



## **Best Execution and Order Handling**

## 1. Purpose

The Vontobel Best Execution and Order Handling Legal Entity Policy (“**Best Execution Policy**” or “**Policy**”) contains a summary of the approaches, procedures, and execution principles that Bank Vontobel AG (“**Vontobel**”) has implemented in order to demonstrate and achieve the best possible result when receiving and/or transmitting and/or executing orders of financial instruments (equities or other financial instruments) on client’s behalf. The objective of this Policy is to continuously obtain the best possible results of the client orders. Asset class specific provisions can be found in the Annex of this policy.

## 2. Applicability and scope of the Policy

This policy applies to retail and professional clients only, both as defined under European and a Swiss laws and regulations. This policy does not apply to all other types of clients. Nevertheless, this policy provides details relevant for these other clients as to how Vontobel executes transactions and handles trade requests.

The principles set out in this policy pertain to receive, transmit and/or execute orders on client’s behalf in securities or other financial instruments.

Execution, as defined by this policy, implies that Vontobel, acting on the basis of a client order (“Order”)

- acts as agent on the initial order of a client in its own name on behalf and for account of the client whereas Vontobel will perform the respective execution transaction in the market or with a third party in a market which will be deemed suitable for order handling on an agency basis;
- executes a transaction with a third-party, in- or outside a regulated market (commission trade), on behalf of the client or;
- immediately concludes a purchase agreement for financial instruments with the client (fixed price transaction).

Spot FX and/or physical delivered commodities instruction orders / transactions are not covered by this policy.

## 3. Achieving the best possible execution for the client

Vontobel has established processes and investment principles, which assure the best possible execution for its clients. In that context, the execution factors and criteria of Order Execution described under Section 5 shall be weighted and applied as deemed appropriate in order to achieve the best possible result for the client. The continuous implementation of our process ensures that, in accordance with this policy the best possible results can constantly be achieved.

## 4. Precedence of client instruction and its impact on Best Execution

Whenever there is a specific instruction from the client, Vontobel will execute the Order following that specific instruction. Specific client instructions may overrule the Best Execution principles as stated in this policy. When specific instructions are given by the client, Vontobel is exempted from adherence to this policy within the scope of the relevant client instructions and the obligation to achieve the best possible execution is deemed to be fulfilled within the scope of the specific instructions given. Where the specific client instruction covers only a portion of an Order and Vontobel has discretion over the execution of other elements of the Order, Vontobel will continue to be subject to the Best Execution Obligation in respect of the elements of the Order that are not covered by the specific client instruction.

## 5. Execution factors and criteria of Order Execution

When taking all sufficient steps to obtain the best possible execution for the client, Vontobel takes into account various factors depending on the relevant class of financial instrument. Vontobel considers the following Execution Factors to execute the Order:

- Price, in terms of the executed price of the transaction;
- Costs, in terms of explicit costs including fees, commissions and implicit costs;
- Likelihood of execution, in terms of the single case ability to execute the Order;
- Likelihood of settlement, in terms of likelihood of the completion of the transaction;
- Size and nature of the Order, in terms of volume and structure of the Order concretely affecting the execution price;
- Speed, in terms of the time taken to execute of an Order;
- any other factors relevant to the execution of an Order.

When executing an Order, Vontobel must take into account the criteria below for determining the relative importance of the execution factors in the circumstances the characteristics of:

- the client including the regulatory categorization of the client if applicable;
- the characteristics of the Order;
- the characteristics of the respective financial instruments governed by the Order;
- the characteristics of the execution venues to which that order can effectively be directed.

Subject to any specific instructions, taking into account the criteria above, Vontobel will generally give the highest priority to the net price. Net price is the total price

paid by the client, consisting of gross execution price plus costs. The relevance of the applied execution factors is listed in the Annex of this policy.

Where there is insufficient immediately available liquidity on the relevant execution venues to execute the relevant Order in full, where the client instructs Vontobel to work a relevant Order over a period of time or by reference to a benchmark calculated over a period of time or where Vontobel determines that there are circumstances such that obtaining the best immediately available price may not be the best possible result for the client, Vontobel may prioritize one or more of the other execution factors shown in this policy. In such cases, Vontobel will determine the relative priority of each execution factor on an order-by-order basis, where the order is executed manually and by order type, where the order is executed using an algorithm.

Vontobel has a degree of discretion in how to apply the different execution factors and this may result in a range of different permissible approaches to executing the Orders.

## 6. Trading Venues

In Order to provide highest possible liquidity Vontobel may place orders on various execution venues classes. This includes, but is not limited to:

- Regulated Markets;
- Multilateral Trading Facilities (“MTFs”);
- Organized Trading Facility (“OTFs”);
- Systematic Internaliser (“SIs”);
- Liquidity Pools;
- Interbank Platforms; or
- with Vontobel liquidity sources, i.e. market makers or another third party supplier of liquidity or on one of Vontobel's internal markets.

A list of the Trading Venues used by Vontobel (see the separate document “Vontobel Trading Venues” on [www.vontobel.com](http://www.vontobel.com)) specifies which execution venues are used for each class of financial instruments. This list is not exclusive but comprises Execution Venues on which Vontobel places permanent significant reliance.

Vontobel reserves the right to use other Execution Venues where Vontobel deems appropriate in accordance with this policy and may add or remove any Execution Venues from this list. The list of “Vontobel Trading Venues” will be updated from time to time, following a regularly assessment by Vontobel in respect of any products that it trades to identify those trading venues that will enable Vontobel, on a consistent basis, to obtain the best possible result when execution client's Orders. The document “Vontobel Trading Venues” forms an integral part of this policy.

## 7. Transmission of Orders

Depending on order, market or trading access characteristics, Vontobel may transmit an Order to third party financial institutions (e.g. brokers) for execution. Vontobel will review selected third party institutions including the formal evaluation of their best execution performance in order to help to ensure appropriate standards of execution, which are consistent with this Policy to the extent possible.

If Vontobel has instructed a third party broker to execute a “client's” order, the corresponding transaction is governed by the measures that the third party broker has taken to ensure under its Best Execution Policy.

## 8. Aggregation of Orders

If it is deemed appropriate, Vontobel may bundle and compile client orders with orders of other Vontobel clients to execute such aggregated orders as block orders if this is in line with the principles of this Policy and not in contrary of any of the affected client's investment interests.

Order bundling, compiling and aggregation may result into detail trading parameters which are adverse to the initial individual order (e.g. as a result of different execution likelihood or speed).

## 9. Variant order handling

If markets are characterized by extraordinary conditions or situations (e.g. partial or full disruption) Vontobel may initiate alternative execution as agent by considering the client's interest.

## 10. Over-the-Counter (OTC) trades and Fixed Price Transactions

In the event that an Over-the-Counter trade has been entered into between the client and Vontobel, the client here-with agrees that such transaction will be excluded from the scope of this policy.

Non-exchange-traded certificates and warrants are executed under commission with the issuer or a third party trading execution service provider. If not being executed under commission Vontobel offers the respective certificates and warrants for a fixed price agreed with the client or a determinable price.

In case the client has entered into a trade with Vontobel on a fixed price or determinable price basis this policy does not apply since execution is not owed under the terms of this policy but only according to the specific contractual obligations between the client and Vontobel.

## 11. Monitoring

Vontobel evaluates transactions in relevant Orders to which the Best Execution Obligation applies for best execution and compliance with this policy through risk-based post-execution benchmarking and analysis. The selected execution venues and brokers as defined under this policy will be periodically reviewed, at least

annually and amended as necessary from time to time. If trading parameters utilized by Trading Venues or Third Party Brokers are substantially deviating from this policy or if Vontobel has reason to believe that certain criteria or factors defined by third parties may prevent Vontobel to realize best execution according to this policy, Vontobel will undertake material review of the respective execution arrangements. Vontobel may adjust the relative importance of specific execution factors in order to meet the best execution principle as set out in this Policy. The client permits Vontobel to make such amendments in this respect unilaterally. Vontobel will inform and explain the client of any such material by publishing an updated version of this policy on Vontobel's website: [www.vontobel.com](http://www.vontobel.com).

## **12. Disclosure and consent**

Vontobel will also undertake the qualitative monitoring of the order execution and will be able to answer client requests in relation to this Policy within a reasonable amount of time.

**Annex 1:**

The following Annex lists the relevant asset classes traded by Vontobel and consolidates the Vontobel's execution factors for each asset class and the respective weighted factors for the choice of the execution venues.

**A. Cash Equities and Equity-likes**

- Vontobel will offer the execution of orders on an agency-basis for cash equities and equity-like using its electronic trading service. Vontobel will treat all orders received through its electronic trading facilities as a transaction on an agency basis, unless otherwise agreed and specified in relation to a particular trade. Vontobel will handle all other orders as a request for a quote from Vontobel to trade a fixed price transaction, unless the Parties have agreed otherwise. Where an order originally instructed to be executed on an agency basis is fully or partially filled at a risk price on Client request the whole trade will be concluded as a fixed price transaction executed in a principal capacity.
- Vontobel may also offer cash equities and equity-likes for subscription, purchase or re-purchase at a fixed or determinable price (fixed price transaction) agreed with the Client over-the-counter (OTC). In this case, Vontobel and the Client are directly concluding a purchase agreement for financial instruments. Fixed-price transaction shall apply when Vontobel executes trades over-the counter for purposes of client order facilitation or liquidity provision.
- Requests received by Vontobel to trade in cash equities and equity-likes will be treated as a request for a quote from Vontobel to enter into a trade as a fixed-price transaction. Any interim update performed by Vontobel to the Client in between of receipt of the request and conclusion of the transaction are of exploratory character only.
- Where Vontobel and the Client agree on the terms of an agreement to purchase a financial instrument at a fixed or determinable price the Vontobel Best Execution Policy and its additional provisions defined in this Annex are not applicable.
- Specific instructions in relation to the Client's trade request or any part of it may prevent Vontobel from obtaining the best possible result for the execution in respect of the elements covered by the Client's specific instructions.

**B. Debt Instruments**

- Vontobel will offer the execution of orders on an agency basis for debt instruments using its electronic trading service. Vontobel will treat all orders received through its electronic trading facilities as a transaction on an agency basis, unless otherwise agreed and specified in relation to a particular trade. Vontobel will handle all other orders as a request for a quote from Vontobel to trade a fixed price transaction, unless the Parties have

agreed otherwise. Where an order originally instructed to be executed on an agency basis is fully or partially filled at a risk price on Client request the whole trade will be concluded as a fixed price transaction executed in a principal capacity.

- Vontobel may also offer debt instruments for purchase or re-purchase and subscription at a fixed or determinable price (fixed price transaction) agreed with the Client over-the-counter (OTC). In this case, Vontobel and the Client are directly concluding a purchase agreement for financial instruments. Fixed-price transaction shall apply when Vontobel executes trades over-the counter for purposes of client order facilitation or liquidity provision.
- Requests received by Vontobel to trade debt instruments will be treated as a request for a quote from Vontobel to enter into a trade as a fixed-price transaction. Any interim update performed by Vontobel to the Client in between of receipt of the request and conclusion of the transaction are of exploratory character only.
- Where Vontobel and the Client agree on the terms of an agreement to purchase a financial instrument at a fixed or determinable price the Vontobel Best Execution Policy and its additional provisions defined in this Annex are not applicable.
- Specific instructions in relation to the Client's trade request or any part of it may prevent Vontobel from obtaining the best possible result for the execution in respect of the elements covered by the Client's specific instructions.

**C. Derivatives (ETD & OTC)**

- For standardised derivatives – which are usually tradable on an exchange (ETD) or another trading venue - Vontobel will generally offer the execution of orders on an agency basis. If agreed with the Client, Vontobel will also offer standardised derivatives at a fixed or determinable price agreed with the client (fixed-price transaction).
- Vontobel will offer non-standardised derivatives (OTC), defined as non-tradeable on a trading venue, for subscription, purchase or re-purchase generally at a fixed or determinable price agreed with the Client. Vontobel and the Client may directly conclude a purchase agreement for financial instruments (fixed-price transaction). All requests received by Vontobel to trade in non-standardised derivatives will be treated as a request for a quote from the Bank to enter into a trade as a fixed-price transaction.
- Where Vontobel and the Client agree on the terms of an agreement to purchase a financial instrument at a fixed or determinable price (fixed-price transaction) the Best Execution Policy and the additional provisions set out in this Annex are only valid to a limited extent. Specific instructions in relation to the Client's trade request or any part of it may prevent Vontobel from obtaining the best possible result for the execution in respect of the elements covered by the Client's instructions.

**D. Funds**

The issuance of investment funds at the issue price as well as their redemption at the redemption price are not covered by this Policy.

**Relevance of the Execution Factors**

<b>EXECUTION FAC- TORS</b>	<b>CASH EQUITY AND EQUITY- LIKES</b>	<b>DEBT INSTRU- MENTS</b>	<b>ETD</b>	<b>STRUCTURED PRODUCTS EXCHANGE TRADED</b>	<b>STRUCTURED PRODUCTS NOT LISTED ON ANY EX- CHANGE</b>
Price	high	high	high	high	medium
Cost	medium	low	medium	medium	low
Speed of execution	medium	low	low	low	low
Likelihood of execution	low	low	low	medium	low
Speed of settlement	low	low	low	low	low
Likelihood of settlement	low	medium	low	low	low
Size of the order	medium	medium	medium	medium	low
Nature of the order	low	low	low	low	low
Any other consideration relating to the execution of the order	low	low	low	low	high

Source: Bank Vontobel AG, Transaction Banking (TB)

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