

BEST EXECUTION POLICY

April 2019



Amagis Capital Management Ltd



Approved by	Board of Directors
Prepared by	Laurent Viteau Operations Manager
Date of Introduction	1 st July 2014
Date of Last Review	29 th April 2019
Version	4

Signed by:

On behalf of the Board of Directors of
Amagis Capital Management Ltd

Mr. Laurent Viteau
Operations Manager
Amagis Capital Management Ltd



1. Purpose

We have put in place an Order Execution Policy to set out the factors we take into account to obtain the best possible result (or “best execution”) on behalf of our Clients either when executing Orders for Clients or when receiving and transmitting Orders to others for execution.

The purpose of this document is to set out information on our order execution policy for our clients and to obtain their consent to such policy. This policy is not intended and does not impose any fiduciary responsibilities or duties over and above the specific regulatory obligations placed upon us or as may be otherwise contracted between us.

2. Best Execution Obligation

Our Order Execution Policy applies to clients of Amagis Capital Management LTD in relation to transactions in financial instruments covered by MiFID in the following instances:

- (i) where we execute orders on a Client’s behalf;
- (ii) where we place orders with other entities for execution that result from our decision to deal when providing the service of discretionary investment management; and
- (iii) where we receive and transmit orders to other entities for execution on the Client’s behalf.

When directly executing orders on a Client’s behalf, we will take all sufficient steps to achieve what is called Best Execution for our orders. This means that we have in place processes which are designed to obtain the best possible execution result on the Client’s orders on a consistent basis. This is subject to and taking into account other various factors, including the nature of the Client’s orders, the relevant market and the priorities the Client places upon us filling those orders.

When placing orders with other entities or receiving and transmitting orders on the Client’s behalf, we will act in the Client’s best interest by ensuring that the entities to which orders are passed to or placed with commit to provide Best Execution to the equivalent standard that we ourselves are obliged to provide.

For certain customised OTC products the Client will request a price from us and we will deal with the Client as principal. To the extent that the Client indicates that the Client is not relying on us to protect the Client’s interests with regard to the price (and other relevant factors of the transaction), we will not be executing and order on the Client’s behalf. In such instances we will disclose that we are not providing Best Execution and the Client is therefore required to undertake the Client’s own due diligence.

3. Execution Factors

We will determine the relative importance of the Execution Factors by using our commercial judgement and experience in light of market information available and taking into account the Execution Criteria.

The Execution factors that will be taken into account are: price; costs; speed; likelihood of execution and settlement; size; nature or any other consideration relevant to the execution of the order.

Price will usually merit a high relative importance in obtaining the best possible result. However, in some circumstances, for some Clients, orders, financial instruments or markets, we may appropriately determine that other Execution Factors are more important than price in obtaining the best possible execution result.

For instance, for the purpose of achieving Best Execution, we will also take into account the Client’s understanding and experience of the market in question, the Client’s dealing profile, the nature of the dealing service the Client requires from us and the Client’s specific and general instructions which may prioritise how we fill the Client’s orders.

4. Specific Instructions Warning



Please note that any specific instructions received from the Client will override our obligation to execute the Client's orders in accordance with our policy and as a consequence may result in a variation from what otherwise would be deemed the best possible result.

5. No Guarantee

While we will take all reasonable steps, based on those resources available to us, to satisfy ourselves that we have processes in place that can reasonably be expected to lead to the delivery of Best Execution of your orders, we cannot guarantee that we will be able to achieve Best Execution for each and every order executed on the Client's behalf. Further, Amagis Capital Management LTD's commitment to achieve Best Execution does not mean that we owe the Client any fiduciary responsibilities over and above the specific regulatory obligations placed upon us or as may be otherwise contracted between us.

6. Reception and transmission of Orders

Subject to any specific instructions that may be given by a Client, we may transmit an order that we receive from a Client to an external entity, such as a third party broker or dealer, for execution. In doing so, we must act in the Client's best interests and also comply with the Execution Factors above. In such cases we may: determine the ultimate execution venue ourselves by accessing specific execution venues through such third parties; or instruct such third parties accordingly (having already satisfied ourselves that they have arrangements in place to enable us to comply with our execution obligations to you).

7. Execution Venue Selection

We may use brokers or dealers to execute orders who in turn use the following venues or combination of venues: a Regulated Market, a Multilateral Trading Facility (MTF), a Systematic Internaliser, our own account, the orders and accounts of other clients, third party investment firms or other liquidity providers or non-EU entities performing similar functions.

A list of the Execution Venues used by the brokers we work with is set out below. This list of Execution Venues is not exhaustive but comprises those Execution Venues on which we place significant reliance. We reserve the right to use other Execution Venues where we deem appropriate in accordance with our order execution policy in order to obtain the best overall result for the Client and may add or remove any Execution Venues from this list.

We will regularly assess the Execution Venues available in respect of any products that we trade to identify those that will enable us, on a consistent basis, to obtain the best possible result when executing Orders. The list of Execution Venues will then be updated, where necessary, following such assessment. We will provide a list of the execution venues we currently use on request.

We currently have connectivity to the following brokers/dealers for execution purposes:

- ALLX Capital Markets
- Atonline Ltd
- Auriga Global Investors
- Banca IMI
- Berkeley Futures Ltd
- CACEIS Bank
- CFE Finance
- Citigroup Global Markets Ltd
- EFG Bank
- Equita SIM Spa
- Exotix Partners LLP
- Global Securities SAM
- Goldman Sachs International



- GMSA Investments Ltd
- ICAP Securities Ltd
- Interactive Brokers
- Intermonte SIM Spa
- Jefferies International Ltd
- Makor Securities LLP
- Merrill Lynch
- Octo Finances SA
- Pareto Securities AS
- UBS AG London

These brokers route our orders to the following regulated markets:

- NYSE Euronext;
- ICE;
- Eurex
- BATS Chi-X Europe;
- Chicago Board of Trade (CBOT); and
- any other Exchange as necessary.

8. Trading Off Regulated Market

There may be occasions where we assess that in order to achieve the best possible result in executing a Client's order we will need to execute the order outside a Regulated Market, for example in the over-the-counter markets.

For those orders executed on behalf of the Client in a non-discretionary capacity, where an instrument is admitted to trading on a Regulated Market or MTF, we are required to obtain the Client's prior express consent before we execute an order in such instrument outside of such Regulated Market or MTF. Please note that this is only applicable if the Client has not already given express consent to us in the account opening documentation to execute the Client's orders outside a Regulated Market or MTF. On this basis we will deem the client to consent to trading on organised trading facilities (OTF). An OTF is a trading venue in which multiple third party buying and selling interest in bonds, structured products, derivatives and other instrument, are able to interact in a system which will generate a contract.

9. Client Limit Orders for shares traded on a Regulated Market

The MFSA rules require unexecuted client limit orders for shares traded on a Regulated Market which are not immediately executed under prevailing market conditions to be made public immediately unless the Client expressly instructs otherwise. This may work to a Client's advantage but on other occasions it may not and by consenting to our order execution policy the Client is expressly instructing us not to use our discretion as to whether to make such Orders public.

10. Order Handling

We will handle all our Clients' orders promptly, fairly and in an expeditious manner. We will execute otherwise comparable client orders sequentially in accordance with the time of their reception unless:

- (i) we are otherwise instructed by you;
- (ii) the characteristics of your order or prevailing market make this impracticable; or
- (iii) the Client's best interests require otherwise – where this is the case, we will promptly inform you of any material difficulty we encounter in carrying out your order as soon as we are aware of it.



We may aggregate the Client's orders with orders from another client where we conclude that it is generally unlikely that the relevant aggregation of orders and transactions will work to the disadvantage of any client whose order is being aggregated. In some cases aggregation may operate to the Client's disadvantage and in other cases aggregation will work to the Client's advantage.

11. Monitoring

We will monitor compliance with our Order Execution Policy.

12. Review

We will review our order execution arrangements regularly. We will also review our Order Execution Policy annually and whenever a material change occurs that affects our ability to continue to obtain the best possible result for our Clients.

We will notify our Clients of any material changes to our execution arrangements or our order execution policy by sending a copy to all our clients. We will also update the list of Execution Venues when necessary and will notify you separately of any changes on request.

13. Consent

The Client acknowledges that he/she have been made aware of and accept the nature, policy and processes that we have in place for providing Best Execution. In the absence of any express instructions from you, the firm shall have full discretion to choose a relevant execution venue from its current execution venues or others as the circumstances dictate, for executing any order or orders (which may include dealing on a principal-to-principal basis with us). In so choosing, we shall assess and balance a range of all relevant execution factors, including those set out in this Best Execution Policy which, in our reasonable determination, we consider relevant to achieving the best result for the Client.

The Client also acknowledges that, to the extent that we fill an order from our own book, including dealing with the Client in relation to any customised OTC product or otherwise enter into transactions with the Client involving taking on any credit exposure to the Client, we may take into account the creditworthiness and other transactional risk features and cost of the order in providing a price for the relevant transaction to the Client.

Where appropriate, the Client has separately consented to us executing the Client's orders outside a Regulated Market or MTF where we feel that this will result in the best possible outcome for your order. Further, for limit orders destined to be executed on a Regulated Market the Client expressly instruct us to keep the Client's limit orders (that are not immediately executed) confidential, unless we believe that to disclose such orders will be in the Client's best interests.

Status of this Policy- Disclosure to Clients

This policy does not form part of our General Business Terms and is not intended to be contractually binding or impose or seek to impose any obligations on us which we would not otherwise have whether under our General Business Terms or the MFSA Rules had this policy not been disclosed to you.

Appendix A
Revision History Log

Version	Section	Description of Amendments	Date Amended (MM/YYYY)	Date Approved (DD/MM/YYYY)	Preparer	Reviewer
1	General	Finalization of the document	07/2014	06/12/2017	Milo Guastamacchia	Andrea Angelone
2.1	General	Annual review with no changes	01/2017	15/01/2017	Antonio Giannino	Board of Directors
2.2	7	Replacement of some broker/dealers	06/2017	17/06/2017	Laurent Viteau	Board of Directors
2.3	General	Replacement of Amagis Capital Partners LLP with Amagis Capital Management Ltd	12/2017	13/12/2017	Andrea Angelone	Board of Directors
3	2	Replacement of “reasonable” with “sufficient” in light of MiFID II	11/2018	16/11/2018	Andrea Angelone	Board of Directors
3	7	Replacement of some broker/dealers	11/2018	16/11/2018	Laurent Viteau	Board of Directors
3	8	Inclusion of OTF	11/2018	16/11/2018	Andrea Angelone	Board of Directors
[4]	7	Update of some broker/dealers	04/2019	29/04/2019	Laurent Viteau	Board of Directors