



# Order Execution Policy for LPIO

## Overview of Best Execution requirement

LPIO executes orders in relation to financial instruments on behalf of its clients. There are two methods that it can use to execute those orders that are distinguished for the purposes of FCA Rules.

First, LPIO can execute the relevant transaction on behalf of the client directly on an exchange or other trading system. The exchange or trading system with which LPIO chooses to execute such a transaction is referred to in this policy as an "Execution Venue". In accordance with FCA Rules, an Execution Venue can include an EEA regulated market, or other exchange, a multilateral trading facility, organised trading facility, a systematic internaliser, a market maker or other liquidity provider.

Secondly, LPIO can place an order as agent with a third party (e.g. another broker or investment bank). Such entities are referred to in this policy as "Brokers".

## LPIO's Core Best Execution Obligations

In accordance with FCA Rules, LPIO is required to take all sufficient steps to obtain the best possible result for its clients when executing orders for its clients. (i.e. to obtain best execution). In seeking to obtain best execution, LPIO is required:

to take all sufficient steps to obtain the best possible result for its clients, taking into account certain "execution factors" – price; costs; speed; likelihood of execution and settlement; size of the transaction; nature of the transaction; or any other consideration relevant to execution. Under LPIO's policy, such other considerations can include (without limitation) the overall cost of the transaction or any costs for executing the order on an execution venue; timely execution availability of price improvement; the potential impact of the transaction on price; importance of retaining commercial confidentiality in relation to trading activities or intentions; liquidity of the market (which may make it difficult to execute an order); order information leakage; trading conflict; market conduct; market impact; venue liquidity and counterparty risk.

In order to comply with the overarching best execution requirement (above), LPIO will ensure that appropriate (execution) policies and/or arrangements are effectively implemented for the carrying out of all orders.

LPIO however are not under any obligation to obtain the best possible result for each individual order; rather we will apply our (execution) policies to each order with a view to obtaining the best possible result in accordance with the (execution) policy.

The detailed policy for order execution contained below will be reviewed regularly and clients will be informed of any material changes to the policy.

## Best Execution Policy

This policy is intended, in as clear a way as possible to demonstrate how LPIO operates and provides best execution as often as is possible.

## Execution Venues

Below is a list of execution venues, used by LPIO when executing orders on behalf of clients. This list is not exhaustive and is subject to change, and will be re-issued periodically.

Instruments	Execution Venues/Clearer
US Equities	NYSE, NASDAQ, NYSE ARCA, BATS, DirectEdge (EDGA & EDGX), BSX, Regional Exchanges, Toronto Stock Exchange, TSX Ventures, Bovespa, Santiago Stock Exchange, Mexican Stock Exchange, DTC, Euroclear
European, Middle Eastern and African Equities	Euronext, Vienna Stock Exchange, Brussels Stock Exchange, Prague Stock Exchange, OMX Nordic Exchange, OMX Nordic Exchange, Helsinki Stock Exchange, Paris Stock Exchange, Deutsche Boerse, Athens Stock Exchange, Budapest Stock Exchange, Irish Stock Exchange, Tel Aviv Stock Exchange, Milan Stock Exchange, AEX Amsterdam Stock Exchange, Oslo Stock Exchange, Warsaw Stock Exchange, Libson Stock exchange, Johannesburg Stock Exchange, BME, Spanish Exchanges, OMX Nordic Exchange, Stockholm Stock Exchange, SIX Swiss Exchange, Istanbul Stock Exchange, London Stock Exchange, Euroclear
Asia Pacific Equities	Australian Stock Exchange, HK Ex, Indonesia Stock Exchange, Tokyo Stock Exchange, Osaka Stock Exchange, SBI Japannext, Bursa Malaysia, New Zealand Exchange Limited, Singapore Exchange, Philippines Stock Exchange, Stock Exchange of Thailand, Euroclear
Fixed Income Bonds and Notes	Jefferies International Limited, Deutsche Boerse (Eurex), Deutsche Boerse (Eurex Repo), Deutsche Boerse (Eurex Bonds), MTS Markets (including BondVision), Euronext LIFFE, Borsa Italiana (MOT, EuroMOT, ExtraMOT), HDAT, SENAF, Euro TLX, London Stock Exchange/CAP (Broker Tec), Tradeweb, Market Axess Europe Limited, Bondspot Securities Market, Tullett Prebon, TP Repo, Reuters Transaction Services Limited, BGC Brokers LP (eSpeed), Bloomberg Local Brokers (in markets where no exchange membership held), Pershing Securities Limited

LPIO believes that the venues above are appropriate to provide best execution to you as these venues enable LPIO to obtain on a consistent basis the best possible result for the execution of client orders. The charges passed down to the client are consistent with the cost to LPIO of dealing with each venue so as not to unfairly discriminate against any one clearer.

We will regularly assess the venues available in respect to any product that we trade in order to ensure they continue to be the most appropriate for our clients.

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## Execution Factors

The decision of which venues is used for any one trade will be reached based on price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of an order. This decision may be influenced by LPIO's own fees and commissions.

When executing an order LPIO will generally treat price as the highest priority for ensuring best execution. Only under exceptional circumstances would this not be the case.

In order to calculate the price LPIO will pay due attention to the 'total consideration'. This is represented by the price of the financial instrument and the costs related to execution, which must include all expenses incurred by the client which are directly related to the execution of the order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order.

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## Execution Criteria

When executing a client order, we will take into account the following criteria for determining the relative importance of the execution factors above:

- (1) the characteristics of the client including the categorisation of the client as retail or professional;
- (2) the characteristics of the client order;
- (3) the characteristics of financial instruments that are the subject of that order;
- (4) the characteristics of the execution venues to which that order can be directed

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## Selecting an Execution Venue

The following methodology will be used when selecting an execution venue for an Order.

Subject to proper consideration of the execution criteria and execution factors referred to above, we will choose where we believe we can trade to the best advantage for (or at no disadvantage to) you.

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## Specific Client Instructions

LPIO can take specific instructions from a client which may override this policy however LPIO may not induce any client to do so. If a client chooses to give specific instructions to LPIO then LPIO will attempt to provide best execution as far as is possible. However this may prevent LPIO from taking the steps that it has designed and implemented in its execution policy to obtain the best possible result for the execution of those orders in respect of the elements covered by those instructions.

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## Order Aggregation

LPIO will check whether any client orders have been aggregated with own account orders or orders from eligible counterparties. If so, LPIO will confirm that the basis of aggregation was in accordance with LPIO's procedures on allocation, and will confirm that such customers were not disadvantaged by the aggregation. LPIO will ensure that any aggregated orders have been promptly and fairly allocated to the customers concerned.

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## Execution Venues

LPIO may use one or more of the types of Execution Venue. LPIO may execute orders on behalf of clients directly on exchanges, multilateral trading facilities or organised trading facilities.

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## Placing Orders with Brokers

In choosing the Brokers to place orders LPIO has taken care to select those Brokers that, in LPIO's view, consistently provide a high quality execution service, taking account of the relevant execution factors for the relevant Instrument Class.

Where LPIO places an order with a Broker for execution by that Broker, LPIO is not responsible for controlling or influencing the arrangements made by the Broker relating to the execution of that order (e.g. LPIO does not control the Broker's choice of execution venues, such as exchanges, multilateral trading facilities or organised trading facilities). LPIO is not required to duplicate the efforts of the Broker to whom an order is passed in ensuring the best possible result.

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## Direct Execution of Orders

In choosing the Execution Venues LPIO has taken care to select those Execution Venues that, in LPIO's view, enable it to obtain on a consistent basis the best possible results for its clients. The selection process takes into account such factors as liquidity, integrity of marketplace and price formation.

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## Choosing Between Order Placement and Direct Execution

LPIO will determine whether to place an order with a Broker or to execute an order directly on an Execution Venue according to the nature of the order and the market in which the relevant order is to be executed. In determining whether to place an order with a Broker or to execute directly, LPIO will have regard to the relative importance of the execution factors. In certain markets, it will only be possible to execute client orders by placing them with a Broker in the relevant market.

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## The factors affecting the choice of Execution Venue or Broker

In relation to an order, an Execution Venue or Broker will be selected as is appropriate in view of the size and nature of the relevant order. LPIO will select Execution Venues and Brokers based on their track records of achieving the best result in terms of the execution factors taking into account, in particular, the geographic and market coverage of the relevant Execution Venue or Broker.

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## Over-the counter trades

When executing orders or using a Broker to deal in financial instruments over-the-counter, LPIO will check that the price quoted is fair by taking into account market data, including comparing that price with similar instruments (where available). There may be counterparty risk when executing an order outside a trading venue. On request by the client, LPIO can provide additional information about the potential impact on the execution of orders when executing over-the-counter.

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## Monitoring and Reviewing this Policy

LPIO has an obligation to monitor the effectiveness of its order execution arrangements and this policy. This obligation has been incorporated into LPIO's general compliance monitoring process and business procedures and policies.

LPIO assesses, on a regular basis, whether the execution venues listed above provide the best possible result for clients or whether it needs to make changes to its execution arrangements. The assessment takes into account the information on execution quality published by execution venues and brokers in accordance with MiFID II. LPIO also conducts regular reviews through random sampling of transactions to ascertain whether the best possible result was obtained in respect of those transactions.

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### Review of Policy

At least annually, LPIO will review this policy and its execution arrangements. The review will focus on whether LPIO would obtain better results for its clients if it was to:

- (A) include additional or different Execution Venues or Brokers;
- (B) assign a different relative importance to the execution factors; or
- (C) modify the process by which Execution Brokers and Venues are selected
- (D) modify any other aspects of this policy and/or its execution arrangements.

LPIO will also review this policy and/or its execution arrangements whenever a material change occurs that could affect its ability to obtain the best possible result for the execution of its clients' orders on a consistent basis, for example, a significant event that could impact the parameters of best execution such as the execution factors specified above.

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### Client Notification / Consent Requirements

LPIO has an obligation to provide its clients with appropriate information on this policy. Where LPIO executes orders on behalf of a client, it will also have an obligation to obtain the client's consent to this policy. By accepting our terms of business, you consent to your transactions being executed in accordance with this policy.

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