

Stanhope Capital LLP

## Best Execution and Order Handling Policy

Version 2.4

Modified 31 March 2018

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## INTRODUCTION

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In accordance with regulatory requirements set by the Financial Conduct Authority ("FCA") Stanhope Capital LLP ("Stanhope Capital") is obliged to provide our clients ("you") with appropriate information on our Policy for obtaining the best result for you ("best execution") that Stanhope Capital will follow when placing orders with other entities for execution that results from our decision to deal in financial instruments on your behalf.

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## OUR DUTY

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Stanhope Capital is obliged to take all reasonable steps to obtain the best execution for you when placing an order for execution, taking into account the factors that can affect execution. Stanhope Capital also have an obligation to implement procedures which provide for the prompt, fair and expeditious execution of client orders in relation to other client orders.

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## APPLICATION

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This Policy applies only to those customers that have been classified by Stanhope Capital as "Professional Clients" or "Retail Clients", in accordance with the FCA defined term. This Policy is not applicable to "Eligible Counterparties" or to clients that make their own trading decisions and trade completely at their own discretion.

The Policy only applies to trading undertaken in respect of financial instruments in accordance with the FCA defined term.

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## SPECIFIC INSTRUCTIONS

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Where Stanhope Capital is given specific instructions with regards to the execution of an order, Stanhope Capital will execute the order in accordance with the specific instructions given. Such instructions may prevent us from taking the steps set out in our Policy to obtain best execution of your order in respect of the elements covered by those instructions. On such occasions executing your instructions satisfies our obligation to take reasonable steps to obtain best execution of your order.

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## EXECUTION FACTORS

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The factors which must be accounted for in any best execution determination include:

- price, which may include explicit transaction costs, bid-asked spread or net price;
- implicit transaction costs or market impact;
- potential speed of execution;
- likelihood of execution and settlement;
- size and nature of the order;
- price momentum before and during order execution;
- any other considerations relevant to the execution of the order.

The relative importance of these factors may change depending on the specific order at hand. Stanhope Capital has established a process that considers these factors in light of:

- Information about market conditions;
- characteristics of the order;
- nature of the financial product;
- characteristics of the client's investment objectives, attitude to risk, etc.;
- characteristics of the potential execution venues.

Each of these factors will play a part in determining the priority of the execution factors for any specific order.

While price will often have a priority ranking, the total consideration is a function of the priority given to the other factors.

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## EXECUTION ENTITIES

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Where we owe you an obligation for best execution, we may place orders for execution using a variety of different entities. These will include ones that we believe will enable us to obtain on a consistent basis best execution on behalf of our clients. The nature of the product or instrument that is to be traded as part of an order will determine the individual entities that we may be able to use to execute the order. For specific products we may have access to only one type of entity or only a single entity.

Client orders may be executed through the following different types of entities open to Stanhope Capital including:

- markets having regulated market status under MiFID;
- trading platforms having multi-lateral trading facility ("MTF") status under MiFID;
- custodian's broking arm;
- subscriptions to fund or private equity in the name of the client or their custodian;
- Unit Trust / ICVC operators/Authorised Corporate Directors;
- Investment firms offering broking facilities;
- other OTC sources of liquidity such as:
  - order crossing networks and electronic trading platforms not having regulated market or MTF status under MiFID;
  - other broker dealers and market makers.

By using OTC sources of liquidity we will be executing client orders outside a regulated market or MTF. You may choose not to have us access OTC sources of liquidity, though this may restrict our ability to execute orders in certain types of instrument or product and/or to obtain the best possible result when executing those orders on your behalf.

Stanhope Capital will typically pass an order to your custodian or a broker for execution. In such cases Stanhope Capital will only consider approved and vetted brokers that have execution arrangements that enable us to comply with our obligations to provide best execution and to act in the clients' best interests.

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## COLLECTIVE INVESTMENT SCHEMES

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Orders for Collective Investment Scheme units/shares will generally be conducted directly with the fund's administrator/custodian. Stanhope Capital will regularly review this arrangement to ensure that it continues to minimise the total consideration for clients and remains consistent with the best execution requirements.

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## MONITORING AND REVIEWING

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Stanhope Capital will monitor the effectiveness of its order execution arrangements and Policy in order to identify and, where appropriate, incorporate any amendments to procedures. Stanhope Capital will assess, on a regular basis, whether the execution venues included in the Policy provided for the best possible result for its clients or whether it needs to make changes to its execution arrangements.

The order execution arrangements and Policy will be reviewed at least annually or whenever a material change occurs.

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## MATERIAL CHANGES

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Any changes to the Policy will be posted on our website.

Additional Information

If there is anything in this Policy that is unclear to you, or, should you require any further information, please do not hesitate to contact us.