

ORDER EXECUTION POLICY

The FCA rules require us when executing orders on behalf of clients to take all sufficient steps to obtain the best possible result for clients, taking into account the “execution factors” (described below), and when we pass client orders to another person for execution to take all sufficient steps to obtain the best possible result. The FCA rules require us to provide our clients with appropriate information about the policy we establish to do this, which is known as our order execution policy and obtain our clients’ consent to it. This document has been prepared to provide that information. FCA Rules require us to notify you of any material changes we make in the future to the policy.

Our policy applies to our retail and professional clients. It applies to orders in relation to financial instruments, such as shares, derivatives, bonds and units.

Whilst FCA rules require us to take sufficient steps to satisfy ourselves that the arrangements we have in place will provide you with the best possible result on a consistent basis, we cannot guarantee that we will be able to provide you with best execution for every order in relation to which we act on your behalf. Our regulatory obligation to provide you with “best execution” does not mean that we owe you any fiduciary responsibilities over and above the specific regulatory obligations placed upon us or as may be otherwise contracted between us.

If a client gives a specific instruction as to the execution of an order we deal with the order in accordance with the specific instructions, not our order execution policy. If the instructions affect only part of the order, we continue to apply our order execution policy to those aspects not covered by specific instructions.

Clients should be aware that specific instructions can prevent us from taking steps set out in our order execution policy to obtain the best possible result in respect of the matters covered by those instructions.

The Execution Factors

Our policy has to take into account a range of different factors which could be relevant to client orders and determine the relative importance of those factors to different orders. The factors that can be relevant to the execution of an order include the prices available, costs of execution, the speed with which a transaction can be done, the likelihood that the transaction will be successfully completed, the size and nature of the transaction. We also have to consider if there are any other factors relevant in a particular case.

For retail clients, we are required to balance these factors so that we are able to deliver the best possible result in

terms of the total amount payable or receivable (i.e. both the price of the instrument and any execution costs payable by the client).

In deciding how to rate the importance of the execution factors we take into account:

- (1) the characteristics of the client, including whether it is a retail or professional client;
- (2) the characteristics of the client order - for example, whether the client has specified any particular price limits or markets on which it wishes its order to be executed or if a securities financing transaction is involved;
- (3) the type of financial instrument concerned. For example, for some types of instrument there may be only limited markets;
- (4) the characteristics of the venues to which we can send our orders. For example, we may have regard to whether a venue provides us with appropriate settlement arrangements for your transaction.

As a general rule, the effect of the above is that we rank the execution factors in the following order of importance:

- (1) price and any related execution costs (i.e. total consideration);
- (2) speed of execution;
- (3) the size of order (for example, this is relevant if the order is outside normal market size);
- (4) settlement, although generally this is a low priority because in the instruments and markets in which we normally deal there are efficient settlement and clearing arrangements.

We do not vary our own charges according to the venue and therefore these are irrelevant. (Clients should be aware that where they place orders for extended settlement, settlement takes place at a date later than the standard for the market concerned, and transactions may be given a loaded pricing by the dealer with whom we place the order).

Our methodology requires us to exercise commercial judgment and experience in the context of market conditions. Whilst the above lists the criteria and factors we take into account and how we balance them, in any particular case they are applied by the individual dealer using his judgment on the basis of reasonably available

information, such as information from brokers, information providers and data vendors.

There may therefore be cases where the circumstances of the order mean that we have to prioritise the factors in a different way or consider an element that is particular to the order in question, for example if the market is illiquid, and in such a case we have to exercise our discretion as to the way in which to achieve the desired result.

In determining what the best possible result is for you, we do not compare the results that would be achieved for you under our order execution policy with those that might be achieved for you by another firm on the basis of its order execution policy.

Our Execution Venues; Passing Orders to Third Parties

An execution venue is the term used to describe a place where your order is executed. If we deal with you as principal then we are the execution venue. The schedule to this policy is not exhaustive but lists the third party venues on which we place significant reliance. In some cases we access them direct; where we are not a direct member we access them through a third party.

We select third parties to execute orders by taking into account their ability to execute orders in accordance with our priorities set out above, their ability to deal with us efficiently and the costs involved.

Where the investment concerned is a unit in a regulated collective investment scheme or open-ended investment company, then acquisitions and redemptions of the investment will take place usually with the unit trust manager/investment company itself. For certain types of investment (for example, shares in private companies) there may be no formal venue.

We select the venue we consider the most appropriate for the order taking account of the execution factors. In relation to some financial instruments there may be only one possible execution venue. Where we execute an order on your behalf in such circumstances it will be assumed that we have achieved best execution.

We reserve the right to use other execution venues where we deem it appropriate to do so in accordance with our full execution policy and we can add or remove execution venues from the list. An updated list of execution venues will be made available if requested. We will not notify you separately of any particular changes to venues.

Consent

We are required to obtain your prior consent to our order execution policy. You will be deemed to provide such consent when you instruct us to act on your behalf in relation to an order.

If you are a discretionary management client, we will assume that you consent to our order execution policy. However, in order to provide our full range of services to you we must obtain your express consent to certain matters and the services we can provide may be affected if you do not sign and return the Agreement with which you have been provided.

We may on occasions execute orders outside an EU regulated market or a multilateral trading facility. Whilst we anticipate that orders will not generally be executed outside an EU regulated market or a multilateral trading facility, there may be circumstances in which it is in your best interests to do so. For example, this could occur where we deal as principal or where we execute your order on a non-European market. This is one of the matters in respect of which your express consent is required.

LIST OF VENUES

London Stock Exchange
Multilateral Trading Facilities
Systematic Internalisers
Any other appropriate UK and International Venues

BONDS

Canaccord
HSBC
Investec
Lloyds
Morgan Stanley
Peel Hunt
RBC
RBS
Winterflood

DERIVATIVES

Monument Securities
ADM

MiFID II will change the high level obligations as set out in MiFID I in relation to Best Execution and these changes are:-

1. Trading Venues:

The definitions of 'trading venues' will include the new MiFID II concept of an Organised Trading Facilities (OTFs). An OTF is a multilateral system whereby multiple third-party buying and selling interests in bonds, structured finance products, emission allowances or derivatives are able to interact in a way that results in a contract. Thus the introduction of OTFs means that many transactions currently categorised off venue will come within a multilateral

trading environment. Equities are not permitted to be traded through an OTF. Thus the scope of the definitions is intended to ensure that more trading is regulated by MiFID II. We may trade on an OTF.

2. **Sufficient Steps:**

Currently under MiFID I we as a firm need to “take all reasonable steps to obtain the best possible result for clients when executing a client order”.

Under MiFID II this requirement will be changed to take “all sufficient steps” to obtain the best result.

3. **Best possible result in terms of total consideration:**

In relation to executing orders on behalf of retail clients the best possible result should be determined in terms of the total consideration representing the price of the financial instrument and the costs relating to the execution.

4. **Best Execution:**

The total consideration relating to a financial transaction consists of Fiske’s costs together with any statutory charges.

5. **Top Five Execution Venues:**

Fiske will be required to publish annually for each class of financial instrument the top five venues in terms of trading volumes where Fiske executed client orders in the preceding year and information on the quality of execution obtained. Such information will be published on Fiske’s website (www.fiskeplc.com).

The information to be provided will include:-

- a) The class of financial instruments and venue name;
- b) Percentage volume and number of client orders executed at that venue;

- c) Percentage of the client orders that were passive, aggressive or directed orders;
- d) Confirmation as to whether Fiske has executed an average of less than one trade per business day in the previous year in that class of financial instrument.

6. **Further Requirements:**

Fiske will need to provide a summary analysis for each class of instrument drawn from monitoring the execution of client orders in the previous year. Topics covered should be the relevant importance given by Fiske to execution factors and a description of any specific arrangements with execution venues.

Information should be published on quality of execution obtained on all venues for each class of financial instrument where Fiske executed client orders during the year.

Information on how the execution factors of costs, speed, likelihood of execution and other factors are considered.

How Venue Selection Occurs

A summary of procedures and processes used to analyse execution quality;

A summary of how Fiske monitors and verifies Best Execution.

