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# Information on Order Handling and Best Execution Policy

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# 1. Introduction and purpose

EFG Bank (Luxembourg) S.A. has defined principles governing the handling and the execution of clients' buying and selling orders in financial instruments.

As part of EFG International, we do not, for the time being, execute directly your orders on an execution venue, but we transmit them upon receipt for execution to EFG Bank AG ("the Bank") in Switzerland. We have selected our counterpart according to procedures we have put in place in order to ensure that our counterpart is treating the orders we transmit to it on your behalf in line with our principles of best execution. Thus, we have ensured that the Bank will take all reasonable steps to obtain, on a consistent basis, the best possible result (or "best execution"), either when executing or receiving and transmitting orders for execution, according to selected criteria and taking into account their respective weighting.

Our principles of best execution and order handling are summarized below. Further details on the best execution policy of the Bank are available on their website [www.efgbank.com](http://www.efgbank.com).

**Unless you object to these principles within 30 days from their date of delivery, you shall be deemed to have accepted them.**

## 2. Scope

The principles apply to the execution of orders on your behalf, i.e. whenever we conclude agreements to buy and sell one or more financial instruments on your behalf, either when providing you with investment advice, portfolio management or execution only services. However, these principles do not apply to the issue of units of investment undertakings at the issuing price or their redemption at the redemption price via the custodian bank.

# 3. Execution criteria and factors

In providing best execution, the Bank will take into account your characteristics as a client (including your categorisation), the characteristics of your order, the characteristics of the financial instruments that are the subject of that order and the characteristics of the execution venues to which that order can be directed. However, the relative importance of any one or several of the aforementioned criteria may vary on a case-by-case basis as a result of the diversity of the markets, financial instruments and orders types. The nature of your order and any specific instruction linked to that order may also limit the choice in the selection of the execution venue.

The following execution factors will generally be taken into account to determine in which way the order can be executed: the price, the execution cost of the transaction, the need for timely execution, the likelihood of execution and settlement, the size and the nature of the financial transaction, the liquidity of the market, or any other consideration relevant to the execution of the order.

If you are a **private client** and in the absence of any specific instructions from you, the best possible result will generally be determined by reference to the total consideration payable, i.e. price and costs of execution. All expenses incurred directly related to the execution such as execution venue fees, clearing and settlement fees and other fees paid to third parties, but excluding our own costs, will be taken into consideration. Timely execution, likelihood of execution and settlement, the size and nature of the order, market impact and any other implicit transaction costs may, at times, take precedence over the immediate price and cost consideration if they are instrumental in delivering the best possible result in terms of total consideration.

If you are a **professional client**, the price will ordinarily merit a high relative importance in obtaining the best possible result.

However, in some circumstances and for some clients, orders, financial instruments or markets, the Bank may reasonably determine that other execution factors are more important than the price in obtaining the best possible execution result. In the absence of any specific instructions from you, the Bank will determine at its own discretion the best balance between the aforementioned factors in order to provide you with the best execution.

## 4. Execution venues

The Bank may use the following execution venue types: regulated markets, Multilateral Trading Facilities (“MTFs”), Systematic Internalisers (“SIs”), market makers or other liquidity providers. A non-exhaustive list of the execution venues on which the Bank places significant reliance in respect of each class of financial instruments is published on its website. The Bank reserves the right to use other execution venues where it deems appropriate in accordance with its best execution policy and may add or remove any execution venues from this list without further notice, i.e. as a consequence of the regular assessment of the available execution venues. Changes to execution venues will not be systematically notified to you and you are hereby advised to refer to the current list of execution venues from time to time on the Bank’s website.

Subject to any specific instructions from you and to proper consideration of the execution criteria and execution

factors referred to above, the Bank will select the execution venue for a particular transaction as follows:

- when placing orders on a regulated market or an MTF, it will select the execution venue that it considers the most appropriate;
- where a financial instrument is exclusively traded outside a regulated market or an MTF, it will place the order with the issuer or another trading partner offering the conclusion of transactions in the relevant financial instrument;
- where a financial instrument is traded both on and outside a regulated market or an MTF and subject to your express consent, it will place the order either in or outside the regulated market or MTF.

## 5. Specific instructions

Where you give specific instructions as to the execution of an order, including selecting to execute on a particular execution venue, the Bank will execute the order in accordance with those specific instructions. Where your specific instructions relate to only part of the order, our counterpart will continue to apply its best execution policy to those aspects of the order not impacted by your specific instructions. However, you are hereby advised that providing specific instructions in relation to the execution of a particular order may prevent the Bank from taking the steps set out in its policy to obtain the best possible result in respect of the elements covered by those instructions.

In case a limit order for stocks negotiated on a regulated market is not executed immediately, you are hereby advised that, unless you gave special contrary instructions, the Bank will give the other market participants access to that order in order to facilitate the most rapid execution possible.

## 6. Order handling

The Bank will execute your orders in a prompt, fair and expeditious manner and in the order they are received, unless market conditions or your interests prevent it from so doing.

We will inform you of any difficulty arising in respect to the treatment of an order within a reasonable time, whereby we will take your location and your preferred method of communication into consideration.

Subject to any specific instructions you may give, the Bank may transmit an order that it receives to another EFG entity or to an external entity, such as a third-party broker, for execution.

Orders will only be aggregated if clients are not disadvantaged by doing so and subject to a written order allocation policy.

## 7. Monitoring and review

We will monitor compliance of the Bank with these principles on a regular periodic basis and review them annually and/or whenever a material change occurs that affects our ability to continue to obtain the best possible result for you.

In case of changes to execution arrangements or in case of minor changes to these principles, an updated version of the present information will be posted on our website [www.efgbank.lu](http://www.efgbank.lu).

In case of material change to these principles, i.e. a change where its disclosure is necessary to enable you to make a properly informed decision about whether to continue utilising the services offered, we will send you the updated version of the present document.

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