

# Summary of Davy UK's Best Execution Policy

## Overview

J&E Davy (UK) Limited (“**Davy UK**”) must act in the best interests of our clients when placing orders with, or transmitting orders to, J & E Davy Unlimited Company “the **Custodian**” or third party/platform providers for execution (the “**Best Execution**” obligations). We are required to take all sufficient steps to obtain the best possible results for our clients when placing or transmitting orders, taking into account the execution factors listed below.

This Policy applies to orders in financial instruments such as funds and other investment types, as further explained in the Agreement. You provide your consent to the execution of your orders in accordance with the Policy by accepting the terms and conditions as issued to you. You should read this Policy in conjunction with the Agreement.

We have designed this Policy to enable us to meet our regulatory obligations and to provide Best Execution to you. If you give us a specific instruction in respect of an order (for example, if you require us to place an order for execution with a particular third-party), this may prevent us from taking steps we have designed and implemented to obtain the best possible result for you. In such circumstances, we will comply with our regulatory obligations by following your specific instructions in respect of the order as a whole, or, where your instructions only relate to a specific aspect of the order, in respect of that aspect of the order.

## Client Categorisation

Unless we tell you otherwise in writing, our Services are provided to you on the basis that you are a Retail Client. This means that you are afforded the greatest level of protection available under the FCA Rules. This policy sets out the steps that we take to achieve best execution for Retail Clients. You are entitled to make reasonable and proportionate requests for further information.

## Scope

The Policy applies to Client orders in all Securities as well as any other financial instruments, which may be executed on your behalf from time to time.

## Best Execution

Davy UK has a regulatory obligation to take all sufficient steps to obtain, on a consistent basis, the best possible result for Clients applies whenever Davy UK places an order with, or transmits an order to, the Custodian or a third-party for execution. Davy UK will consider the following:

- Our arrangements with third parties, which include their arrangements to deliver best execution to you
- Your characteristics (including your regulatory client classification)
- The characteristics of the financial instrument concerned and of your order
- The execution venues we could use to carry out your order (i.e. – to which firms/entities we could transmit your order).

While Davy UK will take all sufficient steps to achieve the best possible result for Clients on a consistent basis, it cannot be guaranteed that best execution is achieved for each trade.

The Policy is subject to:

- Any specific instructions that you give to Davy UK (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).

## Davy UK's Best Execution Obligation

In choosing to place or transmit orders to the Custodian or third-party, Davy UK has satisfied itself that the Custodian or third-party has arrangements in place to enable Davy UK to meet the best execution obligations that it owes to its clients. Any third party to whom Davy UK transmits orders will be directly responsible to you for meeting its best execution obligations.

If you instruct us to place or 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 the Custodian 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 the Custodian or third-party broker.

## Execution Factors

Davy UK will also make every effort to ensure the best possible result for you considering the following factors to the extent that they are relevant:

- 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; and
- Any other consideration that is relevant to the execution of your order.

If you are a Retail Client, except where you provide us with specific instructions as to the execution of your order, the best possible result will generally be determined in terms of the total consideration of a trade. In this context, the "total consideration" means the price of the relevant financial instrument and all costs and expenses relating to execution of your order (such as execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order).

## Executing Your Order

Where you hold a Davy Portfolio, Davy UK will usually place your orders with, or transmit your orders to, the Custodian for execution. Where this is the case, we will rely on the Custodian to obtain the best execution possible based on the brokers/entities to which it ultimately passes the order for execution. In arranging for the execution of your order, the Custodian may:

- use a third-party broker or platform to execute your order
- trade as an agent (where our scope of regulatory permissions allow us to do so); or
- place the order directly with a fund manager.

## Execution Venues

In order to meet the obligation to obtain the best possible result for the execution of client orders, the Custodian may use one of the following types of venues:

- Regulated Markets<sup>1</sup>; such as London Stock Exchange, Euronext Dublin
- Multilateral Trading Facilities ('MFT')<sup>2</sup>; such as AssetMatch
- Organised Trading Facilities ('OTF')<sup>3</sup>
- The Custodian is registered as a market maker<sup>4</sup> on Euronext Dublin and as a primary dealer in Irish government bonds. When entering into a transaction for you, Davy may be dealing as principal for its own account by selling the financial instrument concerned to you or buying it from you
- Other market makers, third party brokers or other liquidity providers
- Non-EU entities performing a similar function to the above

Collectively, executing on a Regulated Market, MTF or OTF is referred to as executing or trading on a trading venue.

Where there is more than one competing execution venue the Custodian considers its own commissions and also the costs for executing the order on each of the eligible execution venues. The Custodian does not structure or charge its commissions in such a way as to discriminate unfairly between execution venues. For certain types of financial instruments, there may be only one execution venue available to the Custodian.

For some orders, the Custodian may determine the best result is achieved by executing outside a trading venue. Such trades are not afforded the same protections as trades executed on a trading venue, which are subject to rules and regulations governing execution and settlement. This increases counterparty risk.

The Custodian may place your order with another broker or dealer for execution. In such cases, the Custodian will satisfy itself that the broker or dealer has arrangements in place to enable us to meet our best execution obligations to you.

A full list of execution venues and third-party executing firms used by our Custodian for each class of financial instrument in respect of which the Custodian executes orders on behalf of clients or places or transmits orders to other entities for execution is available at [www.davy.ie/legal](http://www.davy.ie/legal).

## Client Specific Instructions

When you provide specific instructions in relation to your order, Davy UK will endeavour to ensure that the order is executed in line with those instructions, but we are not obliged to do so. Please note that instructions provided by you may prevent Davy UK from following some or all of the steps of our Policy, which has been designed to obtain the best possible result for clients when placing or transmitting orders for execution. Where a client provides specific instructions that relate to only part of the order, this Policy will be applied to the extent possible to those aspects of the order that are not covered by the instruction.

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<sup>1</sup> Regulated market – is a marketplace, trading system or exchange which meets the minimum EU standards set out in title III of the MiFID Regulations.

<sup>2</sup> Multilateral Trading Facility (MTF) – is, in broad terms, a system that brings together multiple parties (e.g. retail investors or other investment firms) that are interested in buying and selling financial instruments and enables them to do so. These systems can be crossing networks or matching engines that are operated by an investment firm or a market operator.

<sup>3</sup> Organised Trading Facility (OTF) – is a multilateral system that is not a regulated market or MTF bringing together multiple third party buying and selling interests in financial instruments in a way that results in a contract or transaction.

<sup>4</sup> Market Maker: is a firm that buys and sells a particular financial instrument on a regular and continuous basis by posting or executing orders at a publicly quoted price. This is to enhance liquidity in that particular financial instrument. It may also include a firm engaging in algorithmic trading that is pursuing a market making strategy.

## **Charges**

It is Davy UK's policy that its remuneration structure will not influence either the selection of execution venues, or the order flow that follows as a result of the execution process.

## **Monitoring and Review of our Policy**

We will periodically monitor the effectiveness of our Policy to identify and, where appropriate, correct any deficiencies. This will cover the execution quality of any third parties referred to in the Policy. When we make a material change to our Policy, we will notify you.

This review will be carried out periodically or whenever a material change occurs that affects our ability to continue to obtain the best possible result for our clients.

## **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.