

Principles governing the execution of orders in financial instruments within the framework of the asset management (Execution Policy)

The following Principles apply to the **selection of a custodian bank by the asset manager** or to the **direct execution of orders via securities traders**, which the asset manager places within the framework of the asset management mandate and the investment guidelines stipulated therein, for the purpose of buying or selling securities or other financial instruments (e.g. options). Execution means that a corresponding financial transaction is concluded on the basis of the client order or management mandate on the account of the client with another party on a suitable market.

The Principles do not apply in the following circumstances:

- the issue of units in investment undertakings at issue price or their redemption at redemption price via the respective custodian bank;
- fixed-price transactions, i.e. if financial instruments are bought at a price which has been contractually agreed in advance;
- in the event of exceptional market situations or market disruptions, where we shall act to the best of our knowledge and belief in the interest of the client;
- market-sensitive order processing, i.e. we shall deviate from the Principles on a case-by-case basis if this is advantageous for the client;
- pooling of orders, provided this does not result in any disadvantage for the client;
- if the custodian bank is selected by the client. In this case, the client must instruct the asset manager to place orders with one or more custodian banks chosen by him. In this conjunction, the naming of a custodian bank account by the client shall be deemed to constitute an instruction or selection of the custodian bank. In this event, the principles of the commissioned custodian bank or financial services provider shall apply with respect to the realisation of the best possible execution.
- client has issued instructions which have precedence over the following Principles;

1 Principles in the case of a custodian bank recommended by the asset manager

The asset manager shall take steps to ensure that the best possible result is secured when executing orders for the client. The recommendation of a custodian bank commissioned to execute the investment decisions of the asset manager, shall be done on the basis of the following criteria, whereby these shall be weighted to take account of the particular characteristics of the client and the financial instruments in question:

- best possible overall price (costs)
- likelihood of the comprehensive execution and settlement of the order
- speed of the complete execution and settlement
- reliability of the settlement
- scope and nature of the desired services

2 Principles in the case of the direct execution of orders via security traders

The asset manager shall take steps to ensure that the best possible result is secured when executing orders for the client. The selection of a security trader shall be done on the basis of the following criteria, whereby these shall be weighted to take account of the particular characteristics of the client and the financial instruments in question:

- best possible overall price (costs)
- likelihood of the comprehensive execution and settlement of the order
- speed of the complete execution and settlement
- reliability of the settlement
- scope and nature of the desired services

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