



Investment Management Ltd

Best Execution Policy – Retail & Professional Clients

Altus Investment Limited

Authorised and regulated by the

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This document is designed to inform our clients of our policies when seeking to achieve the best possible result for you when we execute trades in financial instruments and foreign exchange on your behalf; either in the case where you give us instructions to execute trades or where we have discretionary authority over your portfolio.

Words in italics are defined in the glossary at the back of this document.

1 What is best execution and what are the execution factors?

The overarching objective is that we take all sufficient steps to obtain the best possible result for our clients. In order to achieve this, we are required to take into account a number of execution factors:

- price,
- costs,
- speed,
- likelihood of execution and settlement,
- size,
- nature or any other consideration relevant to the execution of an order

Altus will also take into consideration any other restrictions that may exist on your account as to where and how your trades can be executed; it should be noted that additional factors may affect whether Altus can achieve best execution for a particular trade.

In determining the applicability of the factors, we consider the following best execution criteria:

- (a) the characteristics of the client including the categorisation of the client as retail or professional;
- (b) the characteristics of the client order, including where the order involves a securities financing transaction (SFT);
- (c) the characteristics of financial instruments that are the subject of that order;
- (d) the characteristics of the execution venues to which that order can be directed.

The application of these factors is a matter of judgement. Other firms may exercise their judgement differently and reach a different conclusion as to how to achieve the overarching objective. In most cases the factors, other than costs, will not be decisive and thus this execution factor will usually be the determining factor. The factors may be interlinked such that for example, in fast moving markets, particularly for large orders, the way we would seek to achieve best total cost/revenue may involve giving the order to a broker who we believe can execute the entire order in a timely manner even if part of the order could be filled at a more advantageous price from another broker.

2 What are our obligations?

Under the *UK Markets in Financial Instruments Directive (UK MiFID)*, we, as a firm that is subject to *UK MiFID* must take all sufficient steps to obtain, when executing orders, the best possible result for our clients. How we assess the best possible result is set out above.

3 Execution Venues (Competing Markets)

For some financial instruments there are a range of execution venues where the trade could be executed. We regularly assess the execution venues available and may add or delete venues in accordance with the overall objective. We will issue instructions to executing brokers where we deem such instructions to be appropriate, in other cases we will leave the decision as to the most

appropriate venue to the executing broker. Unless you instruct us otherwise, whilst adhering to this policy, we shall have complete discretion as to the choice of venues including trading outside a *trading venue* if we believe that trading in that way is likely to achieve the overall objective.

A list of the execution venues we may use will be available in hard copy on request. Some financial instruments may only be traded on one venue, (notably if we purchase units/shares of a collective investment scheme (CIS), the venue will be the fund manager/CIS operator itself).

4 Execution outside of a *trading venue*

Unless you instruct us otherwise, where we consider it to be in your best interest, we will allow the brokers to whom we pass execution instructions to trade outside of regulated markets, *multi-lateral trading facilities* and *organised trading facilities* (each a *trading venue*). The broker will still be bound by their own best execution policies which we will review.

5 Investment into funds

When we invest into funds or other collective investment vehicles the price that we are able to execute at is usually determined by the fund manager based on published prices and we will execute at those prices.

6 How do we execute

We are not a member of any exchange. We seek to ensure we have deep relationships with high quality counterparties with the aim of maximising execution quality in terms of total consideration. In cases when we transmit your order to another broker or dealer the same criteria for selection apply as when we execute your trades ourselves. When passing a trade to a third party for execution we may:

- determine the ultimate execution venue ourselves by accessing specific execution venues through such third parties; or
- instruct the other broker or dealer accordingly (having already satisfied ourselves that they have arrangements in place to enable us to comply with our Best Execution Policy).

For financial instruments that are traded on an exchange (e.g. shares in companies) we pass the order relating to your account to a broker for execution. In the case of a broker in the European Economic Area or Switzerland that broker will have their own best execution policy and will be under the same requirement as we are under *UK MiFID* to seek to achieve best execution for our clients. In the case of brokers outside the EEA and Switzerland those brokers may or may not be subject to local best execution rules. In all cases the selection of a broker is based upon the execution factors.

For quote driven markets (e.g. most bonds, foreign exchange and OTC derivatives) and for overseas markets, the firm that we pass your order to may not be under a best execution obligation as historically in those markets firms operate as principal (that is taking the position onto their own book) rather than as agent. Our selection of broker in this case will reflect the fact that the broker is not under its own best execution obligation and thus the level of monitoring that we will apply is more extensive than in cases where the broker is under such an obligation.

In all cases we will act in your best interests when passing orders to other entities for execution.

7 Specific client instructions

If you provide us with a specific dealing instruction it may prevent us from following our Best Execution Policy as we would usually do but, under FCA rules we will be deemed to have complied with the best execution requirement to the extent of that instruction.

8 Execution broker selection where your custodian limits our choice of execution broker

Where we have a mandate over an account at a custodian, with whom you have a direct contractual relationship, the terms of your relationship with that firm may prevent us from passing on your order to any firm other than the firm where you hold your account or restrict our choice of broker to firms approved by them. The firm where you hold your account has their own best execution policy which they will have separately advised you. As our mandate with you only permits us to use that firm for custody of your assets, we treat any limitation in our selection of executing brokers as a specific client instruction from you.

9 Order Execution Timing

Usually orders will be executed in a prompt, fair and expeditious manner. If an order is of large size or we wish to try to achieve an average price over a time period, the order may be split into sub-orders before being passed for execution. Unless we have combined an order in accordance with paragraph 10 below client orders will be carried out sequentially unless the characteristics of the order or prevailing market conditions require otherwise. Clients will be informed of any difficulty in the prompt execution of orders.

10 Order Aggregation

We may combine or aggregate an order for our clients with orders of other clients. Altus would only aggregate a client order if it was unlikely to work to the overall disadvantage of the client. However, the effect of aggregation may on some occasions work to the client's disadvantage and may on occasions result in our clients obtaining a worse price than if their order was executed separately.

11 Allocation of aggregated orders

Any orders that are aggregated will be allocated according to a pre-defined allocation policy that is designed to achieve a fair result for all clients. Where permitted by the rule of the relevant *trading venue* all clients will be allocated the same price, where such pricing is not permitted the allocation policy will be used to allocated orders and we will monitor the effectiveness of that allocation policy.

12 Monitoring

We will monitor both our compliance with our Best Execution Policy and the quality of execution of third parties to whom we have passed orders:

- in real time on a sample basis at account executive level but subject to compliance review;
- at a monthly compliance review; and
- quarterly at board level.

13 Limit orders

If you give us an investment instruction at a specified price limit and for a specified size (Limit Order), then it may not always be possible to execute that order under the prevailing market conditions. We would be required to make your order public (i.e. show the order to the market) unless you agree that we need not do so. We believe it is in your best interests if we exercise our discretion as to whether

or not we make your order public. By agreeing to the Best Execution Policy you agree to us not making your orders public, unless we consider it is in your best interests for us to do so.

14 Further Information

If you would like any further information about our best execution policy, please contact your usual account executive.

15 Amendments to this policy

We may amend our Best Execution Policy from time to time. A formal review will take place at least annually but this may not result in any changes to the policy. If we make a material change to the Policy we will notify you of the changes before such changes come into force.

Glossary

UK MiFID – represents the EU MiFID framework as transposed and implemented in the UK by a combination of Handbook rules, Treasury legislation, and directly applicable EU regulations (in the latter case, notably by EU MiFIR (No 600/2014), the MiFID Org Regulation ((EU) 2017/565) and a number of RTSs/ITs).

Multilateral Trading Facility – a multilateral system, operated by an investment firm or a market operator, which brings together multiple third-party buying and selling interests in financial instruments – in the system and in accordance with non-discretionary rules - in a way that results in a contract.

Organised Trading Facility – an OTF is a multilateral system which is not a regulated market or an MTF and in which multiple third-party buying and selling interests in bonds, structured finance products, emission allowances or derivatives are able to interact in the system in a way that results in a contract in accordance with Title II of the Directive.

Trading Venue (TV) – a UK trading venue is a Regulated Market, Multilateral Trading Facility or Organised Trading Facility. A recognised non-UK trading venue is a non-UK trading venue that is recognised as a third-country venue for the purpose of transparency under UK MiFID II/MiFIR.