

POLICY FOR BEST EXECUTION AND COMMUNICATION

1. Purpose

This policy is prepared in accordance with:

- a. **Regulation (EU) 2017/565** on supplementary rules concerning the organizational requirements and conditions for the operation of investment firms, Article 76, paragraph 1,
- b. Bekendtgørelse om værdipapirhandlers udførelse af ordrer (**BEK no. 917 af 25/06/2017**), and
- c. Bekendtgørelse om de organisatoriske krav til værdipapirhandlere (**BEK no. 921 af 26/06/2017**).
- d.

The policy aims to ensure that the Company at all times takes all reasonable measures to achieve the best possible outcome and conditions for the customer and that the Company at all times complies with relevant legislation in connection therewith.

The policy has been prepared taking into account the Company's size and organization as well as the nature, scope, and complexity of the Company's business. The policy applies to all employees of the Company. The Board reviews and updates this policy at least once a year. The policy is valid until changed by the Board.

The Company's customers are alternative investment funds (AIF's) with an approved AIFM. The customer and their approved AIFM must be informed of significant changes to this policy.

2. Instruments

The Company may transmit orders in connection with investment advice and portfolio management in instruments according to Annex 2 of The Danish Investment firm and Investment Service and Activities Act:

- a) Options, futures, swaps forward rate agreements and any other derivative contracts relating to climatic variables etc.
- b) Shares and other negotiable securities equivalent to these
- c) Bonds and other negotiable securities equivalent to these
- d) Other transferable securities
- e) Money-Markets instruments
- f) Units in collective investment undertakings
- g) Options, futures, swaps, forward rate agreements and any other derivative contracts relating to securities etc. or other derivatives instruments etc. which may be settled physically or in cash

3. Transmitting orders

The Company does not execute orders or transactions for customers. The Company transmit orders to other generally recognized financial institutions and settlement is made through the customers' custodian bank/depositary. The company's trading counterparties are eligible counterparties that have entered into ISDA and/or GMRA agreements with the company's clients. The company shall, given the circumstances, take all reasonable measures to ensure the best possible outcome for customers. However, this does not apply if the company receives a specific order from a customer on how the order should be executed.

In each case, the following factors must be taken into account:

- a. Price
- b. Transaction Costs
- c. Speed
- d. Execution and settlement probability
- e. Scope
- f. Nature of order
- g. Other factors relevant to the execution of the order

Furthermore, the characteristics of the customer, the characteristics of the order, the characteristics of the financial assets involved in the order, and the characteristics of the counterparty/broker to which the order is directed shall also be taken into account.

4. Guidelines for best execution

Best execution is determined based on the total costs, unless the purpose of executing the order suggests that the factors mentioned above are of greater relevance. By total cost is meant the price of the financial instrument and all expenses directly related to the execution of the order, including fees incurred by the counterparty/broker, clearing and settlement, other fees to third parties involved in the execution of the order.

The Company does not execute orders and does not structure or impose commissions in such a way as to differentiate between counterparties/brokers or executing venues.

Pursuant to Regulation (EU) 2017/565, no. (100) the Company may choose a single entity for execution only if it can be demonstrated that it consistently enables The Company to achieve the best possible outcome for the customers. The Company must reasonably expect that the selected entity will deliver results for the customers that are at least as favourable as those achievable through alternative entities for execution.

5. Counterparties

The Company may use the following counterparties/brokers to transmit customer orders:

- a) Jyske Bank
- b) Nykredit Bank
- c) Nordea
- d) SEB
- e) Danske Bank
- f) Société Générale
- g) Sydbank
- h) Swedbank

The company shall, without undue delay, provide the customer with information about the executing counterparty to whom the order was transmitted. The executing counterparty transmits trading information directly to the customer and settles the transaction against the customer's custodian bank. The counterparty transmits a copy of the trading information to the company. The Company shall on an ongoing basis evaluate the counterparties to ensure the best possible execution of orders.

If there is a specific instruction from a customer, the company is obligated to transmit the order to the executing entity requested by the customer. In such cases, the company may not be able to ensure compliance with best execution.

6. Guidelines for telephone conversations and electronic communication with customers and trading counterparties

The following guidelines concern telephone conversations as well as electronic communication with the company's customers and trading counterparties in connection with the transmitting of customer orders.

For communication with customers, the following applies:

- a) The Company may not provide investment services or conduct investment activities by telephone.
- b) Trade inquiries and other communication with the Company's customers, intended to lead to transactions or the provision of services in connection with customer orders, shall be electronically documented via email. This applies even if these inquiries or other communication do not result in such transactions or the provision of services in connection with customer orders.
- c) Trade inquiries and other communication with the Company's customers must be made with, sent from and received with IT equipment and software provided by the Company to the relevant employee.

- d) Telephone conversations with the Company's customers must not lead to or intend to lead to transactions or the provision of services in connection with customer orders. Telephone conversations with the Company's customers are not typically recorded, as telephone conversations with customers, as per the above, must not lead to transactions or services in connection with customer orders.

Documentation shall be kept for a minimum of 5 years and shall be made available to the relevant customers and competent authorities upon request.

For communication with brokers, the following applies:

The Company's communication with trading counterparties can take place over phone or electronically. Trading counterparties will typically inform the Company about market movements and trading flows by telephone. The Board of Directors has decided that the following guidelines apply:

- a) Telephone conversations with counterparties are recorded and stored by the counterparty.
- b) Telephone conversations and other communication with counterparties that lead to transmitting of orders or investment activities for customers shall be electronically documented via email or Bloomberg chat.
- c) Documentation of transactions or investment activities for customers shall be made with, sent from and received with IT equipment and software provided by the Company to the relevant employee.

7. Control and Reporting

It is the managements responsibility to ensure:

- a) Compliance with this policy and related business processes and communicate them to relevant employees.
- b) That the Company's business processes are up-to-date and reflect the guidelines herein.

The Board shall regularly and at least annually receive reports on the Company's compliance with this policy. The same reporting shall be sent for information to the customer's approved AIFM.

8. Entry into Force

This policy has been adopted and is effective from April 9, 2024.