

CGS-CIMBS Securities (UK) Ltd: Best Execution Policy

Best Execution Policy

This document sets out CGS-CIMB Securities (UK) Ltd ("CCS") Best Execution Policy. As required this document explains the factors that CCS will consider when orders are executed or passed for executing. This policy is designed to achieve the best possible result on a consistent basis and to set out the process by which CCS complies with its execution obligations.

CCS is required under the terms of Markets in Financial Instruments Directive ("MIFID II") to take all reasonable steps to obtain the best possible result for clients when executing orders or when placing an order with or transmitting an order to another entity for execution.

The best possible result is determined in terms of total cost, taking into account not only the price of the financial instrument but also all expenses incurred by you, which are directly related to the execution of the order. This policy sets out how CCS aim to achieve the best possible result.

Scope

CCS's Best Execution Policy applies only to Eligible counterparties and Professional Clients within the meaning of the Markets in Financial Instruments Directive ("MIFID II") qualification rules.

CCS's Best Execution Policy applies only where CCS:

- receives and transmits client orders; and/or
- executes orders on a client's behalf

CCS will execute orders on a client's behalf where the client legitimately relies upon CCS to protect their interests in relation to the pricing or other aspects of the transaction that may be affected by the way that CCS executes the order. For example, this will be the case when CCS:

- executes an order by dealing as agent;
- executes an order by dealing as riskless principal on behalf of a client; and
- works an order on a client's behalf.
- transmits an order to or places an order with another entity for execution.

Subject to any specific instructions that you may give, when executing orders on your behalf, CCS will take all reasonable steps to obtain the best possible result when executing orders or transmitting such orders for other entities (including CCS's affiliates for execution). CCS will determine the relative importance of the execution factors by using its commercial judgement and experience in light of the market information available and taking into account the execution criteria.

In practice, CCS will normally arrange/receive orders under the request of a client. Following the request of a client these orders are then transmitted through CCS's Asian affiliates for execution. CCS maintains a list of the entities with whom orders are executed or to whom orders are transmitted. Where CCS transmits orders to its affiliates for execution, CCS will take all reasonable steps to ensure that the affiliates execute the order in accordance with its policy in order to obtain the best possible result for the client, having regards however to prevailing market practices and regulatory requirements associated with the affiliates and in the market concerned.

Obtaining Best Execution

Subject to any specific instructions that you may give, when executing orders on your behalf, CCS will take all reasonable steps to obtain the best possible result when executing orders. CCS will determine the relative importance of the execution factors by using its commercial judgement and experience in light of the market information available and taking into account the execution criteria.

Execution Criteria

When determining the relative importance of the execution factors, CCS will take into account the characteristics of:

- the characteristics of the client
- the characteristics of the client order;
- the characteristics of the financial instrument that are subject to that order;
- the characteristics of the execution venues to which that order can be directed.

Factors affecting Execution

When choosing which venue to pass the order for execution of the transaction, CCS will take into account the following factors:

- Price;
- Size;
- Speed;
- Cost;
- Settlement;
- Likelihood of execution;
- Likelihood of settlement;
- Nature of the order;
- Market impact;
- Expertise; and
- Any other consideration relevant to the execution of the order.

The group's clients are classified as either, Professional or Elected Professional client under the rules of the MiFID II as agreed at the start of any new relationship. We do not undertake regulated activities with or for retail clients.

It is likely that the most important factors will be price, size and speed of execution, but this will not be the case for every transaction. CCS will take every factor as described above into account for all its transactions.

Execution Venues

An execution venue is a firm or entity to whom CCS or its executing affiliate directs buy or sell orders for conclusion, for example, an exchange, platform or market maker. A list of the principal execution venues that CGS-CIMB group uses in respect of each class of financial instrument can be found below. This list is not exhaustive but includes those venues on which CCS place significant reliance in meeting its obligation to obtain, consistently, the best possible execution result. CCS maintains a complete list of all venues and brokers affiliated and updates this on an ongoing basis.

CCS may use other execution venues or intermediaries where it deems appropriate in accordance with this policy. CCS will notify you specifically of any changes to the list of execution venues but a current list is available on request and can be found below.

Financial Instrument	Venues/Exchanges	Relevant factors in determining choice of venue
Equities	Australia Bangladesh China Hong Kong India Indonesia Japan South Korea Malaysia New Zealand Philippines Singapore Sri Lanka Taiwan Vietnam	<ul style="list-style-type: none"> • Price; • Size; • Speed; • Cost; • Settlement; • Likelihood of execution; • Likelihood of settlement; • Market impact; • Expertise; and • Any other consideration relevant to the execution of the order.

In most cases, CCS or its affiliate will execute its orders on an exchange or platform listed above. However, in some cases trades may be executed with an approved broker/counterpart in which case the broker/counterparty would be the execution venue. Traders may also seek natural sources of liquidity using electronic communication networks (such as Bloomberg), via email and telephone conversations with our dealing counterparties or via crossing networks.

The strategy chosen for executing each order is determined primarily by reference to the market liquidity of each security relative to the size of the order to be executed. Where brokers/counterparties are used by CCS or its affiliates, transactions may be executed only with pre-approval confirmation. CCS maintains an approved broker list for these purposes. This list consists of a mixture of large investment banks and smaller countries specific or niche firms. Due diligence is carried out on new brokers and revised periodically.

Different and complex instruments (often with very limited liquidity) may be used to achieve absolute returns for the client, and therefore it is not appropriate in such cases to judge best execution against the price achieved. Therefore in some circumstances there will only be a very limited number of venues through which the trade can be executed. In such case best execution is demonstrated through achieving the desired trade for the client at a price deemed appropriate by the investment manager or trader. Orders may be executed outside a regulated market or multilateral trading facility as defined under MIFID II and where the client consents to this.

Monitoring and Review

CCS will review its execution policy annually or whenever a material change occurs that affects its ability to obtain the best possible result for the execution of its orders consistently, using the execution venues included in the order execution policy. CCS will also monitor the effectiveness of its order execution policy regularly to identify and where appropriate correct any deficiencies. CCS will notify you of any material changes to its order execution arrangements or execution policy. CCS carries out monitoring of execution quality against the execution factors. This includes monitoring as to the continuing suitability of brokers / execution viewed in light of execution performance.

Fiduciary Responsibility

CCS's commitment to provide clients with best execution in accordance with CCS's Best Execution Policy, does not mean that it owes clients any fiduciary responsibilities over and above the specific regulatory obligation placed upon CCS or as may be otherwise contractually agreed between CCS and a client.

Effect of Instructions

Where we receive specific instructions from the client to execute an order in a particular manner or on a particular venue to transmit the order to or execute the order with a particular broker, by complying with such instructions we will be deemed to provide best execution.

Client Consent

The MiFID II Rules require us to obtain our clients' prior express consent to this Order Execution Policy. By the commencement of trading with CCS, the client acknowledges and agrees that it has read and understood this policy and consents to its terms. If you have any questions, please contact us.

Proprietary Rights

This Best Execution Policy is the property of CGS-CIMBS Securities (UK) Ltd. No parts of this policy or contents are to be reproduced in any form without the prior consent of CGS-CIMBS (UK) Compliance.