

Best Execution Policy

Owner: Compliance & Risk

Introduction

This document sets out the policy for the Broadstone group of companies ('Broadstone') on best execution.

It is in the interests of our clients and our firm that we obtain the best possible result when placing orders for execution on behalf of our clients, with third parties, such as investment fund platforms, fund managers or discretionary fund managers. We are required to take all sufficient steps to provide best execution when carrying out such transactions and, on your request, to provide you with a copy of the policy that we have adopted to achieve that objective. Our policy is also published on our website www.broadstone.co.uk.

This best execution policy applies to orders in investments such as investment funds and other securities. You should read this policy in conjunction with your client agreement.

Execution Venues and Third Parties

An execution venue is effectively a trading venue such as a regulated stock market where investment transactions are executed. We do not execute orders or deals directly with execution venues.

Instead, where we have been delegated responsibility, we will place orders on behalf of our clients with appropriate third parties as explained below:

- **Investments on a platform:** (an online investment administration service) our Investment Advisory team currently use Fidelity as the chosen platform provider. Our Investment Consulting team currently use Mobius Life or other investment manager platforms where a client has access to multiple underlying funds.
- **Investments not on a platform:** for investments held directly with individual fund managers, client orders will be placed directly with the relevant fund manager (or their administrators) for the particular investment.
- **Discretionary Fund Managers:** our Investment Advisory team currently use Cazenove; Quilter Cheviot; Rathbones and Tilney.

We will regularly assess the third parties available to us to identify those that will enable us, on a consistent basis, to obtain the best possible result when arranging the execution of your orders. The third parties have responsibilities in relation to best execution and client order handling themselves. We will also undertake periodic monitoring to ensure that they are meeting the relevant requirements.

Execution Factors

Consumer Clients

The FCA's Consumer Duty Principle 12 states: 'A firm must act to deliver good outcomes to retail customers.' When transmitting orders to a third party, we will make every effort to ensure the best possible result for our clients taking into account the following factors:

- Price;
- Cost;
- Speed;
- Likelihood of execution and settlement;
- Size;
- Nature of the order; and
- Any other considerations relevant to the execution of the order.

For Consumer clients, the price and cost of execution of the order will normally be the most important aspect in obtaining the best possible result. We will therefore assume that this is the most important outcome for your transaction unless you tell us otherwise.

Professional Clients

For Professional clients advised by our Investment Consulting team, depending on the nature of the transactions, you will typically receive written advice in advance relating to any proposed trading activity together with a post trade reconciliation and confirmation for any significant trading activity. In arranging any transactions on your behalf, we will consider a number of factors including, but not limited to:

- Transaction costs;
- Out of market risk;
- Market timing risk; and
- Speed of execution and strategic risk.

Client Specific Instructions

Consumer Clients

If you have given instructions that price is not the most important factor in executing your instructions, we will make every effort to comply with your instructions but cannot guarantee this. This may be due to either the nature of the order, or the type of investment you wish to trade in.

We will make all decisions as to where the orders are placed and will not usually accept specific instructions from clients regarding which third parties to use.

If we do accept any client specific instructions you should be aware that this may prevent us from following the processes set out in this policy, which have been designed to obtain the best possible results for the execution of those orders in respect of the elements covered by those specific instructions.



Professional Clients

Our Investment Consulting team will typically always seek your agreement prior to carrying out any transaction; for example, we will agree with you the amounts and investment funds involved in any transaction. This may include the provision of explicit advice from us and your agreement in relation to specific transactions, or it may relate to a standing instruction that you have provided to us for ongoing or regular transactions.

In the case of cashflow management or rebalancing activity we will generally be trading to bring explicit allocations closer to particular targets, or hedging levels provided by certain funds closer to strategic targets. These trades will generally be executed in line with an agreed cashflow management policy without further client input beyond agreement of the policy itself.

Charges

Consumer Clients

It is our policy that any commission or other charging structures will not influence either the selection of third parties to which we place client orders, or the order flow that follows as a result of the execution process. We will therefore not discriminate between the third parties used to arrange execution of your orders.

Professional Clients

The Investment Consulting team will normally agree an explicit charging basis in advance for managing any transactions on your behalf. This will usually be on a time-cost basis or an agreed fixed fee. We do not accept commission-based remuneration.

Monitoring and Review of our Execution Policy

We will regularly monitor the effectiveness of our Best Execution Policy to identify and, where appropriate, correct any deficiencies. In particular, this will cover the third parties to which we transmit client orders in terms of their quality of execution.

This review will be carried out regularly (usually on an annual basis) or whenever a material change occurs that affects our ability to continue to obtain the best possible result for our clients.

Our Investment Consulting team will usually carry out a post-trade analysis and reconciliation and report this to you following the conclusion of any transaction(s).

Staff Understanding

All relevant staff are made aware of this policy to highlight and emphasise the importance of best execution.