Farley & Thompson
STOCKBROKERS AND INVESTMENT MANAGERS

Best Execution – Order Execution Policy

Introduction
The purpose of this Order Execution Policy is to inform clients of Farley & Thompson's obligations under the Markets in Financial Instruments Directive (MiFID II) and the rules of the Financial Conduct Authority (FCA) in relation to the execution of client orders. This policy explains how we meet those obligations and the arrangements we use to obtain best execution on behalf of our clients.

Client Classification
Farley & Thompson provides services exclusively to Retail Clients as defined by the FCA. Accordingly, this policy has been drafted on the basis that all clients are categorised as Retail Clients and best execution obligations are applied on that basis.

What is Best Execution?
Best execution requires Farley & Thompson to take all sufficient steps to obtain the best possible result for clients when executing or arranging the execution of orders. For Retail Clients, the best possible result will generally be determined by the total consideration paid or received, comprising the price of the financial instrument together with the costs related to execution. In considering whether the best possible result has been achieved, we take account of a range of execution factors as described below.

Client Specific Instructions
Where you provide specific instructions regarding the execution of an order, or any aspect of an order, we will follow those instructions. Specific instructions may prevent us from taking some or all of the steps that we would otherwise take to obtain the best possible result. By following your specific instructions, we will have satisfied our best execution obligations in respect of those aspects of the order covered by those instructions.

Execution Factors
When executing orders on behalf of Retail Clients, we consider a range of factors including:

- Price
- Costs
- Speed of execution
- Likelihood of execution
- Likelihood of settlement
- Size of the order
- Nature of the order
- Any other consideration relevant to the execution of the order

For most Retail Client orders, the greatest importance will be attached to price and costs in determining the total consideration received or paid. Relevant costs may include:

- Execution venue fees
- Clearing and settlement charges
- Any other charges paid to third parties or directly related to the execution of the order

However, there may be circumstances where other factors, such as liquidity, market conditions, order size or market impact, become more significant in obtaining the best possible result.

Order Handling
Under normal market conditions, trades in liquid financial instruments including UK Equities, CREST-eligible International Equities, Exchange Traded Funds (ETFs), Government Bonds (Gilts), Corporate Bonds and Investment Trusts will generally be executed via an automated process using the Retail Service Provider (RSP) network. This process requests quotes from participating market makers and identifies the most favourable quote for the requested size and settlement date.

Where an order cannot be executed through automated systems, or where our dealers determine that the nature of the order may result in a disadvantageous outcome, for example because the order size is significant relative to available market liquidity, we may seek to execute the order manually through an authorised market maker.

Unit Trusts and OEICs
Orders in Unit Trusts and Open Ended Investment Companies (OEICs) are executed through a regulated institutional investment platform linking Farley & Thompson to the underlying fund managers. As these investments are generally priced at a single forward valuation point and do not benefit from competing market quotes, the role of price comparison is less significant than for exchange-traded securities. However, institutional trading arrangements may

provide improved dealing terms and operational efficiencies for clients compared with dealing directly with fund managers.

Execution Venues and Counterparties

Due to the nature and scale of our business, we access liquidity primarily through FCA-authorised market makers connected to the RSP network, providing access to securities traded on the London Stock Exchange and Acquis Exchange. We consider these arrangements to offer an appropriate level of transparency and execution quality for our clients. Our principal execution arrangements are summarised below:

Instrument Type	Primary Execution Venues	Top LSE Venue Firms
UK Equities	London Stock Exchange, Acquis Exchange	Peel Hunt, Winterflood Securities, Investec Bank, Panmure Liberum, Jefferies International, Shore Capital, Deutsche Numis, Canaccord Genuity.
Exchange Traded Funds (ETFs)	London Stock Exchange, Acquis Exchange	
Government Bonds (Gilts)	London Stock Exchange	
Corporate/Other Bonds	London Stock Exchange	
Unit Trusts & OEICs	Institutional Fund Platform	

Where necessary and permitted, transactions may be executed outside a regulated market or trading venue. By accepting this policy and our Terms and Conditions of Business, you expressly consent to such transactions where we reasonably consider them necessary to achieve the best possible result.

Conflicts of Interest

Farley & Thompson maintains a Conflicts of Interest Policy designed to identify, manage and, where necessary, disclose conflicts of interest that could adversely affect clients. The firm acts solely as agent on behalf of clients and does not deal as principal, take proprietary positions or trade against client orders. The firm does not receive remuneration, inducements or other financial incentives in respect of its execution arrangements. Where an actual or potential conflict of interest is identified, it will be managed in accordance with the firm's Conflicts of Interest Policy and disclosed where required by regulation.

Limit Orders

A limit order is an instruction to buy or sell a financial instrument at a specified price or better. Farley & Thompson generally accepts limit orders only where they can be executed promptly under prevailing market conditions and operational arrangements. The firm does not accept stop-loss orders.

Monitoring and Review

Farley & Thompson continuously monitors the effectiveness of its execution arrangements and this policy to ensure clients receive appropriate execution outcomes on a consistent basis. The firm utilises LiquidMetrix to assess and benchmark execution quality. As part of our internal governance framework, we measure performance against several management information indicators, including the proportion of transactions executed at the best available quoted price under prevailing market conditions. These measures are used for monitoring and oversight purposes only and do not limit our obligation to take all sufficient steps to obtain best execution for every client order. Where monitoring identifies deficiencies, appropriate remedial action will be taken.

Review of this Policy

This policy will be reviewed at least annually and whenever there is a material change affecting our execution arrangements, including significant changes in market structure or available liquidity sources, or where monitoring identifies issues that may affect our ability to obtain the best possible result for clients.

Demonstrating Best Execution

We are required to demonstrate, upon request, that client orders have been executed in accordance with this policy. Where appropriate, we will provide clients with information regarding their orders, including details of the execution venue or market maker used and the arrangements we maintain to comply with our best execution obligations.

Disclosure and Consent

This Order Execution Policy is available on the Farley & Thompson website and in paper form upon request. By signing and agreeing to our Terms and Conditions of Business, you acknowledge receipt of this policy and provide your consent to the execution arrangements described within it.