

# Summary of the Wealth Planning Order Reception & Transmission Policy

## CG Wealth Planning Limited (CGWPL)

CG Wealth Planning Limited (CGWPL) does not undertake investment transactions itself, but instead receives your instructions to buy or sell investments and passes them on to the relevant product provider, platform provider, or other organisation to be completed (executed).

For example, having made a recommendation to you, we might receive your instruction to redeem units in a collective investment scheme, which we would then transmit to the operator of that collective investment scheme, or the platform provider that holds the fund on your behalf. This process is referred to as the reception and transmission of client orders.

UK legislation and the rules of the Financial Conduct Authority (FCA) require us to maintain a policy which sets out the steps that we take to obtain the best possible result for you when receiving and transmitting your orders. The regulations also require us to provide you with a summary of that policy, which is the purpose of this document.

If you have any questions about the order reception and transmission arrangements described below, please contact your Wealth Planner.

### 1. Scope of our policy

1.1 We provide advice on a wide range of financial products and services. Our Order Reception & Transmission Policy applies only to those products defined in legislation as 'financial instruments'. The financial instruments which we typically advise on are:

- Units in collective investment undertakings (investment funds), which may include:
  - Unit Trusts
  - Investment Companies with Variable Capital

- Enterprise Investment Scheme Funds (EISs)
- Seed Enterprise Investment Scheme Funds (SEISs).
- Venture Capital Trusts (VCTs)
- Structured products.

### 2. Obtaining the best possible result

- 2.1 Subject to any specific instructions you may give us, we will act in accordance with your best interests when receiving your instructions and transmitting them to product providers, platform providers, or other entities for execution.
- 2.2 We will take sufficient steps to obtain the best possible result for you taking into account the price of the investment and any costs relating to execution, speed, likelihood of execution and settlement, size, nature or any other relevant factor.

### 3. Your instructions

- 3.1 You must give us your investment instructions in writing by letter, email, or fully completed application form.
- 3.2 We do not accept instructions via fax, telephone, verbally in person, or through social media channels (which includes WhatsApp, LinkedIn, Facebook, Twitter, etc).
- 3.3 We will accept your instructions during our normal UK working hours of 08.30 to 17.30 on UK trading days. Counterparties to which orders are to be transmitted may operate different working hours.
- 3.4 Your instruction must include sufficient information to identify:
  - The specific financial instrument you wish to buy or sell

- The quantity e.g. the number of shares, units or the value
- Any other information relevant to the order.

Your instruction may be in the form of a signed acceptance of proposal letter where the details of the recommended transaction are clearly and unambiguously set out in the suitability report.

Where your instruction is unclear or incomplete, we will promptly contact you for clarification. Similarly, where any paperwork needed to transmit your order to the product provider, platform provider or other organisation is missing or incomplete, we will promptly ask you to provide the necessary documentation. For example, we may be unable to transmit an order where:

- The necessary application form has not been provided, or is incomplete, incorrect or unsigned
- Other paperwork, such as high net worth investor statement, has not been supplied, is incomplete, incorrect, or unsigned.

- 3.5 You may give us specific instructions about how or to whom your order is to be transmitted. For example, when you instruct the purchase of units in a collective investment scheme, you might ask that the order be transmitted to the platform provider that you use to consolidate your holdings.

We will satisfy our obligation to act in accordance with your best interests to the extent that we follow your specific instructions when transmitting an order to a product provider, platform provider, or other organisation for execution.

Where your specific instructions relate only to certain aspects of an order, we will apply our Order Reception & Transmission Policy to all other aspects of your order.

## 4. Passing on your instructions

### 4.1 Overarching obligation

We will pass on your instructions to the relevant product provider, platform provider, or other organisation in a timely manner and always with due care and attention.

### 4.2 New issues and time sensitive offers

For applications to participate in new issues, we will not always pass on your instructions on the day of receipt, but will take into account the terms that determine participation during the investment provider's offer period.

Where an investment is only available for a limited period of time, we will make this clear in the suitability report.

It is your responsibility to ensure that a valid instruction and any relevant paperwork is provided to us in sufficient time to allow for the necessary checks to be made prior to transmitting your instruction to the relevant provider.

Where an instruction is received for an investment that has an imminent closing date or other similar deadline, consideration will be given to prioritising this deal, but not ahead of any orders received for the same investment already in the queue. This prioritisation will only occur if CGWPL considers there to be no detrimental impact to other investment instructions already in the queue.

## 5. Execution criteria

- 5.1 When passing on your instructions we will take into account:
- (a) Any specific instructions you have given us
  - (b) Your knowledge and experience
  - (c) The nature of your instructions
  - (d) The financial instruments that you wish to buy or sell
  - (e) The product providers, platform providers, or other organisation to whom your order can be directed.

## 6. Execution venues

- 6.1 Typically, the financial instruments which are in scope of this Policy can only be bought or sold by the issuer, product provider or the platform provider that you have chosen (and which is therefore specified in accordance with section 3.5 above).
- 6.2 The exception are VCTs, which may be traded on the secondary market. Where you hold a VCT in the custody of Canaccord Genuity Wealth Limited (CGWL), and CGWL are executing the order, this policy will apply only to the receipt of your instruction and its transmission to CGWL.
- 6.3 We may, on occasion, transmit orders to entities other than the issuer, product provider, or your platform provider where this is believed to be in your best interests.

## 7. Monitoring

- 7.1 We will monitor the effectiveness of and adherence to this Order Reception & Transmission Policy.

## 8. Review and updates

- 8.1 We will review our order reception & transmission arrangements and policy annually and whenever a material change occurs that affects our ability to continue to obtain the best possible result for our clients.
- 8.2 We will notify you of any material changes. Such notifications may be by means of our website.

## 9. Consent

- 9.1 You will be deemed to consent to the order reception and transmission arrangements described in this document, when you give us an instruction to buy or sell investments to pass on to a product provider, platform provider, or other organisation for execution.
- 9.2 By consenting to the order reception and transmission arrangements described above, you give your express consent for us to transmit your orders outside a regulated market or multilateral trading facility, where we believe that doing so will achieve the best overall result for you.