

SS&C Hubwise Order Execution Policy

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Contents

1.	Introduction	4
1.1	Client’s Consent.....	Error! Bookmark not defined.
2.	Scope	5
2.1	Client Classification	5
3.	Execution Factors.....	6
3.1	The Factors.....	6
3.2	Prioritisation of Execution Factors.....	6
3.3	Best Possible Result	7
3.4	Handling Client-Specific Instructions	7
4.	Executing Clients’ Orders	8
4.1	Regulatory Permissions	8
4.1	Execution Venues.....	8
4.2	Execution Methodology.....	8
4.3	Approved Financial Instruments	9
5.	Order Management and Handling	11
4.1	Aggregation and Allocation	11
4.2	Cross Trades.....	11
6.	Monitoring and Review of Our Execution Policy.....	12
7.	Glossary.....	13
8.	Formalities	Error! Bookmark not defined.
9.	Version Control	Error! Bookmark not defined.
	Appendix 1: Execution Venues.....	15

1. Introduction

Hubwise Securities Limited (SS&C Hubwise) are required by the FCA to establish and implement an Order Execution Policy and to provide our clients with appropriate information regarding how we take all sufficient steps to obtain the best possible outcome on the execution of client orders.

We execute orders on behalf of our clients as part of the platform services we provide. Client orders are received from our FCA-regulated clients who are typically Independent Financial Advisors (IFAs) and Discretionary Fund Managers (DFMs).

This policy applies to all orders received from, and executed on behalf of, our clients. It must be read in conjunction with our terms and conditions and our Conflict of Interests Policy.

1.1 Client's Consent

We are required to obtain your prior consent to our Order Execution Policy. We will deem you to have given consent where you have completed and submitted a Client Agreement. You will be given notice of any material changes to the Policy and, if you continue to use our services after that period you will be deemed to have consented to the change of policy.

2. *Scope*

This Policy is based on SS&C Hubwise's obligation to comply with the FCA best execution requirements as stated in the FCA handbook under COBS 11.2A. We have in place policies and procedures which are designed to allow us to meet our regulatory obligation to take all sufficient steps to obtain the best possible result when executing clients' orders.

When executing or routing an order on your behalf, we will take into account the following criteria to help us determine the relative importance of the execution factors:

- the characteristics of your order, and the security that is the subject of that order; and
- the execution venues to which your order can be directed.

Our commitment 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.

2.1 *Client Classification*

You will be treated as a retail client for the purposes of best execution, regardless of whether you are classified as a retail or professional client. Treating all clients as retail clients provides the greatest level of protection to our clients under the Financial Conduct Authority (FCA) rules and regulations. SS&C Hubwise will always aim to achieve best execution when carrying out transactions on your behalf.

3. Execution Factors

3.1 The Factors

To determine how to achieve the best possible result when dealing with your order, while taking all sufficient steps, we take into account a combination of execution factors:

- **Total consideration** – This is the primary factor that will be taken into account when we endeavour to achieve the best possible result. This is made up of the price of the financial instrument plus any costs related to execution of the order, including all expenses incurred. To ensure that the total consideration of the order leads to the best overall outcome for you, the order may be executed at an instrument price less favorable than the best available, where the costs of executing the transaction would result in client detriment.
 - **Price** – For most frequently traded (liquid) financial instruments, market price will be the overriding factor in attaining best execution. We always endeavour to achieve the most advantageous (best) price available when executing client orders and this will be the case for the majority of orders where the size of the order does not limit Hubwise’s choice of venue. However, in some circumstances, dependent on factors such as the type of financial instrument or size of order, other execution factors may become more important than price in obtaining the best possible execution result.
 - **Costs of the transaction** – To assess which venue to execute an order on, we will take into account any charges that may be passed on to you. This includes any explicit costs (such as exchange fees, overseas brokerage commissions and settlement/custody costs). It is our policy that our commission and charging structure will not influence either the selection of execution venue or the order flow that follows as a result of the execution process. We will therefore not discriminate between the execution venues we use to execute your orders.
- **Speed of execution** – For liquid securities, price volatility may mean that the timeliness of execution is considered a higher priority, as any delays in execution may be detrimental to the price attained.
- **Likelihood of execution and/or settlement** – For securities that have low liquidity, and in the absence of multiple execution venues offering competing prices, the ability to execute may itself constitute best execution. We execute the vast majority of client orders ‘on exchange’ which helps to reduce settlement risk.
- **Size, nature and complexity of the order** – The price displayed by execution venues is for a particular order size. Orders that are, for example, considered large relative to this normal market size, or are for less liquid securities, may result in a price being attained that differs to the price initially displayed.
- **Any other considerations** – It may be necessary to take into account several other factors such as the quality and efficiency of the settlement process post-execution, financial status, responsibility and solvency of the counterparty, and the market impact of the transaction.

3.2 Prioritisation of Execution Factors

We prioritise total consideration (price and transaction costs) as the primary criterion to obtain the best possible result for you. Consideration is also given to other factors, where appropriate, such as timing, speed of execution and liquidity, particularly for non-UK equities, large transactions, or trades in illiquid securities.

We will determine the relative importance of these execution factors by using our industry experience, expertise, and judgement in light of available market information, with the prime aim of prompt, fair and expeditious execution of trades. This approach applies to all types of financial instruments dealt.

3.3 *Limit Orders/Types of Orders*

SS&C Hubwise only accepts limit orders in respect to structured product trades. We do not accept stop-loss instructions nor limit orders for any other financial instrument type.

3.4 *Best Possible Result*

SS&C Hubwise will endeavour to achieve the best possible result based on the factors noted above. The overarching requirement to take all sufficient steps to achieve 'best execution' does not mean that we must obtain the best possible results for our clients on every single occasion. Rather, we need to verify that, on a consistent and ongoing basis, our execution arrangements work well throughout the various stages of the order execution process. If any deficiencies are identified, appropriate remedial action will be taken to promptly rectify them.

3.5 *Handling Client-Specific Instructions*

On occasion we may transmit orders for execution in accordance with express instructions from clients, although it should be noted that this is not standard practice.

It is important that you are aware that if you provide us with a specific instruction, this may prevent us from taking the steps which have been designed and implemented in this Policy to help obtain the best possible outcome for your orders in respect of those elements covered by your instructions. Giving us specific instructions may therefore adversely impact the execution outcome you receive.

In following your instructions, we will be deemed to have taken all sufficient steps to provide the best possible outcome in respect of the order, or the element relating to the aspect covered by the specific instruction. We will follow our best execution obligations in respect of any parts or aspects of your order that are not covered by such instructions.

4. Executing Clients' Orders

4.1 Regulatory Permissions

We hold FCA permission to deal in investments as agent and therefore we will execute all your orders in our capacity as agent. In executing clients' orders, we will apply a range of criteria when determining which counterparties we deal with, including the overall level of service delivered. We do not hold ourselves out as trading as 'Principal' and do not support securities financing transactions (SFTs).

We predominately operate as a business-to-business (B2B) platform, and trading instructions are received directly from our FCA-regulated client adviser firms, or FCA-regulated discretionary fund managers (DFMs) via our portal. For our direct-to-client (D2C) offering, once the preferred model has been selected, trading instructions are automatically generated within the client portal and handled via STP.

4.1 Execution Venues

We have access to a range of execution venues either directly, or via approved counterparties, in order to facilitate best execution. In taking all sufficient steps to obtain, on a consistent basis, the best possible result for you, we will execute your orders on an agency basis using one, or a combination of, the following:

- Regulated Markets (RM) such as the London Stock Exchange (LSE)
- Multilateral Trading Facilities (MTF)
- Retail Service Provider (RSP) networks

4.1.1 Selection Criteria

In selecting our range of counterparties, we consider several factors to determine the appropriate counterparties for each asset class and instrument type. These include, but are not limited to, the following:

- the asset coverage and liquidity provided by these counterparties,
- the various costs, exchange fees and any other ancillary charges that may be incurred,
- the extent of services that may be provided to enable us to meet our obligations to our clients, and
- market reputation and any matters arising from our due diligence process.

4.2 Execution Methodology

Once a trade instruction is received, our electronic order management system routes the order using an algorithm that is based upon the type of financial instrument and whether it is UK or non-UK listed. Wherever possible we aim for instructions to be processed STP – either via an RSP or DMA (Direct Market Access).

Our electronic order management system is connected to a range of internally approved Market Makers that utilise the Retail Service Provider (RSP) network – a request-for-quote (RFQ) system. SS&C Hubwise uses NBTrader as our RSP which is connected to 9 different Market Makers, as outlined in *Appendix 1: Execution Venues*.

Client orders are transmitted via the RSP and requesting a quote simultaneously retrieves quotes from our selected providers and returns the best available quote based on the number or value of shares requested. The RSP holds these quotes for 30 seconds before they expire. Not all our approved Market Makers will always return a quote, and RSPs can alter the quantities in which they are prepared to deal without notice, and quotes can be cancelled at any time. It may therefore not always be possible to obtain a quote using this method.

If the security is not available via the RSP network or a quote is not obtained, such orders may then be executed via DMA.

SS&C Hubwise utilises two counterparties for DMA: Stifel Nicolaus Europe Limited (UK listed financial instruments) and Winterfloods Business Services (predominately non-UK listed financial instruments).

For orders in overseas securities, wherever possible we will use a UK-based entity that quotes and executes securities in Sterling (GBP) as the speed of execution may be more advantageous than price.

Where it has not been possible to execute the trading instruction by the relevant market close on the day of receipt, for example due to insufficient liquidity, then attempts will be made to do so on the following day. Any difficulties experienced in executing the trade instruction will be communicated to you .

4.3 *Approved Financial Instruments*

The following types of financial instrument are supported for execution in relation to client orders but whether these are available is dependent on the service offering of each client firm:

- Equities (UK and Overseas/International)
- Investment Trusts
- Exchange Traded Products (ETFs/ETNs)
- Debt Instruments (Government Bonds / Corporate Bonds)
- Structured Products
- Collective Investment Undertakings (eg OEICs, Unit Trusts; UK domiciled and offshore)

4.3.1 *UK Equities (including Investment Trusts)*

For securities available via the RSP network, all UK trades will be routed electronically via the RSP in the first instance. This is subject to limits both in monetary value and normal market size (NMS) relative to their market listing. These limits are in place to ensure the order is appropriate for an RSP and to ensure minimum market impact. As RSPs can alter the quantities that they are prepared to deal without notice, and quotes can be cancelled at any time it may not always be possible to obtain a quote using this method.

If the security is not available via the RSP network, a quote is not obtained, or it has been moved into an exceptions queue we will send the order via the Direct Market Access (DMA) route. For UK equities (including investment trusts) orders will always be sent to Stifel Nicolaus in the first instance. Where Stifel Nicolaus is unable to complete the transaction, the order will then be sent to Winterfloods Business Services.

4.3.2 *Overseas/International Equities*

For orders in overseas securities, wherever possible we will use a UK-based entity which quotes and executes securities in Sterling (GBP) as the speed of execution may be more advantageous than price. We send orders in overseas equities to Winterfloods Business Services in their role as DMA for execution.

4.3.3 *Exchange Traded Products (ETFs and ETNs)*

Wherever possible all transactions in Exchanged Traded Products (ETPs) will be routed electronically via the RSP in the first instance. This is subject to limits in monetary value and NMS relative to their market listing and whether the financial instrument is able to be traded via the RSP.

If the security is not available via the RSP network or a quote is not obtained, we will send the order via DMA. As with UK equities, ETP orders will always be sent to Stifel Nicolaus in the first instance. Where Stifel Nicolaus is unable to complete the transaction, the order will then be sent to Winterfloods Business Services.

4.3.4 *Debt Instruments (including Government and Corporate Bonds)*

Client orders relating to debt instruments will be routed electronically via the RSP wherever available. If the security is not available for trading via the RSP network, orders are passed to either Stifel Nicolaus or Winterfloods Business Services.

4.3.5 Structured Products

Due to the nature of this type of financial instrument, structured product trading takes place directly with the issuer or their appointed dealer. The Product Provider is often the sole execution venue for that product.

4.3.6 Collective Investment Undertakings (including OEICS and Unit Trusts – domiciled in the UK and Offshore)

Transactions in collective investment undertakings are not in-scope for best execution as there is only a single price available for such financial instruments. The price of the fund is based on the value of the underlying assets and calculated at a set cut-off point each day. We utilise EMX, Calastone and Allfunds to execute fund instructions STP, to minimise manual execution.

5. *Order Management and Handling*

To fulfill our regulatory obligations, we ensure that your order is:

- handled in a way which provides for prompt, fair and expeditious execution;
- accurately recorded and allocated; and
- executed sequentially, unless the characteristics of the order or prevailing market conditions make this impractical, or your interests require otherwise

You will be promptly notified about any material difficulties in being able to carry out a trade instruction.

Once we receive your order, we will execute it as soon as reasonably possible in line with this policy, unless we believe that postponing your order is in your best interests.

Trade instructions are placed and executed at regular intervals throughout the day. For UK markets trading takes place at 30 minute intervals from 08:30 through to market close. For transactions in other jurisdictions, trading commences at the market open for the relevant exchange and then takes place at 30 minute intervals until market close.

5.1 *Aggregation and Allocation*

Orders are aggregated based upon client orders received between each 30 minute trading cycle. Any instructions received after the market close of the relevant market will be aggregated and dealt when the appropriate market opens.

Comparable orders are, in general, generated simultaneously and executed in blocks based around the 30 minute intervals in our trading cycle. These are then allocated to clients fairly and proportionately, as determined by the size of the constituent orders. Any balance will continue to be executed based on the remaining aggregated orders.

5.2 *Cross Trades*

In the event that you wish to execute opposing (ie buy/sell) transactions of the same quantity in the same security our standard policy will be to execute these transactions in the market at the minimum possible cost and with the constant principle that the price achieved will be as fair as possible to each participant in the transaction. This ensures that the transactions are executed at arm's length and with appropriate price discovery and transparency.

6. Monitoring and Review of Our Order Execution Policy

Counterparties are reviewed on at least an annual basis to determine whether existing venues continue to provide the best possible result for you. This helps ensure we have sufficient relationships and coverage across all asset classes to provide best execution and could lead to the addition of further counterparties. Conversely, action could be taken which results in the suspension of an execution venue by us, for example where a Market Maker consistently fails to return quotes via the RSP. In carrying out this assessment, use will be made of our internal monitoring and due diligence findings, as well as applicable execution quality data reported by our execution venues and data provided by ISS LiquidMetrix.

Monitoring of client deals is undertaken on a regular basis to ensure that best execution is being achieved on a consistent and ongoing basis. Hubwise utilises the ISS LiquidMetrix TCA/Best Execution service to demonstrate best execution is being achieved.

Additionally, this policy is reviewed when there is a material change to our arrangements or regulations. Any amendments to this policy as the result of a material change will be notified to our clients, and the most recent version of our Order Execution Policy will be available under the Disclosures section on the website: <https://www.ssctech.com/about/disclosures>.

7. Glossary

Average Daily Volume (ADV): The ADV is the amount an individual security is traded in a day on average over a specified period of time. Trading activity relates to the liquidity of a security. When average daily trading volume is high, the stock can be easily traded and has high liquidity.

Bid/Offer Spread: A bid/offer spread, which may also be referred to as the bid/ask spread, is the amount by which the purchase (offer) price exceeds the bid (sale or ask) price for a security in the market. The bid/offer spread is essentially the difference between the highest price that a buyer is willing to pay for a security and the lowest price that a seller is willing to accept to sell it.

Client: A user of the Hubwise platform, subject to the existing Hubwise Terms and Conditions, forming a contractual agreement between Hubwise and the user. This may be an individual or corporate entity.

Client Order: A transaction instruction to buy or sell one or more financial instruments on behalf of, or at the request of a client.

Direct Market Access (DMA): Electronic trading facilities that provide a way to interact with the order book of an exchange, such as that of the London Stock Exchange.

FCA: Financial Conduct Authority

Liquidity: The measure of how easy it is to trade in securities. For example, a security which trades a couple of times a week would be described as having low liquidity.

Market Maker: Another regulated firm which is obliged to continually make two-way prices for the securities in which they are registered to make markets.

Multilateral Trading Facility (MTF): A system operated by an investment firm or market operator which brings together multiple third-party buyers and sellers in financial instruments and which is subject to a strict set of rules. Such instruments may include shares, bonds and derivatives.

Normal Market Size (NMS): The maximum number of shares in a listed company that can be traded in a single transaction at the price quoted by the market maker. The normal market size is normally set at 2.5% of the total volume of shares for a given company. This stops very large trades from affecting the share price as market makers are not obliged to provide quotes for transactions which fall outside of the normal market size.

Order: An instruction to buy or sell a financial instrument which is accepted by Hubwise for execution or transmission to a third party and which gives rise to contractual or agency obligations to Clients.

Regulated Market or Regulated Investment Exchange (RIE): A multilateral facility operated by a market operator in the EEA, such as the London Stock Exchange, that brings together multiple third parties buying and selling interests in financial instruments where the instruments traded are admitted to the market, according to its rules and systems.

Retail Service Provider (RSP): Automated platforms that utilise market counterparties that have access to Regulated Markets (RMs) and Multilateral Trading Facilities (MTFs).

Total Consideration: This is determined by the price of the security and the costs related to execution, including all expenses incurred that are directly related. Examples include venue charges, clearing and settlement charges, and charges paid to third parties.

Appendix 1: Execution Venues

Current Execution Venues

Outlined below are the execution venues on which we place significant reliance. Other counterparties may be used as deemed appropriate.

These are the venues and counterparties upon which we place reliance as referred to in the Order Execution Policy. Please note that this list of Execution Venues and Counterparties is not exhaustive but comprises of those on which we place significant reliance. This list will be reviewed and updated in line with our Order Execution Policy.

We reserve the right to use other execution venues additional to those listed here where we deem it appropriate in accordance with our Order Execution Policy and to remove any execution venues from the list.

Execution Venues

We utilise the London Stock Exchange (LSE) via Winterflood Business Service as Direct Market Access (DMA) and Hubwise Securities LSE membership for transactions in equities, exchange traded products and debt instruments.

RSP Counterparties

We use NBTrader as our appointed RSP and is connected to 9 different Market Makers. RSP trading applies to transactions in equities, exchange traded products and debt instruments. RSP counterparties are as follows:

- **Jefferies International Limited** – Exchange Traded Products, Equities
- **Numis Securities Limited** – Equities, Investment Trusts,
- **Peel Hunt LLP** - Equities, Investment Trusts, Fixed Income, Exchange Traded Products
- **RBC Europe Limited** - Exchange Traded Products
- **Shore Capital Stockbrokers Limited** – Equities, AIM
- **Singer Capital Markets Limited** - Equities, AIM, Investment Trusts
- **Stifel Nicolaus Europe Limited** – Equities, Investment Trusts
- **Virtu** - - Equities, Exchange Traded Products, Fixed income, Investment Trusts
- **Winterflood Securities Limited** - Equities, Exchange Traded Products, Fixed income, Investment Trusts

DMA Provider

We have appointed Stifel Nicolaus Europe Limited and Winterflood Business Services as our DMA providers.

Other Counterparties

For transactions in Collective Investment Undertakings (including OEICS and Unit Trusts – domiciled in the UK and Offshore) we utilise the STP solutions provided by Calastone and EMX wherever possible. In the event STP is not available, we use AllFunds.