

Order Execution Policy – July 2019

1.0 Introduction

The purpose of this document is to provide clients of Investore (“we”, “our” or “us”) with information on our Order Execution Policy. We are committed to treating our clients fairly and as part of this commitment this policy explains how we handle your deals.

2.0 Best Execution

Whether we execute orders for you directly or whether we place orders to a third party to execute, we owe you a duty of best execution. This means that we take all sufficient steps to obtain the best possible result for you when executing your deals.

Practically this means we consider the following factors in order of priority:

- The price you will pay for the investment
- Costs (any costs you may incur as a result of the transaction being placed)
- Regulatory compliance
- The speed at which we are able to complete the deal
- The likelihood of being able to place the deal and settle it
- The nature of the deal
- The size of the deal

3.0 Policy Scope

We will place orders through regulated third parties for that third party to execute on behalf of our clients. Our activities will include acting on client instructions to;

- Purchase new units/shares from monthly or one-off contributions
- Sell their units/shares held in part or in full

Details of the process for dealing, timing, execution and any constraints will be contained in the Terms and Conditions of the individual products.

3.1 Client Specific Instructions

Whenever we receive a specific client dealing instruction, for example when clients instruct us to sell an investment, the instruction given may limit the extent to which this Order Execution Policy is applied.

Where a client gives a specific instruction, we will look to execute their order as instructed, as we cannot provide advice. If we are asked to place a deal in a way which means we cannot consider all the best execution factors within this policy, we may not be able to obtain the best results for you.

4.0 Nominee Companies

Investore is a trading style of Synergy Financial Services Ltd (SFPL). We may use separate nominee companies for different activities. We currently use one nominee company - Synergy Nominees Limited.

5.0 Policy

Our policy describes the approach that we will adopt for UK Equities and Investment Trusts.

When we place or transmit deals in UK Equities and Investment Trusts to a third party to execute, we send the deal promptly to an established FCA regulated UK firm providing stockbroking services. That firm will in turn execute the deal in accordance with their Order Execution Policy. We regularly review their policy and only consent to it where we are satisfied that firm considers all execution factors, and places appropriate relative importance on these factors, in a manner aligned with our own Order Execution Policy.

Our current elected third party stockbroker is Jarvis Investment Management Limited (JIM). As per our policy we have selected JIM as a result of their offering being the most attractive overall in terms of cost, regulatory compliance, usability, speed of execution, service, financial strength and expertise of staff. We also conduct annual reviews on the offering from our third party provider to ensure continued best execution.

5.1 Aggregation and Allocation

We maintain policies surrounding the aggregation of orders within our operating procedures. Comparable orders are in general placed with third parties in bulk format and when the order executes, the proceeds are allocated to our clients fairly and in line with our operational procedures.