

## Unicorn Asset Management Limited

### Best 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 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.

#### Obtaining the best possible result

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

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

- Price
- Costs
- Likelihood of execution
- Speed of execution
- Likelihood of settlement
- Size of the trade
- Nature of the order
- Liquidity of the instrument
- The market on which the instrument is traded
- Any other factor relevant to 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. We will determine the relative importance of each execution factor using the following criteria:

- Your regulatory client categorisation;
- The investment intentions of the fund manager who places the order
- The characteristics and nature of your order, including 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

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

UAM maintains a list of approved stockbrokers who are obliged to provide best execution. Orders are transmitted and approved stockbrokers who will execute 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 stockbroker has the systems in place to allow it to provide the best possible execution outcome to UAM's satisfaction.

The approved list of stock brokers currently comprises of;

Allenby Capital, Arden Partners, Berenberg, Cenkos Securities, Canaccord Genuity, Cantor Fitzgerald, FinnCap, Investec, Jeffries, Goldman Sachs, Goodbody, Liberum Capital, Marex Spectrum, Numis, Peel Hunt, Panmure Gordon, Shard Capital, Shore Capital, N+1 Singers, Stanfords 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 and regularly review this list and assess the execution venues available in respect of any instruments that we trade. We reserve the right to use other execution venues where we deem appropriate in accordance with our policy and we may add or remove any execution venue from this list.

## 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:

- 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 and assurance reviews undertaken by the firm's compliance function.
- 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 in had the failed trade, cancelled trade or dealing error not occurred. Where there has been 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 for any potential regulatory breaches. Regular management information is produced for the Senior Management team to review.

## **Aggregation and allocation**

There are occasions when it is appropriate to allocate an order between a number of clients. UAM has an aggregation and allocation policy designed to ensure the fair allocation between clients. Please refer to the firm's Order Allocation policy for further details.

## **Responsibility**

Each fund manager initiating an order is individually responsible for achieving best execution of 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.