



Stewart Investors

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# Order Execution Policy

Disclosure Statement

September 2020

## Introduction

The primary service Stewart Investors provides to clients is that of portfolio management. We manage funds and portfolios on behalf of our clients, and in so doing we place orders in various asset classes, primarily equities but also including bonds and money market instruments for liquidity management, currency and collective investment schemes. In carrying out this activity we execute orders on behalf of clients and also transmit or place orders for clients with other entities for execution. These two methods of giving effect to those decisions are distinguished for the purposes of our regulatory requirements, with a separate best execution obligation for each:

### Direct execution

Where we execute a transaction directly with a counterparty or on an exchange or other trading system, we are required to take all sufficient steps to obtain the best possible result for our clients when executing those transactions on their behalf.

### Indirect execution

Where we place an order with a third party (eg a broker) for that third party to execute, we must act in accordance with the best interests of our clients when placing orders with those third parties for execution.

This Disclosure Statement summarises our execution arrangements and the steps we take to meet our obligations to our clients.

Our policy and procedures are designed to obtain the best possible execution result, subject to and taking into account the nature of your orders, the priorities we place upon filling those orders and the market in question, and which in our view provides the best balance across a range of factors, some or all of which may be conflicting.

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## Scope

This Disclosure Statement forms part of our obligations relating to the Markets in Financial Instruments Directive (MiFID) and Chapters 11.2A and 11.2B of the Financial Conduct Authority's Conduct of Business Sourcebook, and sets out our business practices concerning the execution of orders on your behalf.

All references in this document to "we" or "us" are references to Stewart Investors. Where we utilise the services of affiliated companies around the world for execution or order transmission purposes, we will expect them to follow this policy, and for any external brokers and such third parties to treat them as though they were Stewart Investors. The ultimate holding company of Stewart Investors is Mitsubishi UFJ Financial Group Inc.

This Policy applies to business conducted with Professional Clients (as defined under MiFID), and applies in all circumstances except the following:

- Where you provide us with a specific instruction in relation to an entire order, or any particular aspect of an order including selecting to execute using a particular venue or broker, we will execute or transmit the order in accordance with your instructions.
- Where any instruction relates to only part of the order, we will continue to apply this policy to those aspects of the order not covered by the specific instruction. Where you provide us with a specific instruction, this may prevent us from following some or all of the steps in this policy. In following your instructions we will be deemed to have taken all sufficient steps to provide the best possible result in respect of the order covered by your specific instructions.
- Where you give us specific instructions (either for your account in general or in relation to a specific order) requesting your unexecuted limit orders are not made public, you acknowledge that such specific instructions may prevent us from following some or all of the steps in this policy, and that your order may be denied the potential benefits arising from our order allocation and aggregation policies.

## Delivering best execution

When executing orders on your behalf we will take all sufficient steps to achieve “best execution” of your orders. The main factors we will take into consideration include:

- Price;
- Costs;
- Speed of execution;
- Likelihood of execution and settlement;
- The size of the order;
- The nature of the order;
- Prevention of information leakage; and
- Any other considerations relevant to the execution of the order.

The criteria we will use in determining the relative importance of the execution factors listed above include:

- Your characteristics, including your regulatory client categorisation;
- The characteristics and nature of your order, including the broader context of the investment style of the portfolio to which it relates and whether any specific instructions are given;
- The characteristics of the financial instruments that are the subject of your order;
- The characteristics of the execution venues to which your order can be directed.

Regulatory requirements provide that achieving “best execution” does not demand that firms achieve the best possible result with every trade, but that the focus is on taking all sufficient steps for obtaining the best possible result on a consistent overall basis.

It is our policy, therefore, to have a process which ensures that every client order is treated in a way that aims to maximise the chance of getting the best set of results.

## Trading venues

In selecting the most appropriate venues for the purpose of executing your orders, we will take into account the various factors which we believe are relevant to the order. In doing so, we will assess what we reasonably believe to be your best interests in terms of executing the relevant order and the execution factors.

One important consideration when selecting execution venues to transact client orders is that the venue concerned has adequate systems and controls in place to enable the delivery of best execution.

In conducting this assessment we will take into account the factors we believe may be appropriate including, the ability of the venue to manage complex orders, the quality of the venue including the nature of other participants and order types available, the speed of execution, the creditworthiness of the venue and the quality of any related clearing and settlement facilities.

Our approach is to maintain a choice of venues and entities that offer the potential for us to obtain the best possible result for the execution of your orders on a consistent basis. By selecting the most appropriate venues we can limit trading costs and ensure a higher chance of execution. The main factors we will take into consideration include:

- Venue liquidity. We use factors such as historical trading volumes and indications of interest to assess the likelihood of an execution on that venue;
- Venue toxicity. The likelihood that routing to or executing on the venue will impart too much information about the balance of the order;
- Order matching logic. Different venues match contra (buy/sell) orders using differing matching logic. Some venues may prioritise by best price and others by largest size or by submitting broker – we will choose the most suitable for each execution;
- Infrastructure. We will only route to venues which have the infrastructure to efficiently manage the complexity levels appropriate to each order. We also assess the creditworthiness of the venue and the quality of any related clearing and settlement facilities;
- Control of information flow. Venues must ensure unexecuted order information is appropriately protected;
- Access to data. Venues should allow access to trade and price formation data, where appropriate, on an equitable basis and distribute this data at a fair cost; and
- Fees and charges. Venues should not charge excessive fees to transact on their venue, nor should they offer excessive inducements to trade.

In meeting our obligations we may use one or more of the following venue types when executing an order on your behalf:

- Broking firms who transact on behalf of our clients on regulated markets, through their own Multilateral Trading Facilities or as a Systematic Internaliser;
- Other independent Multilateral Trading Facilities where trades can be executed away from the exchanges' order books;
- Organised Trading Facilities and trading facilities that have been declared equivalent in accordance with applicable laws and regulations; and/or
- Third party investment firms acting as market makers or other liquidity providers.

Where we use a broker to execute orders on your behalf, such execution may also be achieved through the use of algorithmic trading, in which an order is traded in line with specific parameters using a proprietary platform provided by that broker. We do not engage in algorithmic trading ourselves but utilise broker-supplied algorithms. We also do not engage in high frequency trading.

In certain financial instruments there may only be one execution venue. In executing a trade in such circumstances we will presume that we have provided the best possible result in respect of these types of financial instruments.

We do not receive any form of remuneration, discount or non-monetary benefit for directing orders to a particular venue or broker for execution. Selection of a broker for an order is driven solely by the factors and inputs as described in this policy.

## Specific financial instrument considerations

The decision around venue consideration will be made having regard to the relative importance of the execution factors for the specific financial instrument in question. The following instrument-related considerations are taken into account:

### Equities

Orders relating to equities (including related exchange-traded collective investment schemes, warrants and derivatives) are generally executed by third party investment firms or through multilateral trading facilities.

In considering the execution factors and deciding the appropriate execution venue, we will take account of factors such as the reason for the order, the size of the order relative to available and historic liquidity, specific portfolio manager instructions (including price limits) and other grounds deemed relevant at the time. While price (including all costs related to execution of the order) will generally be the most important factor, for larger orders particularly factors such as execution certainty, market impact reduction and execution speed may have greater importance. Where an order does not have a specific priority related to timing or speed of execution, we will normally prioritise other execution factors, particularly price, ahead of timing or speed. Where we transmit the order to a broker for execution, we will select a broker who we believe can achieve the best result for orders of this nature; similarly if we transmit the order to be executed through a broker's algorithmic trading platform our selection will include our assessment of that platform's ability to achieve the best result for orders of this nature.

If a natural counterparty does not exist for your order, we use market information and our dealers' experience to select a broker for working part of the order for us, usually on an agency basis, being careful not to expose too much of our order to the market in order to avoid impact costs. This is a general strategy adopted when speed is a less important factor than, say, price or the ability to retain anonymity.

We will, where appropriate, try to identify sources of natural liquidity before entering an order into the market. When we have large single stock orders to transact we typically use multilateral trading facilities in trying to source a natural match. The order will be executed with reference to the prevailing market price. Trading in this manner can greatly reduce market impact.

### Bonds and money market instruments

Orders relating to bonds and money market instruments are executed either by third party investment firms or through multilateral trading facilities or quote aggregation platforms. Orders executed through multilateral trading facilities or quote aggregation platforms will usually involve obtaining screen-based competitive quotations and this approach seeks the best price through competition among multiple third party investment firms.

In the case of larger orders we are more likely to place orders directly with third party investment firms, in which case we will generally obtain at least three quotes and retain these for audit purposes, assuming these quotes can be obtained without impacting the market. While price (including all execution costs) will generally be the most important factor, we may take other factors into account as appropriate to the size and nature of the order.

The diversity in some markets and instruments and the kind of orders that we carry out on your behalf may mean that different factors will have to be taken into account when we assess the nature of our Execution Policy in the context of different instruments and different markets.

For example, there is no formalised market or settlement infrastructure for over-the-counter transactions. In some markets, price volatility may mean that the timeliness of execution is a priority, whereas in other markets that have low liquidity, the act of execution may itself constitute best execution.

In other cases, our choice of venue may be limited (even to the fact that there may only be one platform/market upon which we can execute your orders) because of the nature of the order or of your other requirements.

## Currency

Orders relating to foreign exchange are executed with third party investment firms. For orders of a marketable size, we will obtain several simultaneous quotations from multiple counterparties and retain these for audit purposes, with the predominant factor being best price at the time of execution.

For some orders, particularly larger or more illiquid orders, a single counterparty may be approached dependent on the execution strategy at the time of the order to avoid impacting the market significantly. In such a case, counterparty selection will take into consideration factors such as previous execution performance, clearance and settlement capability, credit worthiness and financial stability, timely trading and ability to trade in large volumes.

Where a client has appointed their own custodian with standing instructions in place for restricted or other currencies, foreign exchange trades will be conducted through the appointed custodian bank. In these circumstances best execution will not apply.

MiFID does not define spot foreign exchange transactions as “financial instruments” however we will strive to apply equivalent standards to such transactions as well as to other instruments which are not defined.

## Collective investment schemes

Orders in collective investment schemes which are not exchange-traded will normally be in an environment where there is no secondary market. Generally we will place such an order with the relevant administrator of the scheme, who will be the execution venue. Such transactions will be effected at an appropriate price based on net asset value, with execution certainty being the most important factor.

In relation to Bonds, Money Market Instruments and Currency the following market and product considerations are taken into account:

### Market characteristics

Execution is dependent on factors such as market transparency and ability to trade in size, pricing and execution speed. Therefore the best price does not automatically equal the best execution, rather best execution is to be assessed on an overall basis taking into consideration these factors described below:

- Market transparency and ability to trade in size. The best observed price in a market is typically quoted as a price against a particular size, which may not match the size of the proposed trade. Where the order is to execute a larger size, if part of the order is executed at the indicated size, the price for subsequent executions may become less favourable (that is, the market may move). On the other hand, if the order is to execute a smaller size, the same price may not be available.
- Price is an important factor to consider whenever it is possible to execute orders at more than one price. Price is always likely to be relevant, but the best price in a given market at a given moment may not represent the best possible result.
- Speed. Prices change over time and the rate of change varies with different instruments, market conditions and execution methods. Where we consider that the cost of an adverse

market movement is likely to be great, faster execution may be required. For larger orders in less liquid instruments other factors may outweigh speed or a slower rate of execution may be needed.

## Product characteristics

A combination of pre-trade and post trade criteria is applied to each type of instrument to determine the importance of the processes that occurs before (and after) trades are executed. We believe pre-trade criteria is important when sensitive to the selection of the counterparty and post trade criteria is important when comparing the trade data against pre trade benchmarks and relevant market data to determine fair pricing.

## Single venue transactions

Operational considerations may prevent us from using more than one venue for execution. In other instances where execution speed and certainty and/or market impact are judged to be more important, obtaining multiple quotes may have a negative impact on obtaining best execution or for some orders there may only be one potential counterparty, in which case we may approach a single broker or counterparty on the basis of their suitability for that transaction. In such cases we will check the fairness of any price proposed by gathering market data relevant to the estimation of such a price and, if possible, comparing to similar assets.

## Brokers and counterparties

Stewart Investors will generally only transact client orders with brokers and counterparties which are regulated, either by the Financial Conduct Authority (FCA) or by the counterparty's and broker's home state regulator, and which have been specifically approved by us after review in accordance with our policy, and they must have execution arrangements that enable them to comply with our obligations. We may also place such orders with our affiliate companies around the world for execution on our behalf, in which case those affiliates will also adhere to this policy.

We have a process for the selection of brokers with whom we place orders for execution. The specific criteria to add a broker varies based on the relevant asset class, however the approval process is applied in the same manner across all asset classes. We do not conduct any activity with a new broker until the screening and approval process has been completed.

The criteria to add a broker to the approved counterparty list is generally based on a number of factors which may include, but is not limited to, our assessment of their:

- Quality of financials;
- Sustainability;
- Execution quality;
- Operational risk;
- Service quality; and
- Reputation, including regulatory status and history

All approved brokers undergo screening including disciplinary actions, criminal proceedings and reputational issues, conducted by our Regulatory Compliance team. In order to minimise the risk of potential conflicts of interest when selecting brokers with whom to place orders for execution, the commission rates we pay are set so as not to discriminate between different brokers. We also do not take part in any form of directed brokerage or commission recapture arrangement, and we do not trade with brokers who are affiliates of us. We do not receive any form of remuneration or discount for directing orders to a particular venue or broker for execution. While discouraged, any minor non-monetary benefits are limited to those permitted under our Gifts and Entertainment Policy. Selection of a broker for an order is driven solely by the factors and inputs as described in this policy. Counterparties are reviewed on an annual basis to ensure relevance.



Where we place an order for execution by an approved broker, we are not responsible for controlling or influencing the arrangements made by the broker relating to execution of that order (ie we do not control the broker's choice of venues). We are not required to duplicate the efforts of the broker to whom an order is passed in ensuring the best possible result. Our policy is therefore to ensure that the approved brokers are the ones who will assist us to comply with our best execution obligations (by delivering the best possible result) and that orders are passed to brokers in accordance with this policy.

## Top-five venues publication

We are required to summarise and make public on an annual basis, for each class of financial instrument, the top five execution venues where we execute orders, and the top five brokers to whom we transmit orders for execution, in terms of trading volumes, in the preceding calendar year, including information on the quality of execution obtained. This information will be published annually on our website by 30 April each year.

## Order handling

We have an Order Handling Policy which governs how we ensure your orders are executed promptly, fairly and expeditiously relative to orders of our other clients. When we create orders on behalf of your account, we act to ensure those orders are executed in a timely manner in line with our order execution policy, and that we record and allocate those executions promptly.

Where we have sufficiently comparable orders on behalf of a number of clients, we will generally look to aggregate such orders. We will not do this if we believe it would disadvantage you, however any particular order aggregation may subsequently prove to have worked to your advantage or disadvantage. To ensure we treat all our clients fairly, our Order Handling Policy governs how aggregated orders are allocated, especially where they are only partially executed. We will allocate all order executions proportionally in accordance with our Order Handling Policy.

Where we have orders where one or more client accounts are buying and one or more client accounts are selling the same security, depending on local regulations, internal procedures, and client instructions we may seek to execute those orders as cross transactions. Such transactions will only be executed where it is in the interests of all clients involved to do so and where local regulations or client restrictions allow it, and will be transacted through a broker as a net trade at a fair and appropriate market price.

## Monitoring and review

We continually monitor our order execution arrangements and policies on an ongoing basis for their effectiveness and to ensure we have oversight of our regulatory obligations on best execution.

On a daily basis, where relevant, the dealers and investment team will discuss the trading flow and prices obtained. In addition, the dealing desk uses third party transaction cost analysis to review the quality of execution on a post trade basis.

On a quarterly basis the transaction cost analysis data is presented to the Execution Oversight Group which seeks to identify wider execution trends and quality including counterparty selection versus trade allocation.

Our Execution Oversight Group is an oversight committee comprising representatives from our Investment, Business Management, Investment Compliance and Operations teams alongside the



dealing desk and regularly reviews trade data from our order management and record keeping systems used to measure trade execution volumes, number of trades and estimates of trade cost. The Group also reviews the quarterly transaction data around wider execution trends and quality.

Through this process we assess whether the execution venues/brokers included in this policy provide the best possible result for you or whether we need to make changes to our execution arrangements from time to time.

The Investment Compliance team periodically monitors the effectiveness of the order execution arrangements and the policy. Any material concerns or issues are recorded and escalated through our internal governance process as appropriate. The Investment Compliance team are also members of the Execution Oversight Group and provide challenge and input into its meetings.

## Updates to the Order Execution Policy

We review our order execution arrangements and policy at least annually or whenever a material change occurs that affects our ability to continue to obtain the best possible result for the execution of your orders. The review will focus on whether we would obtain better results for clients if we were to:

- a) include additional or different venues or brokers (for the relevant instrument class);
- b) assign a different relative importance to the execution factors (for the relevant instrument class); or
- c) modify any other aspects of the policy and/or its execution arrangements.

In undertaking this review, we will take into account:

- (i) the information required to be published annually by execution venues on the quality of execution of transactions on that venue pursuant to Commission Delegated Regulation 2017/575 – RTS27 from venues;
- (ii) any commentary on the quality of executions published by execution venues and brokers pursuant to their obligations under Commission Delegated Regulation 2017/576/EU – RTS28 from brokers;
- (iii) transaction cost analysis data available to us;
- (iv) information that we are required to publish annually on the top five execution venues where we have executed orders, and the top five brokers to whom we have transmitted orders for execution, including information on the quality of execution obtained; and
- (v) any other relevant information or analysis available to us.

The purpose of the review is to carry out an overall assessment of whether the policy and Stewart Investors' execution arrangements are current and enable the firm to obtain the best possible result for the execution of its client orders.

In addition to the annual review, factors that might trigger an early review include:

- a material change to our dealing arrangements;
- the launch of, or substantial change to, a service, activity or product;
- a significant restructure of part of the business; and
- a relevant change in regulation and/or market practice.

We will notify you of any material changes to our order execution policy and a copy of the most recent version will be published on our website. We will also update the list of execution venues and entities when necessary. Clients will not be notified separately of any changes unless this constitutes a material change. The addition or removal of a broker from our approved list would not typically be deemed a material change.

## Client information

On your reasonable request, we will demonstrate that we have executed your order(s) in accordance with this Order Execution Policy.

This disclosure is initially provided to all new clients in order that we can evidence the provision of appropriate information and we also request the client's consent to the policy and prior express consent to the execution of orders outside a regulated market or a Multilateral Trading Facility.

## Appendix: brokers and execution venues

Stewart Investors may use the following brokers, counterparties and multilateral trading facilities as execution venues when seeking best execution. This list is not exhaustive and may be subject to change and revised from time to time. Stewart Investors may use venues not listed below where it deems appropriate in accordance with the Order Execution Policy. Brokers are listed at the main contracting level with Stewart Investors; we may however also contract with various subsidiaries and affiliates for execution in different markets.

### Equities

African Alliance Securities Trading Pty Ltd  
 Auerbach Grayson & Company Inc  
 Batlivala & Karani Securities India Private Limited  
 Bradesco Securities UK Limited  
 BTIG Limited  
 CLSA (UK)  
 Credicorp Capital Limited  
 Credit Suisse Securities (Europe) Limited  
 CT CLSA Securities (Pvt) Limited  
 Exotix Partners LLP  
 Goldman Sachs International  
 Ho Chi Minh City Securities Corporation  
 HSBC Bank plc  
 Instinet Europe Limited  
 Itau BBA USA Securities Inc  
 Jefferies International Limited  
 J.P. Morgan Securities plc  
 Kotak Securities Limited  
 Liquidnet Europe Limited  
 Luminex Trading & Analytics LLC  
 Macquarie Capital (Europe) Limited  
 Merrill Lynch International  
 Mizuho International plc  
 Motilal Oswal Securities Limited  
 RBC Europe Limited  
 Sanford C Bernstein Limited  
 Scotiabank Europe plc  
 Standard Bank of South Africa Limited  
 UBS AG  
 Virtu ITG Europe Limited

## **Bonds and money market instruments**

The Bank of New York Mellon London Branch  
Citigroup Global Markets Limited  
J.P. Morgan Securities plc  
Lloyds Bank Corporate Markets plc  
Merrill Lynch International  
Bloomberg LP

## **Currency**

Australia and New Zealand Banking Group Ltd  
The Bank of New York Mellon London Branch  
Barclays Bank plc  
Citibank NA  
HSBC Bank plc  
JP Morgan Chase Bank NA  
Lloyds Bank Corporate Markets plc  
Merrill Lynch International  
Standard Chartered Bank  
State Street Bank and Trust Company  
UBS AG  
Refinitiv Transaction Services Pte Limited  
FX Alliance LLC

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