



# Best Execution Policy – Global AB

Most recently revised	Applicable from	Owner	Reviewer
September 14 2022	September 14 2022	The CEO	The CCO

## Introduction

According to Chapter 9, article 33, of the Swedish Securities Market Act (2007:528), investment firms must establish systems and internal rules on how the firm will achieve the best possible result when executing a client's order, providing discretionary portfolio management or transmitting orders to other entities for execution. Coeli Global AB ("Coeli" or "the Company"), investment portfolio manager, is thus obligated to take all necessary measures to achieve the best possible results when the Company executes a trade in financial instruments. The execution of trades includes any activity involving the transmission of trades to other entities for execution when conducting discretionary portfolio management. Coeli itself does not have direct access to any exchange or marketplace.

For the purpose of complying with the rules on best possible results, Coeli has adopted this Best Execution Policy which also includes the company's rules for aggregation and allocation of orders. The primary target group for the policy is staff involved in handling portfolio transactions, that is, portfolio managers, traders, and operations/middle office.

## The relative importance of various factors when executing portfolio transactions

To achieve the best possible result in conjunction with transactions for professional clients and eligible counterparties, Coeli will consider the following factors when the portfolio transaction is transmitted for execution:

- price and associated costs
- speed and likelihood for execution and settlement
- the size and nature of the transaction as well as its impact on the market
- other essential conditions for the execution of the order or portfolio transaction

Coeli takes these factors into account at the time of execution with regards to the financial instrument involved and the prevailing market conditions. Coeli will usually consider price to be of the greatest significance, meaning that the Company undertakes to achieve the best possible result in terms of the total amount that the portfolios will pay or receive. In some cases, Coeli will give greater weight to other factors such as whether the order, due to its nature or scope, could have a significant effect on the price, likelihood of execution, or if there are other relevant reasons to consider other factors more important than price. When transmitting trades on behalf of retail clients, Coeli will always consider



best execution in terms of price and the costs borne by the client, including any costs charged by Coeli and/or the party executing the trade.

## Transmitting orders to other entities for execution

Coeli and its affiliated companies have specific procedures for selecting counterparties for the placement of orders in financial instruments (broker/dealers). The procedure for selecting counterparties is designed to ensure that the client's interests are safeguarded in order to give clients the best possible results. Coeli will continuously evaluate the counterparties used for this purpose. Upon approval (and as part of the ongoing evaluation) of counterparties for placement and forwarding of orders, the Company considers the following criteria:

- Size and type of orders that the counterparty generally handles
- Cost/price
- Operational efficiency, i.e. execution and settlement capacity;
- Soft factors such as economic and political risk, reputation, etc.
- Service and previous experience of the counterparty
- The counterparty's best execution policies and procedures, including its trade error procedures
- Potential conflicts of interests related to Coeli's choice of counterparties

The Company shall make an overall assessment based on the above criteria before the counterparty is approved to execute orders on behalf of Coeli. Only counterparties that are evaluated and approved by the above criteria and then placed on the currently applicable Counterparty List (Coeli's list of approved counterparties) may be used to carry out trades.

Coeli has outsourced its broker evaluation procedures to Coeli Asset Management AB. Coeli remains responsible for ensuring that Coeli Asset Management AB evaluates brokers according to the above procedures. More detailed information on applicable rules and procedures for selecting and evaluating counterparties is described in Coeli Asset Management AB's *Broker Evaluation Procedure*. The procedure has been reviewed and approved by the board of Coeli Global AB.

## Execution of orders in shares and exchange traded funds (ETFs)

When trading shares and units of exchange traded funds, Coeli will use an approved broker who can execute the order to the best price including all costs for the transaction.

## Execution of orders in fund units

Subscriptions and redemptions of fund units that are not traded on an exchange or a marketplace will, under normal circumstances, be forwarded directly to the fund management company (or transfer agent or other intermediary acting on behalf of the fund management company) at the price or rate set



by the fund management company (or equivalent). The Net Asset Value as established by the Fund Management Company or the Fund Administrator will be considered the best possible price.

### **Information to clients**

A list of the counterparties that Coeli uses to place portfolio transactions for execution can be made available to clients upon request.

### **Order handling, aggregation and allocation**

Coeli's objective is to execute portfolio transactions quickly, efficiently and fairly. Comparable orders will be executed promptly and in the order in which they are received if this is possible given the nature of the orders or transactions or the prevailing market conditions and clients' interests. Comparable transactions must be conducted simultaneously for all portfolios concerned when the portfolios form part of the same product group, i.e. they are either discretionary investment portfolios or funds.

Coeli's principle involves equal treatment of similar portfolios. However, funds and discretionary management are treated as two separate products, which is why orders will not be aggregated. If both a fund and a discretionary investment portfolio are to undertake a comparable transaction, Coeli must take all reasonable steps to ensure that trading can nevertheless take place simultaneously. If this is not possible, the fund will normally be given priority but trading in the discretionary portfolio must then take place as soon as possible thereafter.

When transactions are conducted simultaneously on behalf of different portfolios (block orders), the volume of trades must be allocated fairly between them. All portfolios for which transactions are conducted must receive an average price. The portfolios are treated according to the same allocation principle in the case of partially executed orders. As a general rule, the distribution principle is pro rata, which means that the volume of trades is distributed as a percentage of the size of the orders included in the block. However, investment limits and restrictions on individual portfolios may mean that this general rule cannot be fully complied with in some cases. Deviations from the distribution principle must be approved in writing by the CIO and the reasons for the deviation documented.

If pro rata cannot be applied fully because the number of instruments in the volume of trades does not even out, the excess instruments must be allocated to the portfolios representing the largest order volumes in the block.

### **Disturbances in the market or trading systems**

Under certain circumstances, for example when trades are disrupted, when a trading venue voids transactions, failure in the market, disruptions in technical systems or other events, Coeli may assess that it lies in the portfolios' best interest that an order be executed in a manner other than those



prescribed in this Policy. Coeli will then take all reasonable steps to obtain the best possible results for the portfolios under the given circumstances.

### **Information about remuneration, fees and soft dollar arrangements**

In conjunction with portfolio transactions Coeli pays a fee (commission) to the counterparty executing a transaction. This cost is borne by the portfolio as a transaction charge. Coeli does not have any soft dollar arrangements. As industry practice, however, brokers may provide Coeli with research material on their own initiative and irrespective of whether Coeli directs trades to the broker or not. This does not burden the portfolios. Portfolio managers may also, from time to time, participate in conferences organized or sponsored by brokers. Coeli approves of participation provided that the conference is deemed to be of more than moderate importance for the professional activities of the portfolio managers.

Any costs for researched purchased by brokers are invoiced to Coeli. These costs do not burden client portfolios.

### **Client directed brokerage**

Coeli may direct brokerage on behalf of Clients. Clients are hereby informed that such direction may result in higher commissions and spreads, less favorable prices, and exclusion from block trades.

### **Cross trading (trading securities between different client accounts)**

Coeli does generally not engage in cross trading. In the rare event that Coeli needs to make an exception from this principle, the following steps shall be taken in order to mitigate the risk of conflicts of interest:

- Coeli shall seek written approval from the affected clients before initiating any trades;
- The reasons for the trade must be properly recorded. The written record shall address, as a minimum, any conflicts of interests in relation to the trade and information on steps taken to mitigate those conflicts;
- The trade must be carried out at a price that is as fair as possible compared to what the open market is currently offering;
- The trade must be executed by a broker, and
- The portfolio manager must be able to present evidence that clients received a price as fair as possible and that no party was treated unfairly in the transaction.

### **Information to clients**

Coeli's clients and counterparties are entitled to obtain a copy of this policy including its attachments on request.



## **Publication**

The CCO is responsible for maintaining and distributing the policy to Portfolio Managers.

## **Responsibility and administration**

The author and contact person regarding this policy is the CCO. The CEO is responsible for the implementation of the policy and appropriate procedures. The Compliance Function is responsible for monitoring compliance with this policy.

## **Updates and amendments**

Coeli's Board will regularly and at least once a year, evaluate and revise the policy. Amendments will take effect from the date specified above. The policy must always be revised in connection with any material changes that are relevant to the execution of the policy, e.g. if Coeli starts trading a new instrument class or if a new market place is established. Any material amendments will be communicated to clients and counterparties.