

ORDER EXECUTION POLICY

The purpose of this document is to set out, in accordance with the MiFID Directive, the best execution and order handling policy which Degroof Petercam Asset Management S.A. (hereafter DPAM) follows when introducing orders or receiving and transmitting orders on behalf of its clients.

The execution policy for orders in respect of financial instruments (the “Order Execution Policy”) described in the present document supplements the General Terms and Conditions of Business governing relations between our Bank and its clients. It is established in accordance with European Directive 2014/65/EU (MiFID II) and particularly article 27.

This policy is based on the policy “Order Execution Policy”(Buy-Side) of the Bank Degroof Petercam SA (hereafter “BDPB”).

The Order Execution Policy applies to all clients of DPAM, being collective or individual management, for retail or professional clients and to financial instruments as defined by MiFID.

1. Prior consent by clients

With respect to financial instruments admitted to trading on a regulated market, the client gives its explicit consent:

- With the general provisions of the Execution Policy;
- A possible execution of orders related to the service provided by DPAM to its clients, outside a trading venue (see for more details below);
- A possible delay in communicating a limit order to the market (see for more details below).

DPAM believes that these two authorisations work to the benefit of its clients for achieving the best possible result in the execution of their orders.

In principle, this consent is given by signing the client contract. Should a client not agree to give prior express consent for one or both of these two specific areas, DPAM will have to process such orders in a less integrated way and this may have a detrimental effect on the quality of the execution of those orders.

2. Choice of the Dealing Desk

Based on the assessment of the services provided by the Dealing Desk of BDPB and on the review of its Order Execution Policy, DPAM has decided to use the Dealing Desk of BDPB for the transfer and execution of the orders generated within the framework of its activities.

On a yearly basis, DPAM will assess the quality of services provided by BDPB and review his choice in case it estimate it can have a better service with another provider.

3. Best Execution requirement of BDPB

BDPB has established and implemented arrangements with a view to providing clients with the best possible result on a consistent basis. BDPB offers what is called "best execution" by taking all reasonable steps to obtain, when executing or receiving and transmitting orders, the best possible result for their clients taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

4. Scope of application of Best Execution

BDPB carries out orders on behalf of clients in accordance with its Order Execution Policy with a view to obtaining the best possible result in accordance with its policy. This means that there is no obligation to obtain the best possible result for each individual order.

BDPB acts on behalf of DPAM when it exercises its discretion in relation to the execution of the order and DPAM relies on BDPB for protecting her client's interests.

BDPB warned DPAM that the best execution requirement does not apply when it gives a specific instruction as to how to execute the order, even though BDPB will always defend its client's interests. If the specific instruction is related to part of the order, BDPB applies its Order Execution Policy to those aspects of the order which are not covered by the specific instructions.

5. Best execution factors

Within the limits of the present execution policy, BDPB determines the criteria it deems most appropriate to consider and prioritize in the execution of any transaction.

This encompasses:

- the price;
- the implicit or explicit costs;
- the speed and likelihood of execution and settlement;
- the size and nature of the order; and
- any other parameters that may impact the quality or total cost of execution.

BDPB interprets the above criteria giving full consideration to:

- characteristics and MiFID classification of the client;
- characteristics of the order;
- characteristics of financial instruments that are the subject of that order; and
- characteristics of the execution venues to which that order can be directed.

For retail clients, in accordance with regulatory requirements, the best possible outcome depends on the total consideration, taking into account both the price of the financial instrument and the overall costs of executing the transaction - including any fees paid to third parties involved in the execution of the order.

For professional clients, in accordance with regulatory requirements, the best possible outcome depends on the relative evaluation of the aforementioned criteria depending on the market circumstances.

For eligible counterparties, in accordance with regulatory requirements, the present execution policy will not apply.

6. Order processing and grouping

Orders are executed promptly and precisely in the chronological order in which BDPB receives them, taking into account the channel through which each order is received. Comparable client orders are hence executed in the chronological order of their arrival, unless the nature of the orders concerned or market conditions make this impossible or clients' interests call for a different procedure.

BDPB may, in relevant circumstances, group similar orders to form a block whenever it reasonably believes that it could obtain a better result than when executing the orders separately. An order allocation policy is established and implemented, providing in such case for the fair allocation of aggregated orders and transactions. Consolidation may however occasionally produce a less favourable result for a particular order.

By endorsing the present execution policy, clients explicitly allow BDPB to act in this manner.

7. Execution venues, intermediaries and counterparties

BDPB selects execution venues able to ensure the best execution of the orders on behalf of its clients with regard to relevant criteria and conditions detailed earlier.

BDPB may use one of the following execution venues, as defined in the regulatory framework :

- Trading platforms:
 - Regulated markets;
 - Multilateral Trading Facilities (MTF) ;
 - Organised Trading Facilities ;
- Platforms other than a trading platform for so-called over-the-counter (OTC) transactions, these platforms may be:
 - Systematic Internalisers ;
 - Market makers ;
 - Transfer agents ;
 - Other liquidity providers

BDPB may execute orders outside a trading venue when in the best interest of the client, and considers the endorsement of the present policy an express consent of its clients to such treatment.

BDPB may also rely on intermediaries to carry out the transactions entrusted to it by its clients. It may call upon one or more intermediaries of its choice whenever it considers it necessary or in the best interest of the client. BDPB ensures these intermediaries provide own execution policies matching the quality criteria set forth in the present policy.

Lists of execution venues and intermediaries selected by BDPB are available on the website of BDPB. These lists may be non-exhaustive as BDPB may select other execution venues and intermediaries when deemed appropriate, in accordance with the present policy.

The lists of selected execution venues and intermediaries are regularly reviewed and updated, at least annually and following every formal review.

Any changes to the execution policy and its annexes will be brought to the client's notice in the manner determined by BDPB according to the materiality of the changes. Information regarding the policy is always available from the website of BDPB in the "investor protection" section.

On an annual basis, BDPB publishes, in line with the regulatory requirements, an activity report detailing i) its five most important execution venues and ii) its five most important counterparties for each category of financial instruments, but also for orders from professional and non-professional clients. The report, like information regarding the policy, will be available from the website of BDPB.

BDPB does not receive any remuneration, rebates or non-monetary benefits for the execution of client transactions on a particular execution venue that would violate the conflict of interest or incentive requirements of the MiFID 2 directive.

8. Specific Instructions

Clients who wish to deviate from order's execution policy must send a specific instruction with their order in written form to that end.

Any specific instructions from the client may prevent BDPB from taking the steps that it has designed and implemented in its execution policy to obtain the best result for the execution order, which the client expressly accepts.

Unless otherwise instructed, a specific instruction given for a particular transaction is valid only for that single transaction, other client orders being deemed to be transmitted for execution in accordance with the execution policy.

In executing or routing specific instructions, BDPB will give priority to the specific instruction over all other relevant execution quality criteria.

9. Assessment

DPAM will monitor the effectiveness of its Order Execution Policy to identify and, where appropriate, correct any deficiencies. DPAM will monitor or ask BDPB to monitor particular transactions by sampling and verifying whether the execution of the order has complied with the policy, and whether the resulting transaction has delivered the best possible result for the client.

DPAM will review the Order Execution Policy at least annually or whenever a material change occurs that affects its ability to obtain the best result for the execution of its client orders.

DPAM shall publish annually, in accordance with the regulatory requirements, a report showing that the selection of a single entity for the execution of orders enables DPAM to obtain the best possible result for its clients and that clients can reasonably expect that the selected entity will enable them

to obtain results that are at least as good as the results they could reasonably expect from using alternative entities for execution.

DPAM refers to the annual publication in accordance with the regulatory provisions of BDPB's business report listing (i) its five most important execution venues and (ii) its five most important counterparties for each category of financial instruments.

Any material change to the Order Execution Policy will be updated on the website of DPAM in the "investor protection" section or be at the disposal of the client in its offices.
