

Summary of Order Handling Policy

1. Introduction and Obligations under MiFID

1.1 This is a summary of the Company's best execution and order handling policy which we, the Company, follow when executing orders on your behalf.

2. Our Duty

2.1 The Company may owe you a duty of best execution when executing orders with you. These circumstances are set out below.

2.2 This means that the Company is obliged to take all sufficient steps to obtain the best possible result for you when executing your orders.

2.3 This does not mean achieving the best price for every client order, but rather the best possible result that the Company can reasonably be expected to achieve with the resources available to the Company.

2.4 The Company also has an obligation to implement procedures which provide for the prompt, fair and expeditious execution of client orders in relation to other client orders or the Company's own trading interests.

3. Application

3.1 We will apply best execution when you are a Professional Client except where we are (i) offering to buy from or sell to you at a price and on terms accepted by you or we accept a price or terms specified by you, or otherwise negotiate the price or terms of a transaction with you; or (ii) you transact with us on the basis of a quote published by us.

4. Specific Instructions

4.1 If you provide the Company with specific instructions this may prevent the Company from taking the steps set out in its policy to obtain the best possible result for the execution of your order in respect of the elements covered by those instructions. Executing your order in accordance with your instructions satisfies the Company's obligation to take all sufficient steps to obtain the best possible result for the execution of your order. However this is only in so far as the aspects of the order covered by your instructions so we may still owe you best execution if you have only issued us with partial instructions.

5. Satisfaction of best execution

5.1 To satisfy the best execution obligation the Company has to take all sufficient steps to obtain the best possible result for its clients. In practical terms, this means selecting execution venues which consistently deliver best execution taking into account the execution factors listed below. In light of the nature of the Company's business (principally acting as market maker for London Stock Exchange (**LSE**) listed investment companies), the Company principally executes orders on regulated markets such as the LSE or "off book" but reported to such regulated exchange. It may, from time to time, and dependent on the factors set out below that we consider relevant in achieving best execution, opt to transact on Multilateral Trading Facilities (**MTF**) or other venues that may be relevant to the particular order.

6. Factors related to best execution

6.1 The factors which the Company may consider in any best execution determination include:

- price, which may include explicit transaction costs, bid-asked spread or net price
- customer instructions
- market depth and liquidity
- the number of any trading or execution venues
- implicit transaction costs or market impact
- potential speed of execution
- size and nature of the order
- price momentum before and during order execution,

AND the Company will also take into account:

- any other considerations relevant to the execution of the order
- whether you have given the Company specific instructions (as execution according to those instructions will satisfy the best execution obligation)

6.2 Where on occasions the Company uses brokers we may also include:

- the broker's willingness to share information and commit capital
- confidentiality provided by the broker
- likelihood of execution and settlement

The relative importance of these factors has been weighed according to product.

6.3 Applicable rules require the Company to obtain your consent to execute any order submitted by you outside of a regulated market, MTF or organised trading facility. By dealing with us

under these terms and in accordance with any separate express consent provided by you, you expressly consent to the execution of orders outside of an EEA regulated market, multilateral trading facility or organised trading facility (collective "EEA trading venues"), transactions in financial instruments that are admitted to trading on an EEA trading venue.

7. Order Handling

- 7.1 The Company must execute client orders promptly and execute comparable client orders promptly and sequentially unless the characteristics of the order or prevailing market conditions make this impossible, or your interests require otherwise.
- 7.2 The Company also does not have to treat client orders sequentially if the orders are received by different media and it would not be practicable to do so.
- 7.3 If your order is to be aggregated with other client orders and/or with the Company's own orders, the effect of aggregation may work to your disadvantage in relation to a particular order.
- 7.4 The Company will not take steps to structure or charge in such a way to discriminate unfairly between execution venues. The Company does not receive payment for order flow, which means the Company does not receive remuneration, discount or non-monetary benefit for routing client orders to a particular trading or execution venue. The Company will not seek to encourage a client to choose a venue solely on the basis of any pricing policy applied by the Company.

8. Fair allocation

- 8.1 The Company will allocate all orders fairly and will not give preference to one client over another.
- 8.2 If the Company aggregated client orders with the Company's own orders and the Company cannot complete the total order the Company will fill the client orders first unless we can show that without the Company's participation the order could not have been filled on such favourable terms or at all.

9. Information on execution

- 9.1 In accordance with applicable regulations the Company will publish annually information on the top five execution venues it has used in terms of trading volume for classes of financial instruments. It will make this information available for Professional Client orders where a duty of best execution was owed. This information will be published on the Company's website. In practice we will always deal as principal with you and will be the only execution venue for transactions executed with us.
- 9.2 As an execution venue the Company will also make available on its website, as required by applicable regulations, information on the quality of its executions.

10. Monitoring and review

- 10.1 The Company will monitor and review the effectiveness of the order execution arrangements implemented to ensure that best execution is provided on a consistent basis where applicable. The Company will review its policy and arrangements at least annually or wherever there is a material change that affects its ability to continue to obtain the best possible result for clients. The Company intends to publish material amendments on its website.