

COLUMBIA THREADNEEDLE INVESTMENTS - EMEA¹ ORDER EXECUTION POLICY (FOR PROFESSIONAL CLIENTS) Collective Investment Schemes Annex – applicable to the following instrument types: Open Ended Collective Investment Schemes

November 2021

¹This Order Execution Policy applies to the following legal entities: Threadneedle Asset Management Limited, Threadneedle International Limited, Threadneedle Investment Services Limited, Threadneedle Management Luxembourg S.A., BMO Asset Management Limited (UK), BMO Asset Management Netherlands B.V., BMO AM Multi-Manager LLP, BMO Rep Asset Management Plc, BMO Fund Management Limited, BMO Investment Business Limited, LGM Investments Limited and Thames River Capital LLP

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1. POLICY STATEMENT

1.1. GENERAL

This policy relates to the trading activities carried out by Columbia Threadneedle Investments (EMEA) (“Columbia Threadneedle”). This Annex is supplemental to the main overarching Summary Order Execution Policy and sets out some of the more specific factors that are taken into consideration when either executing orders in collective investment schemes directly on venues or, to the extent applicable, where such orders are transmitted to other firms (i.e. brokers) for execution on venues.

Where orders are placed with brokers and that entity therefore executes orders “on a client’s (Columbia Threadneedle’s) behalf”, that entity will be judged to be performing a service whereby they either:

- Execute an order by dealing as agent;
- Execute an order by dealing as risk-less principal on behalf of a client (or as matched principal as the case may be); and
- “Work” an order on a client’s behalf.

In such instances described above, Columbia Threadneedle will be owed a duty of best execution by the Broker entity. However, in other instances where Columbia Threadneedle “requests for quote”, as is usually the case in fixed income markets (i.e. broker acts as principal in the transaction), then entities will generally not owe a duty of best execution to Columbia Threadneedle over such quotes.

CIS ORDERS

1.2. ORDER EXECUTION - UNITS IN COLLECTIVE INVESTMENT SCHEMES

Where deals on behalf of clients when purchasing units or shares in “internally managed” collective investment schemes, Columbia Threadneedle will execute these instructions via the relevant UCITS management company or AIFM. For example, in respect of UK domiciled Columbia Threadneedle branded OEIC sub-funds such trades will be executed via the relevant Authorised Corporate Director (or ACD), namely Threadneedle Investment Services Limited (TISL). Similarly, in the case of any UK Non-UCITS retail schemes (NURS), these too will be executed via TISL in its capacity as ACD and Alternative Investment Fund Manager (AIFM). Such orders will be executed at the next dealing point and at a price determined in accordance with the FCA’s Collective Investments Scheme sourcebook (COLL). In the case of Luxembourg domiciled Columbia Threadneedle branded SICAV sub-funds such trades will be executed via Threadneedle Management Luxembourg S.A., the appointed Management Company to the SICAV. In respect of BMO branded OEIC sub-funds such trades will be executed via the relevant ACD, namely BMO Fund Management Ltd. In the case of Luxembourg domiciled BMO branded SICAV sub-funds such trades will be executed via FundRock Management S.A. and for BMO Liability Driven Investment (LDI) and Reserved Alternative Investment Fund (RAIF) products, such trades will be executed via BMO Asset Management Luxembourg S.A.

Where Columbia Threadneedle executes trades in exchange traded funds (ETFs) and closed ended investment companies (e.g. investment trusts), these shall follow the process described in the Equities Annex.

1.3. BEST EXECUTION FACTORS

Columbia Threadneedle endeavours to provide all of our clients “best execution” on an equal basis.

However, given the nature of forward priced open-ended collective investment schemes, the price at which Columbia Threadneedle is able to trade at is determined by the official price of the relevant fund on the day.

1.4. BEST EXECUTION CRITERIA

The key criteria for assessing where to execute a trade in a unit/share of an open-ended CIS is which entity is contractually appointed as operator of that scheme.

1.5. EXECUTION VENUES

The decision to use which venue or entity is dictated by whichever legal entity is the operator of the relevant open-ended collective investment scheme as described in section 1.2. Where the fund is a non-affiliated product, execution instructions will be given to the relevant operator of that external fund, consistent with the process described above for affiliated funds.

1.6. MONITORING

Columbia Threadneedle will keep its arrangements under review. In respect of dealing in the units of open-ended CIS, if other secondary CIS markets become available, which would mean trading away from the scheme operator in the interest of achieving best execution such venues will be considered for inclusion in Columbia Threadneedle's execution arrangements.

1.7. REVIEW

Columbia Threadneedle will review its execution policy and procedures on at least an annual basis. Details of material changes to this Policy will be made available to clients. This policy is available on the Columbia Threadneedle website under the heading 'Legal Documents' within the Literature section.

1.8. GENERAL TERMS OF ORDER HANDLING

When executing trades for open ended CIS, Columbia Threadneedle will seek to ensure that it submits its unit dealing trade instructions to the relevant scheme operator in advance of the applicable deal cut off times to ensure that transactions are effected in a timely manner.

1.9. SPECIFIC CLIENT INSTRUCTIONS

When a client gives Columbia Threadneedle a specific instruction as to the execution of an order, then that order will generally be executed in accordance with those specific instructions. Clients should therefore be aware that providing specific instructions will override Columbia Threadneedle's obligations to execute client orders in accordance with this Policy.

Similarly, if a client gives a specific instruction for an "Advisory Fund" or an "Advised Execution" fund, this instruction may prevent us from obtaining the best possible result in accordance with our Policy.

2. APPENDIX 1

Definitions

Advised Execution – means a non-discretionary arrangement between the firm and its client to effect executions upon instruction from the client following the provision of reactive advice given to that client.

Advisory Fund - means a non-discretionary portfolio whereby advice is provided to the client by the firm and from which the client retains responsibility for choosing whether or not to accept the advice given.

AUT – means an authorised unit trust.

CIS – means a Collective Investment Scheme

COLL – means the FCA's Collective Investments Scheme sourcebook which applied to funds authorised by the FCA.

Execution Venue/Entity - means a Regulated Market (RM), a Multilateral Trading Facility (MTF), an Organised Trading Facility (OTF), a Systematic Internaliser (SI) or a market maker, or another liquidity provider or an entity that performs a similar function.

Financial Instruments – includes:

- i. transferable securities;
- ii. money-market instruments;
- iii. units in collective investment schemes;
- iv. options, futures, forwards, swaps, forward rate agreements and any other derivative contracts relating to securities
- v. derivative instruments for the transfer of credit risk;
- vi. financial contracts for differences.

Note: Financial instruments do not include spot transactions, or loans and certain commodities.

LDI – means a Liability Driven Investment product

MiFID - means the Directive 2004/39/EC of the European Parliament and the Council of 21 April 2004 on Markets in Financial Instruments Directive and any implementing directives and regulations.

MiFID II - means the Directive 2014/65/EU of the European Parliament and the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (recast).

MiFIR – means the Regulation (EU) No 600/2014 of the European Parliament and the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/2012.

MTF (Multilateral Trading Facility) – means a system operated by an investment firm or a market operator, which brings together multiple third-party buying and selling interests in Financial Instruments, in the system and in accordance with non-discretionary rules, in a way that results in contract in accordance with the provisions of Title II of MiFID.

OTF (Organised Trading Facility) – means a multilateral system which is not a regulated market or an MTF and in which multiple third-party buying and selling interests in bonds, structured finance products, emission allowances or derivatives are able to interact in the system in a way that results in a contract in accordance with Title II of MiFID

NURS – means a Non UCITS retail scheme, which is a fund, authorised by the Financial Conduct Authority (FCA) which is neither a UCITS scheme or a qualified investor scheme and is subject to the requirements of the FCA Handbook (namely COLL).

OEIC – means an open-ended investment company

Professional Client – means a client meeting the criteria laid down in Annex II of MiFID.

RAIF – means a Reserved Alternative Investment Fund

RM (Regulated Market) - means a multilateral system operated and/or managed by a market operator which brings together multiple third party buying and selling interests in Financial Instruments in the system and in accordance with non-discretionary rules, in a way that results in contract, in respect of the Financial Instruments admitted to trading under its rules and/or systems and which is authorised and functions regularly in accordance with the provisions of Title II of MiFID.

SICAV – means a fund which is a société d'investissement à capital variable

SI (Systematic Internaliser) – means an investment firm which, on an organised, frequent, systematic and substantial basis, deals on own account when executing client orders outside a regulated market, an MTF or an OTF.

Trading Venue – means a regulated market, an MTF or an OTF

UCITS – means undertakings for collective investment in transferable securities (i.e. schemes or funds) that are established in accordance with the UCITS Directive

APPENDIX 2

Columbia Threadneedle will execute deals in the units/shares of open ended CIS via the relevant operator of the scheme. Such operators may consist of the following:

Threadneedle Investment Services Limited

Threadneedle Management Luxembourg S.A.

BMO Fund Management Limited

FundRock Management Company S.A.

BMO Asset Management Luxembourg S.A.

Other external (non-affiliated) operators as appropriate (*this will be dependent on the relevant product provider*)

Threadneedle Asset Management Limited. Registered in England and Wales No. 573204.
Threadneedle International Limited. Registered in England and Wales No. 2283244.
Threadneedle Investment Services Limited. Registered in England and Wales No. 3701768
Registered Office: Cannon Place, Cannon St, London EC4N 6AG.
Threadneedle Management Luxembourg S.A. Registered with the Registre de Commerce et des Societes (Luxembourg) No. B 110242. Registered office 44 rue de la Vallée, L-2661 Luxembourg
BMO Asset Management Limited (UK). Registered in England and Wales No. 00517895
BMO AM Multi-Manager LLP. Registered in England and Wales No. OC328350
BMO Fund Management Limited. Registered in England and Wales No. 02170242
Thames River Capital LLP. Registered in England and Wales No. OC310934
Registered Office: Exchange House, Primrose Street, London, EC2A 2NY
BMO Rep Asset Management Plc, Registered in England and Wales No. 01133893
Registered Office: 7 Seymour Street, London, England, W1H 7JW
LGM Investments Limited. Registered in England and Wales No. 03029249
Registered Office: 95 Wigmore Street, London, W1U 1FD
BMO Investment Business Limited. Registered in Scotland No. SC151198
Registered Office: 6th Floor Quartermile 4, 7a Nightingale Way, Edinburgh, Scotland, EH3 9EG
BMO Asset Management Netherlands B.V.
Registered office Jachthavenweg 109 E, Amsterdam, 1081KM, Netherlands
Threadneedle Asset Management Limited, Threadneedle International Limited, Threadneedle Investment Services Limited are authorised and regulated by the Financial Conduct Authority.
Threadneedle Management Luxembourg S.A. is regulated by the Commission de Surveillance du Secteur Financier (CSSF)
BMO Asset Management Limited (UK), BMO AM Multi-Manager LLP, BMO Rep Asset Management Plc, BMO Fund Management Limited, BMO Investment Business Limited, LGM Investments Limited and Thames River Capital LLP are authorised and regulated by the Financial Conduct Authority.
BMO Asset Management Netherlands B.V. is regulated by the Dutch Authority for the Financial Markets (AFM)
