



Best Execution Policy

2nd July 2019

It is in the interests of our clients and Evolution Wealth Network Ltd that we obtain the best possible result when placing orders with other firms e.g. third-party brokers and fund managers for the execution of client orders or when transmitting orders on behalf of clients.

Evolution Wealth Network Ltd and its representatives will not execute orders directly but may transmit orders on behalf of clients. We are required to take all sufficient steps to provide best execution when transmitting such orders and, on your request, to provide you with a copy of the policy that we have adopted to achieve that objective.

This best execution policy applies to orders in financial instruments such as funds and other securities. You should read this policy in conjunction with our client agreement.

Execution Factors

When placing orders with other firms for the execution of orders or when transmitting orders, we will make every effort to ensure the best possible result for our clients taking into account the following factors:

- Price
- Cost
- Speed
- Likelihood of execution and settlement
- Size
- Nature of the order
- Any other considerations relevant to the execution of the order

For retail clients, the price and cost of execution of the order will normally be the most important aspect in obtaining the best possible result. We will therefore assume this is the most important outcome for your transaction unless you tell us otherwise.

Executing your order

In arranging for the execution of your order:

- We may use a third-party investment product provider, platform or broker to execute your order;
- We may trade as an agent (where our scope of regulatory permissions allows us to do so);
- We may place the order direct with a fund manager.

Execution venues

All orders placed by us are executed through the following venues/third parties:

- As independent financial planners, we are not restricted to any firms or a limited section of the market. As such we may use any platform, product provider or fund manager as is deemed appropriate to your circumstances and needs. The execution venues will be dictated by the advised provider or platform's arrangements
- When executing orders outside a regulated market, we will obtain your explicit consent prior to proceeding.

On an annual basis, we will publish the top 5 entities used for each type of order or product category. This is available on our website or on request from your financial adviser.

We will regularly assess the venues/third parties available to us to identify those that will enable us, on a consistent basis, to obtain the best possible result when arranging the execution of your orders. The list will then be updated, where necessary, following such assessment.

The third parties have responsibilities in relation to best execution and client order handling themselves. We will also undertake periodic monitoring to ensure that they are meeting the relevant requirements.

Client Specific Instructions

If you have given instructions that price is not the most important factor in executing your instructions, we will make every effort to comply with your instructions but cannot guarantee this. This may be due to either the nature of the order, or the type of financial instrument you wish to trade in.

If we do accept any client specific instructions, you should be aware that this may prevent us from following the processes set out in this policy which have been designed to obtain the best possible results for the execution of those orders in respect of the elements covered by those specific instructions.

Collective investment schemes

For orders in collective investment schemes e.g. Unit Trusts, OEICs and Investment Trusts, we will place the order directly with the relevant fund manager/platform provider and/or the operator of the collective investment scheme.

Charges

It is our policy that commission and charging structures will not influence either the selection of execution venues, or the order flow that follows as a result of the execution process. We will therefore not discriminate between the execution venues we use to arrange execution of your orders.

Monitoring and review of our execution policy

We will regularly monitor the effectiveness of our best execution policy to identify and, where appropriate, correct any deficiencies. In particular, this will cover the execution quality of any third parties referred to in the policy.

This review will be carried out regularly (on at least an annual basis) or whenever a material change occurs that affects our ability to continue to obtain the best possible result for our clients.

Staff understanding

All relevant staff are made aware of this policy to highlight and emphasise the importance of best execution.

Important Information: Issued by Evolution Wealth Network Limited, Holmwood, Broadlands Business Park, Langhurstwood Road, Horsham, RH12 4QP, which is authorised and regulated by the Financial Conduct Authority. Registration in England No 08229133.