



**Policy for Executing Orders
in Financial Instruments**



Policy for executing orders in financial instruments

1. Scope

This policy for executing orders in financial instruments (hereafter the "Policy") applies equally to the execution of orders from retail clients, professional clients and eligible counterparties issuing European Depositary Bank SA (hereafter the "Bank") with such orders for the purpose of acquiring or disposing of securities or other financial instruments (e.g. options). The "execution" or "executing" of an order refers to the Bank concluding a corresponding execution transaction for the account of a client (commission transaction) with another party on a suitable execution venue as a result of the client issuing an order. The meaning of an "execution venue" encompasses trading venues (stock exchanges and multilateral and organised trading facilities (MTFs and OTFs), trading with a market maker, OTC trading, and trading with systematic internalisers (hereafter referred to collectively as "execution venues")). If the Bank and the client directly conclude a purchase agreement for financial instruments (fixed-price transaction), the provisions governing fixed-price transactions shall apply (point 6).

2. Objective of executing an order

Client orders may regularly be executed through various methods and at various execution venues, such as stock exchanges, other trading venues (such as MTFs and OTFs), OTC trading (whether domestically or abroad), floor trading and electronic trading. The following sections describe the execution methods and possible execution venues for the main types of financial instrument that are generally expected to enable the best possible execution in the interests of the client, and through which the Bank will therefore execute the client's orders. The Bank's own financial interests have no influence on the choice of execution venues.

When determining specific execution venues, the Bank acts on the assumption that the client's primary objective is to obtain the best possible price, considering all costs associated with the execution transaction. Since securities are generally subject to market fluctuations and therefore the possibility of market developments being disadvantageous to the client after the order is placed cannot be excluded, execution venues where full execution is likely and can be accomplished quickly

are chosen as a priority. The Bank shall observe other relevant criteria (e.g. market conditions, reliability of settlement) in addition to the aforementioned guidelines.

3. Precedence of instructions

The client may instruct the Bank as to the execution venues on which their order should be executed. Such instructions take precedence over this Policy.

Please note:

The Best Execution Policy only fully applies if, when placing your order, you neither explicitly specify an execution venue for it nor explicitly provide an instruction.

4. Routing orders

In certain situations, the Bank may be unable to execute a client order itself, and may instead route it

- in accordance with this Policy - to another financial services provider for execution.

5. Differing execution in individual cases

If the executing trader deems that a purchase or sales agreement differs substantially from conventional orders by virtue of its type and/or scope, the Bank may, on a case-by-case basis, execute the order in derogation from this Policy in the interests of the client. The same applies in the event of unusual market conditions or market disruptions. The Bank will inform the client immediately if the execution is to be carried out in deviation from standard practice.

6. Fixed-price transactions

This Policy applies to a limited extent only if the Bank and the client conclude with each other a purchase agreement for financial instruments at a fixed or determinable price (fixed-price transaction). In such a case, execution in the manner described above shall not occur; instead, the Bank and the client must provide the financial instrument and pay the purchase price respectively, in direct compliance with the contractual agreement. The following execution policy specifies the conditions under which the Bank regularly offers the option to conclude such fixed-price transactions.

The same applies if the Bank offers securities for subscription as part of a public or non-public offering,



or if the Bank and the client together conclude contracts regarding financial instruments (e.g. option contracts) that are not tradable on a stock exchange

7. Execution policy governing different types of financial instrument

7.1 Interest-bearing securities

The Bank offers the opportunity to execute orders for interest-bearing securities (including zero-coupon bonds) on a trading venue (i.e. multilateral or organised trading facility) or on an execution venue that is not a trading venue (such as a systematic internaliser, market maker or other liquidity provider). If execution on one of the aforementioned trading venues is impossible, the client's order shall be executed on a domestic or foreign stock exchange.

If the client's order concerns other interest-bearing securities, it shall be executed, subject to the client's consent to OTC execution, by way of interbank trading with another bank or financial services provider. If consent is not granted or if execution by way of interbank trading is impossible, the client's order shall be executed on a domestic or foreign stock exchange.

If the client places an order with the Bank without specifying an execution venue, the Stuttgart and Frankfurt Stock Exchanges shall be considered.

7.2 Shares

The Bank executes orders by way of commission as follows: For shares that are tradable on a German stock exchange, the Bank generally places orders with the Xetra, Frankfurt and Stuttgart Stock.

For shares that are not tradable on a German stock exchange and whose company's registered office and primary listing location are not in Germany, the Bank generally trades through an intermediary in the country in which the company concerned has its registered office. An alternative stock exchange shall be selected if the primary execution venue is different.

Our intermediaries occasionally use alternative regulated trading venues in order to constitute the best possible execution.

7.3 Units in investment funds and exchange-traded funds

The issue and redemption of units in investment funds at issue and redemption price respectively are excluded from this policy.

As a general rule, the Bank executes orders to acquire and dispose of units in investment funds.

Orders regarding exchange-traded funds (ETFs) are executed on a German stock exchange if such funds are traded on a German stock exchange. The execution policy for shares applies in this case.

Orders regarding exchange-traded funds that are not listed on a German stock exchange or are expressed in a foreign currency are executed on a foreign stock exchange.

If instructed to do so, the Bank can execute orders regarding exchange-traded funds on a trading venue (i.e. multilateral or organised trading facility) or on an execution venue that is not a trading venue (such as a systematic internaliser, market maker or other liquidity provider). If execution on one of the aforementioned trading venues is impossible, the client's order shall be executed on a domestic or foreign stock exchange.

The Bank itself is a member of the Bloomberg MTF and can use this platform to execute orders if instructed to do so.

7.4 Certificates and warrants

The Bank offers certificates and warrants originating from selected third-party issues for subscription or acquisition (as well as for redemption, if applicable) at a fixed price (fixed-price transaction). Where there is no fixed-price transaction, the Bank shall execute the client's order as follows:

Orders for certificates, warrants and comparable securities that are tradable on a German stock exchange are generally executed on a German stock exchange.

Transactions regarding certificates, warrants and comparable securities that are not tradable on a German stock exchange are executed on a foreign stock exchange.

If instructed to do so, the Bank can execute orders regarding certificates, warrants or comparable securities on a trading venue (i.e. multilateral or organised trading facility) or on an execution venue that is not a trading venue (such as a systematic internaliser, market maker or other liquidity provider). If execution on one of the aforementioned trading venues is impossible, the client's order shall be executed on a German or other foreign stock exchange.

7.5 Financial derivatives

Financial derivatives include (among others) financial futures traded under standardised conditions on a stock exchange or agreed individually over the counter between the client and the Bank. Depending on the financial instrument, specific conditions or special agreements may apply, such as the Special Conditions



for Forward Transactions or the Framework Agreement for Financial Futures.

For exchange-traded financial derivatives, execution occurs on the stock exchange on which the transaction type (contract) for which the client has placed the order is traded (e.g. Eurex or foreign futures exchanges).

The Bank executes orders for exchange-traded derivatives at M.M.Warburg & CO Hamburg and JP Morgan Securities PLC. For non-exchange-traded financial derivatives (forward exchange transactions and currency options), a transaction takes place between the Bank and the client.

In order to minimise counterparty risk with OTC transactions, the Bank has them collateralised through their counterparties.

8. Choice of intermediaries

If the Bank has no direct access to an execution venue, it shall not itself execute the client's order, but shall instead route it – in accordance with this Policy – to an appropriate intermediary, which shall then execute the client order pursuant to the Bank's instructions.

When executing orders, intermediaries place orders on MTFs and/ or OTFs where appropriate, in addition to using the primary stock exchanges in domestic markets. The Bank is a member of the MTF of the Bloomberg price information system.

The Bank regularly reviews its intermediaries and monitors the quality of their executions.

9. List of execution venues

The following execution venues are available for our clients to carry out stock-market trading:

German stock exchanges

- Berlin
- Düsseldorf
- Frankfurt am Main
- Hamburg-Hannover
- Munich
- Stuttgart
- Xetra

European stock exchanges

- Austria (Xetra Vienna)
- Belgium (Euronext Brussels)
- Denmark (OMX Copenhagen)

- Finland (OMX Helsinki)
- Greece (Athens Stock Exchange)
- Ireland (Irish Stock Exchange)
- Italy (Borsa Italiana)
- Netherlands (Euronext Amsterdam)
- Norway (Oslo Stock Exchange)
- Poland (Warsaw Stock Exchange)
- Portugal (Euronext Lisbon)
- Sweden (OMX Stockholm)
- Switzerland (SIX Swiss Exchange)
- UK (London Stock Exchange)

Stock exchanges in the Americas

- Canada (Toronto Stock Exchange)
- Canada (TSX Venture)
- USA (American Stock Exchange)
- USA (NASDAQ)
- USA (NYSE)

Stock exchanges in Asia and the rest of the world

- Australia (Australian Stock Exchange)
- Hong Kong (Hong Kong Stock Exchange)
- Japan (Tokyo Stock Exchange)
- Singapore (Singapore Stock Exchange)
- South Africa (JSE Securities Exchange)

The Bank also has access to other stock exchanges, but these are subject to specific restrictions. Please enquire for further details.

Our intermediaries use other trading venues where appropriate if they serve to achieve the best possible execution.

This Policy also applies to stock exchanges and trading venues used by our intermediaries that are not listed above.

10. Weighting of criteria during execution

The weighting of criteria is considered when a client order is executed or routed. The total fee is the execution criterion that takes the highest priority. The total fee comprises the price of the financial instrument and all execution-related costs.

The following factors are reflected in the cost:

- Fees paid to third parties for executing the order
- Clearing and settlement costs, including taxes and other fees
- Fees and charges payable to/at the execution venue

The Bank considers the criterion of the likelihood of



execution, as well as qualitative criteria such as trading hours at execution venues, and liquidity.

Price	50 %
Costs	25 %
Likelihood of execution	25 %

11. Top 5 trading venues/reporting

The Bank regularly publishes statistics about the five most important trading venues in terms of trading volume. These statistics can be found on our website (www.europeandepositorybank.com).

This information is published for all relevant financial instruments pursuant to Article 27(6) of Directive 2014/65/EU (MiFID II).

The Bank also regularly publishes information about the execution quality achieved and continuously updates the list of execution venues.