

Best Execution Policy

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1. General provisions

1.1 This Best Execution Policy ("Policy") shall stipulate the terms, conditions, and principles, based on which AS Redgate Capital ("Redgate Capital") shall execute the transaction orders in financial instruments ("Order") of retail and professional clients ("Clients") of Redgate Capital.

1.2 Redgate Capital is committed to treating Clients fairly and transacting with them in a professional and transparent manner. Redgate Capital has the obligation to provide its Clients with best execution of Orders which means Redgate Capital must take all reasonable steps to obtain the best possible result for the Client when executing their Orders or arranging transactions on the Client's behalf, taking into account various factors of best execution as referred in subsection 3 of this Policy and subject to any specific instructions received from the Client.

1.3 This Policy shall be followed with every Order given by the Client, except when the Client issues specific instructions, and should be read in conjunction with the General terms & conditions for investment services and other terms regulating provision of services.

1.4 For all retail clients the best possible execution will be determined in terms of the total consideration, representing the price of the financial instrument and the costs related to execution. Whenever there is a specific instruction from a Client, Redgate Capital shall execute the Order following the specific instruction, and compliance with that specific instruction will be treated as satisfaction of the best execution obligation of Redgate Capital to Client.

1.5 Redgate Capital recognizes that the professional clients also rely on Redgate Capital to provide best execution therefore Redgate Capital will execute Orders from professional clients in line with this Policy to the extent possible. In certain circumstances Redgate Capital determination of the relative importance of the execution factors regarding Orders of professional clients may differ from retail clients including for example where the likelihood of execution may take precedence over price.

1.6 The Policy covers the classes of financial instruments listed below:

- equity instruments – listed shares, depositary receipts, certificates, other equity-like financial instruments;
- debt instruments – bonds, money market instruments and other interest bearing or discounted debt instruments (except for primary offerings in form of private placements);
- exchange traded products – exchange traded funds, exchange traded notes and exchange traded commodities;
- units of collective investment undertakings (fund units);
- money market instruments;
- derivatives

1.7 Redgate Capital has the right to decide the instrument types and particular instruments, markets etc, in what case the Orders are accepted. The decision is made first based on availability of execution counterparties and access to particular markets. The Policy covers following services:

- Execution of order on behalf of Clients
- Reception and transmission of Clients' orders
- Portfolio management (*in case such service can be provided by Redgate Capital after issuance of additional activities license for portfolio management, execution of transactions with financial instruments in course of portfolio management service is considered as Client Order*).

1.8 By signing the contract for the provision of investment services, the Client agrees to the General terms & conditions for investment services and to the terms of this Policy. Redgate Capital will monitor the effectiveness of the given Policy's Order execution arrangements and execution policy to identify and, where appropriate, correct any deficiencies. The Policy shall be reviewed at least once a year. Any amendments to the Policy shall be published on the website of Redgate Capital at <https://redgatewealth.eu/en/our-services/our-internal-rules/>.

1.9 In case the Client is not satisfied with the execution of the Order, Redgate Capital is obligated to provide, at the written request from the Client, any necessary and relevant information enabling the Client to verify whether Redgate Capital executed the Order in question in full compliance with this Policy and other applicable terms of business of Redgate Capital.

2. Executing orders

2.1 Redgate Capital acts on behalf of Clients (not from own book) in relation to all submitted Orders. This means that any Client of Redgate Capital will be dealing with the underlying market and not with Redgate Capital.

2.2 Redgate Capital executes Client Orders on regulated markets by using its third party brokers. Redgate Capital has no direct access to any regulated market. The broker may in turn transmit the order to another broker. It is also possible for the broker to execute the transaction outside of a trading venue.

2.3 While executing Client Orders on OTC market Redgate Capital may execute those with its brokers or may cross Clients' Orders.

2.4 When executing Client Orders by transmitting them to third parties, Redgate Capital will take sufficient efforts to select such third parties (i.e., brokers, counterparties) that consistently allow the best result to be achieved. Redgate Capital takes reasonable steps to ensure that execution of Orders obtain the best possible result for Clients, however fast-moving markets may result in execution of a transaction at a price which has ceased to be the best market price. Depending on the circumstances the slippage may have either favourable or adverse material impact on the execution of Client Orders.

2.5 In certain situations, whether as a result of trading suspensions, cancellation of transactions by the execution venue, disrupted markets, system failures, orders with illiquid instruments or other situations/factors, it may be impossible or inappropriate to execute the orders according to this Policy. In such situations Redgate Capital will take all reasonable steps to achieve the best possible overall result for the client under the prevailing circumstances.

2.6 Redgate Capital shall inform the Clients if any material difficulty relevant for executing the Orders properly should emerge.

3. Important factors of best execution of orders

3.1 Redgate Capital executes all given Client Orders according to the Redgate Capital imposed General terms & conditions for investment services.

3.2 When executing Client Orders, Redgate Capital shall consider the following information:

- the characteristics of the Client, including the categorization of the Client as retail or professional;
- the characteristics of securities that are the subject of that Order;

- the characteristics of the Client Order.

3.3 Redgate Capital shall consider the following factors when executing and transmitting Orders:

- likelihood of execution and settlement (liquidity);
- total consideration (the sum of the price of the financial instrument and the costs related to execution, including all expenses incurred by the client, which are directly related to the execution of the Order);
- speed of execution and settlement;
- the nature and size of the Order and transaction and its market impact;
- other factors that Redgate Capital believes to have significance for the execution of the Order.

3.4 While executing the Orders with tradable equity- and equity-liked instruments (typically executed on regulated market), the prioritization of execution factors is the following:

- Total consideration of price and costs associated with execution;
- Speed and likelihood of execution;
- Size of the Order;
- Other factors.

3.5 While executing the Orders with tradable debt instruments (including money market instruments and other interest bearing or discounted debt instruments; typically executed on OTC market), the prioritization of execution factors is the following:

- Availability of counterparties; speed and likelihood of execution;
- Total consideration of price and costs associated with execution;
- Size of the Order;
- Other factors.

3.6 The importance of the factors described in clauses 3.2. and 3.3. will be assessed in line with Redgate Capital experience and considering market conditions, including the need for timely execution, availability of price improvement, the liquidity of the market and size of the Order and the potential impact on total consideration. For the time being we consider the price as the most important factor as its impact on the total consideration is the greatest.

3.7 If the client Order obliges Redgate Capital to execute this Order contrary to any or some considerations in Clauses 3.2. and 3.3. Redgate Capital shall execute the order pursuant to the respective Order (Specific Instructions). Redgate Capital shall make best endeavours to inform the Client of such circumstance (see Clause 4 for more detail).

4. Specific instructions from clients

4.1 If a client provides specific instructions on full or partial execution of the Client's Order, the Order shall be executed according to such instructions. Provision of specific instructions of the client to Redgate Capital may prevent Redgate Capital from taking the steps that it has designed and implemented in this Policy for best execution of client Orders to obtain the best possible result for the execution of those orders in respect of the elements covered by those instructions.

4.2 Redgate Capital shall be considered to have offered the best execution of an Order as long as it has acted in accordance with the relevant specific instructions of Client.

5. Order handling process

5.1 Clients can give orders to Redgate Capital by providing digitally signed order forms.

5.2 Redgate Capital accepts Client Orders and transmits immediately those to execution (if not agreed otherwise) if such Orders have arrived between 9.30 – 16.30 (Estonian time) on days what are business days in Estonia. Orders which arrive later than 16.30 will be in general transmitted to execution on next working day. Execution of orders on regulated markets are subject to the working days and hours of the specific markets, where the orders can be executed.

5.3 Client orders will be executed in the order which they are received, unless it is not practical due to characteristics of relevant order or the prevailing market conditions or due to other factors.

5.4 Redgate Capital shall execute an Order of each client separately. Redgate Capital may aggregate Client Order with other Client Orders if it is unlikely that the aggregation of orders will work overall to the disadvantage of any client whose Order is to be aggregated. **Redgate Capital can pool Clients' similar orders to achieve higher probability and better terms of execution and lower execution cost for the Clients. Redgate Capital will not aggregate client orders with it's own orders.**

5.5 Orders for units in collective investment undertakings are accepted and transmitted to relevant **collective investment undertaking's management company** (or to third party providing the service for Redgate Capital) for execution in accordance with the collective investment undertaking rules.

5.6 Subscription orders are accepted and transmitted to the issuer or its representative by Redgate Capital in accordance with the terms of offering prospectus or offering terms. In case of oversubscription Redgate Capital will in general follow the allocation instructions given by the issuer or the arranger of the issue and intends to treat the Clients with similar orders as equally as possible.

6. Selection of execution venues and third parties

6.1 Redgate Capital selects third parties with sufficient efforts to ensure best execution to Client Orders on a continuous basis. Redgate Capital reviews third parties who execute Client Orders on regular basis to assess the execution quality obtained.

6.2 Redgate Capital takes following factors into consideration when selecting suitable third party:

- Likelihood of execution and settlement;
- Liquidity (bid-ask spread, market depth);
- Costs applied by third party;
- Other relevant factors.

6.3 Redgate Capital is using third-party brokers and counterparties for execution of Client Orders, which are listed in Annex 1 of this document.

Annex 1. List of third parties for execution of transactions with financial instruments

Redgate Capital may use the following parties listed below for execution of transactions with financial instruments; Redgate Capital may also use other brokers not listed below where it deems appropriate in accordance with the Best Execution Policy and remove any Brokers from the list.

- AS SEB Pank
- AS LHV Pank
- Pareto Securities AS
- ABG Sundal Collier
- Adamant Capital Partners AD
- Arctic Securities
- Gottex Securities AB
- Luminor Bank AS