

Order reception and transmission policy

Canaccord Genuity Financial Planning Limited (CGFPL)

CGFPL does not undertake investment transactions itself but instead acts a receiver and transmitter for instructions received from investors or their appointed advisers.

When we receive an instruction to buy or sell investments on behalf of a client, we shall do so in accordance with this policy.

Under the EU Markets in Financial Instruments Directive (MiFID and MiFID II) and the rules of our regulator, the Financial Conduct Authority (FCA) which implements the Directive, we are required to put in place an order reception and transmission policy and to take all reasonable steps to obtain the best possible result for our customers when receiving and transmitting orders for execution.

This document should be read in conjunction with our Terms of Business.

1. Scope of this policy

1.1 CGFPL provides advice on a wide-range of financial products and services. This policy applies only to those products defined as financial instruments and as such in practice this is limited to:

- Venture Capital Trusts (VCTs)
- Units in collective investment undertakings, which may include:
 - Enterprise Investment Schemes (EISs)
 - Seed Enterprise Investment Schemes (SEISs)
 - Business Relief Schemes
- Structured products

1.2 If you require a general investment account for the purpose of trading in other types of financial instruments or to hold assets in custody, we will introduce you to our affiliate Canaccord Genuity Wealth Limited.

2. Obtaining the best possible result

2.1 Subject to any specific instructions that may be given by you, when transmitting orders on your behalf, CGFPL will take all sufficient steps to obtain the best possible result for clients using its judgement and experience in light of market information available to it and taking into account the Execution Criteria and Execution Factors listed below.

3. Receipt of investment order

- 3.1 Investment instructions will only be accepted via letter or email, where a scanned signed instruction has been attached. We do not accept instructions via fax.
- 3.2 Due to the nature of the investments we advise upon, we do not accept instructions by telephone.

4. Reception and transmission of orders

- 4.1 Where CGFPL transmits an order, the specific instruction will need to be relayed to us from the client in a form acceptable to us and must include:
- Sufficient information to identify the asset (e.g. SEDOL, ISIN, asset name)
 - Where appropriate, the quantity of units to be traded or the value; and
 - Any other consideration relevant to the receipt and transmission of the order.
- 4.2 We may contact you where we do not receive sufficient information to transmit the order, including for the following reasons:
- Application form for the investment has not been provided

- Additional paperwork, such as investor statements, have not been supplied, are incomplete or incorrect
- Adviser fees or commission terms have not been specified
- We have not received a signed Suitability Report

4.3 Please note, should you give CGFPL specific instructions as to the transmission of an order to undertake on your behalf, CGFPL will transmit the order strictly in accordance with those specific instructions. This may prevent CGFPL from taking the steps set out in this Policy to obtain the best possible result for the execution of that order. Where your specific instructions relate only to part of an order, CGFPL will continue to apply this Policy to that part of the order not covered by those specific instructions.

4.4 Subject to any specific instructions that may be given by you (see above), we may transmit an order that we receive from you to another entity within the Canaccord Genuity group of companies (of which we are a member) or to an external entity, such as a third party broker, for execution. In doing so, we must act in your best interests and consider the Execution Factors and Execution Criteria above.

5. Handling of instructions

5.1 In all cases the orders will be transmitted for execution in a timely manner and always with due care and attention. For applications to participate in new issues, this will not always be on the day of receipt, but will be in accordance with the investment provider's offer period.

5.2 Where an investment is only available for a limited period of time, we will advise you of this in our Suitability Report. It is your responsibility to ensure that relevant paperwork has been returned to us with sufficient time to allow us to process the necessary checks prior to transmitting your order.

5.3 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 we consider there to be no detrimental impact to other investment instructions already queued.

6. Market hours

6.1 We will only accept client orders during our official working hours of 8.00 to 17.00 on UK trading days. Market hours may of course differ from these, depending on the asset being traded.

7. Execution criteria

7.1 When transmitting an order on behalf of clients, CGFPL will take into account the characteristics of:

- (a) the client;
- (b) the order;
- (c) the financial instruments that are the subject of the order; and
- (d) the execution venues to which the order can be directed.

8. Execution factors

8.1 In designing our Reception and Transmission policy we take into account the following execution factors:

- (a) Price
- (b) Size
- (c) Likelihood of settlement
- (d) Cost of execution
- (e) Speed of execution

8.2 The primary factor when considering execution is price. The likelihood of settlement will also have a high importance in the execution process so CGFPL is not likely to deal with counterparties or use execution venues where it believes that settlement will not take place.

8.3 In some circumstances, for some orders, financial instruments or orders, CGFPL may determine that the relative importance assigned to the above execution factors will need to change in order to obtain the best possible result for clients.

9. Execution venues

9.1 Typically, the financial instruments which are in scope of this Policy are limited to purchase through a single venue, which is normally the product provider itself.

9.2 Sales and redemptions may also be limited to the product provider. The exception are VCTs, which may be traded in the secondary market.

9.3 If you hold a VCT in the custody of our affiliate, Canaccord Genuity Wealth Limited, your order may be executed on a Regulated Market. Sales will be made in accordance with their own Order-Execution Policy. You will need to be a client of Canaccord Genuity Wealth Limited in order to utilise its custody service.

9.4 If supported by the product provider, you may be able to dispose of your holding through a matched bargain service. If this is available to you at the time of the proposed disposal, we will notify you in writing and provide you with the relevant details.

9.5 In very limited circumstances, we may be able to match a disposal with a client acquisition. Due to the nature of the tax benefits that are attached to an investment which are typically in scope of this policy, we cannot guarantee availability. We would only consider such a transaction if we considered it to be in the best interests of both parties.

9.6 This list of venues is not exhaustive. CGFPL may, on occasion, use other venues if it believes that it is in the best interests, as far as the overall result is concerned, of clients to do so.

10. Monitoring

10.1 CGFPL will monitor the effectiveness of and its compliance with this Policy.

11. Review and updates

11.1 CGFPL will review at least annually its order execution arrangements and this Policy, and whenever a material change occurs that affects its ability to continue to obtain the best possible result for clients it will adjust them accordingly.

11.2 CGFPL will notify you of any material changes to these execution arrangements or this order Policy. Such notifications may be by means of our website.

12. Record-keeping

12.1 Whenever we transmit an order to another entity for execution, a record will be made of the following details after making the transmission:

- The name or other designation of the person whose order has been transmitted
- The name of other designation of the person to whom the order was transmitted
- The terms of the order
- The date and time of transmission

12.2 Records will be retained and destroyed in line with our record keeping policy.

13. Consent

13.1 By consenting to this Policy, you are giving CGFPL your express consent to transmit your orders outside a Regulated Market or Multilateral Trading Facility such as Systematic Internalisers or Organised Trading Facilities where CGFPL believes that doing so will achieve the best overall result for a client.

13.2 You will be deemed to consent to this policy when you give CGFPL an order to transmit a transaction.