



INVESTMENT MANAGEMENT S.A.
LUXEMBOURG

Best Execution Policy

March 2019

BEST EXECUTION AND CLIENT ORDER HANDLING POLICY

This policy applies to the Company in the context of managing UCITS and relates to the execution of decision to deal and placing orders.

The UCITS Directive requires management companies to act in the best interest of a UCITS they manage when:

- a) executing decisions to deal on behalf of the UCITS in the context of the management of their portfolios.
- b) placing orders to deal on behalf of the managed UCITS with other entities for execution, in the context of the management of their portfolios.

Management companies must take all reasonable steps to obtain the best possible result for the UCITS, taking into account price, costs, speed, likelihood of execution and settlement, order size and nature or any other consideration relevant to order execution. This obligation is known as the duty of "best execution".

When providing the service of portfolio management, the company will ensure the wealth managers always act in the best interests of the investors when choosing a broker for the purpose of executing financial transactions on behalf of IFPIM.

The Best Execution and Client Order Handling Policy ensures that best execution is reached for all clients and that their orders are handled in a fair, just and timely manner.

All principles in this Policy comply with the legal requirements of the relevant provisions on best execution and client order handling of Directive 2014/65/EU (MiFID II), Directive 2014/91/EU (UCITS V), Directive 2011/61 (AIFMD – Level 1), AIFMD – Level 2, UCITS Notice 14.3.

I – SCOPE

The Company's Best Execution and Client Order Handling Policy applies to the execution of transactions on behalf of the following clients:

- funds collectively managed by the Company;
- both retail and professional clients for individual portfolio management of the Company;
- both retail and professional clients for investment advice of the Company.

This Policy applies to all financial instruments for which the Company executes transactions on behalf of its clients, including, but not limited to: equity, bonds, money market instruments, units in collective investment undertakings, listed and unlisted derivatives.

This Policy will apply in the absence of any specific instructions by the client.

II – BEST EXECUTION

1. General Provision

When the Company executes an order on behalf of a client, it will take all reasonable steps to obtain the best execution.

In general, the Company will take into account the following factors to establish best execution:

- price,
- costs, speed,
- likelihood of execution and settlement,
- size,
- nature or any other relevant consideration.
- market Impact

For determining the relative importance of each of those factors, the Company will take into account the following criteria:

- the characteristics of the client. For clients for discretionary management, this includes their categorization as retail or professional. For funds, this includes the objectives, investment policy and risks specific to the fund, as indicated in the prospectus or as the case may be in the fund rules or articles of association of the fund;
- the characteristics of the client order;
- the characteristics of the financial instruments involved;
- the characteristics of the execution venue to which the order can be directed.

2. Specific provisions

When the Company executes an order on behalf of a retail client, it will determine the best execution by considering the price of the financial instrument and the costs related to the execution. These costs will include all expenses, incurred by the client, which are directly related to the execution of the order.

When there is more than one competing venue to execute an order, the commissions and costs - on behalf of the client - of the Company for executing the order on each of the eligible execution venues, will be taken into account in the assessment of the best execution.

3. Instructions by the client

When the client gives specific instructions (i.e. when the client fixes one factor of his order like price or time for instance, this order will be considered as been given under specific instructions) relating to the execution of an order, for example the indication of an execution venue, the Company will handle that order in accordance with this specific instruction.

Whenever the Company executes an order or a specific aspect of an order following specific instructions from the client, for example the indication of an execution venue, the Company will be deemed to have taken all reasonable steps to obtain best execution for all other factors of the order and has consequently fulfilled all legal obligations concerning best execution vis-à-vis said client.

Clients should, however, take into account that any specific instruction may prevent the Company from taking the steps that it has designed and implemented to obtain the best possible result for the execution of those orders in respect of the elements covered by those orders.

III – ORDER EXECUTION

An execution venue is a regulated market, a multilateral trading facility, a systematic internaliser, a market maker or another liquidity provider or an entity that performs a similar function in a non-EEC country to the functions performed by any of the foregoing.

When placing orders for execution, the Company will handle the order by transmitting it to a counterparty, who will determine the execution venue. The Company will satisfy itself that the counterparty concerned has arrangements in place that enable the Company to comply with this Policy.

The order can be executed outside a regulated market or MTF.

IV – CLIENT ORDER HANDLING

1. General Provision

The Company promptly and accurately receives and allocates orders executed on behalf of clients.

The Company carries out comparable client orders sequentially and promptly unless the characteristics of the order or prevailing market conditions make this impracticable or the interests of the clients require otherwise.

The dealing desk of the Company transmits client orders to various recognized counterparties on a 'first come, first served' basis. If possible, the Company aspires to keep the time for the handling of orders at the dealing desk to a minimum. After checking orders for consistency and consequently applying the four-eye principle, they are immediately placed at a Selected Counterparty. The Company monitors this to the extent of the instruments at its disposal

The Company will inform clients of any material difficulty relevant to the proper carrying out of orders promptly upon becoming aware of the difficulty.

2. Allocation and aggregation of orders

The Company will only carry out a client order in aggregation with another client order when it is unlikely that the aggregation of orders and transactions will work to the disadvantage of any client whose order is aggregated.

Aggregated orders have significant benefits for the client, the main benefit being the lower cost. The Company will only aggregate client orders if they are initiated with the same set of execution instruction, if they are initiated on the same day and if they will follow exactly the same order chain

If an aggregated order is partially executed, the order will be settled for the different clients on a pro rata basis, according to the contribution made to the aggregated order. The order management system of the Company is to permit only pro rata allocation whenever an aggregated order is partially executed.

V – REVIEW AND MONITORING

The principles of this Policy are incorporated in the organization, processes and systems of the Company.

Periodical ex-post monitoring on the application of the principles is performed with a view to identifying and, where appropriate, correcting any deficiencies. The Company will review the Best Execution and Client Order Handling Policy at least on a yearly basis and update it whenever necessary.

Updates may occur in case of:

- changes in legislation;
- changes in business activities of the Company or services provided by the Company;
- organizational changes within the Company;
- new internal rules, procedures or policies within the Company.

The previous list is not exhaustive.

If a client requires more information on this Policy or any other aspect of best execution, he may contact the Company.

The Board of Directors of the Company approved this version of the Best Execution and Client Order Handling Policy on March 14th., 2019.