

# Best Execution Policy

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## 1 Objective

Directive 2004/39/EC of the European Parliament is to be implemented in national Luxembourg law as part of the legislative project No. 5627, through amendment and addition to law of 5 April 1993 on the financial sector.

The directive sets standards for the execution of client orders by investment firms. Each investment firm must establish a Best Execution Policy. Unless the client gives the investment firm explicit instructions when the order is submitted, as for example with a fixed price order, the Best Execution Policy will apply to achieve the best possible result for the client when the order is executed.

When carrying out client orders, investment firms must assess the relative importance of the issues listed in Article 21 Section 1 of Directive 2004/39/EC with respect to the following criteria:

- a) The nature of the client and whether the client can be classified as a private investor or a professional client;
- b) The characteristics of the client order;
- c) The characteristics of the financial instruments contained in the relevant order;
- d) The characteristics of the execution venues to which the order can be sent.

The “execution venue” means a regulated market, a multilateral trading facility (MTF), a systematic internaliser, a market-maker, any other liquidity provider or an institution which exercises a comparable function in a third country.

The Best Execution Policy of Sal. Oppenheim jr. & Cie. S.C.A. (hereafter OP Lux) identifies the execution venues which deliver the best possible results on a consistent basis and provides information on the factors which determine the choice of execution venue. To achieve this, the individual factors are described and weighted to enable an assessment of the execution venue.

The execution principles set out in this policy are reviewed once a year. A review will also be carried out if there is a significant change which affects the ability to continue to achieve the best possible result in the client's interests.

## 2 Weighting of the factors listed in Art. I MiFID

To ensure the best possible execution, OP Lux has established principles for the execution of orders in financial instruments and foreign exchange.

### 2.1 Determination and definition of the factors:

- a) Price
- b) Costs
- c) Speed of execution
- d) Probability of execution and settlement
- e) Size (Execution size)
- f) Type (Order type)
- g) Management of the order

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## **a) / b) Price and costs:**

The price and the costs of execution are important considerations in achieving the best possible result when executing orders. For the purchaser of a security it is only the total cost that is relevant, which consists of the price of the security plus all relevant associated costs. MiFID stipulates that this order execution issue should receive the heaviest weighting for private investors and that price and costs should be taken in conjunction with each other. Associated costs such as third party fees, brokerage, contract note fees and transaction fees therefore need to be taken into account when selecting the execution venue if these fees are charged to the client.

The quality of prices depends to a large extent on the nature of the price formation process of the execution venue in question. Criteria indicative of high quality of prices include as large a number of participants as possible, the use of market makers and the similarity of prices to other markets, the so-called reference market principle. This means that a security's home exchange, which usually has the highest liquidity, determines the price for other markets. For example, on the German stock exchange the floor exchange brokers undertake to offer the current bid/offer spread available on a foreign stock's domestic market on the German market too.

## **c) Speed**

This criterion refers to the period between the receipt of the order and the point at which it can theoretically be executed on the market.

The speed of a market is largely determined by the market model in use (e.g. continuous auctions, quote-driven prices etc.). In addition the process of transmitting the orders to the execution venue can also be key. A direct link to the execution venue, also in the form of what is known as "direct market access (DMA)", can be an important advantage in this context. Orders sent by DMA are transmitted electronically to the respective exchange without any human intervention.

## **d) Probability of execution and settlement**

The probability of order execution on the relevant market is dependent to a large extent on liquidity. In this context, "designated sponsors" are regarded as liquidity providers.

The sub-issue of the probability of settlement covers the risks of problems in the settlement of securities transactions, which could result in problems in delivery.

## **e) Size of the order**

This refers to the size of the order compared with the typical size of an order on the market in question.

## **f) Type of order**

This refers to the different types of order which can be issued on the various markets. Examples of order types include:

Limited orders

Unlimited orders

Orders with a time limit

Stop-Loss orders

Stop-Buy orders

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Clients specify the order type when they place an order. Therefore only markets which are able to carry out the desired order type can be considered. The order type can therefore be a criterion that excludes certain execution venues.

## NOTE:

The use of the above order types, with the exception of “unlimited”, leads to an order being tied to a particular execution venue as a result of which it may not be possible to meet the criteria of speed and probability of execution. When an order is tied to a particular execution venue it may be the case that the order could have been carried out more quickly on a different execution venue.

## **g) Management of the order**

The bank may at its own discretion, but is not obliged to:

- combine client orders with orders from other clients or with orders in which the bank or its staff have a financial interest. It may also allocate securities purchased or sales proceeds in a way that is fair and equitable in the opinion of the bank and is in conformity with the applicable regulations, and
- permit an external broker with whom an order has been placed to combine the order with other orders subject to the applicable rules of the exchange or the MTF.

Combining an order with the orders of other clients may be detrimental for an individual order. A statement of an order which has been combined with other orders is provided as soon as is practicable.

## **2.2 Weighting of factors**

### **2.2.1 Description of the weighting process**

The issues listed in section 2 are weighted for different groups of financial instruments and clients, which produces certain order groups:

#### **I Groups of financial instruments (categories)**

##### **A German and Austrian stocks:**

- DAX
- MDAX, SDAX and TecDAX
- Other domestic stocks

##### **B Foreign stocks**

- EuroStoxx50, Dow Jones Industrial Average, Nasdaq 100
- Other foreign stocks

##### **C Investment funds**

##### **D Securitised derivatives**

##### **E Bonds**

##### **F Money market and foreign exchange instruments**

##### **G Exchange-traded derivatives (Futures / Options)**

##### **H OTC derivatives**

## II Client groups:

- Private investors
- Professional clients
- Eligible counterparties

These groups are not broken down into any other sub-groups.

Professional clients are treated in the same way as private investors for the purposes of Best Execution.

The Best Execution policy lists the execution venues on which results meeting clients' interests can be obtained on a consistent basis and for a large number of orders (Art. 21 III 2 MiFID). This enables a standardization across both the type of client order (for both buying and selling) and the different financial groups.

MiFID specifies the combination of costs and price as the main weighting criterion for private investors. As a result of the equal treatment accorded to the professional investors client group this criterion is therefore the most important overall.

### 2.2.2 Weighting and ranking:

The main criteria determining the differing weights attributed to the order execution issues are based on the characteristics of the financial instruments and in some cases on the client type.

MiFID stipulates that it is mandatory to give the highest weighting to the combination of price and costs for private investors. The same procedure is also applied to professional clients as the total costs also produce the best decision here in terms of Best Execution.

A higher weighting is given to the probability of execution and settlement than to speed. This is based on the consideration that orders are normally placed on the market quickly anyway (speed), but that market liquidity (probability) is then of central importance for the execution of the order and this factor is more important overall. In extremis, an order can be transmitted to the execution venue within a fraction of a second but may not be executed there due to a lack of liquidity.

However, the probability of settlement should only be seen as a minor issue in relation to the selection of foreign execution venues, as the settlement processes are standardised. Since OP Lux either settles securities transactions via a "general clearer" or else has its own local depository, the probability of settlement can always be regarded as high.

The order size and bid / offer spread are a further consideration, although they do not represent independent factors in themselves. The order size is a characteristic to be considered in relation to the "probability of execution and settlement", while the bid / offer spread criterion is only of interest for foreign stocks and falls under the price / costs issue. In the case of sell orders the depository situation must be taken into account. From a cost perspective and to avoid settlement risks it does not make sense to sell stocks on execution venues where no depository exists or the securities are not held. This could entail expensive transfers of depository.

The same ranking of criteria therefore applies to both private and professional investors:

Price and costs

Probability of execution and settlement

Speed of execution

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The weighting process is not carried out for financial instruments which are traded on futures exchanges and for OTC financial products, as the issue of execution venue does not normally arise in either case.

### **3 Assessment of execution venues / third parties (Screening)**

The selection process filters out those execution venues which consistently provide the best possible results for the execution of client orders on a consistent basis. In this respect, an assessment should be made of how well these venues can satisfy the client needs which have been identified. In some cases this may result in a number of execution venues being considered to be equally good.

OP Lux has direct links to the venues included in the policy in the form of DMA (Direct Market Access), or has indirect access via brokers through electronic order routing or by telephone.

This section sets out the execution venues which can be considered for the different groups of financial instruments and which can deliver good results on a consistent basis.

The policy only covers execution venues for orders from private investors. Execution venues for eligible counterparties are not considered, as they are not subject to the Best Execution requirements.

In addition, the policy only deals with the agency business as OP Lux is not a systematic internaliser and so does not normally carry out any fixed price transactions.

### **3.1 German and Austrian stocks / Foreign stocks**

OP Lux sends all stock orders to external brokers and pays broker fees varying between 10 and 20 bp for this. A detailed listing of broker fees is available on request.

#### **3.1.1 German and Austrian stocks**

As part of OP Lux's Best Execution Policy, orders for the German and Austrian stock markets are sent to Oppenheim Frankfurt. The orders are forwarded electronically by electronic order routing and in exceptional cases by telephone.

The criteria of price and costs are key in the selection of Oppenheim Frankfurt as broker. Oppenheim is also the preferred depository as it will also achieve a very high settlement probability. Due to the excellent technical links between Sal. Oppenheim Frankfurt and the various exchanges, there is also a very high probability of execution in terms of speed of execution.

#### **- Xetra**

##### **Price / Costs:**

Xetra offers very high quality of prices due to the high liquidity level and the narrow price spreads. The costs for clients are low as only the broker fees are charged. The client is not charged contract note fees and settlement fees.

##### **Speed of execution:**

Sal. Oppenheim Frankfurt has a direct link to Xetra.

The speed of execution can be regarded as consistently very high due to the auction principle (opening auction, midday auction, closing auction) and the open order book, which provides transparency of market depth. The auction principle guarantees that all orders in the system at the moment of price determination will be dealt with in the order in which they were entered in the system (price / time priority - i.e. for the same limit the order which was placed earliest is carried out first).

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## **Probability of execution and settlement:**

Xetra offers a very high probability of execution due to the very high liquidity level for DAX stocks. Standardised settlement procedures are in place.

## **- Floor exchanges / regional exchanges**

### **Price / Costs:**

The prices have a Xetra reference, i.e. the price quoted is at least the same as on Xetra. This guarantees execution at the best possible price at the moment at which the order is issued and the best possible price quality, although a brokerage fee of 0.04% for DAX stocks and 0.08% for NON-DAX stocks applies.

### **Speed of execution:**

Sal. Oppenheim Frankfurt has a direct link to the floor exchanges.

All the regional exchanges (Frankfurt, Hamburg, Düsseldorf, Berlin, Munich and Stuttgart) have a closed order book, i.e. the depth of the market can only be seen by the exchange brokers.

In contrast to the market model used by the Xetra electronic trading system, which has several fixed auctions, the stock exchange floors offer continuous auctions. The exchange broker's order book compares all buy and sell orders. The price at which the largest turnover can be achieved is then determined.

## **Probability of execution and settlement:**

Liquidity is provided by the exchange brokers. Standardised settlement processes exist.

## **3.1.2 Foreign stocks**

### **Price / Costs:**

Foreign stocks which are also listed in Germany can be traded through Xetra or on an exchange floor, as well as on their domestic exchanges.

If there is no specific instruction from the client, foreign stocks are traded on the exchange where the best result can consistently be achieved for the client.

A growing number of stocks are traded on several execution venues at the same time. Where the fungibility of the stocks permits, so-called "smart order routing" systems are used. "Smart order routing" systems continuously publicise the best bid and offer prices on the various exchanges, which makes it extremely likely that the best price will be obtained. It is therefore also possible to fragment a client order over various execution venues to achieve the best possible result for the client.

When selecting brokers, the possibility of "smart order routing" should be taken into account.

Broker fees vary between 10 and 20 bp. A detailed list of brokers and fees is available on request.

Equity Trader Direct Market Access/DMA (all of Europe, Brazil, Canada, Czech Republic, China, Greece):

The bank is connected to various brokers via Bloomberg Routing, Reuters IOE and RTEX, so that orders can be routed to the market immediately through DMA (direct market access). This enables OP Lux to exploit the exchange membership of these brokers and so gain direct access to the markets. The cost is a commission of 0.15%.

Non-DMA brokers (USA, Japan, Asian exchanges, South America)

In markets with which SOP has no direct link, brokers who guarantee efficient order execution are used. In these cases, fees are charged for executing the transaction, which are passed on to the client.

## 3.2 Investment funds and ETFs (exchange traded funds)

### - Fundsettle

Fund trading platform run by Euroclear for foreign funds whose custodian banks are connected to the system. The alternative is the manual trade with Transfer Agents which are not connected to the system.

### - Custodian banks

Manual trade in funds: if a custodian bank or transfer agent is not connected to Fundsettle, orders are issued by fax and settled after the receipt of the confirmation. The fund managers calculate the charges due and there is therefore transparency of costs. The probability of execution is also high. Euroclear delivery fees may also be payable on top of the initial charges levied by the custodian banks.

### - ETFs

ETFs are index funds, the composition of which replicates the weighting of an index and can be traded at any time without any initial charges. There is only a bid/offer spread when buying and selling. ETFs are traded via their domestic exchange.

## 3.3 Securitised derivatives

Securitised derivatives are often quoted on exchanges and, if liquidity permits, they are also traded over the exchange.

### - Stuttgart EUWAX

#### Price / Costs:

Broker commission of 10 bp max. plus standard exchange fees.

#### Speed of execution:

The orders are submitted by telephone to Bank Sal Oppenheim Frankfurt, which has a direct link to Euwax.

#### Probability of execution and settlement:

Euwax is the main market in Germany for derivative instruments. Liquidity is ensured by "Quality Liquidity Providers" (QLPs), who are in contact with the issuers or by the issuers themselves acting as market makers. Standardised settlement processes are in place.

### - Frankfurt regional exchange (Smart Trading)

#### Price / Costs:

Broker commission of 10 bp max. and brokerage of 8 bp.

The prices quoted by the exchange brokers or liquidity providers are limited to a maximum net EUR 10,000 in the Smart Trading market segment, i.e. the exchange broker is only obliged to deal at the price quoted for orders up to this size limit.

#### Speed of execution:

The orders are submitted by telephone to Bank Sal Oppenheim Frankfurt, which has a direct link to the Frankfurt stock exchange.

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## **Probability of execution and settlement:**

Another market for derivative instruments alongside EUWAX, as a few issuers have listed their products on the Frankfurt exchange rather than on EUWAX. For the ISINs in question there is a high probability of execution on the regional exchange in Frankfurt.

Standardised settlement processes are in place.

## **- Issuer**

As a basic principle, every order for securitised derivatives can also be traded directly with the issuer.

If Sal. Oppenheim is the issuer, as a basic principle, all orders must be traded directly with Bank Sal Oppenheim Frankfurt.

## **Price / Costs:**

Net, as trading is interbank.

## **Speed of execution:**

Delays are possible where enquiries are by telephone.

## **Probability of execution and settlement:**

High probability of execution.

## **3.4 Bonds**

The bond market is largely organised on a market maker trading system. This is a system in which the transactions are executed on the basis of binding price quotations which are continuously available to market participants, which forces the market makers to continuously quote prices at a level which matches the need for members and participants to trade on a commercial scale with the risks for market makers themselves.

To gain access to market maker prices, OP Lux uses Bloomberg and Reuters for electronic trading. To minimise settlement risks and achieve as high an execution probability as possible at the best possible prices, agreements to trade bonds via Bloomberg or Reuters are only made with selected counterparties.

Bonds which are not electronically tradeable are traded by telephone or via an exchange.

## **- Interbank trading via market maker trading system**

### **Price / Costs:**

No commission, as trading is interbank, on a net basis. The interbank market is an important execution venue for bond trading. High price quality is ensured by the market making of a number of different market participants.

### **Speed of execution / Probability of execution and settlement:**

The system permits the fastest possible execution.

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## **- Interbank trading via telephone**

### **Price / Costs:**

No brokerage, as net trade. However, in terms of quality, the price is inferior due to the small number of providers and the lack of market transparency, and the longer order route compared with electronic execution.

### **Speed of execution / Probability of execution and settlement:**

The system permits the fastest possible execution.

## **- Regional exchanges in Germany (Frankfurt, Stuttgart)**

### **Price / Costs:**

The orders are submitted by telephone to Sal. Oppenheim Frankfurt. The commission is 5 bp plus sliding scale commission for bonds.

### **Speed of execution / Probability of execution and settlement:**

There is the fastest possible execution for smaller volumes (e.g. up to EUR 250,000).

Standardised settlement processes are in place.

## **3.5 Money market instruments**

The money market differentiates between call money and time deposits, and in securities which are classified as money market paper (e.g. federal treasury bills, CDOs and commercial paper). At OP Lux, securities classified as money market securities are dealt with in the same way as bonds at OP Lux.

## **- Trading in call money and time deposits**

The interest rates on call money and time deposits are derived from the interest rates available in the interbank market and are based on a general or special agreement with the client.

## **- Spot foreign exchange transactions**

### **Price / Costs:**

Spot foreign exchange transactions are carried out at the next Frankfurt euro reference rate. Amounts over EUR 50,000 or equivalent can be executed directly in the interbank market on request.

Spot foreign exchange transactions are traded via the Internet applications of selected banks or Reuters Dealing. As a basic principle, these are not exchange-based transactions and there is therefore no commission. The transactions are settled by applying a margin agreed with the client in advance.

### **Speed of execution:**

There is direct access to both systems.

### **Probability of execution and settlement:**

High probability of execution.

## **- Currency forward transactions via brokers and Reuters Dealing**

### **Price / Costs:**

Currency forward transactions are traded via the Internet applications of selected banks or via Reuters Dealing. These are not exchange-based transactions and there is therefore no commission. The transactions are settled by applying a margin agreed with the client in advance.

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**Speed of execution:**

There is direct access to both systems.

**Probability of execution and settlement:**

High probability of execution.

To minimise settlement risks, trading is only carried out with first-class counterparties.

**3.6 Exchange-traded derivatives**

The European market for exchange-traded derivatives is currently still segmented, which means that these derivative instruments are only tradeable on a single exchange as they only have comparable but not identical characteristics. The execution venue is therefore pre-determined and the question of alternative execution venues does not arise.

With exchange-traded derivatives, the movements in value of open transactions are marked to market daily and the margin requirements are updated continuously. Therefore the availability of settlement via clearing accounts and the associated risks is an important factor when selecting the executing broker.

**Price / Costs:**

Exchange-traded derivatives are traded via the Internet applications of selected banks, either through direct market access or by telephone. Commissions vary between EUR 0.90 and EUR 2 per contract. A detailed list of brokers and commissions is available on request.

**Speed of execution:**

Access via Internet applications which enable very fast and direct access to the market.

**Probability of execution and settlement:**

High probability of execution.

The execution venue is pre-determined and the question of alternative execution venues does not arise.

**3.7 OTC derivatives**

The question of the execution venue does not arise here as the bank will be in possession of a declaration of intent from the client that the transaction will be carried out directly with the bank on the agreed terms and every detail is agreed with the client (see section 5). For MiFID purposes, this constitutes an instruction. The Best Execution Policy may therefore be limited to a description of how an OTC transaction materialises.

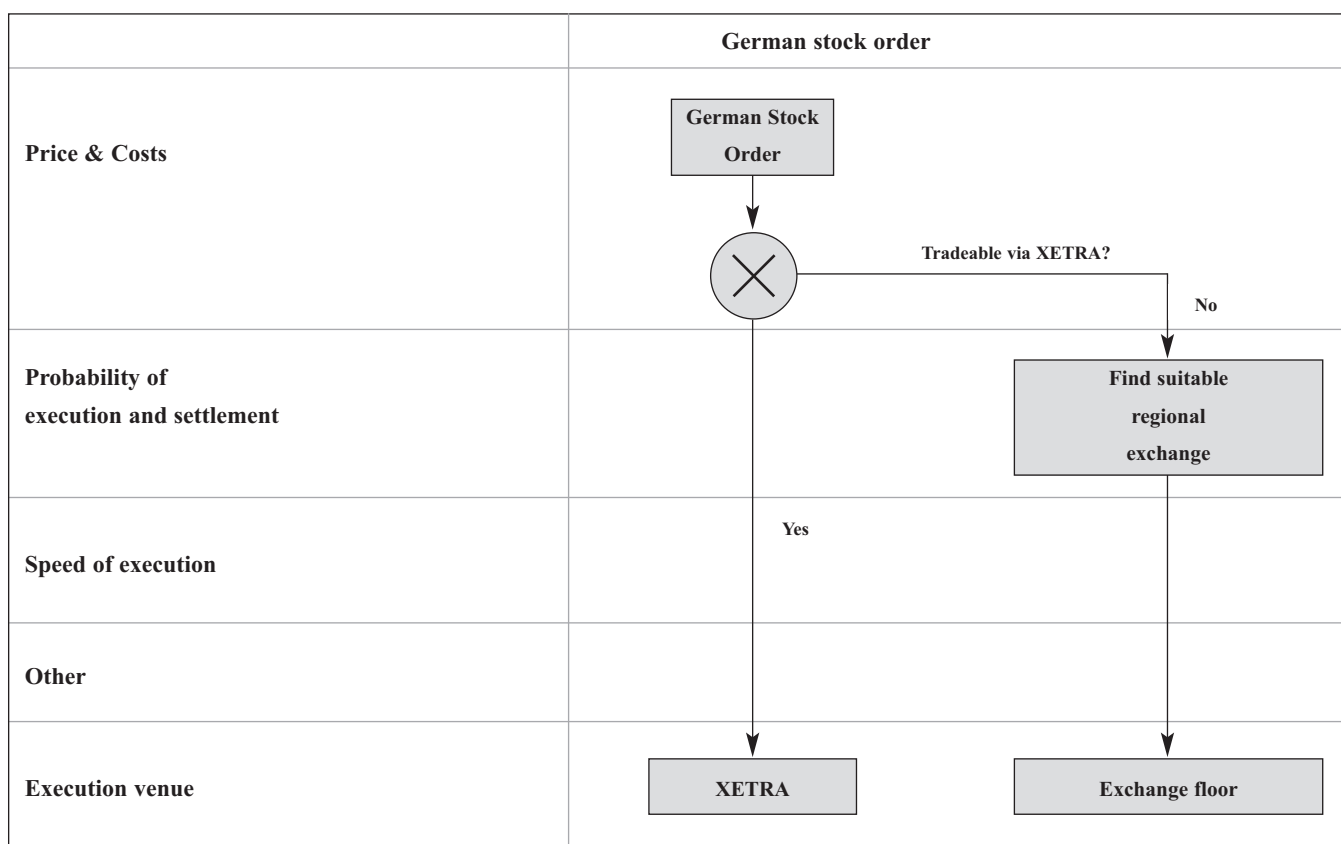
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## 4 Determination of the execution route by order groups (Clusters)

Taking each order group individually, the following execution routes consistently offer the best possible results for the execution of private investor orders in light of the weighting factors named above:

### 4.1 German and Austrian stocks / Foreign stocks

#### 4.1.1 German and Austrian stock orders



Orders are sent to Bank Sal Oppenheim Frankfurt and are dealt with as follows.

For all index constituents (DAX, MDAX, SDAX and TecDAX) and stocks listed on Xetra Austria, electronic trading via Xetra offers the highest liquidity, the narrowest spreads and therefore the highest speed and probability of execution. If the price is the same, Xetra is also cheaper than trading over the floor as no brokerage is payable. The prices quoted by the exchange brokers and liquidity providers are limited to maximum net amounts. The exchange broker is obliged to deal at the price quoted up to a specified net amount in EUR (e.g. EUR 10,000 in Frankfurt). If an order exceeds this volume, the price quotation is only honoured if there is a “genuine” order in the order book. If this is not the case, it is always possible that the broker will change the price quotation.

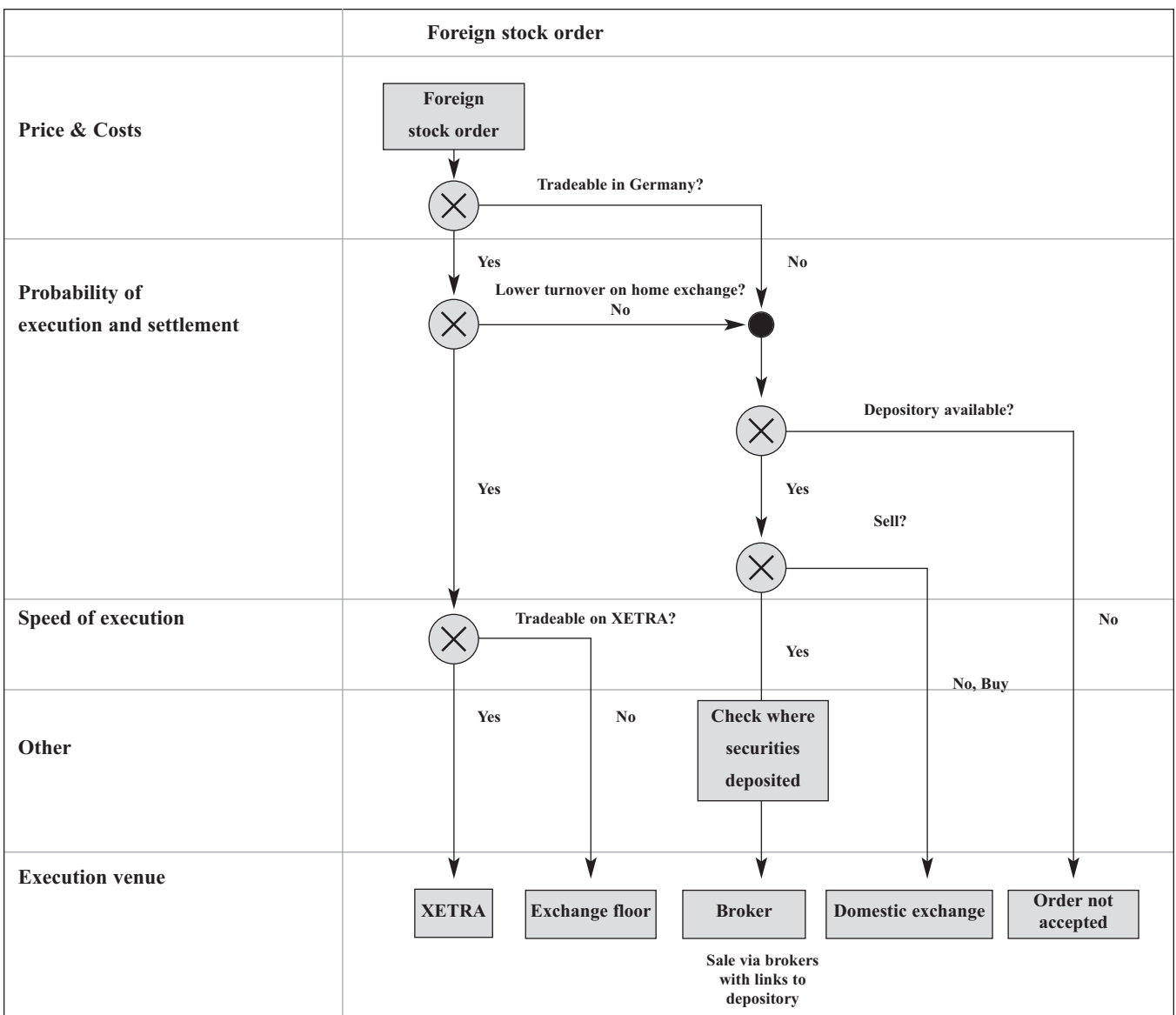
As a result, execution via Xetra is generally preferable to execution over the floor for index constituent securities.

The regional floor exchanges are the preferred alternative for second-line stocks for which a price is not quoted on Xetra or for which there is or only one quotation daily due to their low trading volume.

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In general orders, placed on Xetra which are not executed immediately should not be transferred to a regional exchange after the closure of Xetra at 5:30 pm, even if this means that an order valid for the day will then expire. However, the trader may decide at his own discretion as a result of the order size whether an individual transaction is to be executed via a regional exchange. The decision is made on the basis of the trading volume, as liquidity is normally lower in the floor trading than on Xetra, the Xetra reference is no longer available after Xetra closes, the exchange brokers' order books are not full and therefore the potential price movements can be greater.

## 4.1.2 Foreign stock orders



A distinction is to be made here between foreign stocks listed in Germany and those that are only listed on their domestic exchange.

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If foreign stocks are also listed in Germany, it should be noted that better prices are normally quoted on the stock's domestic exchange, as the prices quoted on other exchanges normally include delivery fees and arbitrage costs. However, brokers charge fees of between 10 bp and 30 bp, whereas 10 bp commission applies to trades on German stock exchanges via Sal Oppenheim Frankfurt and a further 8 bp brokerage if a trade is carried out over the floor. From a price and costs perspective, trading via the domestic exchange is therefore normally preferable.

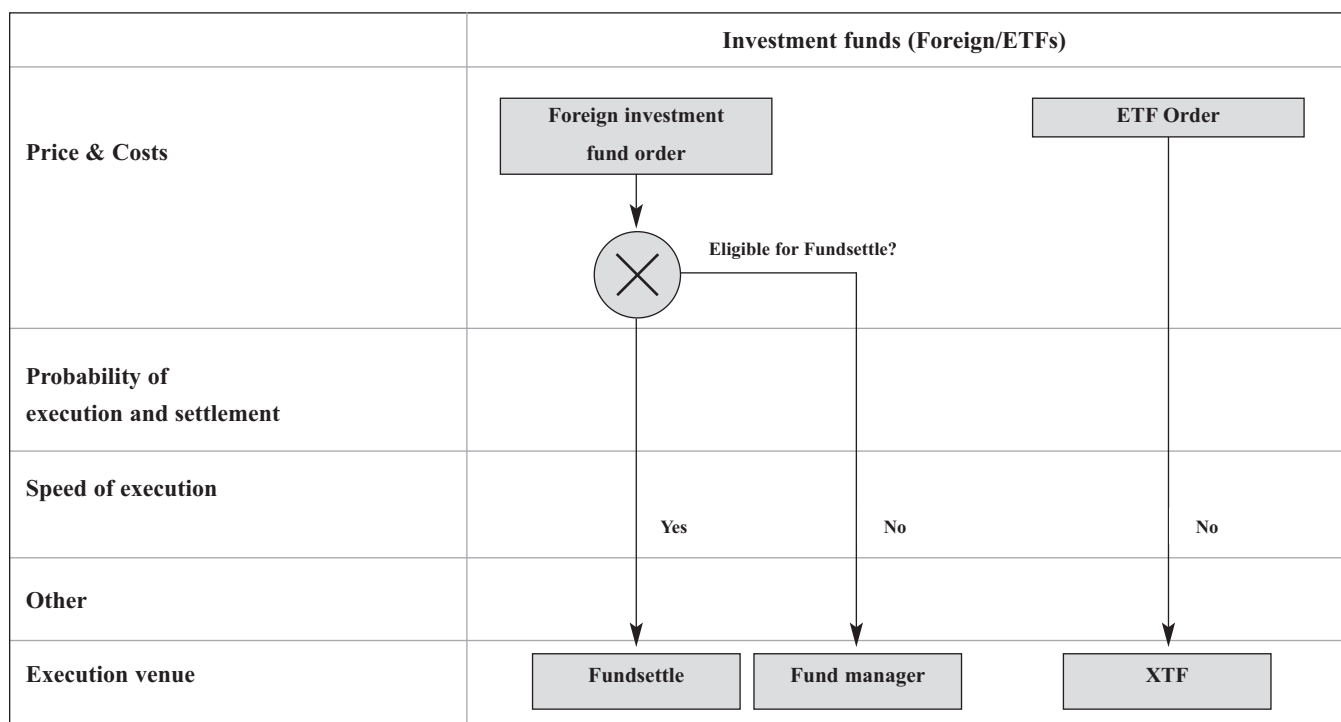
Orders for foreign stocks whose opening hours do not correspond to European trading hours should be carried out via the domestic exchange due to the greater liquidity available there.

When trading on foreign markets, the buying and selling conditions are also a criterion, as the depository situation can be important. From a cost perspective, it makes sense to sell stocks in countries in which the physical stocks are held, as otherwise expensive depository transfers are normally required. In addition, client orders are not generally accepted for exchanges in which OP Lux does not hold a depository.

For foreign stocks which are only listed abroad, the following execution routes apply:

- Austria: Execution directly on Xetra Vienna via Sal Oppenheim Frankfurt
- USA / Canada: Execution through brokers via Bloomberg or Reuters; DMA
- Europe: Execution through the trading platforms of various brokers via Bloomberg or Reuters, DMA
- Japan / Asia: Execution via the stock exchange by means of telephone orders
- Australia: Execution via the stock exchange by means of telephone orders to Sal. Oppenheim Frankfurt

## 4.2 Investment funds and ETFs



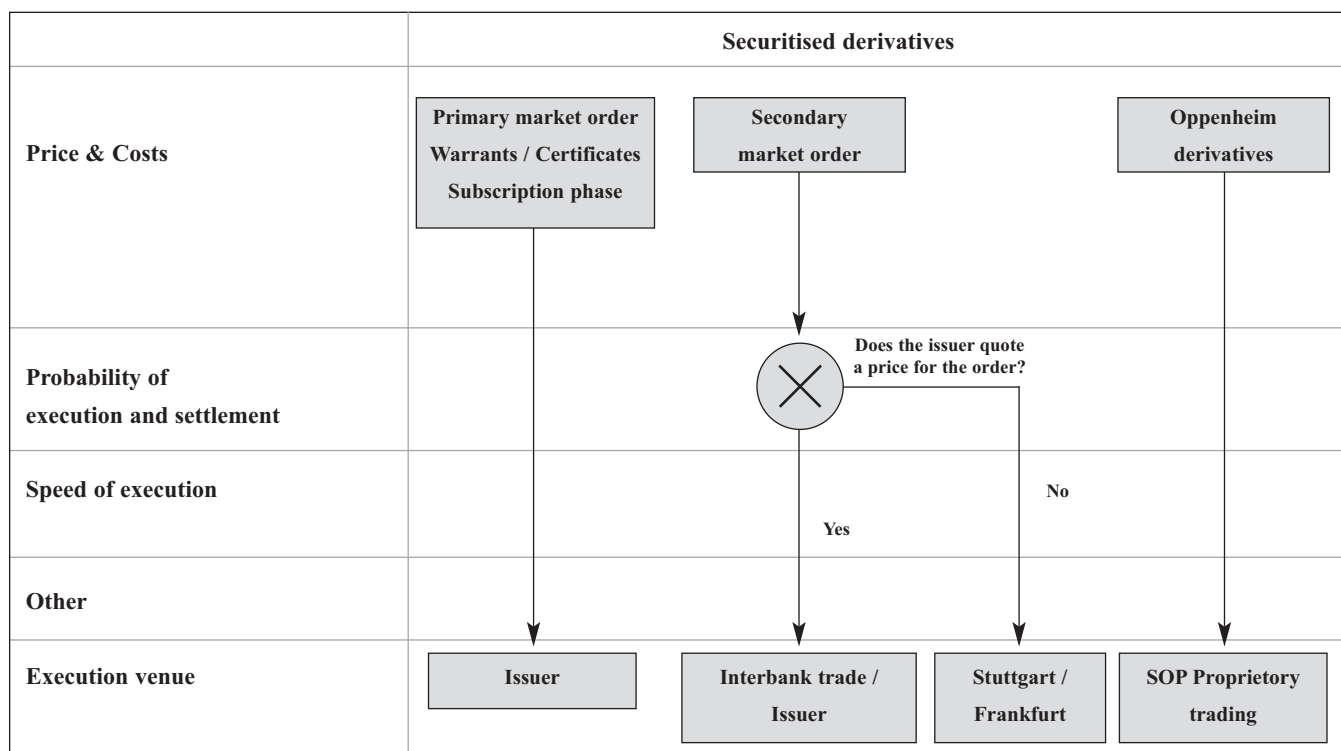
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Funds are normally traded with the relevant Transfer Agent. If the Transfer Agent is connected to the order routing system of the Euroclear Fundsettle service, this is used. If a fund is not tradeable via Fundsettle or the Transfer Agent is not connected to the system, the order is sent directly to the Transfer Agent by fax.

Investment fund units which can also be traded on a stock exchange or a regulated market are dealt with in the same way as stocks. This applies to a range of funds (XTFs and ETFs and funds which can be traded via the regulated unofficial market (Freiverkehr) in Germany, which counts as a regulated market). Executing the order directly with a designated market maker is also possible after consultation with the client, if this leads to a better result. This is the case particularly for order sizes representing more than one third of the normal daily volume in the fund. However, the agreement of the client must be obtained and documented before carrying out such a direct transaction. A general agreement to such transactions is possible.

## 4.3 Securitised derivatives

### 4.3.1 Subscription phase / primary market



If a bank sends a subscription order from its client to the issuer of the derivative, the execution route is pre-determined, as there are no alternative execution venues. The client agrees to this execution route by declaring that they want to subscribe to the paper.

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## 4.3.2 Secondary market

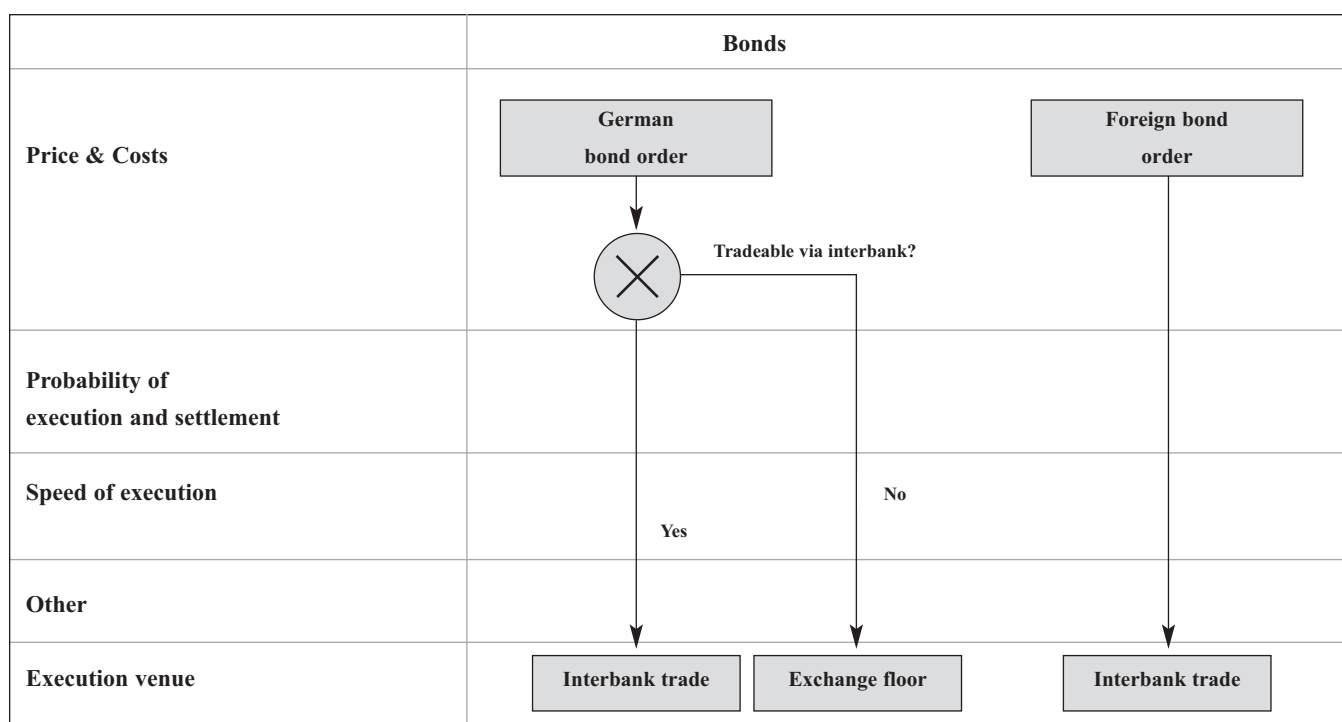
Structured securitised derivatives are traded both on and off-exchange in the secondary market. If there is no instruction from the client to the contrary, an order for a structured securitised derivative is traded directly with the issuer.

In addition, if the issuer rejects the order due to insufficient order volume, it will be forwarded to Euwax/Scoach via Oppenheim Frankfurt. Euwax/Scoach are considered, to be the main markets for this product group, where orders of up to EUR 10,000 may be traded efficiently.

Derivatives which are not listed on a stock exchange are traded with the issuer via interbank trading.

Client orders in derivatives for which Sal Oppenheim is the issuer should generally be traded directly with Sal. Oppenheim Derivatives Trading.

## 4.4 Bonds



Bonds are generally traded directly, only with counterparties with top credit quality. Limited orders can only be accepted for exchange-traded bonds in euro. Broker and possibly also market maker commissions are charged on these transactions and amount to around 5 bp to 30 bp.

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## 4.5 Money market transactions

### - FX Forwards

Carried out via Internet applications with Dresdner, UBS and Barclays.

Carried out via Reuters Dealing.

### - Money Market

Agreement of interest rates based on interbank trading.

## 5 OTC derivatives and securities lending / repo

OTC derivatives are not currently offered to clients as a transaction type.

OTC derivatives are therefore only traded on the basis of explicit instructions from clients and are consequently not subject to the Best Execution Policy.

Securities lending transactions (lending, repos) are only carried out for our own account with banking counterparties, i.e. eligible counterparties.

## 6 Documentation

### 6.1 Client information

Clients have been informed in writing of the outlines of the Best Execution Policy drawn up by the Bank.

### 6.2 Documentation and review requirements

The Best Execution Policy is reviewed once a year by Trading, PB and the Investment Office. However, the policy can also be changed between annual reviews if the bank changes its weighting of the factors or market structures change.

Compliance is also involved in the review of the policy, in addition to the above departments.

The amended policy is provided to all advisors or they are informed that the regular review did not lead to any changes. Clients are informed if changes are made to the Best Execution criteria.