

Best Execution Policy

1 January 2021

1. Content and Purpose

GAM (Luxembourg) S.A. (“GAM Lux”) is authorised as management company pursuant to Chapter 15 of the Law dated 17 December 2010 relating to undertakings for collective investments (hereinafter the “Law of 2010”) and as an alternative investment fund manager (“AIFM”) pursuant to Chapter 2 of the Law dated 12 July 2013 relating to alternative investment fund managers (hereinafter the “Law of 2013”), and is further authorised to provide discretionary portfolio management under (i) Article 101 (3) a) of the 2010 Law and (ii) Article 5 (4) a) of the 2013 Law respectively.

Owing to the implementation of UCITS Directive as amended from time to time and its regulations, the implementation of the AIFM Directive, the implementation of the Markets in Financial Instruments Directive 2014/65/EU (hereinafter “MiFID II”) and its regulations, the Law of 17 December 2010 on undertakings for collective investment as amended, the amended Special Funds Law of 13 February 2007 (hereinafter the “Law of 2007”), the Law of 12 July 2013 on alternative investment fund managers, as amended, the Law of 5 April 1993 on the financial sector, as amended, the Law of 30 May 2018 on markets in financial instruments and the relevant circulars and regulations of the Commission de Surveillance du Secteur Financier (“CSSF”) (all combined defined as the “Regulation”), uniform rules have been established for fund management companies in Luxembourg with regard to organisational requirements, conflicts of interest, conduct of business, risk management and content of the agreement between a depositary and a Management Company or Alternative Investment Fund Manager (AIFM).

These regulations should improve investor protection, increase market efficiency and reduce administrative obstacles within the European financial market. Another important goal is the best possible execution (hereinafter “Best Execution”) of the trading decisions of undertakings for collective investment (hereinafter “UCIs”, i.e UCITS and AIF) as well as for portfolios managed on a discretionary client-by-client basis (hereinafter “Client Portfolios”). The provisions to be applied form part of this Best Execution Policy (the “Policy”).

GAM Lux has delegated the investment management activity to duly appointed investment managers (hereinafter referred respectively as “Delegates”) which comply with Best Execution requirements.

The Policy specifies the execution principles to be used by GAM Lux or, as the case may be, its Delegates to implement trading decisions in order to achieve the best execution for investors and clients.

This Policy sets forth information relating to how GAM Lux seeks to ensure Best Execution in accordance with the regulatory requirements.

This Policy relates to the execution of decisions to deal and place orders and specifies the manner in which GAM Lux or, as the case may be, its Delegates will ensure that buy and sell orders for assets in the different markets are executed in the best interests of the investment fund, the investor or client. GAM Lux has implemented processes and measures designed to ensure the requisite due diligence and integrity, lawful and professional conduct, compliance with market standards and, above all, the safeguarding of the best interests of the investment fund, the investor or client.

These principles apply to trades involving FI executed for the account of UCIs or Client Portfolios managed by GAM Lux. Trades are executed by Delegates, the Best Execution principles of the respective Delegates shall apply. In order to ensure best possible execution in these instances GAM Lux will require that any Best Execution principles adopted by the relevant Delegates are consistent with this Policy.

The investments governed by this Policy that may be acquired are:

- securities,
- money market instruments,
- structured financial instruments,
- tradable fund units,
- derivatives traded on a stock exchange,
- forward rate agreements and all other OTC derivatives relating to eligible assets, and
- alternative assets if these are included as eligible assets in accordance with the legislation.

For Client Portfolios this Policy shall be read in conjunction with the UK Order Execution Policy, available upon request.

2. Definitions

“Best execution” is a determination of facts and circumstances that firms take all sufficient steps to obtain the best possible result in the execution of an order for a client that depends, among other things, on the nature of the transaction, the price and availability of the investment instrument, the speed of execution, the size of the order, the terms of the order, the market in which the transaction is effected, and the extent to which it is possible to select from among multiple broker-dealers capable of effecting the transaction.

3. Organisation, duties and responsibilities

Regulatory Provisions

The provisions under the Regulation require GAM Lux or, as the case may be, its Delegates to:

1. Take all reasonable steps to obtain the best possible result for the UCI, its investors or a client when:
 - i. executing portfolio management decisions; or
 - ii. placing orders with third parties for execution;
2. Put in place a policy, to be reviewed annually and whenever there are material changes affecting Best Execution
3. Introduce a Management Information System on policy monitoring and incident reporting
4. Monitor the Policy on annual basis and monitor the effectiveness of their Best Execution arrangements on a regular basis;
5. Be able to demonstrate that they have acted in accordance with their policy and this Policy;
6. Make appropriate information on its policy (and changes to it) available to investors and clients.

More generally, GAM Lux or, as the case may be, its Delegates must:

- put in place procedures for the prompt, fair and expeditious execution of orders, which should ensure that:
 - o orders are executed promptly and are accurately recorded and allocated;
 - o otherwise comparable orders are executed sequentially and promptly unless this:
 - is impracticable because of the characteristics of the order or prevailing market conditions; or

- is not in the best interests of the UCI, its investors or a client;
- ensure assets received on settlement of a trade are promptly and correctly delivered to the UCI or client or registered in its account;
- not misuse information relating to pending orders, e.g. by front-running and must take all reasonable steps to prevent others from doing so;
- only aggregate orders with orders for another UCI or client if:
 - o it is reasonably expected that aggregation will not work to the overall disadvantage of any UCI or other client whose order is to be aggregated;
 - o the Delegate has implemented a policy for the fair allocation of aggregated orders (including how the volume and price of orders determine allocation, and how partial executions are treated); and
 - o partially executed orders are allocated in accordance with the Company's order allocation policy; and
- only aggregate orders for UCI's or other clients with the Delegate's own orders if:
 - o the resulting trades are not allocated in a way that is detrimental to the UCI or other clients; and
 - o partially executed orders are allocated to the UCI or other clients in priority over those for the Company's own account (unless the Company can demonstrate that aggregation was necessary for the transactions to be carried out on such advantageous terms, or at all - in which case, they may be allocated proportionally).

The Regulation specifies that execution venues that may be used include:

- Regulated markets;
- Multi-lateral trading facilities ("MTF");
- Organised trading facilities ("OTF")
- Systematic internalisers (i.e., a firm which, on an organized, frequent and systematic basis, deals on own account by executing client orders outside a regulated market or an MTF);
- Market makers or other liquidity providers (which includes non-European economic entities that perform a similar function to the other execution venues listed above); and
- By matching orders internally through a crossing network or through a third-party crossing network.

4. Best Interest

In order to act in the best interest of a UCI, its investors or Client Portfolios and the integrity of the market, GAM Lux and its Delegates strive to ensure that:

- a) neither the UCI, nor its investors or other clients are charged undue costs;
- b) all reasonable measures are taken to obtain, or ensure to obtain, the best possible result for the UCI, its investors or other clients taking into account the following factors:
 - price,
 - transaction costs,
 - instrument and order features, market conditions,
 - quality, speed of order execution,
 - quality of processing,
 - probability of order execution and settlement,
 - Ability of counterparty to appropriately manage the products over their term and existing settlement agreements (for derivatives),

- market access,
- order size,
- nature of financial instruments or assets, or
- any other consideration relevant that might contribute to the quality of the execution of the order.

In principle, a best possible result for investors and clients is not just determined by the price of a financial instrument but through a combination of many factors. The factors that are of particular relevance depend on the type of transaction. In seeking Best Execution, GAM Lux or, as the case may be, its Delegates must take all reasonable steps to obtain the best possible results for a UCI or a client taking into account the above factors.

In determining the relevant importance of each of the above factors, GAM Lux or, as the case may be, its Delegates will take into account the following Best Execution criteria:

- the objectives, investment policy and risks specific to the managed UCI or portfolio;
- management regulations or articles of association, prospectus or offering documents;
- the characteristics of the order;
- the characteristics of the financial instruments or other assets that are the subject of that order;
- the characteristics of the execution venues to which that order can be directed.

GAM Lux or, as the case may be, its Delegates will also take into consideration the following particular aspects in order to achieve Best Execution:

- eligible assets of the UCI or portfolio,
- strategy of the UCI or portfolio,
- the objectives and implementation policy of the strategy,
- the GAM Lux risk management policy,

Notwithstanding the above, whenever there is a specific instruction from the client, GAM Lux or, as the case may be, its Delegates shall execute or place the order with or transmit it to another entity for execution as instructed by the client.

Where an order is executed on behalf of a retail client, the best possible result shall be determined in terms of the total consideration, representing the price of the financial instrument and the costs relating to execution, which shall include all expenses incurred by the client which are directly relating 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.

For the purposes of delivering best possible result in accordance with the previous subparagraph where there is more than one competing venue to execute an order for a financial instrument, in order to assess and compare the results for the client that would be achieved by executing the order on each of the execution venues listed in the order execution policy that is capable of executing that order, the executing entity's own commissions and the costs for executing the order on each of the eligible execution venues shall be taken into account in that assessment.

When executing orders or taking decision to deal in OTC products including bespoke products, the fairness of the price proposed to the client shall be checked, by gathering market data used in the estimation of the price of such product and, where possible, by comparing with similar or comparable products.

GAM Lux considers that financial instruments traded on one or more regulated markets are traded at the best price on a specific regulated market where the liquidity of the instrument in question is the best and/or the likelihood of execution is the highest.

Since GAM Lux or, as the case may be, its Delegates is however not itself connected to any regulated market, it may perform orders through a third party acting as trading counterparty/intermediary (e.g. a broker) to achieve Best Execution. In light of this, GAM Lux or, as the case may be, its Delegates shall normally appoint brokers who have access to, the most liquid regulated markets and who have the greatest potential to execute the order. In this respect, Delegates may trade on the market which provides greater dealing opportunities or the better price.

5. Order Execution policy

Execution venues

An execution venue is a regulated market, a multilateral trading facility, organised trading facility, a systematic internaliser, a market maker or another liquidity provider or an entity that performs in a non-EEA country a function which is similar to the functions performed by any of the foregoing.

Delegates maintain policies for identifying each class of instrument, and the entities with which orders may be placed. Arrangements are only permissible when they are consistent with the obligations detailed above.

GAM Lux or, as the case may be, its Delegates shall determine the ultimate execution venue/entity for the UCI or Client Portfolios order on the basis of the order execution factors as described above.

Due to system failures or extraordinary market conditions it may be necessary to execute an order in a manner deviating from the principles set out above. Nevertheless, even in such cases GAM Lux or, as the case may be, its Delegates shall aim to achieve the best possible result for the UCI or Client Portfolio.

For Client Portfolios the Delegates maintain policies for identifying each class of instrument, and the entities with which orders may be placed refer to Appendix 1 and Appendix 2 of this Policy. In addition, Delegates may have direct access to a number of trading venues, as set out in the Appendix 1 of this Policy.

The Delegates may have direct access to a number of trading venues. The venue will be selected from this list based on the Delegates assessment of the execution criterion in relation to that particular order, and in accordance with its prioritisation of the execution factors. This will typically lead to the venue being selected that is expected to provide the most favourable price at which to execute the order.

Where there is only one venue available for execution of the order, the Delegates will only use that single venue to fill the order.

Delegates may have the authority to execute orders directly on a venue known as Direct Electronic Access ("DEA") or Direct Market Access ("DMA"), using a broker's membership of that venue. This enables the Delegates to 'work an order' direct on the trading venue without any additional assistance or intervention from the broker which provided this electronic access. The Delegates' access and controls for DEA (or DMA) shall be managed through their execution management systems and be reviewed regularly.

Handling of orders

GAM Lux or, as the case may be, its Delegates have established procedures and arrangements to:

- ensure that orders executed on behalf of a UCI or a client are promptly and accurately recorded and allocated;
- ensure orders are executed sequentially unless prevailing market conditions make this impracticable or the interests of a UCI or a client require otherwise
- ensure financial instruments/sums of money received in settlement of the executed orders shall be promptly and correctly delivered to the appropriate account;
- ensure that there will not be a misuse of information relating to pending orders and take all reasonable steps to prevent the misuse of information.

GAM Lux or, as the case may be, its Delegates may bundle buy and sell orders from different UCIs and Client Portfolios managed by GAM Lux and execute them as aggregated orders (collective order / block order) if it appears expedient and in the best interests of the relevant UCI or investors or clients based on the order volume, securities type, market segment, current market liquidity and price sensitivity of the security being traded.

GAM Lux hereby note that bundling may place individual orders at a disadvantage. However, GAM Lux or, as the case may be, its Delegates will only bundle orders if it is generally unlikely that UCIs or Client Portfolios are placed at a disadvantage.

Executed block orders are allocated to the UCIs and Client Portfolios on a pro rata basis. Partially executed block orders this may result in exceptions to the foregoing if the partially executed orders are allocated based on minimum denominations. If a new issue can be subscribed at several brokers, the possibly differing allotment ratios of each broker with whom a subscription is made are those which apply.

Delegates shall ensure the fair allocation of aggregated orders, including how the volume and price of orders determine allocations and the treatment of partial executions. In so doing, the Delegates shall consider the following factors:

- unlikelihood that the aggregation will negatively impact or generate disadvantage for a UCI or a client;
- in case of aggregation or partially execution, related trades shall be allocated pursuant to the order allocation policy;
- Delegates will execute and place orders diligently, efficiently and fairly; and
- where Delegates aggregate an order of a UCI or a client with an own client's order they must not allocate trades in a way that is detrimental to the UCI or the client.

6. Information on top five investment firms that executed client orders (Client Portfolios only)

GAM Lux or, as the case may be, its Delegates shall summarise and make public on an annual basis, for each class of financial instruments, the top five investment firms in terms of trading volumes where it transmitted or placed client orders for execution in the preceding year and information on the quality of execution obtained. This disclosure shall not include orders executed for UCIs.

The latest reports of the top five execution venues for each class of financial instruments by entity can be accessed through the Delegates' website.

7. Potential Conflict of Interest

GAM Lux or, as the case may be, its Delegates shall not receive any remuneration, discount or non-monetary benefit for routing UCI or client orders to a particular trading venue or execution venue which would infringe the requirements on conflicts of interest or inducements.

GAM Lux or, as the case may be, its Delegates may group UCI or client orders and execute UCI or client trades with another client. In such cases it has set out policies and controls in order to ensure that trades are carried out at a fair market price and in the UCI's, the investor's and/or clients' best interests.

GAM Lux or, as the case may be, its Delegates are required to maintain a conflicts of interest policy identifying the circumstances that constitute or may give rise to a conflict of interest entailing a material risk or damage to the interests of one or more UCIs, the investors or clients, and specifying the procedure that they follow and measures that they adopt in order to manage such conflicts. This requirement applies to potential conflicts of interest that may arise between GAM Lux, its Delegates, the UCIs, the investors and/or clients as a result of the execution arrangements which could prevent them from satisfying their Best Execution obligations.

8. Monitoring and review

GAM Lux will monitor, on a regular basis, the effectiveness of the Policy.

GAM Lux will review the Best Execution policy and procedure of their Delegates as part of the on-boarding due diligence exercise as well as during on-going due diligence, to ensure it complies with the regulatory requirements. Delegates will be required to submit to GAM Lux periodic reports, which shall include inter alia indicators of execution oversight to ensure compliance with the Policy. Delegates are also required to notify without delay GAM Lux's Compliance Department of any infringements of the rules contained in this Policy. GAM Lux has the right to inspect all documents and/or procedures connected with the transactions engaged in by the Delegates at any time.

GAM Lux or, as the case may be, its Delegates will make appropriate information on their Best Execution policy (and changes to it) available to investors and clients.

9. Review Process

The Policy is reviewed on an annual basis and more frequently as required to reflect business and market developments.

10. Implementation

This Policy is entered into effect as of 1 January 2021.

Appendix 1: Outlines main execution factors and venues/brokers (for Client Portfolios only)

2.1 Equity trading

2.1.1 Execution of liquid equities and exchange traded funds (ETFs)

Order type	Equity & ETF trades
Summary/ Description	GAM operates a centralised dealing desk (“CDD”) which is responsible for all equity execution. When an order is received by the CDD, it will gauge the current market price of the instrument with reference to bids and offers on both the electronic order book of the relevant exchange or alternative trading venues.
Key execution factors	<ul style="list-style-type: none"> • Size • Price • Liquidity • Cost • Likelihood of execution • Commission rate for a required service
Main execution venues / brokers	Indications of Interest (“IOIs”) will be reviewed to identify whether any brokers have clients that are looking to execute the other side of the order (known as ‘natural liquidity’) or if there are any trading opportunities via MTF or OTF crossing platforms
Additional considerations	Where a broker has posted a relevant IOI, the CDD will aim to deal at the best possible price. If the order can be executed via a crossing network, then it will normally be done at mid-market price.

2.1.2 Execution of illiquid equity trades

Order type	Illiquid equity trades
Summary/ Description	If an order is received for an illiquid instrument (e.g. shares in a small company), the chances of finding an IOI or an opportunity to trade on a MTF, or equivalent, platform will often be reduced.
Key execution factors	<ul style="list-style-type: none"> • Likelihood of execution • Liquidity • Price • Speed
Main execution venues / brokers	The CDD will typically identify which brokers have seen the greatest trading activity in the instrument and then approach one or more to enquire if an opposing order can be found.
Additional considerations	The CDD will need to manage the risk of information leakage of GAM’s trading intention to minimise the chance of the price moving adversely against the client. To assist in searching for liquidity, algorithmic trading platforms will be used to avoid information leakage of trading intentions.

2.1.3 Execution of large equity trades

Order type	Large equity trades
Summary/ Description	If the order size is a large percentage of the instrument's average daily volume ("ADV") this may limit the ability to execute with immediacy at the indicative market price.
Key execution factors	<ul style="list-style-type: none"> • Size • Price • Liquidity • Cost • Likelihood of execution • Speed
Main execution venues / brokers	The CDD may place the order either/and/or with a counterparty that has had recent trading activity in the security, or through an algorithmic trading platform. In both cases, the CDD will set the parameters of the order, for example any limit price, trading volume constraints and/or timing. To fulfil the total order the counterparty or algorithm will often split the order into smaller lot sizes to execute with available liquidity, to minimise market impact.
Additional considerations	For ADV's of less than 5%, the CDD may use algorithms to reduce the cost of the order execution.

2.1.4 Execution of programme trades

Order type	Programme trades
Summary/ Description	Programme trades may be used to execute a large number of orders at one time. These are usually as a result of cash investments or divestments arising on an account. Depending on the profile of all combined orders, the nature of the order and market conditions, the programme may be executed on a risk (broker's proprietary trading book) or agency basis.
Key execution factors	<ul style="list-style-type: none"> • Cost • Price • Size of order • Likelihood of execution • Speed
Main execution venues / brokers	<p>In the majority of cases a programme trade will consist of liquid instruments and will be executed on an agency basis.</p> <p>For programme trades a standard commission rate has been agreed with all GAM's counterparties, so marginal cost will not be a factor in broker selection but will still remain a factor that determines using programme trading or not.</p>

Additional considerations	<p>Pre-trade the CDD will analyse the potential liquidity of the individual components of the programme and may remove individual orders that have a potential high cost impact. The removed orders will then be executed outside of the programme.</p> <p>Where a programme is to be executed on risk, at least two brokers will typically be asked to quote for the programme trade; however, in the case of very large trades, it may be necessary to take a quote from just one broker to minimise information leakage of GAM's trading intentions.</p>
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2.2 Convertible bond trading

2.2.1 Execution of convertible bond trades

Order type	Convertible bond trades
Summary/ Description	Convertible bonds ("CBs") trade with reference to an issuer's underlying equity price, creditworthiness and the prevailing market bond price. The conversion value of the instrument will often be the key factor in determining the market price of a CB and therefore the execution of these instruments will have characteristics of both equity and fixed income instruments.
Key execution factors	<ul style="list-style-type: none"> • Price (number and quality - for synthetic or other structured trades where the client has credit risk with the counterparty beyond settlement, GAM will look to execute with the lower credit risk counterparty to protect the client even if pricing is not as advantageous) • Size of order • Liquidity of both the bond and underlying equity • Nature of the order
Main execution venues / brokers	IOIs (also known as 'axes' for certain asset classes) and runs (which are indicative price levels for instruments that a broker specialises in), along with other reference price data, will be used to provide pre-trade information. The OVCV function on Bloomberg is deemed a market standard for calculating the CB delta and is used to compare broker quotes that incorporate the current underlying equity price. Where the cost to execute is lower to do so, the order may be executed as a swap with a broker, client restrictions permitting. The TSOX execution management system may be used in conjunction with IB chat to execute trades.
Additional considerations	<p>The time zone of the underlying equity market will also be a consideration as CB deltas will be determined accordingly.</p> <p>For large or illiquid orders, pre-trade checks on the potential sources of liquidity will be consistent. However GAM may refrain from requesting multiple quotations, in order to limit information leakage and any adverse market impacts.</p>

2.3 Fixed income trading

2.3.1. Execution of liquid fixed income trades

Order type	Liquid FI trades
Summary/ Description	<p>GAM will assess broker IOIs and runs including other reference prices prior to execution. GAM will then request quotes based on price, spread or yield and execute with the best overall result. TSOX and IB Chat are the predominant tools used for executing fixed income instruments.</p> <p>When executing fixed income transactions, GAM will be acting in an agency capacity, on behalf of clients. For the majority of orders the executing counterparty will be acting in a principal capacity and is therefore deemed to be the execution venue. As such, they in their principal capacity, would not owe GAM a general duty of best execution, unless agreed contractually.</p>
Key execution factors	<p>Where a variety of competing trading quotations are available:</p> <ul style="list-style-type: none"> • Price • Size (and liquidity) • Nature of the order
Main execution venues / brokers	<p>GAM will execute on various electronic trading platforms such as MTFs, OTFs or Systematic Internalisers seeking, where available, multiple competing quotations. The size, liquidity and complexity of the individual fixed income instrument will dictate the trading platform, venue and strategy selected. GAM uses a number of trading platforms to request quotations from competing liquidity providers.</p> <p>MTFs and open trading platforms are also used to bring together multiple third party buying and selling interests to enable GAM to electronically execute orders, often at the indicative mid-pricing level.</p>
Additional considerations	<p>In choosing the appropriate number and selection of counterparties the trader will assess a number of factors including, but not limited to, indicative market prices, spreads or yields posted by market makers, the size of the order, market liquidity and conditions, IOI's from brokers' inventory and a market makers' execution hit and miss ratios in the relevant sector or instrument. In addition, individual trading platform protocols will dictate the number of requests for quotes available by order type.</p>

2.3.2 Execution of large or illiquid fixed income trades

Order type	Large or illiquid FI trades
Summary/ Description	<p>For Rates instruments (includes Government, semi-government bonds) or Credit Bond orders deemed large in size or illiquid in nature, for example emerging market bonds, the limited provision of market liquidity may result in different trading strategies being adopted. Whilst the pre-trade checks on potential sources of liquidity will be consistent GAM may refrain from requesting multiple quotations so as to limit any information leakage and adverse market price impacts.</p>

Key execution factors	<ul style="list-style-type: none"> • Size (Even if away from the indicative market price, size may take preference over price if it is deemed to minimise any possible adverse market impact on the final execution.) • Liquidity • Price • Nature of the order
Main execution venues / brokers	<p>For orders of a size that might significantly impact (move) a market GAM may choose to only request a quote from one broker, who will then execute on 'risk' (generally acting as principal) completing all or part of the order.</p> <p>Other examples where a single venue may be used would be for Supply Chain Finance instruments which are securitised underlying trade finance commitments. The instruments are often very illiquid.</p>
Additional considerations	N/A

2.4 Foreign exchange trading

2.4.1 Execution of liquid FX trades

Order type	Liquid FX trades
Summary/Description	Given the highly liquid nature of most currency pairs, the majority of orders are executed electronically via a multibank streaming price platform.
Key execution factors	<p>GAM will determine the best method of execution taking into account, but not limited to, the following ranked factors:</p> <p>General</p> <ul style="list-style-type: none"> • Nature of order (e.g. hedge roll, required to generate settlement cash) • Size (and liquidity) Minimising price impact • Price • Any netting opportunities with other live orders <p>Risk transfers (including NDFs)</p> <ul style="list-style-type: none"> • Speed • Price • Size of the order <p>Algorithms/orders</p> <ul style="list-style-type: none"> • Likelihood of Execution • Size (and liquidity) • Any netting opportunities with other live orders
Main execution venues / brokers	<ul style="list-style-type: none"> • Bloomberg FX Go • FX Connect • FXAll • GAM's internal broker price aggregator • Bank Algorithms
Additional considerations	A client's eligible counterparties. For large swap orders at least two or more counterparties would be put in competition.. In these instances, the best price

sourced, from the eligible counterparties available for each client, will be the primary execution factor. This may mean that a client who restricts the use of some counterparties, may not always receive the best price available.

2.4.2 Execution of large, illiquid currency pairs and non-deliverable forwards

Order type	Large in size; illiquid currency pair; or a non-deliverable forward trade
Summary/Description	Where the order is large in size or an illiquid currency pair, a single counterparty may be selected to execute all or part of the order in the market in line with any price limits or time constraints that GAM set, (assuming that there is limited risk of GAM's dealing intentions leaking to the market). Alternatively, GAM may request bilaterally (via IB Chat or Telephone) competing executable quotes with a minimum of eligible counterparties, to minimise the leakage of GAM's dealing intentions which may adversely impact the market price.
Key execution factors	<ul style="list-style-type: none"> • Nature of order • Likelihood of execution • Size • Liquidity • Price • Any netting opportunities with other live orders
Main execution venues / brokers	Counterparty selection will be based on a bank's indicative pricing, previous performance in that currency pair and whether it is eligible to execute the client's order.
Additional considerations	<p>GAM continually monitors liquidity and indicative spread levels, quoted by its counterparties, in different currency pairs and sizes to gauge indicative pre-trade execution costs.</p> <p>GAM undertakes pre-trade analysis by reviewing and monitoring via various tools and pricing sources, execution rates and pricing spreads to identify the best liquidity providers.</p> <p>GAM will also take into account the Investment Managers' objectives for any active FX orders (i.e. taking a position in a currency pair), which may impact the pace at which the orders are executed, including specific levels for entry and exit. Where FX orders are contingent on the purchase/sale of another financial instrument execution will be timed accordingly where appropriate and in the best interests of the client.</p>

2.5 Exchange traded derivatives ("ETDs")

2.5.1 Execution of liquid ETDs

Order type	Liquid ETD trades
Summary/Description	GAM use a number of executing counterparties (some of which may also be GAM's clearing brokers), when trading both equity and fixed income ETDs (which include Futures and Listed Options). The executing brokers will have "Give up" agreements established between themselves and GAM's clearing brokers.

	ETD's may be executed on 'risk' where the executing broker acts as principal, or agency, and will depend on the nature and size of the order, the prevailing market conditions and any investment objectives of the Investment Manager.
Key execution factors	<ul style="list-style-type: none"> • Likelihood of execution • Nature of the order (e.g. hedge or outright position) • Size (and liquidity). Need to minimise market impact • Price • Cost (including clearing fees)
Main execution venues / brokers	The individual instrument will dictate the available venues in addition to the client's derivative contractual arrangements. As ETDs trade on exchange, GAM will usually electronically transmit an order to a chosen broker to execute, setting any price limits, volume or timing constraints.
Additional considerations	N/A

2.5..2 Execution of large ETD orders

Order type	Large ETD trades
Summary/Description	When the exchange permits, GAM will consider block trading (executing on 'risk') large ETD orders, basing the decision on quotes provided by all available ETD counterparties.
Key execution factors	<ul style="list-style-type: none"> • Size • Price • Liquidity • Speed
Main execution venues / brokers	Depending on the block size order rules for a particular instrument and exchange, a risk price may be requested from one or more counterparties.
Additional considerations	N/A

2.6. Over the counter ("OTC") derivatives

2.6.1 Execution of non-complex OTC trades

Order type	Non-complex OTC trades
Summary/Description	<p>Trading in non-complex OTCs will be subject to appropriate documentation (such as an ISDA) being in place between the client and specific counterparties.</p> <p>For liquid, non-complex instruments which may include Interest Rate Swaps ("IRS"), Swaptions, FX Options, Credit Default Swaps ("CDS") and Credit Default Indices ("CDX"), market reference prices and valuations are readily available through a range of sources such as Bloomberg.</p>
Key execution factors	<ul style="list-style-type: none"> • Size

	<ul style="list-style-type: none"> • Liquidity • Price (and market impact) • Nature of the order
Main execution venues / brokers	<p>GAM uses a number of executing counterparties when trading OTCs. The availability of an individual client's ISDA Master Agreement, Credit Support Annex and Cleared Derivatives Execution Agreement with eligible counterparts will influence broker selection for respective client orders.</p> <p>Depending on local regulations the determination of trading venue to execute Interest Rate Swaps may be mandated to SEFs (in the US) or to MTFs. Subject to contractual arrangements established between the client and a particular SEF/MTF their orders would be executed, on a competing quotation basis with eligible counterparts, on that SEF/MTF.</p>
Additional considerations	IRS are generally executed via OTCX and FX Options are executed via IB Chat or Telephone.

2.6.2 Execution of large or complex OTC trades

Order type	Large/Complex OTC trades
Summary/ Description	For OTC trades that are large in size or complex in structure, GAM may choose to open the order to only one counterparty to source a risk price, for all or part of that order, to restrict information leakage of GAM's trading intentions. Alternatively, a counterparty may be instructed to work the order in line with GAM's instructions. The choice of counterparty will reflect their indications of interest and relevant legal documentation in this or associated instruments.
Key execution factors	<p>General</p> <ul style="list-style-type: none"> • Size • Liquidity • Price (market impact) <p>Structured trades (e.g. Total Return Swaps (TRS))</p> <ul style="list-style-type: none"> • Underlying instrument costs • Financing/borrowing costs • Price (overall) • Operational considerations (e.g. reporting and valuation timeliness/precision)
Main execution venues / brokers	<p>GAM uses a number of executing counterparties when trading OTCs. The availability of an individual client's ISDA Master Agreement, Credit Support Annex and Cleared Derivatives Execution Agreement with eligible counterparts will influence broker selection for respective client orders.</p> <p>Depending on local regulations the determination of trading venue to execute Interest Rate Swaps may be mandated to SEFs (in the US) or to MTFs. Subject to contractual arrangements established between the client and a particular SEF/MTF their orders would be executed, on a competing quotation basis with eligible counterparts, on that SEF/MTF.</p>

Additional considerations	Where OTC derivative trades are not executed on a trading venue, the fairness of the price proposed by the eligible counterparty is referenced using different pricing/valuation tools. A fair market valuation is based on an assessment of independent market data and current liquidity conditions prior to execution. In these instances, the ability to execute in larger size, even if away from the indicative market price, may take preference if it is deemed to minimise any possible adverse market impact on the final execution.
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2.7. Money market (“MM”) instruments

2.7.1 Execution of primary MM trades

Order type	Primary MM trades
Summary/Description	When trading in primary money markets, GAM will be acting in an agency capacity on behalf of clients. Trading in primary money markets will be subject to selecting the appropriate issuer/deposit taker based on GAM’s internal credit research analysis and any client guidelines or restrictions.
Key execution factors	<ul style="list-style-type: none"> • Nature of the order • Price • Credit Quality of Issuer/Deposit taker and tenure offered
Main execution venues / brokers	GAM’s internal credit analysis is based on research of the issuer, respective credit ratings and GAM’s existing exposure (via underlying clients’ assets) to the individual entity. Some money market instruments can be traded on MTFs, namely T-Bills, fixed Medium Term Notes (“MTN”) and some Euro Commercial Paper (“ECP”).
Additional considerations	For any tradable money market instrument, a competing price or yield may be sought, however, by their nature, GAM may only be able to execute with one counterparty due to the above stated limitations.

2.7.2 Execution of secondary MM trades

Order type	Secondary MM trades
Summary/Description	GAM uses a number of executing counterparties when trading in secondary money markets.
Key execution factors	<ul style="list-style-type: none"> • Price • Likelihood of execution
Main execution venues / brokers	GAM will receive indicative market pricing and indications of interest from numerous approved counterparties. Some reference prices are available via MTFs and broker quote screens.
Additional considerations	For any tradable money market instrument competing quotes may be sought, however, by their nature, GAM may only be able to execute with one counterparty due to the above stated limitations. In such situations, comparable instruments of a similar type issuer and credit quality will be used to validate price fairness.

Appendix 2: Financial Instruments and Brokers (for Client Portfolios only)

Asset Class	Broker
Shares & Depositary Receipts, Equity Derivatives Admitted to trading on a trading venue, Contracts for difference and Other instruments	ARQAAM CAPITAL LIMITED
	ATLANTIC EQUITIES LLP
	Avior Capital Markets (Pty) Ltd
	Banco Bradesco S/A.
	BANCO SANTANDER, S.A.
	BANK OF CHINA INTERNATIONAL (UK) LTD
	BNP PARIBAS UK LIMITED
	Canaccord Genuity Group Inc.
	CANTOR FITZGERALD AND CO INC
	Carnegie Investment Bank AB
	CENKOS
	CHINA INTERNATIONAL CAPITAL CORPORATION HONG KONG SECURITIES LIMITED
	CIMB GK GOH
	Citigroup Global Markets Europe Limited
	CLSA Limited
	COWEN
	Credit Suisse Securities (Europe) Limited
	CSAP
	Daiwa Capital Markets Europe Limited
	DBS Vickers (Hong Kong) Limited
	DEUTSCHE BANK
	Edelweiss Securities Limited
	FINNCAP
	Goldman Sachs International
	Goodbody Stockbrokers UC
	HSBC BANK PLC
	INSTINET EUROPE LIMITED
	INVESTEC BANK PLC
	INVESTMENT TECHNOLOGY GROUP LIMITED
	ITAU BBA International plc
	J&E Davy [63540061DPCBNMCGRY22]
	J.P. Morgan Securities PLC
	Jefferies International Limited
	Joh. Berenberg, Gossler & Co. KG
	KBC INVESTMENTS LIMITED
	KCG EUROPE LIMITED
	KEPLER CHEUVREUX
	LIBERUM CAPITAL LIMITED
	LIQUIDNET EUROPE LIMITED
	Macquarie Bank International Limited
Maybank Kim Eng Securities (London) Ltd	
Merrill Lynch International	
MIR Securities Limited	
Morgan Stanley & Co. International PLC	
MUFG Securities EMEA PLC	

	Multrees Investor Services (Offshore)
	Nomura International PLC
	NPLUS1 SINGER CAPITAL MARKETS LIMITED
	NUMIS SECURITIES LIMITED
	PILLING & CO STOCKBROKERS LTD
	POWSZECHNA KASA OSZCZĘDNOŚCI BANK
	Raymond James & Associates, Inc.
	REDBURN (EUROPE) LIMITED
	Sanford C. Bernstein Limited
	SMBC Nikko Capital Markets Limited
	STIFEL NICOLAUS EUROPE LIMITED
	UBS Group AG
	VTB CAPITAL PLC
	WELLS FARGO SECURITIES LLC
	WINTERFLOOD SECURITIES LIMITED
	WOOD & Company Financial Services, a.s.

Bonds, Swaps, forwards, and other interest rates derivatives, Futures and options admitted to trading on a trading venue, Credit derivatives	Absa Bank Ltd
	AMHERST PIERPOINT SECURITIES LLC
	AUSTRALIA AND NEW ZEALAND BANKING GROUP
	BANCO BILBAO VIZCAYA ARGENTARIA SA MADRI
	BANCO SANTANDER, S.A.
	BANK OF AMERICA NA NEW YORK
	BARCLAYS BANK PLC
	BMO CAPITAL MARKETS CORP
	BNP PARIBAS UK LIMITED
	BOCI FINANCIAL PRODUCTS LIMITED
	BREAN CAPITAL LLC
	CANTOR FITZGERALD AND CO INC
	CIBC
	CITIC SECURITIES BROKERAGE HK LTD
	Citigroup Global Markets Europe Limited
	COEX Partners Limited
	COMMONWEALTH BANK OF AUSTRALIA LONDON
	CREDIT AGRICOLE CORP AND INVESTMENT BANK
	Credit Suisse Securities (Europe) Limited
	DBS Group Holding Ltd.
	DEUTSCHE BANK
	DZ BANK AG DEUTSCHE ZENTRAL-GENOSSENSCHA
	Goldman Sachs International
	GUGGENHEIM SECURITIES LLC
	HILLTOP SECURITIES INC.
	HSBC BANK PLC

ICAP MANAGEMENT SERVICES LTD
ICBC Standard Bank PLC
ING BANK NV LONDON
J.P. Morgan Securities PLC
JANNEY MONTGOMERY SCOTT LLC
Jefferies International Limited
Joh. Berenberg, Gossler & Co. KG
KEPLER CHEUVREUX
KEYBANC CAPITAL MARKETS INC
KGS-ALPHA CAPITAL MARKETS LP
LARRAIN VIAL SA CORREDORA DE BOLSA
MARKETAXESS CAPITAL LIMITED.
MESIROW FINANCIAL INC
MITSUBISHI UFJ TRUST AND BANKING CORPORA
MIZUHO INTERNATIONAL PLC
Morgan Stanley & Co. International PLC
MTS MARKETS INTERNATIONAL INC
MUFG Securities EMEA PLC
Multrees Investor Services (Offshore)
NATIONAL ALLIANCE SECURITIES LLC
NATIONAL AUSTRALIA BANK LONDON
NATIXIS SECURITIES AMERICAS LLC
NATWEST MARKETS PLC
Nomura International PLC
ODEON CAPITAL GROUP LLC
PERFORMANCE TRUST CAPITAL PARTNERS LLC
PERSHING SECURITIES LTD VIA LIQUIDITY FI
PILLING & CO STOCKBROKERS LTD
RAYMOND JAMES FINANCIAL INC.
RBC EUROPE LIMITED
ROBERT W BAIRD LTD
Royal Bank of Scotland GRP PLC
SAMUEL A RAMIREZ AND COMPANY INC
SC LOWY FINANCIAL HK LTD
Scotia Capital Inc.
Seaport Group Europe LLP/The
SMBC Nikko Capital Markets Limited
SOCIETE GENERALE CAPITAL MARKETS FINANCE
STANDARD CHARTERED PLC
STIFEL NICOLAUS EUROPE LIMITED
SumRidge Partners LLC
TORONTO-DOMINION BANK LONDON
TPCG Financial Services Agente de Valore
UBS Group AG
UNICREDIT BANK AG.

	US BANCORP.
	VALORES BANCOLOMBIA SA
	WELLS FARGO SECURITIES LLC
	WESTPAC BANKING CORP LONDON
	ZURCHER KANTONALBANK.

Currency derivatives, Commodities derivatives and emission allowances Derivatives	Bank Julius Bär & Co. AG
	BANK OF AMERICA NA NEW YORK
	Banque Pictet & Cie S.A.
	BARCLAYS BANK PLC
	BNP PARIBAS UK LIMITED
	CBA
	Citigroup Global Markets Europe Limited
	Credit Suisse Securities (Europe) Limited
	DEUTSCHE BANK
	EFG PRIVATE BANK (CHANNEL ISLANDS) LIMITED
	Goldman Sachs International
	HSBC BANK PLC
	J.P. Morgan Securities PLC
	LLOYDS BANK CORPORATE MARKETS PLC
	Morgan Stanley & Co. International PLC
	Multrees Investor Services (Offshore)
	NATWEST MARKETS PLC
	Nomura International PLC
	Pictet & Cie SA, Geneva
	RBC EUROPE LIMITED
	Rothschild & Co Bank AG
	Royal Bank of Scotland GRP PLC
SOCIETE GENERALE CAPITAL MARKETS FINANCE	
State Street Global Markets, LLC	
UBS Group AG	