



AVENTICUM
CAPITAL MANAGEMENT

**Aventicum Capital Management (UK) LLP
Order Execution Policy
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1 Background

Aventicum Capital Management (UK) LLP ("ACMUK") is authorised by the Financial Conduct Authority ("FCA") as an alternative investment fund manager ("The Manager") to both alternative investment funds and managed account clients (together, "Clients").

This Order Execution Policy ("Policy") outlines out the basis by which ACMUK will seek to provide best execution to its Clients as set out in the FCA Conduct of Business Sourcebook (COBS 11.2); implementing the requirements of the Markets in Financial Instruments Directive ("MiFID"). ACMUK's Policy is consistent with the Credit Suisse Asset Management Global Best Execution Policy.

2 Scope and Purpose

The best execution rules require firms to take all reasonable steps to ensure the best possible outcome when either executing client orders or placing orders with other entities to execute.

There are two methods ACMUK portfolio managers use when executing trades on behalf of its Clients:

- 1) ACMUK can place an order with a third party (e.g. a broker or investment bank) for that third party to execute on behalf of the client. Such third parties are referred to in this policy as "Brokers".
- 2) ACMUK may execute the relevant transaction on behalf of the client or fund directly with a counterparty or on an exchange or other trading system. The counterparty, exchange or trading system with whom ACMUK chooses to execute such a transaction is referred to in this policy as an "execution venue".

For the avoidance of doubt, ACMUK cannot guarantee best execution when following a specific dealing instruction from a client. In this scenario, ACMUK will execute orders on a "best efforts" basis.

3 The Best Execution Obligations

In order to demonstrate best execution, ACMUK is required to take into account the following execution factors:

- Price;
- Costs;
- Speed;
- Likelihood of execution and settlement; and
- Size and nature of the order or any other consideration relevant to the execution of the order.

Best execution does not just mean "best price" and firms are required to consider the following criteria to determine the relative importance of the execution factors:

- The characteristics of the client including the client categorisation (best execution only applies to retail and professional clients);
- The characteristics of the client order;
- The characteristics of the financial instruments that are the subject of that order; and

- The characteristics of the execution venue to which that order can be directed.

4 Instrument Types - Establishing Best Price

ACMUK may invest in a broad range of Emerging Markets Corporate securities including:

- Bonds;
- Commercial paper and other short term credit instruments;
- Exchange Traded Funds (“ETFs”);
- Loans and loan participations;
- Credit-linked notes;
- Credit derivatives (including but not limited to credit default swaps and total return swaps);
- Interest rate derivatives for hedging purposes (including Futures);
- Currency derivatives for hedging purposes; and
- Other form of credit instrument that the Manager determines are consistent with the ICAV’s investment strategy.

For full details of the investment objective, investment strategy and investment restrictions please refer to the AQS Emerging Markets Corporate Debt Total Return Fund ICAV Prospectus.

Price is a factor in every transaction. Wherever possible, the following practices should usually be followed to determine the best price for each transaction type (subject to markets and requirements):

4.1 OTC Transactions

ACMUK executes all orders Over-The-Counter (“OTC”). Wherever possible the Trader will obtain at least 3 quotes and record them manually on the daily blotter. If the quote with the best price is not selected, an explanation should be provided outlining the reasons why (e.g., smaller quantity than quoted).

However, ACMUK can also trade in illiquid assets that are not actively traded and where it is not possible to secure 3 independent quotes. In this scenario it is at the discretion of the portfolio manager to choose counterparties based upon the execution factors which are noted in section 3, above.

4.2 Exchange-Traded Derivatives

Whilst ACMUK currently executes all orders OTC, they may also choose to invest in exchange traded derivatives e.g exchange-traded futures and options contracts and exchange traded contracts for differences.

The vast majority of exchange-traded derivatives transactions will be affected by passing an order to a relevant Broker.

Where the order is to be executed directly with an execution venue, the Trader should check prices quoted by/available on at least three of the approved execution venues. However, in circumstances where the Trader considers that speed of execution, certainty of execution and/or market impact are important execution factors, he or she is permitted to deal on the basis of the

prices quoted by/made available on a single execution venue.

5 Broker Selection

ACMUK has taken care to select Brokers that consistently provide a high quality execution service, taking account of the relevant execution factors. All brokers must be approved via the Credit Suisse counterparty approval process, which is overseen by Risk Management. Where ACMUK places an order with a Broker for execution by that Broker, ACMUK is not responsible for controlling or influencing the arrangements made by the Broker relating to the execution of that order (e.g. ACMUK does not control the Broker's choice of execution venues, such as exchanges, multilateral trading facilities or internal dealing facilities).

6 Client Order Handling and Allocations

From time to time ACMUK will aggregate a number of client orders buying or selling the same security together for execution either via a Broker or directly with the execution venue. Once these client orders have been executed, the Trader will allocate orders across the clients who participated in the order. In these cases such orders and executions will be treated as follows:

- Allocation of order fills between several clients will be prompt, fair and consistent. In most cases, depending on trading processes, allocations will have been made at pre-execution.
- Occasionally, when participating in a new issue that is over-subscribed, ACMUK might only receive a partial allocation of its original order. In this scenario it would become necessary to re-allocate the order on a pro-rata basis. If pro-rata allocation is not a viable option (due to the minimal size) then final allocation will be recorded with reference to Compliance/Chair of the Investment Committee ("Chair"); and
- The Trader will only aggregate orders if it reasonably believes that doing so would be of benefit to all clients.

7 Monitoring and Review

AMCUK has an obligation to monitor the effectiveness of its order execution arrangements. This Policy will be reviewed at least annually.

8 Client Notification

ACMUK has an obligation to provide its portfolio management clients with appropriate information on this Policy. ACMUK will make available its Policy to its portfolio management clients at any time when an Investment Management Agreement (IMA) is signed, upon request and via publication on the ACMUK website.

Clients will be notified of any material changes to this Policy (whether pursuant to the review process or otherwise) via the ACMUK website.