

## BEST EXECUTION AND ORDER ALLOCATION POLICY

### 1. BACKGROUND

MUFG Corporate Markets Trustees (UK) Limited is required by the Financial Conduct Authority (FCA) to publish a policy setting out how it achieves best execution for its clients.

MUFG Corporate Markets Trustees (UK) Limited must obtain the best possible result for a client when it either executes customer orders itself as agent on your behalf or receives and transmits your instructions to third parties for execution

This policy sets out MUFG Corporate Markets Trustees (UK) Limited's strategy and details the key steps it takes to comply with the overarching best execution requirement and how those steps enable it to obtain the best possible result for you.

MUFG Corporate Markets Trustees (UK) Limited presumes that all retail and professional clients are placing 'legitimate reliance' on the firm to deliver best execution for all transactions, regardless of how they arise. This policy therefore applies to all MUFG Corporate Markets Trustees (UK) Limited's retail and professional clients and must be read in conjunction with the relevant service terms and conditions.

Where your order is ultimately executed on a regulated market or otherwise you are deemed to have given your consent for your order to be executed in accordance with this policy.

### 2. EXECUTION FACTORS AND CRITERIA

In delivering the best possible result, there may be other execution factors to be considered, other than the immediate price, which may be given precedence. These include:

- speed of execution
- likelihood of execution and settlement
- size and nature of order
- market impact e.g., the liquidity of the market (which may make it difficult to execute an order),
- any other implicit transaction costs

Where the nature of an order, instrument or market conditions demand, MUFG Corporate Markets Trustees (UK) Limited may, in its sole discretion, adjust the importance of these criteria where it believes that this is necessary to obtain the best possible result for you. In its application of these criteria, MUFG Corporate Markets Trustees (UK) Limited will also take into account your categorisation as a retail or professional client, the nature of your order and the service in question, the characteristics of the financial instrument and the characteristics of the available counterparties and/or venues of execution.

For all transactions that MUFG Corporate Markets Trustees (UK) Limited undertakes on client's behalf it will ordinarily treat them as a retail client; this will always be specified in the terms of business or the client agreement. The services that MUFG Corporate Markets Trustees (UK) Limited offers are execution-only and ordinarily relate to non-complex financial instruments that are traded on the UK markets, an EEA regulated market or an equivalent third country market and accordingly it makes no assessment of the appropriateness or suitability of the transaction unless otherwise detailed in the terms of business.

MUFG Corporate Markets Trustees (UK) Limited recognises that for retail clients the most important factor to determine best execution is the total consideration in terms of the price of the securities in question and the related execution costs payable by the client. Consequently, price and costs of execution are normally selected as the most important factors for the execution of a trade. However, this does not mean that you will necessarily receive the highest headline price for your orders in every case. Where shares are illiquid (i.e., rarely traded), factors such as the likelihood of execution and settlement may be given priority over the overall cost the client will incur, in ensuring the best possible result is achieved. Unless otherwise specified, this approach is also taken with professional clients.

### 3. EXECUTION ARRANGEMENTS

#### (A) TELEPHONE AND INTERNET DEALING SERVICE

All orders in listed securities received through MUFG Corporate Markets Trustees (UK) Limited's Telephone and Internet Dealing Service are normally undertaken by MUFG Corporate Markets Trustees (UK) Limited as your agent through its share dealing platform. This platform is provided to MUFG Corporate Markets Trustees (UK) Limited by Infront Financial Information Limited (IFIL).

#### MUFG Corporate Markets

A division of MUFG Pension & Market Services

All orders received are placed by IFIL on an execution venue which is usually either the UK markets, an EEA regulated market or an equivalent third-party market. IFIL then confirms back to MUFG Corporate Markets Trustees (UK) Limited whether your trade has been successfully executed and the details of execution.

Where orders in listed securities are valued over £50,000 or the stock in question is illiquid or for other reasons cannot be executed by IFIL, a wider range of brokers will be considered in the execution of your order to achieve the best possible.

IFIL has been selected to provide this service for the following reasons:

- IFIL is a leading provider of multi asset class trading platforms, which provides access to significant pools of liquidity.
- IFIL provides electronic prices through its Retail Service Provider (RSP) network on behalf of MUFG Corporate Markets Trustees (UK) Limited in real-time and is contractually obliged to provide best execution.
- IFIL provides an electronic link to MUFG Corporate Markets Trustees (UK) Limited's dealing platform which is an effective and efficient method of placing trades.

MUFG Corporate Markets Trustees (UK) Limited actively monitors and reviews these arrangements to ensure that it continues to meet its overarching best execution obligation to you as outlined in this policy.

#### (B) OTHER TRADING SERVICES

This section comprises orders in listed securities arising from the following services:

- Dividend Reinvestment Plans;
- Shareholder Reduction Programmes
- Monthly Share Purchase Plans;
- Share Incentive Plans;
- Nominee Administration Service;
- Postal Share Dealing;
- The sale of shares issued from the exercise of a share option.

MUFG Corporate Markets Trustees (UK) Limited is not itself a market-facing firm. Orders are placed by MUFG Corporate Markets Trustees (UK) Limited as your agent with a counterparty which will be, in all cases, a third party investment firm or broker who may deal as a principal, as an agent, as market maker or liquidity provider. MUFG Corporate Markets Trustees (UK) Limited will, in all cases, satisfy itself that any such counterparty has arrangements in place to enable us to comply with our obligation to you under this policy. Furthermore, MUFG Corporate Markets Trustees (UK) Limited actively monitors and reviews these arrangements to ensure that it continues to meet its overarching best execution obligation to you as outlined in this policy.

The entities that MUFG Corporate Markets Trustees (UK) Limited currently uses for placing trades in listed securities are detailed below. This list is not exhaustive, and it includes the entities on which we generally place reliance. MUFG Corporate Markets Trustees (UK) Limited reserves the right to use another entity that may, from time to time, be appropriate in light of our overall policy arrangements.

There are also a very limited number of circumstances in which MUFG Corporate Markets Trustees (UK) Limited does not deal as an agent on your behalf and only receives and transmits orders to other entities for execution. In these instances, MUFG Corporate Markets Trustees (UK) Limited will act in your best interests to fulfil the overarching obligation outlined in this policy.

#### (C) UNLISTED SECURITIES

Unlisted securities are shares and other financial instruments that are not listed on any exchange and may carry specific additional risks and be more difficult to trade than listed securities. MUFG Corporate Markets Trustees (UK) Limited do not facilitate trades in unlisted securities.

### 4. SPECIFIC INSTRUCTIONS

MUFG Corporate Markets Trustees (UK) Limited's policy is not to accept specific instructions from clients unless such instructions concern a limit order placed via the telephone or internet dealing service provided through IFIL or via an online exercise facility available for certain share option schemes.

Limit orders can fail for several reasons, as outlined in the terms and conditions of the relevant service. MUFG Corporate Markets Trustees (UK) Limited only offers a limit order service on a reasonable endeavour basis, and it remains the responsibility of the client to monitor the execution of the order.

MUFG Corporate Markets Trustees (UK) Limited does not ordinarily accept instructions from clients to place trades on specific venues. If MUFG Corporate Markets Trustees (UK) Limited does accept such an instruction, even if it is a venue or broker not listed in this policy, MUFG Corporate Markets Trustees (UK) Limited will be deemed to have complied with its best execution duty under FCA rules only in respect of the part or aspect of the order to which the specific instructions relate, provided that such an instruction is accurately undertaken by MUFG Corporate Markets Trustees (UK) Limited.

Where MUFG Corporate Markets Trustees (UK) Limited accepts a limit order, instruction to direct orders to a specific venue or any other specific instruction, this may affect the quality of execution that it can provide to its clients and some or all of this policy may not apply to such orders.

## 5. AGGREGATION

The nature of some services offered by MUFG Corporate Markets Trustees (UK) Limited is such that your order may be aggregated with those of other clients for execution. Aggregated orders may result in a large number of shares being dealt in the market which may result in a higher or lower price being obtained or a delay in executing the order in full on the designated market. If it is not possible to fully execute an aggregated order on the day the order is placed, the broker will be instructed by MUFG Corporate Markets Trustees (UK) Limited to fulfil the order in its entirety, which may take several days. Sale proceeds will only be issued after the broker has provided a contract note to MUFG Corporate Markets Trustees (UK) Limited confirming fulfilment of the order.

In placing an aggregated order, irrespective of the size of the order and the length of time taken to fulfil the order in the designated market, a higher or lower price might be achieved than if your order had been executed separately.

If an aggregated order could not be filled in its entirety, where this has been provided for by the terms of the service, MUFG Corporate Markets Trustees (UK) Limited will usually allocate on a *pro rata* basis and will take sufficient steps to ensure that any such allocation is in the best interests of all customers to ensure that they are treated fairly.

## 6. TRANSPARENCY

You have the right to ask us to demonstrate that any order undertaken by MUFG Corporate Markets Trustees (UK) Limited on your behalf has been carried out in accordance with this policy. We can provide a written explanation at your request of how our obligation to you under this policy has been met.

You may make reasonable and proportionate requests for information about MUFG Corporate Markets Trustees (UK) Limited's policies and arrangements and how we review these. MUFG Corporate Markets Trustees (UK) Limited will answer such requests within a reasonable time period.

## 7. PRIORITISATION

MUFG Corporate Markets Trustees (UK) Limited will execute otherwise comparable orders promptly and sequentially in accordance with the time of their receipt by MUFG Corporate Markets Trustees (UK) Limited except for circumstances where the prevailing market conditions make this impractical, where we are prevented from doing so by a specific instruction (e.g., a limit order) or where this is not in the best interests of MUFG Corporate Markets Trustees (UK) Limited's clients.

## 8. VENUES OF EXECUTION

When carrying out your order, we place significant reliance on the following execution venues:

- member firms of the London Stock Exchange
- member firms of the International Capital Market Association
- member firms of overseas stock exchanges
- other UK and overseas execution venues deemed, by MUFG Corporate Markets Trustees (UK) Limited, to be appropriate considering the overarching best execution obligation.

The following is a list of venues on which MUFG Corporate Markets Trustees (UK) Limited places significant reliance in the discharge of its obligation to its retail and professional clients under this policy.

BMO Capital Markets Limited	Singer Capital Markets Limited
Canaccord Genuity Limited	Deutsche Bank
Cavendish Securities	Panmure Liberum
Investec Bank Plc	Peel Hunt LLP
Jefferies International Limited	Shore Capital Stockbrokers Limited
Joh. Berenberg, Gossler & Co. KG	Winterflood Securities Limited
Morgan Stanley	Zeus Capital

This list is not exhaustive and execution may occur on alternative venues provided they are selected in accordance with our best execution policy and standard due diligence process.

## 9. BROKER SELECTION PROCESS

MUFG Corporate Markets Trustees (UK) Limited will only place your orders with brokers who are known to have a good market reputation, sufficient resources to meet the volume of client orders MUFG Corporate Markets Trustees (UK) Limited will route to them, sufficient size to be able to access sizeable pools of liquidity, as well as an obligation to provide best execution to their clients.

MUFG Corporate Markets Trustees (UK) Limited will also consider any relevant published reports when selecting brokers/entities for execution, and as part of their annual due diligence, to ensure that a consistent level of best execution has been achieved by them.

MUFG Corporate Markets Trustees (UK) Limited undertake initial due diligence on brokers used to execute your trades at the outset and thereafter on an ongoing annual basis. The due diligence process considers several aspects of the broker in question, including their regulatory permissions, market reputation, financial record, terms of business, transaction reporting functionality and contingency planning.

## 10. POLICY REVIEW AND MONITORING

MUFG Corporate Markets Trustees (UK) Limited monitors execution performance daily, on both a pre-trade and post-trade basis and any executed trades falling outside the industry standard for best execution are investigated and resolved where necessary. At least once a year MUFG Corporate Markets Trustees (UK) Limited will review the effectiveness of this policy and will, where appropriate, correct any deficiencies that are identified.

MUFG Corporate Markets Trustees (UK) Limited will also conduct a review of this policy in response to any 'material change'. MUFG Corporate Markets Trustees (UK) Limited defines 'material change' as any change, whether commercial, legal, regulatory, or otherwise that causes existing arrangements to be no longer appropriate to reflect MUFG Corporate Markets Trustees (UK) Limited's legal or regulatory position or obligations, or that will otherwise affect MUFG Corporate Markets Trustees (UK) Limited's ability to deliver best execution to its clients on a consistent basis.

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