

Introduction and Purpose

Aubrey Capital Management has a duty to act honestly, fairly and professionally and in the best interest of its clients. On 3rd January 2018 the second Markets in Financial Instruments Directive (MiFID II) became an industry standard in the UK. This new regime introduced a number of new rules and requirements which the FCA has now adopted. The rules provide a comprehensive approach to the execution of transactions in financial instruments irrespective of the trading methods used to conclude those transactions.

This document sets out Aubrey's approach to achieving best execution for its clients in accordance with the regulatory requirements to which it is subject. There are different processes for achieving best execution for the Funds and Private clients managed by Aubrey and these are detailed in separate sections below.

Definition

Elements of the MiFID II directive relate to the execution of client orders and aim to provide investors with assurances that certain key factors are taken into account when executing these orders. This gives a degree of comfort to clients that every effort is made, by investment firms like ours, to make certain that orders are executed on terms that are most favourable to the client and that the "best possible result" or "best execution" is pursued and achieved.

Application

All staff involved in dealing for our funds and/or clients are required to comply with this policy at all times.

Policy

Execution Quality

When executing orders on behalf of clients we will take all sufficient steps to achieve "best execution". We have in place a policy and procedures which are designed to obtain the best possible execution result taking into account the nature of the order and the markets in question and which provides, in our view as managers, the best balance across a range of sometimes conflicting factors.

To achieve "best execution" we will take into account the following factors and their relative importance;

- Price
- Overall cost of transaction
- Speed of execution
- Likelihood of execution and settlement
- Liquidity of the market (which may make it difficult to even execute an order)
- Size of transaction
- Nature of transaction

- Whether it is executed on a regulated market or over-the-counter
- Any other consideration relevant to the execution of the order
- Counterparty risk

To determine the relative importance to be placed by us on any of the execution factors we will take into account;

- The significance of the above factors may vary according to the nature of the instrument. For instance while the price will be a primary factor in most equity transactions it will be of less relevance where the price is set at, for example, net asset value with a collective vehicle. Similarly counterparty risk may be a primary issue for some equities but again not relevant for trades in collective vehicles
- The characteristics of the client including the categorisation of the client as a retail or professional investor
- Your experience and understanding of the market in question
- The characteristics of the client order, those of the financial instruments that are the subject of that order, and, the execution venues to which that order can be directed and their ability to deal with complex orders
- Any specific or general instructions given to us by a client

In the absence of express instructions from a client, we will exercise our own discretion in determining the factors that we need to take into account for the purposes of providing that client with “best execution”.

The best possible result for any client will be determined in terms of the total consideration, representing the price of the financial instrument and the costs relating to execution. Related costs include all expenses incurred which are directly related to the execution of the order.

The same approach will be followed across all financial instruments and markets in which we execute client orders. Differing market conventions and diversity of financial products will result in different factors being prioritised when we assess the characteristics of specific orders.

Execution Process for Funds

We use a formalised process to seek the most favourable terms reasonably available to fulfil our client orders. This will be achieved through Approved Brokers (Brokers that have been assessed in terms of their counterparty risk and quality of their execution policy and listed on our approved list of brokers) who have committed to providing “best execution” to us and who we consider to be the best placed to afford our clients best execution on a regular basis.

In all orders we will carefully consider the elements listed above to ensure that our regulatory obligations are met and that any specific instructions received or given are strictly adhered to in a timely manner. However, the diversity of markets and instruments and the kind of orders that we may undertake on a client’s behalf may mean that different factors have to be taken into account when we assess the nature

of a specific order. For example, there is no formalised market or settlement infrastructure for over-the-counter transactions.

Clients should be aware that in some markets, price volatility may mean that the timeliness of execution is a priority, whereas, in other markets with low liquidity, the first available execution may itself constitute best execution. In other cases, our choice of venue may be limited (for reasons such as there may only be one platform/market upon which we can execute an order for a client) because of the nature of the order or the client's requirements and instructions to us.

We will employ all reasonable resources available to us to ensure executions are routed efficiently and monitored to ensure the execution quality is in the best interest of our clients.

The length of time taken to execute each order depends on its size and the natural liquidity in the market. Our process allows for trades to be completed as soon as practicable under the existing market conditions, with the overall aim of minimising market impact and obtaining best execution.

Execution Process for Private Clients

Before placing an order with CREDO, Aubrey's investment manager must record:

- a) The reason for dealing
- b) The basis of allocation

If all clients have not been included in the allocation, then the Investment Manager must enter a comment explaining why the order is being placed for a restricted number rather than all.

All required trades are generated online by Aubrey Managers based on the latest market price held in MyCredo Application. Once an order is generated, the pre-allocated cash and pre-allocated market value (of the security) fields are updated based on this estimated market price. Once an order has been executed in the market and the actual execution price is known, together with other market fees, the allocated cash and allocated market value fields are updated based on **actual** execution price and market costs.

In the event of a partial satisfaction only of an aggregated order, the default position on allocation will be pro rata. If pro rata allocation would result in uneconomic or unsuitable holdings for the clients involved, the investment managers may allocate other than on a pro rata basis but at all times will take steps to ensure that allocation is in the best interests of all clients over the longer term.

All trades executed by Credo on Aubrey behalf are reported to Aubrey within 24 hours.

Ongoing Commitment

As previously stated, it is our intention to review this Best Execution Policy annually or when material changes are made. This will ensure that our policy and methods of execution remain current and in line with market and regulatory developments. In addition, we will, on a regular basis, assess the quality of execution afforded by those venues on which we execute client orders and whether we need to change our execution arrangements. We will, of course, notify clients of any significant/material changes to this

policy. Clients should note that whilst we take all reasonable steps, based on those resources available to us, to satisfy ourselves that we have processes in place that can be reasonably expected to lead to the delivery of best execution of our clients' orders, we cannot guarantee that we will always be able to provide best execution of every order executed on behalf of a client.

Execution Venues for Funds

The execution venues and third parties that we use for executing and receiving and transmitting orders are listed below. Execution venues are selected after a detailed analysis of the following:

- Credit rating
- Financial analysis; and
- Internal Service Score

The latter is the result of a review which measures performance against a number of measures including quality of research, service from analysts, company access, quality of execution and settlement efficiency.

The list below is not exhaustive, but it comprises those execution venues and third parties on which we place significant reliance. We reserve the right to use another execution venue and third parties where we consider that it is appropriate in the light of our Execution Policy. We may from time to time add or remove an execution venue or third party from this list. We will regularly assess the execution venues and third parties available in respect of any products that we trade to identify those that will enable us, on a consistent basis, to obtain the best possible result when executing orders. This appendix will be reviewed as part of our routine monitoring obligations.

Name of broker	Markets
HSBC	Global
China International Capital Corporation	Asia
CLSA	Asia
Sanford Bernstein	Hong Kong Connect
Itau Cordeval	Brazil & Mexico
Equita Sim	Europe
Kepler Cheuvreux	Europe
Berenberg	Europe
RW Baird	United States
Raymond James	United States
William Blair	United States
Motilal Oswal	India
Pershing	Hong Kong Connect
Jefferies	Asia
DNB	Europe
King & Shaxson	Europe

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