

## ORDER EXECUTION POLICY

### Introduction

Financial Investments provides a discretionary management service dedicated to managing client assets in personalised portfolios.

This policy document sets out the execution arrangements we use when we effect transactions on behalf of clients. Our aim is to achieve best execution consistently for our clients in line with regulatory requirements by considering certain factors which are laid out later in the document. The policy is reviewed once a year and published on our corporate website. [www.financial-investments.ltd.uk](http://www.financial-investments.ltd.uk)

### Best execution

We do not execute orders ourselves. Where client assets are held with our custodian and broker, we always transmit orders to them for execution on behalf of us and our clients. Where client assets are held by providers directly on their platforms, we transmit orders directly to the product provider for execution on behalf of us and our clients. We seek to obtain the best results for our clients by considering the following execution factors:

- the price our clients will pay
- the costs payable by our clients
- the size and nature of the order
- the speed of execution and settlement of the order
- the likelihood the client order will be executed and settled
- any other consideration

Normally, the factor of price to our clients carries highest importance when executing orders. But there may be times where other factors such as the speed of execution will be given greater relative importance.

In determining the relative importance of these factors, we will take into account following criteria:

- the characteristics and categorisation of the client
- the characteristics of the client order
- the characteristics of the financial instruments that are subject of that order
- the characteristics of execution venues and brokers available
- our commercial judgment and experience

We will carry out investment transactions for individual clients independently, unless we decide to buy or sell the same financial instrument for several clients at the same time. We may, but are not obliged to, combine such orders to obtain best execution.

## **Order execution limitations**

We will take into account instructions given by our clients to buy or sell a financial instrument. This may prevent us from following this policy and the client will therefore take responsibility of best execution.

## **Execution venues**

We always transmit orders to our broker or the product provider direct for execution on behalf of us and our clients. Depending on the financial instrument, the order may be executed on regulated markets in the United Kingdom or overseas. Our primary execution venue for equities and ETF's will always be the London Stock Exchange and Euroclear for corporate bonds. We may also cross a client sale against another client buy order.

We review our choice of execution venues regularly and give consideration to the availability of the financial instrument, speed of execution and settlement and clearing facilities provided by the venue. We reserve the right change venues or use another venue in order to achieve best execution for our clients.