



Natixis Investment Managers UK Limited

Best Execution Policy

This Best Execution Policy (the “Policy”) outlines the regulatory obligations of Natixis Investment Managers UK Limited (“the Firm”) in relation to executing trades or transmitting orders for execution to a third party on behalf of its clients. The Policy integrates the Firm’s obligations under the Financial Conduct Authority’s implementation of the Markets in Financial Instruments Directive (2014/65/EU), as well as the Regulation on Markets in Financial Instruments (2014/600/EU).

Scope

This Policy applies to investment services rendered to clients of the Firm who have been categorised as Professional Clients under the FCA Rules and to any financial instruments [covered by the FCA Rules]. This Policy applies to the Firm both in relation to the execution of orders in financial instruments and to the transmission of orders in financial instruments to a third party investment firm for execution.

The Firm only deals with Professional Clients, who sign an investment management agreement with the Firm. Subject to compliance with applicable laws and regulations and any contractual limitations, the Firm delegates the investment management of its clients’ portfolios to one or more of its affiliated investment manager entities, located in EU and non-EU jurisdictions (the “Delegate Managers”), but remains fully responsible for meeting its obligations under this Policy.

Responsibilities

The Firm must act in accordance with the best interests of its clients. The Firm is required to ensure that all sufficient steps are taken to obtain the best possible result (‘best execution’) for our clients taking into account the execution factors outlined below.

The Firm has established and implemented effective arrangements for complying with the obligation to take all sufficient steps to obtain the best possible results for its clients, including this Best Execution Policy to allow it to obtain, in accordance with the FCA Rules.

Execution factors and Execution criteria

The execution factors to be taken into account are price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of an order.

The relative importance the Firm assigns to the execution factors will be determined using industry experience, expertise and judgment in light of available market information with the prime aim of prompt, fair and expeditious execution of trades. This applies to all types of financial instruments dealt.

The Firm will ensure that when a client’s orders are being executed, the following criteria will be taken into account for determining the relative importance of the above execution factors:

- a) the characteristics of the client including the categorisation of the client as a Professional Client;
- b) the characteristics of the client order, including where the order involves a securities financing transaction (SFT);
- c) the characteristics of financial instruments that are the subject of that order;
- d) the characteristics of the execution venues to which that order can be directed.

It is the Firm's policy that all asset classes follow the Best Execution policy but Delegate Managers have tailored order execution procedures based on market characteristics of the subject asset class and the applicable regulatory requirements. The Firm will monitor compliance of its Best execution policy in a manner appropriate to each Delegate Manager and asset class.

Execution venues and brokers

Trading venue means a regulated market, a multi-lateral trading facility or an organised trading facility. The overriding consideration when using execution venues is that the venue concerned has systems in place which enable the delivery of best execution to the satisfaction of the Firm. Following execution of a transaction, the client will be informed of where the order was executed through the periodic reporting statements provided to the client.

Execution of trades outside of trading venues

Where a client has provided its consent, trades may be executed or orders transmitted for execution outside of regulated markets, multilateral trading facilities or organized trading facilities ("trading venues") partially or in full.

This may provide the advantage of an improved execution price and faster execution, however, additional risks may be incurred.

Specific instructions from the client

Where a client gives a specific instruction, the Firm shall execute the order following the specific instruction.

Clients should be aware that a specific instruction from a client may prevent the Firm from taking the steps that it has designed and implemented in this Best Execution Policy to obtain the best possible result for the execution of those orders in respect of the elements covered by those instructions.

Client Order handling

The following conditions will be satisfied when carrying out client orders:

- a) orders executed on behalf of clients will be promptly and accurately recorded and allocated;
- b) carry out otherwise comparable client 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.

Record keeping

The Firm has in place a record procedure set out in the Compliance manual. The Firm keeps records of all services, activities and transactions undertaken for clients for at least five years and for any longer period as requested by the FCA.

Order Aggregation and allocation

Policies surrounding the aggregation of orders are maintained within operating procedures.

In accordance with the FCA Rules, Client orders or a transaction for own account will not be carried out in aggregation with another client order unless (i) it is unlikely that such aggregation of orders and transactions will work overall to the disadvantage of any client whose order is to be aggregated; (ii) it is disclosed to each client whose order is to be aggregated that the effect of aggregation may work to its disadvantage in relation to a particular order; (iii) there is an established and effectively implemented order allocation policy, providing for the fair allocation of aggregated orders and transactions, including how the volume and price of orders determines allocations and the treatment of partial executions.

Where an order is aggregated with one or more other client orders and the aggregated order is partially executed, it shall allocate the related trades in accordance with its order allocation policy.

Disclosure and Reporting

In accordance with FCA requirements, the Firm shall clearly provide clients with all relevant information as written in the Policy in good time prior to or following the provision of the service as applicable.

Conflicts of Interest and Inducements

The Firm has in place a Conflicts of Interest Policy which sets out the arrangements the Firm has in place to ensure it takes all appropriate steps to identify and then prevent or manage conflicts of interest between itself and its client in accordance with the relevant regulations. This includes arrangements governing inducements such as fees and non-monetary benefits. Conflicts will be disclosed to the Client as a measure of last resort to be used only where the effective organizational and administrative arrangements established by the Firm to prevent or manage its conflicts of interests are not sufficient to ensure with reasonable confidence, that the risks of damage to the interests of the client will be prevented.

Monitoring and Oversight

The Firm reviews the Policy and arrangements at least annually or where a material change occurs that affects the Firm's ability to continue to obtain the best possible result for the client. A material change is a significant event that could impact parameters of best execution such as cost, price, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

The Firm monitors reviews Delegate Manager's best execution arrangements through the Delegate Oversight Programme ('the Oversight Programme'). Key aspects of this Oversight Programme include on-site due diligence visits (both at the outset and on a continuous basis), the compilation of all relevant policy documents and the implementation of a schedule of ad-hoc and periodic reporting.

Management Information is reviewed periodically by senior management and the responsible committee as applicable.

The Firm will notify clients of any material changes to this Best Execution Policy.

July 2021

Reviewed November 2023