

Best Execution Policy

AK Jensen Investment Management Limited (“AKJIM”)

2019

1. Introduction

The Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments (“MiFID II”) requires investment firms when executing orders on behalf of clients to take all sufficient steps to obtain the best possible result taking into account price, liquidity, cost, speed, likelihood of execution and settlement, size, nature of the order or any other relevant consideration (the “Best Execution Obligation”). AKJIM may receive and place your order with brokers for execution, and the best execution obligation applies to all of these.

AKJIM will categorise you as a “Professional Client” and will therefore be dealing with you in accordance with the Financial Conduct Authority rules for “Professional Clients”. Where dealing with Professional Clients, we owe the best execution obligation where the client is legitimately relying on AKJIM in relation to the execution of the transaction.

AKJIM has established and implemented a Best Execution Policy setting out the most important and/or relevant aspects of the arrangements that we have put in place to comply with our Best Execution Obligation. AKJIM does not execute trades itself but places orders with selected brokers and therefore has no direct control over ensuring that Best Execution is achieved. Our obligation is therefore to monitor the executions undertaken by our brokers to ensure execution provided is the best available.

AKJIM’s obligations in relation to Best Execution means that we will take reasonable steps to ensure that we obtain the best possible result for you and monitor our policy at least annually to ensure that we are following Best Execution obligations. We monitor our brokers closely to ensure they are providing Best Execution as required.

Please speak to your relationship manager if you would like further information about the policy.

2. Scope of the Best Execution Obligation

We will monitor the performance of our selected brokers to monitor that Best execution is being provided as AKJIM does not execute trades itself, but selects appropriate brokers to do this on its behalf.

Specific orders may prevent us from being able to follow the steps which we have outlined in this policy which have been designed and implemented to obtain the best possible result for execution. Nevertheless, when a specific instruction covers only part of an order, or only one aspect of it, the Execution Policy remains applicable to the aspects of the order not covered by the specific instruction.

3. Exclusions

Best Execution does not apply to non-MiFID financial instruments and Eligible clients. AKJIM does not provide asset management to retail clients.

4. Consent

Our Best Execution Policy is distributed together with the investment management agreement “the Agreement”, and they should be read together. We therefore deem to have received your consent of our Best Execution Policy once the Agreement is fully executed.

5. How AKJIM will treat each financial instrument

The Fund’s Executing Brokers may or may not have a SOR in place when dealing with orders. In the absence of strict instructions, the SOR will choose the venue(s) on which the order may be executed partly or in whole. The factors affecting the SOR’s choice in venue can be found in the Executing Broker’s Execution Policy (see appendix II –).

i. Equities – Shares & Depositary Receipts

When trading listed securities through AKJIM, we will act on either an agency or matched principal basis.

The primary factors affecting a choice in execution venue for listed equities are price together with cost. Other considerations such as speed, likelihood of execution and settlement, reduction of market impact, size, nature or other relevant points related to an order, are also taken into account, especially for larger orders.

ii. Debt Instruments – e.g. bonds, convertible bonds, notes, debentures

When trading OTC debt instruments, orders are called in to the Executing Broker who will act as Principal in most cases. AKJIM will seek to get a fair price on behalf of its clients, looking at multiple factors such as bid/ask price available, liquidity offered by the execution provider, and where possible price of similar products when market data is scarce or not available. Except to the extent that a client gives specific instructions, AKJIM apply discretion when determining the timing and structure of order placement in the market, with the aim of achieving Best Execution given the size of the order, liquidity available and prevailing market conditions.

iii. Interest rate/credit/currency/securitised and other listed derivatives

When trading listed derivatives through AKJIM, we will act on either an agency or matched principal basis.

The primary factors affecting a choice in execution venue for listed derivatives are price together with cost. Other considerations such as speed, likelihood of execution and settlement, size, nature or other relevant points related to an order, are also taken into account.

iv. Exchange traded products (ETFs, ETNs and ETC)

When trading Exchange Traded Products through AKJIM, we will act on either an agency or matched principal basis.

The primary factors affecting a choice in execution venue for exchange traded products are price together with cost. Other considerations such as speed, likelihood of execution and settlement, size, nature or other relevant points related to an order, are also taken into account.

6. Execution Venues

Orders can be executed by our brokers using a variety of different execution venues offered by

our Executing Brokers whether it being Regulated Markets, Multilateral Trading Facilities (“MTF”), Organised Trading Facilities (“OTF”), Systematic Internalisers (“SI”), market makers or other liquidity providers.

AKJIM is not restricted to only using Executing Brokers that are subject to MiFID for carrying out orders. In order to be able to use an entity that is not subject to the MiFID Best Execution regime, in particular a non-EEA service provider, AKJIM will employ best efforts to ensure that the execution arrangements of such an entity allow it to comply with the overarching Best Execution requirement.

When selecting a third party Executing Broker, AKJIM will carefully select the entity by undertaking the necessary due diligence – obtaining the Best Execution Policy (from MiFID applicable brokers) whilst taking into account other relevant factors which may affect the choice of broker such as market knowledge, liquidity provider, fees and other such considerations which may vary from time to time.

AKJIM will monitor its Executing Brokers in terms of Best Execution on a periodic basis by reviewing sample trades and take action as necessary. The factors used to determine whether AKJIM’s Executing Brokers do indeed meet their Best Execution Obligation, will be those factors listed in the Executing Brokers’ Best Execution Policy.

In accordance with Regulatory Technical Standard (RTS) 28, AKJIM will summarise and make public, on an annual basis, for each class of financial instruments, the top five Executing Brokers in terms of trading volumes where AKJIM transmitted or placed our client orders for execution in the preceding year and information on the quality of execution obtained. The information shall be consistent with the information published in accordance with the technical standards developed under Article 27(10)(b) of Directive 2014/65/EU.

Please refer to Appendix I for a full list of execution brokers available and Appendix II for the full list of execution venues available through our executing brokers. Our website will always reflect the most up-to-date list.

7. Monitoring & Review

AKJIM’s Best Execution Policy will be reviewed at least annually and at any other time that a material change occurs that may affect AKJIM’s ability to obtain Best Execution on a consistent basis using the venues in its policy. AKJIM will consider all relevant market information that it obtains about its venues as well as the results of its monitoring. Such a review shall also be carried out whenever a material change as defined in Article 65(7) of the Directive occurs that affects the firm’s ability to continue to obtain the best possible result for the execution of its client orders on a consistent basis using the venues included in AKJIM’s Execution Policy.

The review will include monitoring the effectiveness of our order execution arrangements and the Execution Policy in order to identify and, where appropriate, correct any deficiencies. In particular AKJIM will assess on a regular basis, whether the execution venues/brokers included in the order Execution Policy provide for the best possible result for the client or whether changes are required to our execution arrangements.

8. Client Notification

AKJIM will notify you of any material and significant changes to our order execution arrangements or this Execution Policy – such notification may be made via our website at this

link www.AKJ.com.

When requested by a client, AKJIM will demonstrate that execution of the clients' order has been undertaken in accordance with this Policy – this will be achieved by analyzing the selected brokers' performance.

Any queries in connection with AKJIM's execution arrangements or its Execution Policy should be directed to our Execution Services department, which is trading@akj.com.

9. How will orders be handled?

In order to achieve Best Execution for clients, AKJIM will ensure its brokers execute client orders promptly and sequentially, unless characteristics of the order or prevailing market conditions make this impossible or impractical, or the interests of the client require otherwise.

AKJIM will ensure that its brokers used do the following:

- Orders executed on behalf of clients are promptly and accurately recorded and allocated;
- Financial instruments or payments for executed orders are received promptly and correctly delivered to the client;
- Clients are treated fairly and that their interests remain paramount: and
- All reasonable steps will be taken to prevent the misuse of information relating to pending client orders.

10. Inducements

AKJIM does not receive any remuneration, rebates or non-monetary benefits for the execution of client transactions on a particular Execution venue which would infringe any conflicts of interest or inducement requirements under MiFID 11, e.g. AKJIM cannot receive payments for order flow which would result in a conflict of interest.

Appendix I - EXECUTING BROKERS

Baader Bank AG (BAAD)

Best Execution Policy:

https://www.baaderbank.de/media/public/db/media/1/2017/03/103/98.100_08_2018_0005_en.pdf

AK Jensen Limited (AKJL)

Best Execution Policy:

https://www.akj.com/src/documents/BEST-EXECUTION-POLICY-AKJL-MIFID-II_2018.pdf

Wood & Company (WO)

Best Execution Policy:

https://www.wood.cz/media/3304/client-order-execution-policy_en.pdf

Nomura (NO)

Best Execution Policy:

<https://www.nomura.com/nam-europe/resources/upload/order-execution-and-best-execution-policy-equities.pdf>

Swedbank

Best Execution Policy:

<https://www.swedbank.no/en/our-services/mifid2.html>

Sparebank (SB1 Markets)

Best Execution Policy:

<http://www.sb1markets.com/showfile.ashx?fileinstanceid=7f381e9f-07a7-41ab-b632-d72216883465>

Nordea Markets

Best Execution Policy:

<https://www.nordea.com/Images/37-241158/nordea-execution-policy-and-appendix-international-en.pdf>

Stifel Nicolaus Europe Ltd

Best Execution Policy:

<https://www.stifel.com/disclosures/best-execution>

DNB Markets

Best Execution Policy:

<https://www.dnb.no/portalfront/nedlast/no/markets/engelsk/agreements/order-execution-mifid2-eng.pdf?popup=true>

Seaport Global Securities LLC

Best Execution:

<http://www.seaportglobal.com/Pages/Disclosures>

Carnegie AS

Best Execution Policy:

[https://www.carnegie.se/Global/Sweden/Om/terms/Best%20execution%20\(BEX\)eng_juni18.pdf](https://www.carnegie.se/Global/Sweden/Om/terms/Best%20execution%20(BEX)eng_juni18.pdf)

Arctic Securities AS

Best Execution Policy:

https://www.arctic.com/doc/pages/20180103_Best_Execution_Policy_1512388577.pdf

Pareto Securities

Best Execution Policy:

<http://www.paretosec.com/download/compliance/GeneralBusinessTerms.pdf>

DNB

Best Execution Policy:

<https://www.dnb.no/portalfront/nedlast/no/markets/engelsk/agreements/order-execution-mifid2-eng.pdf?popup=true>

ABG SUNDAL COLLIER

Best Execution Policy:

<https://www.abgsc.com/resources/downloads/legal--compliance/terms--policies/ABG-Sundal-Collier-Order-Execution-Policy-MIFID-II.pdf-1>

Canaccord Genuity

Best Execution Policy:

<https://www.canaccordgenuity.com/globalassets/wealth-management-uk/documents/legal/uk-order-taking-and-execution-may-2018.pdf>

Clarksons Platou Securities

Best Execution Policy: <http://securities.clarksons.com/Investment-Banking/Compliance/BestExecutionPolicy>

Fearnley Securities AS

Best Execution Policy:

https://www.fearnleysecurities.com/hubfs/Final%20Compliance%20Folder/01.%20General%20Terms%20/Order%20Execution.pdf?_hstc=27675171.5cc9d1e0f423cc10fe3dabf9bdab8110.1553701945758.1553701945758.1553701945758.1&_hssc=27675171.1.1553701945758&_hsfp=2258857222

Jefferies International Limited

Best Execution Policy:

http://www.jefferies.com/CMSFiles/Jefferies.com/files/Policies/JIL_OrderExecutionPolicy.pdf

Merrion

Best Execution Policy:

<https://www.merrion-investments.ie/assets/documents/execution%20policy.pdf>

Raymond James Financial International Limited

Best Execution Policy:

http://www.raymondjames.com/capitalmarkets/euroequities_french/pdfs/enqver-selectionandorderexecutionpolicies.pdf

Cowen and Company LLC

Best Execution Policy:

Clickbase/Documents/3rd Party Brokers

Evercore ISI

Best Execution Policy:

<https://www.evercore.com/additional-disclosures/>

Svenska Handelsbanken AB

Best Execution Policy:

<https://www.handelsbanken.se/en/personal/savings/best-execution>

Imperial Capital LLC

Best Execution Policy:

<https://www.imperialcapital.com/vContent.aspx?PageId=legal-k>

Johnson Rice

Best Execution Policy:

<http://www.jrco.com/routing-customer-orders/>

SEB – Skandinaviska Enskild Banken

Best Execution Policy:

[https://webapp.sebgroup.com/mb/mblib.nsf/a-w/112c1cb7f9ba2298c12581e8003a0500/\\$file/order_execution_policy.pdf](https://webapp.sebgroup.com/mb/mblib.nsf/a-w/112c1cb7f9ba2298c12581e8003a0500/$file/order_execution_policy.pdf)

Haywood Securities Inc.

Best Execution Policy:

<https://haywood.com/docs/default-source/default-document-library/best-execution-policy-and-procedures-february-2018.pdf?sfvrsn=8>

Appendix II – Execution Venues

Lit Regulated Markets	RM / MTF
Australia, Sydney	RM
Austria, Vienna	RM
Belgium, Brussels (Euronext)	RM
Romania, Bucharest	RM
Bulgaria, Sofia	RM
Canada	RM
Czech Republic, Prague	RM
Denmark, Copenhagen	RM
Euronext Liffe	RM
Finland, Helsinki	RM
France, Paris (Euronext)	RM
Germany, Deutsche Borse/Xetra	RM
Germany, Eurex	RM
Germany, Euwax	RM
Germany, Regional	RM
Greece, Athens	RM
Hong Kong	RM
Hungary, Budapest	RM
Indonesia, Jakarta	RM
Ireland, Dublin	RM
Israel, Tel-Aviv	RM
Italy, Milan	RM
Japan, Tokyo	RM
Malaysia, Kuala Lumpur	RM
Nasdaq OMX	RM
Netherlands, Amsterdam (Euronext)	RM
New Zealand, Auckland	RM
Norway, Oslo	RM
Philippines, Manila	RM
Poland, Warsaw	RM
Portugal, Lisbon (Euronext)	RM
Singapore	RM
South Africa, Johannesburg	RM
South Korea, Seoul	RM
Spain, Madrid	RM

Spain, MEFF	RM
Sweden, Stockholm	RM
Switzerland, SIX Swiss	RM
Taiwan, Taipei	RM
Thailand, Bangkok	RM
Turkey, Istanbul	RM
UK, London LSE	RM
UK, London SEAQ	RM
UK, London SEAQ Int.	RM
UK, London SEATS	RM
UK, London SETS	RM
USA, AMEX	RM
USA, CBOE, CFE, ECBOT, PHLX, ISE, ME	RM
USA, NASDAQ	RM
USA, NYSE	RM
Lit MTF Venues	RM / MTF
Aquis Exchange	MTF
BATS Lit Book	MTF
Chi-X Lit Book	MTF
Equiduct	MTF
Turquoise Lit Book	MTF
Dark MTF Venues	RM / MTF
BATS Dark Book	MTF
Chi-delta	MTF
Citi Match	MFT
Credit Suisse CrossFinder	MFT
Instinet Blockmatch	MFT
ITG Posit	MFT
Nordic @ Mid	MFT
Sigma X MTF	MFT
Turquoise Dark Book	MFT
Turquoise Midpoint	MTF
UBS MTF	MFT
Xetra Mid-Point	MFT
Futures & Options Venues	RM / MTF
CBF	RM
CBOT US Single Stock Options	RM
CBT	RM

CBT	RM
CME	RM
CMX	RM
HKFE (HK Futures)	RM
ICE EUROPE	RM
ICE US	RM
IDEM (Italian Derivatives)	RM
ME (Canada Derivatives)	RM
MEFF (Spanish Futures)	RM

NYMEX	RM
OMX	RM
OSE - OSAKE (futures)	RM
GX (Singapore Futures)	RM
SPX - ASX 24	RM
TSE (Tokyo Futures)	RM
XAEX (Amsterdam deriv's)	RM
XBRD (Brussels deriv's)	RM
XMON (Paris deriv's)	RM

Fixed Income
Beringer Finance
ABG SUNDAL COLLIER
Arctic Securities AS
Canaccord
Carnegie AS
Clarksons Platou Securities AS
DNB
DNB Markets
Fearnley Securities AS
Jefferies International Limited
Merrion
NORDEA MARKETS
Pareto Securities AS
RAYMOND JAMES FINANCIAL INTERNATIONAL LIMITED
Seaport Global Securities LLC
Sparebank
Stifel Nicolaus Europe Ltd
Swedbank Norway
BB Securities
BRYAN GARNIER
Cambridge International Securities
CHALKHILL PARTNERS LLP
Davy
Evercore ISI
Forte Securities
GILBERT DUPONT
Maxim Group
RW Pressprich & Co
Strategas Research Partners
Tavira Securities Limited

