

## Scope

It is in the mutual interests of Mattioli Woods plc (MTW) and its clients that the best possible results are obtained when executing transactions as principal on behalf of the Mattioli Woods fund range, on behalf of clients for whom it acts on a discretionary basis, or when transmitting orders on their instruction on an advisory or execution-only basis.

## Applicable

This policy applies to all of MTW's clients for whom best execution occurs, and it should be read in conjunction with MTW's client agreement.

## Purpose

MTW is required, under the rules of the Financial Conduct Authority (FCA), to take all sufficient steps to provide the best possible results for its clients taking into account the execution factors. In order to achieve best execution, MTW has put in place appropriate systems, controls, and procedures overseen by the Head of Investment Operations, and reported on to the Investment Committee on an annual basis.

## Objective

MTW is committed to adhering to the established market standards of execution, to ensure the correct result for its clients in respect of best execution.

## Executing orders

When executing orders, MTW will take all sufficient steps to obtain the best possible result for clients, taking into account the following execution factors:

- price
- costs
- speed
- likelihood of execution and settlement
- size
- nature
- any other consideration relevant to the execution of the order

Where MTW executes an order on behalf of a retail client, it will consider the best possible result in terms of the total consideration, representing the price of the instrument and the costs related to execution including all expenses incurred by the client which are directly related to the execution of the order. This includes execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order.

## Specific instructions from a client

Where a client gives a specific instruction as to the execution of an order, the relevant part of that order will be executed in line with those instructions. In acting on a specific instruction, the ability to take the steps MTW has designed to ensure we obtain the best possible result may be impaired.

MTW will determine the relative importance of the execution factors by using commercial judgement, experience in the context of market conditions and information available and considering the execution criteria:

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

### Specific instructions with MAFs

In some circumstances for certain orders, financial instruments, or markets, MTW may determine that other execution factors are more important than price in obtaining the best possible execution result. For example, if the order could take place in full via a certain venue for speed and guaranteed execution, rather than waiting for a specific price to become available via multiple orders and venues over time which could be detrimental to the price achieved.

MTW will take all sufficient steps, based on those resources available, to satisfy themselves that they have processes in place that can sufficiently be expected to lead to the delivery of best execution, while acting in accordance with the best interests of its clients.

### Execution venues

In executing an order, MTW may use a third-party or agency broker, or may execute the order directly in the markets using Retail Service Provider (RSP) direct market access functionality where available via the platforms it uses.

All MTW orders are executed through one of the following routes:

- via one of the platforms it uses where the assets are already held or are to be held on a platform. For collective investments, orders will be routed to the fund manager, and for direct stocks/shares, Exchange Traded Funds (ETFs), Exchange Traded Commodities (ETCs) and investment trusts, orders will be placed either directly in the market via RSP functionality where available and the order is able to be executed automatically, or by the platform's dedicated broker service. The platforms currently used by MTW to purchase the financial instruments covered by this policy are Pershing, ABRDN, Aviva, Old Mutual, Transact, AXA and Platform Securities.
- directly with investment houses/managers (administrators or dealing desks) for collective investments.
- directly via a stockbroker for direct stocks/shares, ETFs, ETCs and investment trusts. MTW places significant particular reliance on Winterflood Business Services for the execution of such trades within its own fund range. MTW has access to the London Stock Exchange Level 2 Share Data Blended Order Book, broker rankings by trade flow, and history of recent trades so has insight for directing its professional fund trades.

For client orders, MTW is responsible for choosing where to transmit orders for execution rather than choosing the eventual execution venue itself. When considering where to transmit client orders, MTW will prioritise its core platform, Pershing, due to the ease with which accounts can be opened and orders placed, together with our satisfaction with the quality of their execution. If assets are held on another platform by the client, that platform will be used to transmit the client's orders. If it is not suitable to transmit the order via a platform, in choosing an alternative placement method, MTW will consider costs, ease of account opening, ease of order placement, and adequacy of order and asset reporting provided.

If MTW is dealing in overseas securities, they will deal with market makers and brokers who are members of the London Stock Exchange.

MTW will confirm to clients where an order has been executed via contract notes for advisory and execution-only orders.

MTW will regularly assess the execution venues available in respect of any financial instruments that it trades to identify those that will enable it, on a consistent basis, to obtain the best possible result when executing orders. MTW will make all decisions as to where orders are instructed for execution or transmitted, but in most cases does not choose the execution venue itself.

Some stocks including American Depositary Receipts (ADRs) will be listed on more than one market. MTW may deal on other markets if by doing so it would help to obtain the best overall result.

## **Limit orders**

MTW does not accept limit orders.

## **Charges**

MTW does not charge commission itself on orders nor does it profit from order submission in any way. Charges arising by the third parties through which it executes trades are passed on to the underlying client and will be considered as part of the overall monetary consideration of each order.

## **Use of third parties**

MTW ensures terms and conditions are in place with all counterparties, and that they will ensure that the third parties will take all sufficient steps to provide best execution when MTW instructs transactions through them. MTW obtains and reviews the order execution policies of all such third parties.

## **Monitoring and review of the Order Execution Policy**

MTW has appropriate controls and procedures in place to ensure that the best possible results are obtained when executing orders. These processes are overseen by the Head of Investment Operations and periodically monitored by the compliance department and are as follows:

- a periodic review\* of its platforms, brokers, and execution venues, including justification of using Pershing as its core platform. Should any of these provisions worsen or become unsatisfactory, MTW will engage alternatives
- a monthly review, and annual report, of price achieved for direct stocks/shares with challenges being made to the brokers and agency brokers where relevant

- a periodic review\* of the systems it uses to analyse best execution
- an annual review of this policy

\*MTW will review its order execution arrangements at least annually and whenever a material change occurs that affects the ability to continue to obtain the best possible result for clients.

MTW will notify clients, either in writing or by email, of any material changes to its execution arrangements or its order execution policy.

## **Staff Understanding**

All relevant employees are made aware of this policy to highlight and emphasise the importance of best execution. Annual best execution training is undertaken within the investment operations team.

## **Questions**

If you have any questions regarding MTW's order execution policy, please contact your consultant.

## **OUR CONTACT DETAILS**

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