

APPENDIX 2: INFORMATION ABOUT DAVY UK'S ORDER EXECUTION POLICY

This is a summary of our Order Execution Policy ('Policy'). You should be aware that by giving us orders to transmit or place with other entities for execution on the basis of this Order Execution Policy, you are consenting to having your orders transmitted or placed with other entities for execution as set out in the policy.

OVERVIEW

Under the EU Markets in Financial Instruments Directive 2014/65 EU ('MiFID II'), as implemented by the rules of the Financial Conduct Authority, Davy UK is required to have an order execution policy in place which describes its approach to taking all sufficient steps to obtain on a consistent basis the best possible result for its Retail Clients when it transmits or places their orders with other entities for execution. The purpose of this document is to provide Retail Clients with information on our Policy.

WHAT IS MEANT BY 'BEST EXECUTION'?

Best execution is a term used to describe the regulatory obligation to ensure that we take all sufficient steps to obtain on a consistent basis the best possible result for our Clients when passing orders to third parties to be executed, and applies whenever we transmit or place an order with another entity for execution. While we will take all sufficient steps to achieve the best possible result for you on a consistent basis, we cannot guarantee that we will achieve the best possible result for each and every trade. The criteria we typically take into account to ensure we achieve the best possible result for you on a consistent basis are described in this summary of our Policy.

Our Policy is subject to:

- any specific instructions that you give to us e.g. an instruction to execute subject to a specified price limit ('Limit Order');
- the nature of your order (e.g. large orders relative to the normal trading volume of the financial instrument); and
- the nature of the markets and financial instruments (e.g. whether there are buyers and sellers in the market for the financial instrument).

BEST EXECUTION OBLIGATION

As stated above, Davy UK owes a duty of best execution when transmitting or placing orders on a Client's behalf.

The following factors will be taken into consideration by Davy UK in determining how to obtain the best possible result for your order:

- price of the financial instrument;
- costs and expenses related to execution;
- the size of the order;
- likelihood of execution and settlement;
- speed of execution;
- nature of the order;
- any other consideration that is relevant to the execution of your order.

As this policy applies to Retail Clients the best possible result for a Client will be determined in terms of the total consideration of a trade, representing the price of the financial instruments and all costs and expenses relating to execution (such as execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order). In some circumstances, Davy UK may use its discretion to place a higher importance on the other factors referred to above. In general, the ranking of the relevant importance of such factors is listed in this order, but may vary on a case-by-case basis as Davy UK will also take the following criteria into account:

- your categorisation as a Retail Client;
- the characteristics of your order;
- the characteristics of the financial instrument(s) that are the subject of that order; and
- the characteristics of the execution venues to which the order can be directed.

ORDER TRANSMISSION

Davy UK currently places orders with the Custodian for onward transmission to an executing broker. However, from time to time, Davy UK may place orders with a third party other than the Custodian for onward transmission to an executing broker.

When Davy UK places orders with a third party, such as the Custodian, for onward transmission to an executing broker, Davy UK will satisfy itself that the third party has arrangements in place to enable Davy UK to comply with its obligation to act in your best interests.

ORDER EXECUTION

Davy UK currently uses a single third party broker for execution of all Client order under this Agreement. However, from time to time, Davy UK may use other third party brokers for execution in order to obtain the best possible result for you on a consistent basis. Such third party brokers will be selected in line with the Policy, and details of these can be provided on request.

Where Davy UK uses a third party broker for execution, Davy UK will satisfy itself that the third party broker has arrangements in place to enable Davy UK to comply with its obligation to act in your best interests.

By entering into this Agreement you explicitly consent to your orders being executed outside of a regulated market, MTF or OTF.

SPECIFIC CLIENT INSTRUCTIONS

When you provide us with specific instructions in relation to your order, we will endeavour to ensure that the order is executed in line with those instructions. However, please note that instructions provided by you may prevent us from following some or all of the steps of our Policy, which has been designed to obtain the best possible result for Clients when passing orders to the Custodian for execution. You provide specific instructions that relate to only part of the order, our Policy will be applied to those aspects of the order that are not covered by the instruction.

If you instruct us to transmit your order as a market order, we may provide you with the current market price. However, Davy UK cannot guarantee that the price quoted will be the price secured by J&E Davy or third party broker when they execute your order. Davy UK will not be liable for any direct or indirect losses incurred as a result of market movements between a market price quoted to you and that secured by J&E Davy or third party broker.

REVIEWING AND MONITORING OF THE POLICY

We will monitor the effectiveness of our Policy on an ongoing basis to ensure that it consistently achieves the best possible result for our Clients and to identify whether more favourable results could consistently be achieved by transmitting or placing orders with other entities for execution. Monitoring will be achieved through a regular review of trading analytics and execution data. A summary of Davy UK's review of execution quality is available on www.davy.ie/legal. Where deficiencies are identified, we will take appropriate measures and effect suitable changes to our Policy to address such deficiencies.

We will carry out an overall review of our Policy on an annual basis or more frequently where a material change occurs. As part of the review process we will consider whether we need to make any changes to our Policy. We will notify you in the event that we make a material change to the Policy by posting an updated version of this summary on our website at www.davy.ie/legal.

STAFF UNDERSTANDING AND TRAINING

All relevant staff are made aware of the Policy and given appropriate training to highlight and emphasise the importance of best execution.