

Whitley Asset Management: Order Execution Policy

Under the EU Markets in Financial Instruments Directive (MiFID and MiFID II) and the rules of our regulator, the Financial Conduct Authority which implements the Directive, we are required to put in place an order execution policy and to take all sufficient steps to obtain the best possible result for our customers when receiving and transmitting orders for execution.

The purpose of this document is to provide information on our Order Execution Policy. WAM undertakes to seek the best possible result after taking into account the various components of the transaction. This Policy sets out the execution factors and the primary execution venues WAM will use when transmitting orders for execution.

Execution criteria

When arranging the execution of an order on behalf of clients, WAM will take into account the characteristics of:

- the client;
- the order;
- the financial instruments that are the subject of the order; and
- the execution venues to which the order can be directed.

Execution factors

The following factors will be taken into account when executing an order:

- Price
- Size
- Likelihood of settlement (of executing and settling the trade)
- Speed and success (of execution)
- Minimising potential market impact
- Nature of the order
- Cost

WAM will take into consideration all the execution factors to achieve the best possible overall result for the clients. Price and the likelihood of settlement will also have a high importance in the execution process so WAM is not likely to deal with counterparties or use execution venues where it believes that settlement will not take place. In some circumstances, for some orders, financial instruments or orders, WAM may determine that the relative importance assigned to the above execution factors will need to change in order to obtain the best possible result for clients. Due consideration will be given to the circumstances of the client, order, financial instrument or market and will be determined on a case by case basis.

It is important to note that should a client give WAM specific instructions as to the execution of an order to undertake on their behalf, WAM will execute the order strictly in accordance with those specific instructions. This may prevent WAM from taking the steps set out in this Policy to obtain the best possible result for the execution of that order. Where the client's specific instructions relate only to part of an order, WAM will continue to apply this Policy to that part of the order not covered by those specific instructions.

Execution Entities

The firm will place orders through the broker most appropriate to each client. This will in general be via the custodian recommended to the client by WAM but will occasionally be a broker connected to a custodian appointed by the client prior to establishing a relationship with WAM.

WAM regularly reviews the best execution policies of those custodians recommended to clients by the firm and details can be provided on request; WAM needs to be satisfied that its clients' custodians/brokers have robust and effective best execution policies and monitoring arrangements in place to ensure best execution. Examples of this would be the use of <https://www.liquidmetrix.com> (or similar) to identify outliers, and regular reviews of this data so as to rectify any issues identified. WAM also itself monitors execution activity on a rolling basis during the year to as to be sure that client outcomes are good.

Aggregation of client orders

We may aggregate client orders with other client orders where we feel it is necessary to do so in order to obtain the fairest overall result for all clients involved, for example where we are executing client orders in bulk. We have an allocation policy in place to ensure that fair treatment is given to all client orders in such instances. Orders which have been aggregated are usually executed pro-rata but may vary if in the interest of the individual orders. The overriding principle is that fair allocation is given to all orders received.

Monitoring

WAM will monitor the effectiveness of and its compliance with this Policy.

Review

- a) WAM will review at least annually its order execution arrangements and this Policy, and whenever a material change occurs that affects its ability to continue to obtain the best possible result for clients it will adjust them accordingly.
- b) WAM will notify clients of any material changes to these execution arrangements or this order Policy. Such notifications may be by means of our website.

Annual Publications

On an annual basis, a list of our top five venues, for each instrument type, will be published on our website.

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