or as part of its portfolio management activities, it must ensure that orders are:

- Executed promptly in accordance with objectives;
- Accurately recorded and allocated; and
- Executed sequentially unless the characteristics of the order or prevailing market conditions make this impracticable, or the interests of the client require otherwise.

This may involve the aggregation of orders of other clients. Where orders are aggregated this will occur in accordance with the relevant MiFID II rules when EFGAM UK reasonably believes it will not be to your detriment. However, on occasion, aggregation may result in you obtaining a less favourable price. Records will be maintained as required by the rules. The executed orders are allocated to clients fairly

and proportionately. All client orders are pre-allocated on our order management system before they are sent to the dealing desk for execution.

Where trades are partially filled, fills are allocated on a pro rata basis by the order management system. In the event of an uneven allocation, such as a minimum tradeable piece, the trading desk will consult with the Portfolio Management team in an effort to obtain the fairest outcome for clients. All post trade allocation changes will be documented, and records kept.

In exceptional circumstances, such as technical faults or loss of connectivity at execution venues, EFGAM UK may be forced to employ other methods of execution other than the methods stated above.

## **7. Express Prior Consent**

Occasionally, we may wish to execute orders outside a regulated market or multilateral trading facility or organised trading facility, for example if a particular bank or investment firm is offering the best execution terms but intends to trade off-exchange. EFGAM UK is required to obtain your prior express consent to execute orders away from a Regulated Market<sup>1</sup> or a Multilateral Trading Facility (MTF)<sup>2</sup> for an instrument that is ordinarily traded on a Regulated Market or MTF. By signing the terms of the client agreement you have given such prior express consent.

You agree, by signing the terms of the client agreement, that EFGAM UK will not make public client limit orders in respect of shares admitted for trading on a Regulated Market which are not immediately executed under prevailing market conditions.

## **8. Monitoring and Review**

Our execution arrangements and the Order Execution Policy may change from time to time. This policy will be reviewed at least annually, including an assessment of the execution venues used, or whenever a material change occurs that affects our ability to obtain the best result for the execution of your orders.

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<sup>1</sup> A regulated market is a market place, trading system or exchange which meets the minimum EU standards set out in title III of the MiFID. Under MiFID, entities that offer multilateral trading for financial instruments (such as an order book), must be organised as either a regulated market or a MTF, with slightly different standards applying to each

<sup>2</sup> MTF means a system that brings together multiple parties (e.g. investors or other investment firms) that are interested in buying and selling financial instruments and enables them to do so. These systems can be crossing networks or matching engines that are operated by an investment firm or a market operator. Instruments may include shares, bonds and derivatives. This is done within the MTF operator's system.

## Schedule A – Execution Venues

| <b>Equity Counterparties</b> |                                   |
|------------------------------|-----------------------------------|
| Sanford C Bernstein Ltd      | Morgan Stanley & Co International |
| Bank Vontobel AG             | EFG Harris Allday                 |
| CLSA (UK)                    | CIMB Securities Ltd               |
| Strategas Securities LLC     | ISI Evercore Group LLC            |
| Kepler Cheureux SA           | Mainfirst Bank AG                 |
| Flow Traders BV              | UBS AG                            |
| Virtu Americas LLC           | UOB - Kay Hian Private Ltd        |
| Credit Suisse AG             | Stifel Nicolaus Europe Ltd        |
| HSBC plc                     | Mirabaud Securities Ltd           |
| JP Morgan Securities         | Investec                          |
| Liberum Capital Ltd          | Peel Hunt LLP                     |
| DBS Vickers Securities Ltd   | Canaccord Genuity Limited         |
| ZKB                          |                                   |

| <b>Fixed Income</b>                         |   |
|---|---|
| Toronto Dominion Bank                       | Banco Santander SA                            |
| Mitsubishi UFJ Trust International Ltd      | Jefferies International Limited               |
| Morgan Stanley & Co International           | SocGen International Ltd                      |
| JP Morgan Securities                        | HSBC plc                                      |
| Goldman Sachs International                 | Credit Suisse Securities                      |
| Bank of America Merrill Lynch International | UBS AG  |
| Standard Chartered Bank plc                 | Cantor Fitzgerald Europe                      |
| Citic CSLA                                  | Mizuho International plc                      |
| Kepler Cheuvreux SA                         | Bridport & CIE SA                             |
| EF&F Man Capital Markets Inc                | Bradesco Securities Inc                       |
| Nomura International plc                    | RBC Europe Ltd                                |
| Deutsche Bank AG                            | Wells Fargo Securities International Ltd      |
| Lloyds Bank Corporate Markets               | ZKB   |
| ANZ Banking Group                           | Credit Agricole Corporate and Investment Bank |
| National Australia Bank Ltd                 | Natixis SA                                    |
| Barclays                                    | Citigroup                                     |

| <b>Derivatives</b>                |  |
|-----------------------------------|--|
| Morgan Stanley & Co International |  |

| <b>Foreign Exchange</b>                     |          |
|---|----------|
| Bank of America Merrill Lynch International | HSBC plc |

| <b>Multi-Lateral Trading Facilities (MTF) (Equities and Fixed Income)</b> |                                |
|---|--------------------------------|
| Market Access Europe Ltd  | Bloomberg Trading Facility Ltd |
| Tradeweb  |                                |