

## Order Execution Policy

### Introduction

The Markets in Financial Instruments Directive 2014/65/EU (MiFID II) requires Unicorn Asset Management (UAM) to take all reasonable steps to obtain the best possible result for clients when executing and placing orders. This is known as Best Execution. The FCA expects firms to act as good agents, placing equal focus on controlling clients' costs as delivering returns and applies whether one is executing orders on behalf of clients or placing orders with others for execution.

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### Obtaining the best possible result

In our role as investment manager for our clients, we make decisions to deal for funds and client portfolios. When a decision to trade has been taken, we take all reasonable steps to obtain the best possible execution outcome for that trade.

Our obligation is to take all reasonable steps to obtain the best possible result for our clients taking into account the Execution Factors listed below. We will determine the relative importance of the Execution Factors by reference to the circumstances at the time of execution of the order and by taking into account the Execution Criteria set out below. Our obligation to obtain the best possible result may be affected by any specific instructions issued by you as to execution of an order or part thereof.

### Execution Factors

Our trading activities are limited to transactions in UK equities, including ETFs. The scope of this policy is limited to such instruments.

When undertaking an order, UAM will endeavour to achieve best execution for its clients, taking into account a number of factors including, amongst others, the following:

- Price
- Explicit Costs (e.g., the commission paid to a broker to execute a deal, stamp duty)
- Implicit Costs (e.g. the impact of a trade on the price obtained, the bid – offer spread, delays)
- Likelihood of execution
- Speed of execution
- Size of trade
- Nature of the order

- Liquidity of the instrument
- The market on which the instrument is traded
- Any other factor relevant to the order
- The market impact of the order

This does not mean achieving the best price for all client orders, but rather the best possible result that we can reasonably expect to achieve with the resources available to us.

The relevance of execution factors will vary from trade to trade and will depend upon prevailing market conditions.

We will determine the relative importance of each execution factor using the following criteria:

- Your regulatory client categorisation and mandate
- The investment intentions of the fund manager who places the order
- The characteristics and nature of your order, including, the size of the order relative to other transactions, the need to minimise any market impact of the trade and whether any specific instructions are given;
- The characteristics of the financial instruments that are the subject of your order; and
- The characteristics of the execution venues to which your order can be directed

#### [Execution venue selection and oversight](#)

UAM places client orders on an agency basis with its approved counterparties, those parties constitute the firm's execution venues.

The firm's Execution Committee are responsible for review and approval of the firm's execution venues.

Venues are selected in accordance with the execution factors and criteria outlined in this policy. Only venues approved by the Execution Committee are permitted to be used for client order placement.

In exceptional circumstances, other venues may be used if to do so is in the best interests of clients.

Our approved brokers are themselves obliged to provide the best possible outcome when trading for their clients, their arrangements are set out in their respective Order Execution policies which are reviewed and assessed by the Execution Committee as part of the approval process.

The firm's client orders are transmitted to approved stockbrokers who will execute those orders on:

- Regulated markets such as the London Stock Exchange
- Multilateral Trading Facilities (MTF)

The firm considers various criteria when choosing a venue, but primarily the confidence that the broker has the systems in place to allow it to provide the best possible execution

outcome to UAM's satisfaction.

The approved list of brokers currently comprise;

Allenby Capital, Berenberg, Canaccord Genuity, Cavendish Deutsche Numis, Investec, Jeffries, Goldman Sachs, Goodbody, Liquidnet, Marex Spectrum, Peel Hunt, Panmure Liberum, RBC, Shard Capital, Shore Capital, N+1 Singers, Stanford Capital Partners, Stifel, Turner Pope, UBS, Winterflood Securities, WH Ireland, Zeus Capital

Venue performance is reviewed by the Execution Committee via the use of Transaction Cost Analysis reporting as well as feedback from the firm's investment teams. The Committee regularly reviews all approved brokers and assess the adequacy of existing as well as potential additional execution venues in respect of any instruments that we trade. We reserve the right to use other execution venues that we deem appropriate in accordance with our policy and we may add or remove any execution venue from this list.

We will not direct trades to brokers for:

- Correction of an error
- Provision of gifts or entertainment
- Preferential IPO allocation

#### Specific instructions

In the unlikely event that clients give us a specific instruction as to the execution of an order, we will execute the order in accordance with those specific instructions. Where client instructions relate to only part of the order, we will continue to apply our order execution policy to those aspects of the order not covered by specific instructions. Clients should be aware that providing specific instructions in relation to the execution of an order may prevent us from taking the steps set out in this policy to obtain the best result in respect of those elements covered by those instructions.

#### Governance and oversight

The board of UAM have delegated responsibility for oversight of the effectiveness of the firm's execution arrangements and Order Execution Policy to the firm's Execution Committee.

The Execution Committee are responsible for:

- Ensuring that the firm has effective arrangements in place to enable it to achieve the best execution outcomes for clients.
- Ensuring that the firm adheres to its Order Execution policy and is able to demonstrate that to clients at their request.
- Review and maintenance of the firm's Execution Policy
- Review and approval of the firm's execution venues
- Analysis of execution outcomes include review of transaction cost analysis.
- Provision of periodic reports to the board in relation to the outcome and status of the above.

#### Failed Trades, cancelled trades & dealing errors

Where a failed trade or dealing error is identified, UAM will ensure, where there has been client detriment that the client is put back in the position they would have been had the

failed trade, cancelled trade or dealing error not occurred. Where the incident resulted in a gain, this will be passed back to the client.

Cancelled trades are monitored to ensure that there is a full rationale for the cancellation of the trade and that any possible client detriment has been investigated and corrected. In all cases clear audit trails are recorded to evidence the identification and resolution of these errors. All dealing errors are logged and reviewed by the Compliance officer, who will assess whether client redress, remedial action or control enhancement is required in addition to determining whether the incident constituted a regulatory breach. Breach and error trends are presented to and reviewed by the Conduct Committee.

#### Aggregation and allocation

There are occasions when it may be appropriate to aggregate client orders where the nature of the orders make it suitable to do so and will enable the firm to complete the orders fairly and expeditiously.

When making a decision to aggregate client orders, we will assess whether to do so will work to the overall advantage of all participating clients.

In all cases, order aggregation must be consistent with the firm's Order Allocation policy. For more details, please refer to the Order Allocation Policy.

#### Responsibility

Each fund manager initiating an order is individually responsible for achieving the best outcome for that order.

#### Internal crossing and conflicts of interest

Should there be a reason to cross a security from one client to another, the mutually agreed price will usually be the mid-price to ensure no client is favoured over another. The trade will take place through the market.

#### Record keeping

UAM enter, promptly, the details of all transactions onto its portfolio management system. The records of all transactions are kept for a minimum of five years.

#### Review of Policy

The firm will review its Order Execution policy at least annually and whenever a significant change occurs that impacts on our ability to achieve best execution for our clients.

Clients will be notified of any significant changes to the Order Execution policy or execution arrangements.

#### Changes to order execution policy

The firm complete reviews of the Order Execution policy and related procedures on at least on an annual basis or in the event of a material event that affects our ability to obtain the best possible result for the execution of client orders using our chosen execution venues.

We will notify clients of any material changes to this policy.