



Policy for execution and handling of orders

C WorldWide Fund Management S.A.

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1. General principles

The purpose of this policy is to ensure that decisions to deal on behalf of the fund (the “Funds”, each a “Fund”) managed by C WorldWide Fund Management S.A., including its Danish branch (“CWFM”) in the context of the management of their portfolios are made in the best interest of each of the Funds and that portfolio transactions are executed promptly, fairly and expeditiously.

CWFM shall take all reasonable steps to obtain the best possible result for the Funds (“best execution”), taking into account price, cost, speed likelihood of execution and settlement, order size and nature, or any other consideration relevant to the execution of the order.

The relative importance of these factors shall be determined by reference to the following criteria:

- a) the objectives, investment policy and risks specific to the Fund, as indicated in the prospectus or as the case may be in the management regulations or the articles of association;
- b) the characteristics of the order;
- c) the characteristics of the financial instruments that are subject of that order;
- d) the characteristics of the execution venues to which that order can be directed.

Furthermore, CWFM shall ensure that:

- a) orders executed on behalf of the Funds are promptly and accurately recorded and allocated;
- b) otherwise comparable Fund orders are executed sequentially and promptly unless the characteristics of the order or prevailing market conditions make this impracticable, or the interests of the Funds require otherwise;
- c) Financial instruments or sums of money, received in settlement of the executed orders be promptly and correctly delivered to the account of the appropriate Fund.
- d) Information related to pending Fund orders is not misused and that all reasonable steps are taken to prevent the misuse of such information.

2. Execution model

The Board of Directors of CWFM has decided to apply an execution policy in its management of the Funds accommodated to the objective, investment policy and risks specific to the Funds and to the business model of CWFM.

- a) The execution and placement of orders is carried out by the Investment Manager as an integrated part of the investment management agreement.
- b) The Investment Manager may aggregate orders on behalf of the Funds with other client orders in order for the funds to get the best results of the order execution.
- c) CWFM allows the Investment Manager to execute orders outside regulated markets and MTFs in order to optimize the order execution.

This model has the following benefits to the Funds and the business model of CWFM:

- It ensures an efficient investment management of the Funds. The Investment Manager is able to integrate the investment decisions with the execution of trades which ensures a swift and timely execution of orders and a reduction of operational risks when handling the orders.
- The Investment Manager is, where relevant, able to aggregate orders on behalf of a Fund with other orders of its portfolio clients to the advantage of the execution of orders on behalf of the Funds.
- The administrative costs of the fund management are lowered substantially. CWFM's business model is based on a small and efficient organization. By letting the Investment Manager carry out execution and placing of orders CWFM's administrative costs are lowered (e.g. as there are no costs associated with a trading desk) for the benefit of the investors in the Funds.

It shall be ensured by agreement with the Investment Manager that the Investment Manager – in accordance with the MiFID rules concerning best execution and handling of orders – adheres to the above listed principles of this policy, where applicable, in the Investment Manager's policy and its execution and handling of orders on behalf of the Funds.

3. Monitoring of effectiveness and quality

The Conducting Person supervising investment management shall monitor on a regular basis the effectiveness of this policy and the quality of the executions and order handling made by the Investment Manager.

The monitoring shall at least once a year include an assessment of whether the brokerage fee of the Investment Manager is adequate considering the benefits associated with the efficient investment management, timely execution, prices and reduction of the Funds' risks and costs.

Any deficiencies shall be reported to the Board of Directors and be corrected.

4. Review of the policy

This policy shall be reviewed at least annually by the Board of Directors, based on the result of the monitoring performed by the Conducting Person supervising investment management.

If material change occurs that affects the ability to obtain the best possible result for the Funds, the Conducting Person supervising the investment management of CWFM shall submit a revised policy to the Board of Directors for their approval.

Information on this policy shall be made available to the investors of the Funds on the Website of CWFM (www.cww.lu).

Adopted by the Board of Directors on September 02, 2021.