



Order Execution Policy Client Summary

The information below provides a summary of Brown Shipley's Order Execution Policy. The document is designed to provide clients with a general understanding of Brown Shipley's typical dealing arrangements and explains how we at Brown Shipley meet our regulatory obligation to take all sufficient steps to obtain the best possible result when executing orders, otherwise known as 'best execution'. Brown Shipley's approach is underpinned by our core principles to treat clients fairly and act in accordance with the best interests of our clients.

Further details about Brown Shipley's Order Execution Policy will be provided upon request.

Dealing Arrangements for custody clients

Where clients have a custody agreement with Brown Shipley, assets are held to the order of Brown Shipley. As part of that agreement, a group wide trading, settlement and custody platform is in place. As a result, the execution of all orders for these clients has been outsourced to an agency broker, currently Brown Shipley's parent company KBL European Private Bankers (KBL), who route these to a panel of executing brokers. In turn, these brokers have access to a range of execution venues (for example, Regulated markets such as the London Stock Exchange, the broker's own account, other trading platforms etc.) within their local market. A full list of these executing brokers will be provided on request.

Execution Venues

As some companies have listings on more than one national exchange, when executing an order Brown Shipley will consider the purpose of the order as the prime factor in selecting the execution venue. For example, if the purpose of the order is to achieve UK equity exposure then Brown Shipley will typically execute the order on a UK exchange even if the UK exchange is not always the primary or most liquid market for that particular security.

Where client orders are received on an execution only basis (i.e. where orders are provided by clients without advice from Brown Shipley) we will advise on the markets available to them and request a specific instruction.

Brown Shipley will trade in the market execution currency of the particular security and will settle in the same currency unless otherwise instructed by the client. If no cash account is held in the market execution currency of the trade or where client specific instructions are received, a foreign exchange transaction will be undertaken on the clients' behalf to either settle the transaction or remit proceeds in the client's base currency.

Our brokers may trade outside a trading venue where they consider this will provide best execution.

A list of execution venues used by us or our brokers is attached as appendix 1.

Order Execution Factors

Execution outcomes will usually be measured in terms of total consideration paid. However, there may be circumstances where a variety of factors are important when considering how to obtain the best result for clients. These are the typical factors that will be considered:

- Price
- Size and/or nature of the order
- Likelihood of execution and settlement
- Speed of execution
- Other costs

The relative importance of each factor is determined by taking into account the following:

- The characteristics of the client order
- The characteristics of the Financial Instrument concerned by the order
- The characteristics of the brokers and /or execution venues to which that order can be directed.

If specific instructions are provided directly from clients that affect Brown Shipley's application of the above execution factors, the instruction will be respected and in some cases, this may prevent all elements of this policy being followed.

Asset types

The dealing processes vary depending on the type of asset being traded, a summary of the relevant information for each asset type is provided below:

Equities and exchange traded funds

Orders for these asset types will be routed to the agency broker. They in turn will route the order to one of their executing brokers. The executing broker will typically use a variety of automated processes to ensure they select the best venue from those available at that time.

For any illiquid stock or large order, relative to the normal market size in that security, the order will be actively managed by a trader who will use their experience and discretion in deciding the timing and structure of the order execution, with the aim of achieving the best overall price given the relevant order execution factors.

Bonds and other debt instruments

Orders for these asset types will be routed to the agency broker who will only execute orders through an MTF and endeavour to find the best possible price from the counterparties available through the MTF. In some circumstances the inability to execute an order OTC may mean that the best available price is not achieved.

Structured Products

Structured products are typically private placements with no active secondary market. They are, typically, not tradeable on an exchange and we will execute orders on an over the counter basis with our parent company.

Collective Investment Schemes

Orders for units or shares in these asset types will be routed to the agency broker who place the orders directly with the fund, the fund's operating company or through a third party, depending upon the most effective method of trading that particular security.

Order Handling

Brown Shipley employs an automated order management system for dealing and orders are booked to client accounts as soon as they are completed. Any partially dealt orders at the end of each day will be allocated to clients in accordance with Brown Shipley's Order Allocation Policy (additional detail and information about this Policy will be provided upon request).

Charges

Brown Shipley does not directly charge any broker execution costs to clients for equity, bond and collective investment orders. The agency broker agreement means that the same execution price for a security is incurred, regardless of the final execution venue(s). Therefore there is no incentive to use any one particular venue and no difference in the actual cost of execution between venues. For structured products any broker's commission will be passed on to clients.



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Where clients have selected a tariff structure which includes an element of trading commission, the charge is based on the overall service tariff and the commission element is not directly linked to any brokerage costs incurred for executing the trade.

Third Party Custody

Where client assets are held outside of Brown Shipley's custody (i.e. within a third party's custody) the Order Execution Policy applies in the same way as described above except for the routing of orders. Brown Shipley will route orders for non-UK equity, bonds and other debt instruments through the agency broker. Orders for UK equities will be routed directly to an appropriate executing broker and orders for collective investment schemes directly to the fund, the fund's operating company or through a third party.

Monitoring & Review of Arrangements

Brown Shipley actively monitors and reviews the executions achieved on behalf of its clients. This on-going monitoring activity allows for the identification of and, where appropriate, corrective action to be taken to improve the quality of the execution service provided.

An annual review of all brokers and venues utilised by Brown Shipley is undertaken (this includes assessments of execution quality, service delivery and the financial standing of the firm). In the case of the agency broker arrangements with Brown Shipley's parent company, monthly reviews of service provision are conducted followed by an annual due diligence review.

As well as on-going reviews and assessments, Brown Shipley also reviews its Order Execution Policy on at least an annual basis in line with our policy governance framework. If material changes result, these will be communicated and implemented accordingly.

Brown Shipley will publish on its web site, at least annually, details of our top 5 execution brokers per instrument class.

Conflicts Of Interest

Brown Shipley is a wholly owned subsidiary of KBL European Private Bankers. In recognition that potential conflicts of interest could arise where dealing arrangements include reliance on the use of a connected party, Brown Shipley ensures that these arrangements do not undermine the delivery of best execution for its clients. Brown Shipley has implemented business practices and management oversight arrangements, supported by controls that monitor these potential conflicts on an ongoing basis and reports to the Enterprise Risk Committee and Board Risk, Compliance and Legal Committee on how effectively such potential conflicts are managed.

Details of Execution

Brown Shipley will keep records of all activities and actions relating to an order. On request by a client we will demonstrate that we have executed the order in accordance with our execution policy.

Consent

Brown Shipley is required by its regulator (The Financial Conduct Authority) to obtain prior client consent to its Order Execution Policy. Clients will be deemed to have provided such consent when accepting Brown Shipley's terms and conditions.



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Appendix 1 - List of Execution Venues

Primary Markets

ASX - ALL MARKETS
ASX - CENTER POINT
ATHENS EXCHANGE S.A. CASH MARKET
BOERSE BERLIN
BOERSE DUESSELDORF
BOERSE MUENCHEN
BOERSE STUTTGART
BOLSA DE MADRID
BOLSA DE VALORES DE SAO PAULO
BOLSA MEXICANA DE VALORES (MEXICAN STOCK EXCHANGE)
BORSA ISTANBUL
BORSA ITALIANA S.P.A.
CHICAGO BOARD OF TRADE
CHICAGO MERCANTILE EXCHANGE
DEUTSCHE BOERSE AG
EUREX DEUTSCHLAND
EURONEXT - EURONEXT AMSTERDAM
EURONEXT - EURONEXT AMSTERDAM
EURONEXT - EURONEXT BRUSSELS
EURONEXT - EURONEXT LISBON
EURONEXT - EURONEXT PARIS
EURONEXT AMSTERDAM
EURONEXT LIFFE
EUWAX
HONG KONG EXCHANGES AND CLEARING LTD
INDONESIA STOCK EXCHANGE
IRISH STOCK EXCHANGE - ALL MARKET
ITALIAN DERIVATIVES MARKET
JOHANNESBURG STOCK EXCHANGE
LONDON STOCK EXCHANGE
LUXEMBOURG STOCK EXCHANGE
MARCHE OPTIONS BELGES
MEFF FINANCIAL DERIVATIVES
MERCADO CONTINUO ESPANOL - CONTINUOUS MARKET
MONEP
MOSCOW EXCHANGE-DERIVATIVES AND CLASSICA MARKET
MOSCOW STOCK EXCHANGE
NASDAQ - ALL MARKETS
NASDAQ CAPITAL MARKET
NASDAQ NORDIC
NASDAQ OMX BX
NASDAQ OMX HELSINKI LTD.
NASDAQ OMX PHLX
NASDAQ OMX PSX
NEW YORK STOCK EXCHANGE, INC.
NEW ZEALAND EXCHANGE LTD
NYSE MKT LLC
OMX NORDIC EXCHANGE STOCKHOLM AB

OMX NORDIC EXCHANGE COPENHAGEN A/S
OSAKA EXCHANGE
OSLO BORS ASA
PRAGUE STOCK EXCHANGE
SINGAPORE EXCHANGE
SIX STRUCTURED PRODUCTS EXCHANGE
SIX SWISS EXCHANGE
SIX SWISS EXCHANGE - BLUE CHIPS SEGMENT
STOCK EXCHANGE OF THAILAND
TEL AVIV STOCK EXCHANGE
TOKYO STOCK EXCHANGE
TOKYO STOCK EXCHANGE - TOSTNET-1
TORONTO DERIVATIVES EXCHANGE
TORONTO STOCK EXCHANGE
TSX VENTURE EXCHANGE
WARSAW STOCK EXCHANGE/EQUITIES/MAIN MARKET
WIENER BOERSE AG
WIENER BOERSE AG AMTLICHER HANDEL (OFFICIAL MARKET)
XETRA

MTFs

BATS
BATS CHI-X EUROPE -CXE ORDER BOOKS
BATS Y-EXCHANGE, INC.
BATS Z-EXCHANGE
BOERSE BERLIN EQUIDUCT TRADING
BLOOMBERG EMSX
BLOOMBERG TSOX
CHI-X AUSTRALIA
CHI-X CANADA ATS
CHI-X JAPAN
NYSE ARCA
TURQUOISE

Others

BLOCKMATCH
ALPHA EXCHANGE
AQUA EQUITIES L.P.
AQUIS EXCHANGE
BANK OF AMERICA - MERRILL LYNCH INSTINCT X ATS
BANK OF AMERICA - MERRILL LYNCH OTC
BARCLAYS ATS
BATS CHI-X EUROPE -BXE DARK ORDER BOOK
BIDS TRADING L.P.
BLINK MTF
BLOCKMATCH
CITADEL SECURITIES ATS
CITI CROSS
CITI MATCH
CREDIT SUISSE AES CROSSFINDER
CREDIT SUISSE AES CROSSFINDER EUROPE



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Appendix 1 - List of Execution Venues - Continued

CREDIT SUISSE LIGHT POOL
CROSS EXANE
DEUTSCHE BANK SUPER X
EDGX EXCHANGE
EXANE BNP PARIBAS
FIDELITY CROSSSTREAM ATS
GOLDMAN SACH MTF
INSTINET CBX (US)
JANE STREET EXECUTION SERVICES LLC
JPM
JPMX
KCG
KNIGHT CAPITAL MARKETS LLC
KNIGHT MATCH ATS
MILLENNIUM
MORGAN STANLEY AND CO. INTERNATIONAL PLC
MS POOL
OMEGA ATS
OTC
PEEL HUNT RETAIL
SBI JAPANNEXT-J-MARKET
TURQUOISE DARK
UBS ATS
UBS MTF

December 2017