



**Architas Multi-Manager
Limited (“Architas”)**

Order Execution Policy

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1. Introduction

This Order Execution Policy applies to Architas Multi-Manager Limited (“Architas”, “we”). It covers all deals and all financial instruments where we execute a decision to deal on behalf of our clients directly with an execution venue and also where we place or transmit an order to other entities for execution. It excludes orders for mandates delegated to third party investment managers. In these circumstances the third party’s order execution policy will apply.

Third party managers are responsible for ensuring best execution within the portion of assets under their control and for maintaining their own order execution policies. These requirements form part of the investment management agreement between the manager and Architas and are subject to periodic monitoring activities.

We are required to act in the best interests of our clients, including the funds we manage, when directly executing decisions or orders to deal on their behalf or by transmitting such orders to third parties.

Therefore we must:

- take all reasonable steps to obtain on a consistent basis **the best possible result for our clients** (including for the funds we manage) when executing orders, subject to and taking into account any specific instructions a client may give and the execution factors detailed in section 2 below; and
- comply with the obligation to **act in accordance with the best interests of our clients** when placing orders with other entities for execution that result from our decisions to deal in financial instruments on behalf of our clients (including the funds we manage), subject to and taking into account any specific instructions a client may give. (The ‘best execution’ obligations).

Under the FCA regulations, we are required to establish and implement effective arrangements for complying with the obligation to ‘take all reasonable steps to obtain the best possible result for our clients when executing orders’ and when placing orders with other entities for execution.

In particular, Architas must establish and implement a policy to allow us to obtain, for clients’ orders, the best possible result in accordance with both these obligations. This document constitutes our Order Execution Policy. We are also required to provide our clients with appropriate information on our order execution policy and to obtain certain consents; in particular we must obtain any client’s express consent before executing an order outside of a regulated market or a Multilateral Trading Facility.

The obligation to provide best execution applies to all financial instruments. However, given the difference in market structures or the structure of financial instruments, it is not possible to apply a uniform procedure for achieving best execution. Therefore, we take into account the different circumstances associated with the execution of orders related to particular types of financial instruments.

This Order Execution Policy will be revised annually by Architas Compliance or as the circumstances dictate and presented to the Architas Risk & Operations Committee for review and approval. It is also provided to the Architas Investment Committee for noting.

2. Execution factors

In seeking to give a client best execution, we are required to take into account certain execution factors and decide on their relative importance. Whilst price is likely to be a key execution factor, in seeking the best possible result the following additional factors should also be considered:

- total cost of execution
- speed
- likelihood of execution or settlement
- size of the order
- nature of the order and any other consideration relevant to the efficient execution of the order (including the availability of liquidity and the market impact of the order)

In determining the relative importance of the execution factors, we take into account the following criteria:

- the characteristics of the client including the **categorisation** of the client (currently, Architas is only permitted to provide investment management to professional clients, namely collective investment schemes and institutional clients);
- the characteristics of the **client order** (e.g. type of trade)
- the characteristics of **financial instruments** that are the subject of that order (e.g. the asset class)
- the way the instrument is traded
- the characteristics of the **execution venues** to which that order can be directed (e.g. the particular market, country or region)
- the objectives, investment policy and risks specific to the funds managed by Architas, as indicated in their prospectus or in their constituting instrument

We can only pass an order to a counterparty which:

1. is subject to the obligation to take all reasonable steps to obtain the best possible result for its clients taking into account the execution factors; and
2. has established and implemented an order execution policy to enable it to comply with this obligation in accordance with all regulatory requirements and if passing this order is consistent with our own obligation to obtain the best possible results for our clients (including the funds we manage)

3. Execution venues

An execution venue means a regulated market, a multilateral trading facility (MTF), a systematic internaliser, a market maker or other liquidity provider or an entity that performs a similar function in another country.

A regulated market is an execution venue operated or managed by a market operator, to bring together various third parties who want to buy and sell certain types of investments in line with fixed rules that the market operator establishes.

An MTF is an execution venue, operated by an investment firm or a market operator, which brings together multiple third-party buying and selling interests in financial instruments in accordance with nondiscretionary rules, in a way that results in a contract. MTFs offer an alternative to regulated markets with fewer restrictions as to what investments can be traded on them.

A systematic internaliser is an investment firm, which on an organised, frequent and systematic basis, deals on its own account by executing client orders outside a regulated market or an MTF.

We treat all our clients in a fair manner and utilise the execution venue and methodology we deem most appropriate, based on the above execution factors. When we execute client orders, we will aim to select the execution venue that will deliver the best result. Different execution venues are appropriate for different classes of financial instrument and types of orders.

We will periodically consider appropriate new execution methods, market makers, liquidity providers or networks and compare expected results with those we currently achieve to ensure we offer our clients best execution. We will trade in and/or authorise counterparties to trade outside of a regulated market or MTF only if it is in the best interests of the client and in accordance with our best execution obligation, subject to client consent.

For certain financial instruments, there may only be one execution venue, and in executing an order in such circumstances, we shall presume that we have met our best execution obligation.

4. Specific client instructions

Whenever there is a specific instruction from a client in relation to an order, we will execute the order following the specific instruction and in doing so will have fulfilled our best execution obligation to the client.

Where instructions relate to only part of the order, we will operate in accordance with this Order Execution Policy to those aspects of the order not covered by the specific instruction.

Please note that any specific instructions may prevent us from taking the steps that we have designed and implemented in our policy to obtain the best possible result for the execution of those orders in respect of the elements covered by those instructions.

5. Trading methods

We will consider on a transaction by transaction basis all relevant factors (see section 2 – Execution factors) when choosing both an execution venue and which method of trading to be the most appropriate for our clients' best interests at that time. We may deal with a broker in different ways, both in their capacity as agent and principal. They act as agent when they work orders for us by interacting directly on order books and when they cross stock from other clients and us. They act as principal when we use their capital commitment.

6. Broker selection

With the exception of funds (see section 9.2), Architas does not directly execute client orders, but rather routes the orders resulting from the investment decision process to other financial intermediaries (a broker) for execution.

To help us achieve the best possible result for our clients, we have appointed State Street Global Markets International Limited (“SSGM”) for the provision of both advisory and execution only services under an agency only arrangement. This appointment was made on the basis of their capability to service our clients’ needs in the relevant markets and instruments. Under these arrangements with SSGM, any research which may be received from SSGM is paid for directly by Architas under separate charging arrangements, and not charged to the funds and/or our clients.

SSGM is an investment service provider domiciled in the UK and is authorised and regulated by the Financial Conduct Authority. It has the required permissions for the provision of execution only services, on an agency basis, to us. As an FCA regulated firm, SSGM is required to maintain and comply with its own best execution policy when determining where to execute client orders.

Architas may use different execution counterparties depending on the asset class involved and will consider the factors in section 2 (Execution factors). Neither commission nor turnover targets are set for execution counterparties.

Best execution

When passing orders to our single preferred broker, in the majority of cases, trading will be done on the primary exchange where a security is listed. Other markets may be used, if doing so helps us to obtain the best possible result.

7. Monitoring and review

We will monitor the effectiveness of our execution arrangements and policy in order to identify and, where appropriate correct, any deficiencies. We will assess on a regular basis whether the execution venues included in this Order Execution Policy provide the best possible result for our clients or whether we need to make changes to our execution arrangements.

Where we are passing an order to another entity (SSGM) for execution, we will monitor their execution quality. We will notify our clients of any material changes to this Order Execution Policy.

8. Execution policy

This policy is split into three major asset classes:

- Equities (including closed ended funds such as Investment Trusts);
- Collective investment schemes (including unit trusts, OEICs, exchange traded funds, SICAVs and hedge funds);
- Fixed income (including property index certificates and any related derivatives)

9. Equities and associated instruments

9.1. Best execution criteria

For equities, the method of trade execution and the significance of the execution factors will depend on the particular instrument being traded, the size of the trade and on prevailing market conditions. Some instruments have different characteristics, which necessitate different approaches to trading. Listed collective investment schemes (e.g. exchange traded funds) will be dealt via our preferred broker, SSGM. The choice of execution venue will be influenced by the execution factors and is limited to counterparties approved by Architas (currently only SSGM as described in section 6 – Broker selection) and the client's specific investment restrictions as contained in the investment management agreement or in the prospectus of the funds managed by Architas.

9.2. Funds

Collective investment schemes (CIS), such as regulated funds and hedge funds, can only be executed through the operator of the fund and therefore there is only one venue for execution. However, listed hedge funds will be transacted in accordance with the regular equity execution process, detailed above.

10. Fixed income and associated instruments

10.1. Best execution criteria

Unlike equities, there is no central regulated market. The method of trade execution and the significance of the execution factors will depend on the particular instrument being traded, the size of the trade and prevailing market conditions. The choice of execution venue will be influenced by the execution factors and is limited to counterparties approved by Architas (currently only SSGM as described in section 6 – Broker selection) and the client's specific investment restrictions as contained in the investment management agreements or in the prospectus of the funds managed by Architas.

10.2. Instrument specific variations

Foreign exchange (FX)

Architas will generally execute these trades via the relevant custodian with reference to market rates appropriate for the trade size.

11. Client order handling policy

11.1. General principles

We have established and implemented procedures and arrangements in respect of all the client orders carried out which provide for the prompt, fair and expeditious execution (i) of all client orders, relative to other orders and (ii) of portfolio transactions on behalf of the funds we manage.

Our order handling policy ensures that when carrying out client orders (including portfolio transactions on behalf of the funds we manage):

- orders executed on behalf of clients are promptly and accurately recorded and allocated; and

- otherwise comparable orders are carried out sequentially and promptly unless the characteristics of the order or prevailing market conditions make this impracticable, or the interests of the client require otherwise.

Lastly, we have in place insider trading and personal account dealing procedures aimed at preventing the misuse of information relating to client orders.

11.2. Aggregation of orders

We will only carry out a client order (including an order for one of the funds we manage) in aggregation with another client order (including an order for another fund we manage) if we are satisfied that to do so would not disadvantage either client. The Investment Team are required to record the rationale as to why the aggregation does not cause client detriment. These rationale will be subject to challenge from the Compliance function.

11.3. Allocation policy

For orders across multiple funds where there is a partial execution, allocation is always made on a **pro rata** basis (with respect to the orders placed, not the size of the relevant funds). However, if that results in a holding which, in the relevant fund manager's opinion, is too small to be suitable (for example, it is below minimum market size or would incur disproportionate costs to the client) then the relevant fund may be excluded from the allocation. Allocations which are not pro-rated are agreed by the Chief Investment Officer or their nominated alternate in advance and the rationale is recorded within the order management system at the point of allocation.

12. Delegated investment management

We require third party mandate managers to provide their order execution policy with the contract when they are appointed and annually thereafter. These policies are subject to review by Architas as part of its delegated investment manager oversight. We obtain monthly and quarterly attestation from each investment manager that they have adhered to their policy over the course of the relevant period.

We require each manager to provide us with summary information on all commission payments made by them on our behalf.

When carrying out ongoing monitoring of third party managers we require them to demonstrate how they have adhered to their policy and how they monitor this adherence.

The broker forum is responsible for the oversight of third party managers' order execution compliance.