

Best Execution and Client Order Handling Policy

Introduction and Purpose

MM Wealth Ltd, ('MM Wealth'), is required to act honestly, fairly and professionally in accordance with the best interest of clients when providing investment services. This is predominately set out in MiFID II, MiFIR and in the FCA's Handbook.

The Best Execution and Client Order Handling Policy sets out how MM Wealth will ensure that all sufficient steps are taken to obtain the best possible result for all clients and that their orders are handled in a fair, just and timely manner.

This Policy applies to all of our clients and services, and it should be read in conjunction with our Discretionary Portfolio Management Service Agreement.

Definition

Best execution is the obligation on a firm to take all sufficient steps to obtain the best possible result when executing client orders or placing orders with other entities to execute. There are a number of execution factors to consider when delivering best execution including price, cost, speed, likelihood of execution and settlement, size and nature of the order and any other relevant consideration.

Application

This Best Execution and Client Order Handling Policy applies to MM Wealth when executing client orders or placing orders with (or transmitting orders to) other entities for execution.

This Best Execution and Client Order Handling Policy applies to all financial instruments for which MM Wealth carries out orders on behalf of its clients. The Best Execution and Order Handling policy will not apply to the extent where MM Wealth follows specific instructions from a client when executing client orders or placing an order with, or transmitting an order to, another entity for execution.

Policy – Best Execution

General Obligation

The best execution obligation requires MM Wealth to take all sufficient steps to achieve the best possible result on a consistent basis, rather than in every case. In practice, MM Wealth has implemented improved Best Execution mechanisms, including:

- ensuring this policy is designed with the intended outcomes in mind;
- strengthened front-office accountability;
- strengthened systems and controls and detection capabilities to identify any potential deficiencies; and
- monitoring of the execution quality obtained as well as the quality and appropriateness of the execution arrangements.

Please note that specific instructions from a client may prevent the firm from achieving best execution in line with this policy.

Execution Factors

MM Wealth will assess best execution by taking into account the “execution factors” which include price, costs, speed, likelihood of execution and settlement, order size, execution reliability of executing broker, nature or any other consideration relevant to the execution of the order.

MM Wealth will exercise judgement in the best interests of its clients given their different needs and requirements and is required to take into account several criteria to determine the relative importance of the execution factors:

- the characteristics of the client, including the categorisation of the client as retail or professional;
- the characteristics of the client order;
- the characteristics of the financial instruments that are the subject of that order; and
- the characteristics of the execution venues to which that order can be directed.

MM Wealth is responsible for assessing the relative importance of the execution factors in light of these criteria and the process by which it determines the relative importance of those factors. This may result in a range of different permissible approaches to executing client orders based on each financial instrument we trade.

When carrying out orders for retail clients, the best possible result shall be determined in terms of total consideration, representing the price of the financial instrument and costs relating to execution.

For our ‘retail clients’ (total consideration), the price and cost of execution of the order will normally be the most important aspect in obtaining the best possible result, therefore MM Wealth will assume this is the most important outcome for your transaction unless the client tells us otherwise.

Deciding Execution Venues

In arranging for the execution of an order, MM Wealth will, as a matter of practice, invest it through a platform or custodian service, which is responsible for achieving the best execution. This is then monitored by MM Wealth. MM Wealth only places trades via our approved custodians/platform providers.

MM Wealth does not use brokers directly. MM Wealth is obliged to ensure that our approved execution venues (meaning custodians/platform providers) included in this policy are the ones who will assist the firm in complying with its best execution obligations (by delivering the best possible result) and that orders are passed to those Brokers in accordance with the policy.

In choosing the Execution Venues for a particular instrument class, MM Wealth has taken care to select those Execution Venues that, in the firm’s view, will enable it to obtain on a consistent basis the best possible results for its clients.

Execution Venues

A list of approved execution venues is kept by MM Wealth and is reviewed, at least annually, or whenever a material change occurs that affects the ability to continue to obtain the best possible result for clients. Appendix 1 currently identifies, in respect of each class of instrument traded, the execution venues and entities with which orders are placed or to which MM Wealth transmits orders for execution. The following outlines MM Wealth’s approach to selecting counterparties. Generally, MM Wealth does not allow its clients to choose an execution venue.

The vast majority of all orders placed by MM Wealth are executed through the following platforms/custodian services: A J Bell and Standard Life.

Direct Execution of Decisions to Deal

In the case of transactions that MM Wealth itself executes directly on behalf of clients, the Execution Venues on or with which it executes those transactions. The Execution Venues identified must at least include those that enable MM Wealth to obtain on a consistent basis the best possible result for the execution of client orders.

Executing/Placing Orders with Execution venues that are not on the approved list

MM Wealth's employees must not place orders with an execution venue that has not been approved unless there are exceptional circumstances. Any execution of a transaction that falls outside the approved list must be pre-approved by a member of senior management.

Best Execution Considerations for Each Instrument Class

MM Wealth's assessment of the relative importance of the execution factors in relation to decisions to deal in each Instrument Class is detailed in the table Appendix 1. This policy differentiates between each of the separate categories of financial instrument where MM Wealth's clients invest.

Over The Counter (OTC) products

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

Inducements

MM Wealth shall not structure or charge its commissions in such a way as to discriminate unfairly between execution venues.

MM Wealth shall inform clients about inducements it may receive from execution venues.

Client notification/consent requirements

MM Wealth will provide its clients with appropriate information on this policy. In order to comply with this obligation, summary of this policy is included within our Term of Business (which all clients have been provided) and is also available on the website. To the extent that if MM Wealth makes any material changes to this policy (whether pursuant to the review process or otherwise), the firm will notify its changes to its clients. Compliance will ensure that such notifications are made upon request from a client, MM Wealth shall provide its clients or potential clients with information about entities where the orders are transmitted or placed for execution.

Policy – Client Order Handling

General Obligation

MM Wealth will implement procedures and arrangements which provide for the prompt, fair and expeditious execution of client orders ("the Orders") and to allocate Orders fairly when it conducts transactions involving several clients in the same security at the same time. This policy sets out the procedures and arrangements that MM Wealth has implemented to meet these obligations.

Allocation Factors

The nature of MM Wealth's business requires it to select from a large array of possible eligible investments that are appropriate to its clients. It must decide on the quantity that is prudent to purchase, to which clients they should be allocated and in what size.

Trades will be allocated to clients on a basis believed to be fair and equitable; no client will receive preferential treatment over any other.

In determining the suitability of each investment opportunity to a client, consideration will be given to a number of factors, the most important being the client's investment objectives and strategies, existing portfolio composition and cash levels. Having considered these factors and prior to executing any transactions, MM Wealth will determine the allocation of an order for each client.

Order Handling

If an order is made by one client only, it is executed in the normal manner in accordance with the Best Execution Policy and the entire execution is allocated to this client. MM Wealth will ensure that any Orders executed on behalf of clients are promptly and accurately recorded and allocated.

MM Wealth will carry out otherwise comparable Orders sequentially and promptly unless the characteristics of the Order or prevailing market conditions make this impracticable, or the interests of the client require otherwise. MM Wealth will inform clients of any material difficulty relevant to the proper carrying out of orders promptly upon becoming aware of the difficulty. MM Wealth will not misuse information relating to pending client orders and shall take all reasonable steps to prevent the misuse of such information by any of its relevant persons.

No allocations will be made to a personal account of the firm.

Aggregation and Allocation of Orders

The investment management team will not carry out a client Order in aggregation with another client Order unless the following conditions are met:

- It is unlikely that the aggregating of orders and transactions will work overall to the disadvantage of any client whose Order is to be aggregated; and
- It is disclosed to each client whose order is to be aggregated, either orally or in writing and either specifically or in the terms of business that the effect of aggregation may work to its disadvantage in relation to a particular Order.

MM Wealth places Orders on a first come first served basis. Where an investment opportunity is suitable for two or more clients, MM Wealth will allocate the opportunity equitably in order to ensure that funds have equal access to the same quality and quantity of investment opportunities, and in determining such allocations will consider the Allocation Factors.

MM Wealth will only aggregate client orders if they are initiated with the same set of execution instructions, if they are initiated on the same day and if they follow exactly the same order chain (e.g. same custodian). In the first instance, orders will be allocated according to the size of the original order. Where this is not possible, for example because the order is not filled, then in order to ensure fairness, all deals will be allocated in accordance with the pre-trade allocation. Where changes are made to the pre-trade allocation,

records are maintained of the changes made and the reason. MM Wealth will generally allocate trades on a pro-rata basis, based upon capital weighting, subject to the consideration of the Allocation Factors and the treatment of partial executions.

If an order is received from one client and, whilst this is being executed, other clients give orders in the same instrument, then the execution will go to the first client until the subsequent order was received and then executions will be prorated subsequently. Such orders will also be subject to further review to ensure that no front running has occurred. In the event that front running has occurred, the subsequent order may be cancelled or re-allocated.

If an aggregated order is partially executed, the order will be settled for the different clients on a pro-rata basis, according to the contribution made to the aggregated order. The order management system of MM Wealth is designed to only permit pro-rata allocation whenever an aggregated order is only executed. When allocating aggregated orders, MM Wealth must not give unfair precedence to any party involved. All deals must be allocated prior to execution. If deals are not pre-allocated, then the reason must be recorded.

If an error is identified in an allocation, a re-allocation may be made for an aggregated order. In such cases, a record of the reason for and the basis of the reallocation must be fully documented, and the re-allocation will be completed within one business day of the identification of the error.

Allocation records for aggregated transactions must include the time and date of the allocation; the relevant product; the client's identity and any eligible counterparty and the amount allocated to each client and party involved. MM Wealth is required to retain the records relating to aggregated orders for a period of at least five years from the date on which the order is allocated or reallocated.

Specific Instructions

If an instruction that price is not the most important factor in executing an order is received from a client, MM Wealth will make every effort to comply with such instruction but cannot guarantee it. This may be due to either the nature of the order, or the type of financial instrument in question.

MM Wealth will make all decisions as to where the orders are placed in relation to the execution venue. We will therefore not accept specific instructions from clients regarding the venue where the order is executed.

If we do accept any client specific instructions, clients should be made 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.

Use of Third Parties

The third parties have responsibilities in relation to best execution and client order handling themselves. Our terms and conditions with our counterparties provide that they will make all sufficient efforts to provide best execution when we instruct transactions through them. We will also undertake periodic monitoring to ensure that they are meeting the relevant requirements.

Dealing in Collective Investment Schemes

When MM Wealth arranges deals in collective investment schemes (e.g. Unit Trusts, OEICs and Investment Trusts), we may deal directly with the fund manager and/or the operator of the collective investment scheme or we may arrange the deal through a third party such as a 'fund supermarket', (an online transaction service), or Wrap/Custodian service.

Providers of Unit Trusts and OEICs generally calculate and set their prices once a day, in accordance with the Financial Conduct Authority requirements, over which we usually have no influence.

Charges

It is MM Wealth's policy that its commission and charging structure will not influence either the selection of execution venues, or the order flow that follows as a result of the execution process. MM Wealth will not therefore discriminate between the execution venues we use to arrange execution of clients' orders.

Procedures

MM Wealth will adopt the following procedures to monitor the effectiveness of its order execution arrangements and this policy as well as be able to demonstrate to clients that it has acted in accordance with this policy.

Front Office Monitoring

The systems necessary to record and monitor orders and executions as well as the links with the middle office and prime brokers lie within the front office. Therefore, all orders must be made through the front office. Additionally, all confirmations, if not communicated direct, will be passed to the front office.

It is solely the job of the front office to monitor the quality of executions and ensure compliance with FCA regulations and to also ensure proper control. Authorised traders are communicated to our counterparties with instructions to them not to accept orders from anybody else. Orders made by others risk not being recognised.

The dealing desk is responsible for keeping copies of orders and trade confirmations.

Compliance Monitoring

The compliance monitoring process will involve a periodic review by compliance of a random sample of transactions to ascertain whether the best possible result was obtained in respect of those transactions.

Compliance has set out various factors that will identify transactions that require further investigation to determine whether Best Execution was achieved.

For transactions where price was the most important execution factor, this will involve a review of prices that were available at the time of execution. Where better prices than the price obtained were available, compliance will discuss this with the relevant member of staff who effected the transaction and determine whether, bearing in mind the other factors that the portfolio manager/ trader considered to be of importance (e.g. size and nature of order) at the time, the best result was nevertheless achieved.

Where another execution factor was the most important (e.g. speed of execution), compliance will consider whether the best possible result was achieved in terms of that factor and again whether, bearing in mind the other factors that the portfolio manager considered to be of importance at the time (e.g. price, size and nature of order), the best result was nevertheless achieved.

The Compliance Officer, as owner of this policy, may make changes to this policy depending upon the outcome of the monitoring process. The monitoring of the adherence to this policy and the record keeping forms part of the Compliance Monitoring Programme performed by the Compliance Officer.

Review

At least annually, MM Wealth will review this policy to ensure it is capable of delivering best execution on a consistent basis and orders are handled in a fair, just and timely manner. MM Wealth 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. What is material will depend on the nature and scope of any change. This could include close links, conflicts of interests and common ownerships with respect to any execution venues used to execute orders.

The reviews will be supervised by the Compliance Officer and this requirement has been incorporated into MM Wealth's compliance monitoring process.

APPENDIX 1: DETAILED REQUIREMENTS OF THE EXECUTION POLICY FOR EACH INSTRUMENT CLASS.

Instrument Class	Execution Factors
<p>Cash Equities This Instrument Class includes equities, warrants and depositary receipts and equity CFDs.</p>	<p>The firm uses the approved Execution Venues (custodians). In the unlikely event the firm trades Cash Equities, for smaller orders, the portfolio manager will on many occasions consider that price is the most important execution factor. Other execution factors are permitted to be taken into account at the discretion of the relevant portfolio manager as is appropriate for the size and nature of the relevant order (and one or more of these other factors may displace price as the most important factor). Where the order is to be executed directly with an Execution Venue (custodian), the portfolio manager will check the quoted prices available on the relevant Execution Venue (custodian). For larger orders, the portfolio manager will often consider that certainty of execution, reduction of market impact and speed of execution will have greater importance.</p>
<p>Bonds This Instrument Class includes corporate and government bonds, convertible and exchangeable bonds, commercial paper, asset-backed securities, mortgage-backed securities, certificates of deposit and structured debt securities.</p>	<p>In relation to transactions in bonds, the portfolio manager will on many occasions consider that price (including costs) is the most important factor. Other execution factors are permitted to be taken into account at the discretion of the relevant portfolio manager as is appropriate for the size and nature of the relevant order. For larger orders, the portfolio manager will often consider that certainty of execution, reduction of market impact and speed of execution will have greater importance.</p>
<p>OTC Derivatives This Instrument Class includes OTC options, OTC forward transactions, OTC swaps (including credit default swaps, total return swaps, variance swaps interest rate swaps and currency swaps). MM Wealth invests in OTC derivative instruments to hedge against market risk or to gain exposure to an underlying asset. Such derivatives will be either standard contracts or will be structured contracts.</p>	<p>Trading derivative contracts off-exchange will be effected by MM Wealth with the Execution Venue (custodian). All such transactions are effected on a request-for-quote or negotiated deal basis. For transactions in OTC derivatives, the portfolio manager will on many occasions consider that price (including costs) is the most important factor. Other execution factors can be taken into account at the discretion of the relevant portfolio manager as is appropriate for the size and nature of the relevant order. In most circumstances, transactions may be initiated by the Execution Venue (custodian) rather than by MM Wealth. For larger orders, the portfolio manager will often consider that certainty of execution, reduction of market impact and speed of execution will have greater importance.</p>
<p>Exchange Traded Derivatives This Instrument Class covers exchange-traded futures and</p>	<p>The firm uses the client's custodian in respect of transactions in financial instruments falling within this Instrument Class.</p>

<p>options contracts and exchange traded contracts for differences. MM Wealth invests in exchange-traded derivative instruments to hedge against market risk or to gain exposure to an underlying asset.</p>	<p>The vast majority of exchange-traded derivatives transactions will be effected by passing an order to the custodian. The portfolio manager will on many occasions consider that price (including costs) is the most important factor. Other execution factors can be taken into account at the discretion of the relevant portfolio manager as is appropriate for the size and nature of the relevant order. Where the order is to be executed directly with an Execution Venue (custodian), the portfolio manager will check the quoted prices on the relevant Execution Venue (custodian).</p>
<p>Collective Investment Schemes</p>	<p>For the vast majority of CISs there is no secondary market and it is almost invariably the case that MM Wealth will place an order for the purchase or sale of units with the operator or manager or administrator of the fund. The “Execution Venue (custodian)” for such transactions would therefore always be the operator /manager /administrator (as appropriate). Transactions are effected at the net asset value of the CIS. Certainty of execution (i.e. the ability to execute the order) is the most important factor.</p>