

TRICADIA EUROPE LLP
(the “Firm”)

The Firm is making the below disclosures in compliance with so COBS 11 Annex 1 EU Regulatory Technical Standard 29 (RTS 28).

BEST EXECUTION POLICY

Before the Firm provides investment services for its clients, it is important that the clients of the Firm understand how the Firm will execute transactions. The following information is a summary of the Firm’s Best Execution Policy which is designed to provide its clients with a general understanding of the Firm’s typical dealing arrangements for different instrument types and the execution venues that the Firm uses. This information should not however be seen as a prescriptive statement of how a particular order must be dealt with.

Best execution involves the Firm taking all sufficient steps to obtain the best possible result for the clients’ transaction(s). This result can be measured by a number of execution factors though for retail clients it is defined in terms of “total consideration”, comprising of price, costs (including execution venue fees), clearing and settlement fees and any other fees paid to third parties involved in the execution of the order. Costs may be excluded, however, that are attributable to differences in the nature of the services that the Firm provides to its clients.

The Firm’s Typical Dealing Arrangements for Different Types of Investment

Equities

For standard UK market orders, and in normal market conditions, the Firm may poll different execution venues (using automatic execution technology) to identify the best terms available at the point of trading for the equity concerned. Other orders, including those relating to international equities, that cannot be executed automatically will be dealt manually with another regulated firm or via a Multilateral Trading Facility (MTF). This involves a manual search for reference trading prices via market data feeds or by comparing prices offered by other market participants. When an appropriate counterparty is identified, the price is negotiated manually and executed on the best terms identified for the order in question. This may occur off-exchange.

Debt Securities (including bonds)

The debt market in some locations is not centrally organised, and for many non-government issues, is not a liquid market. In these circumstances the majority of debt issues or bonds must be dealt manually in order to identify current traders in the security concerned. If liquidity is available and a price comparison made for the size of trade concerned, the Firm will route the order to the counterparty which provides the most competitive overall pricing. For some smaller orders, the Firm is able to use automatic execution technology which will source the best bid and offer from a range of bond dealers.

Over the Counter Products

Over the counter products are products that are traded other than on a formal exchange (for example structured products or FX). Over the counter products are typically sourced via a third party. The order routing process will depend firstly on the execution factors. Further issues that may affect the order process include the following:

- For bespoke, highly negotiated transactions or for those which may be original trading ideas or for which the Firm has a duty of confidentiality to the originating firm, the Firm will route such orders exclusively to the originating firm since there will be no other available market liquidity within a reasonable timeframe; and
- For some more standardised products, the Firm will usually select and price poll from a shortlist of dealing counterparties identified by the Firm to be among the most competitive in the field concerned.

Foreign Exchange (or FX)

The FX market is wholly over the counter and off exchange across all FX products. Under normal market conditions, the Firm will generally execute with a primary FX counterparty using electronic trading tools. In the event that the Firm cannot execute electronically, it will execute manually. In certain circumstances and product types, the Firm will also use other FX counterparties to fulfil its best execution obligations.

Execution Factors

The Firm will take all sufficient steps to obtain the best possible result for its clients taking into account the following execution factors:

- Price;
- Costs;
- Speed;
- Likelihood of execution;
- Settlement;
- Order size;
- Nature;
- Venue; and
- Any other relevant consideration.

The Firm does not need to obtain the best possible results for its clients on every single occasion; rather it will verify on an ongoing basis that the execution arrangements it has established work well throughout the different stages of the order execution process. The Firm will take all appropriate remedial actions if any deficiencies are detected to achieve the best possible results for its clients on an ongoing basis.

In the majority of cases, the Firm would typically expect that the most significant issue to be taken into account will be the total consideration to be paid or received. However, there will be occasions when other factors may be more important or relevant and, as discretionary managers, the Firm may use its judgement and experience to give greater prominence to other execution factors other than price based on one or more of the criteria set forth above.

Brokers and Execution Venues

Primarily, brokers and venues are selected based on their ability to meet the best execution factors listed above. The Firm utilizes the list of approved brokers maintained by Tricadia Capital Management, LLC, in accordance with Tricadia Capital Management, LLC's Brokerage Selection and Best Execution Policy. Factors warranting specific consideration in evaluating brokers and execution venues include the financial integrity of the broker or execution venue, any previous disciplinary or regulatory issues of the broker or execution venue and the general industry reputation of the broker or execution venue. Brokers and execution venues are evaluated periodically to ensure continued compliance with these criteria, among other factors.

Reporting

The Firm will publish reports on an annual basis of the top five investment firms in terms of trading volumes where it transmitted or placed client orders for execution in the preceding year and the information on the quality of execution obtained and take account of that information and information published by execution venues on execution quality in their policies on best execution.

The top five investment firms in terms of trading volume for calendar year 2017 for applicable asset classes are set forth below. Asset classes of which the Firm did not have any trading activity in the applicable year have been omitted from the report.

Additional Information

Where a client makes reasonable and proportionate requests for information about the Firm's policies or arrangements and how they are considered and reviewed, the Firm shall answer clearly and within a reasonable time.

Top Five Execution Venues

Class of Instrument		Debt instruments				
Notification if <1 average trade per business day in the previous year		Yes				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
BARCLAYS BANK PLC LEI:G5GSEF7VJP5I7OUK5573	21.17%	24.69%	14.86%	11.11%	0.00%	
DEUTSCHE BANK AKTIENGESELLSCHAFT LEI:7LWTFZYICNSX8D621K86	13.29%	11.11%	7.41%	3.70%	0.00%	
Goldman Sachs International LEI:W22LROWP2IHZNBB6K528	11.34%	13.58%	9.88%	3.70%	0.00%	
UBS Limited LEI:REYPIEJN7XZHSUI0N355	10.20%	3.70%	3.70%	0.00%	0.00%	
BNP PARIBAS LEI:R0MUWSFPU8MPRO8K5P83	8.60%	6.17%	3.70%	2.47%	0.00%	

Class of Instrument		Bonds				
Notification if <1 average trade per business day in the previous year		Yes				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
BARCLAYS BANK PLC LEI:G5GSEF7VJP5I7OUK5573	16.96%	21.62%	14.86%	6.76%	0.00%	
DEUTSCHE BANK AKTIENGESELLSCHAFT LEI:7LWTFZYICNSX8D621K86	15.49%	12.16%	8.11%	4.05%	0.00%	
Goldman Sachs International LEI:W22LROWP2IHZNBB6K528	13.21%	14.86%	10.81%	4.05%	0.00%	
UBS Limited LEI:REYPIEJN7XZHSUI0N355	11.89%	4.05%	4.05%	0.00%	0.00%	
BNP PARIBAS LEI:R0MUWSFPU8MPRO8K5P83	10.02%	6.76%	4.05%	2.70%	0.00%	

Class of Instrument		Credit derivatives				
Notification if <1 average trade per business day in the previous year		Yes				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
JPMorgan Chase Bank, National Association LEI:7H6GLXDRUGQFU57RNE97	69.22%	58.82%	41.18%	17.65%	0.00%	
Credit Suisse International LEI:E58DKGMJYYYJLN8C3868	14.23%	23.53%	5.88%	17.65%	0.00%	
BARCLAYS BANK PLC LEI:G5GSEF7VJP5I7OUK5573	10.68%	5.88%	5.88%	0.00%	0.00%	
Goldman Sachs International LEI:W22LROWP2IHZNBB6K528	3.56%	5.88%	0.00%	5.88%	0.00%	
Citibank, National Association LEI:E57ODZWZ7FF32TWEFA76	2.31%	5.88%	0.00%	5.88%	0.00%	

Class of Instrument		Equities				
Notification if <1 average trade per business day in the previous year		Yes				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders	
BARCLAYS CAPITAL SECURITIES LIMITED LEI:K9WDOH4D2PYBSLSOB484	50.79%	40.00%	40.00%	0.00%	0.00%	
J.P. Morgan Securities PLC LEI:K6Q0W1PS1L104IQL9C32	49.21%	60.00%	40.00%	20.00%	0.00%	

Class of Instrument		Securities Financing Transactions (Bonds)	
Notification if <1 average trade per business day in the previous year		Yes	
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	
BARCLAYS BANK PLC LEI:G5GSEF7VJP5I7OUK5573	100.00%	100.00%	