

BEST EXECUTION POLICY

Purpose

ICM Global Funds Pte Ltd (the “Firm”) has a fiduciary responsibility as a fund manager/advisor to its clients to act in utmost good faith and in the best interest of its clients. This document covers the placing and/or executing of the Firm’s orders for the purchase or sale of any capital markets products in its capacity as an agent, and whether the order is being executed on-exchange or off-exchange¹.

Regulation

Reference is made to the Monetary Authority of Singapore’s Notice SFA 04-N16 - Execution of Customers’ Orders, in respect of implementing written policies and procedures for the following:

- to place or execute or both, as the case may be, customers’ orders on the best available terms; and
- to place or execute, or both, as the case may be, comparable customers’ orders in accordance with the time of receipt of such orders.

Product Scope

Best Execution applies to all capital market products managed by the Firm which include but not limited to the following:

- Listed securities
- Unlisted securities
- Over-the counter instruments
- Collective Investment Schemes

Best Execution factors

The following factors² will be considered when selecting broker/dealer/counterparty to execute orders on behalf of the Firm’s clients (i.e. for the funds or accounts for which it manages):

- Price;
- Costs;
- Speed of execution;
- Liquidity;
- Likelihood of settlement;
- Size/nature of order; and
- any other consideration relevant to the order.

The Firm will exercise its discretion in determining the relative importance of the above factors based on its experience and professional judgment, considering the execution criteria below.

Execution Criteria

When the Firm places or transmits an order for execution it will take account of the execution factors relevant to that order. Ordinarily, while price merits a high relative importance but, in some circumstances, the firm may appropriately determine that other factors are equally as important by reference to the following criteria:

¹ Includes cross-trades and off-market transactions

² Exclude unlisted securities, e.g., private equities where prices are ascertained through negotiations between the management and the manager (after its due diligence process)

- the objectives, investment policy and risks specific to the fund, as indicated in the funds rules or articles of association, prospectus or offering documents of the funds;
- the characteristics of the client, i.e. accredited or institutional;
- the characteristics of financial instruments that are the subject of that order; and
- the characteristics of the execution venues to which that order can be directed.

Execution Venues

Generally, trade orders are executed on stock exchanges, and the Firm shall place or transmit the order to a broker/dealer for execution. However, in some circumstances the Firm may choose an alternative venue³ which it believes could obtain the best possible result on a consistent basis for executing client orders than if it were to place or transmit order via a broker/dealer.

For unlisted securities, e.g. private equity products, unlisted notes, etc., the execution of such investments will be documented with negotiated agreements, which will be in line with the best interests of the clients.

Broker/Counterparty Selection

The Firm intends to only route orders to a broker/dealer/counterparty which has in place policies and procedure to provide best execution to its clients. Example of factors that the Firm may use in selecting broker/dealer/counterparty includes:

- Asset class coverage
- Execution capability
- Pricing and sourcing capability
- Financial and Capital adequacy
- Liquidity provision
- Service quality
- Operational capability
- Responsiveness
- Reputation, including regulatory status and licensing
- Anti-financial crime

Where the Firm deals with brokers which are not subject to a regulatory obligation to provide best execution, the Firm will require the broker to agree to a contractual provision to provide the Firm with best execution.

The Firm will monitor the performance of all its brokers/dealers/counterparties whether they owe a regulatory or contractual obligation to provide best execution to the Firm. The Firm will not continue to submit orders to brokers which do not provide best execution on a consistent basis.

The Firm will periodically review its brokers' performance, which includes an examination of the execution of orders, as part of its ongoing due diligence to assess and monitor if the brokers are providing the appropriate level of expertise and experience when executing in the relevant market/order.

Monitoring and Review

The Firm periodically monitors compliance with our Best Execution procedures and policy, and the effectiveness of our Best Execution policy and procedures, in order to identify and, where appropriate, correct any deficiencies.

³ Alternative venues where execution take place may include dark pools, liquidity providers and market makers