

Cerno Capital Partners LLP
Authorised and regulated by the
Financial Conduct Authority under firm number: 465408

Best Execution Policy – Retail & Professional Clients

CERNO CAPITAL

Issue date: January 2018

Update 1: March 2019

Update 2: January 2020

Update 3: April 2021

Update 4: June 2024

Update 5: September 2025

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Purpose of this document

This document is designed to inform our clients of our policies when seeking to achieve the best possible result (“best execution”) for clients when we execute trades in financial instruments (including spot foreign exchange which technically is not a financial instrument) on your behalf either in the case where you give us instructions to execute trades or where we have discretionary authority over your portfolio.

Words in italics are defined in the glossary at the back of this document.

1 What is best execution/what are the execution factors?

The overarching objective is that we take all sufficient steps to obtain the best possible result for our clients. We seek to achieve this objective by taking into account a number of execution factors. The factors we take into account are:

- i. any restrictions that may exist on your account as to where your trades can be executed;
- ii. total consideration to the client of the transaction after all fees and commissions have been taken into account;
- iii. size of the transaction;
- iv. speed of execution and settlement;
- v. likelihood of execution;
- vi. likelihood of settlement; and
- vii. any other factor we consider is relevant to the transaction.

In determining the applicability of the factors we consider:

- i. Market information;
- ii. The details we hold about you, our client; and
- iii. the nature of the transaction including the specific financial instrument and the markets that the specific financial instruments

The application of these factors is a matter of judgement. Other firms may exercise their judgement differently and reach a different conclusion as to how to achieve the overarching objective. In most cases the factors other than total consideration to the client will not be applicable and thus this execution factor will be the determining factor. The remaining factors are not listed in any order of priority. The factors may be interlinked such that for example, in fast moving markets, particularly for large orders, the way we would seek to achieve best total cost/revenue may involve giving the order to a broker who we believe can execute the entire order in a timely manner even if part of the order could be filled at a more advantageous price from another broker.

2 What are our obligations?

Under the second Markets in Financial Instruments Directive (“MiFID II”), we, as a firm that is subject to MiFID II must take all sufficient steps to obtain, when executing

orders, the best possible result for our clients. How we assess the “best possible result” is set out under “What is best execution?” above.

3 Execution Venues (Competing Markets)

For some financial instruments there are a range of execution venues where the trade could be executed. We regularly assess the execution venues available and may add or delete venues in accordance with the overall objective. [If you have instructed us to use a particular venue and we have accepted that instruction the transaction will be executed on the venue of your choice.] We will issue instructions to executing brokers where we deem such instructions to be appropriate, in other cases we will leave the decision as to the most appropriate venue to the executing broker. Unless you instruct us otherwise, whilst adhering to this policy, we shall have complete discretion as to the choice of venues including trading outside a trading venue if we believe that trading in that way is likely to achieve the overall objective.

A list of the execution venues we may use will be available in hard copy on request. Some financial instruments may only be traded on one venue, (notably if we purchase units/shares of a collective investment scheme (CIS), the venue will be the fund manager/CIS operator itself).

4 Execution outside of *regulated markets, multi-lateral trading facilities and organised trading facilities* (each a trading venue)

Unless you instruct us otherwise, where we consider it to be in your best interest we will allow the brokers to whom we pass execution instructions to trade outside of regulated markets, multi-lateral trading facilities and organised trading facilities. The broker will still be bound by their own best execution policies which we will review.

Where Cerno executes an OTC trade it will consider the fairness of the price from available market data and where possible comparing the price with similar or comparable products. Cerno also considers the counterparty risk associated with trading outside a trading venue and manages this risk by only trading with high-quality counterparties with high credit ratings.

5 Investment into funds

When we invest into funds or other collective investment vehicles the price that we are able to execute at is usually determined by the fund manager based on published prices and we will execute at those prices.

6 Commencement Date

This policy will apply from 3 January 2018 (the date that *MiFID II* comes into force).

7 How do we execute

We are not a member of any exchange.

We seek to ensure we have deep relationships with high quality counterparties with the aim of maximising execution quality in terms of total consideration.

In cases when we transmit your order to another broker or dealer the same criteria for selection apply as when we execute your trades ourselves. When passing a trade to a third party for execution we may:

- Determine the ultimate execution venue ourselves by accessing specific execution venues through such third parties; or
- Instruct the other broker or dealer accordingly (having already satisfied ourselves that they have arrangements in place to enable us to comply with our Best Execution Policy).

For financial instrument that are traded on an exchange e.g. shares in companies, we pass the order relating to your account to a broker for execution. In the case of a broker in the European Economic Area or Switzerland that broker will have their own best execution policy and will be under the same requirement as we are under MiFID II to seek to achieve best execution for our clients. In the case of brokers outside the EEA and Switzerland those brokers may or may not be subject to local best execution rules. In all cases the selection of a broker is based upon the execution factors.

For quote driven markets e.g. most bonds, foreign exchange and OTC derivatives and for overseas markets, the firm that we pass your order to may not be under a best execution obligation as historically in those markets firms operate as principal (that is taking the position onto their own book) rather than as agent. Our selection of broker in this case will reflect the fact that the broker is not under his own best execution obligation and thus the level of monitoring that we will apply is more extensive than in cases where the broker is under such an obligation.

In all cases we will act in your best interests when passing orders to other entities for execution.

8 Specific client instructions

If you provide us with a specific dealing instruction it may prevent us from following our Best Execution Policy as we would usually do but, under FCA rules we will be deemed to have complied with the best execution requirement to the extent of that instruction.

9 Execution broker selection where your custodian limits our choice of execution broker

Where we have a mandate over an account at a custodian, with whom you have a direct contractual relationship, the terms of your relationship with that firm may prevent us from passing on your order to any firm other than the firm where you hold your account or restrict our choice of broker to firms approved by them. The firm where

you hold your account has their own best execution policy which they will have separately advised you. As our mandate with you only permits us to use that firm for custody of your assets we treat any limitation in our selection of executing brokers as a specific client instruction from you.

10 Order Execution Timing

Usually orders will be executed in a prompt, fair and expeditious manner. If an order is of large size or we wish to try to achieve an average price over a time period the order may be split into sub-orders before being passed for execution.

Unless we have combined an order in accordance with paragraph 11 below client orders will be carried out sequentially unless the characteristics of the order or prevailing market conditions require otherwise.

Clients will be informed of any difficulty in the prompt execution of orders.

11 Order Aggregation

We may combine (or 'aggregate') an order for our clients with orders of other clients. Altus would only aggregate a client order if it was unlikely to work to the overall disadvantage of the client. However, the effect of aggregation may on some occasions work to the client's disadvantage and may on occasions result in our clients obtaining a worse price than if their order was executed separately.

12 Allocation of aggregated orders

Any orders that are aggregated will be allocated according to a pre-defined allocation policy that is designed to achieve a fair result for all clients. Where permitted by the rule of the relevant trading venue all client will be allocated the same price, where such pricing is not permitted the allocation policy will be used to allocated orders and we will monitor the effectiveness of that allocation policy.

13 Monitoring

We will monitor both our compliance with our Best Execution Policy, and the quality of execution of third parties to whom we have passed orders on the following frequency:

- i. Real time – on a sample basis – account executive level but subject to compliance review;
- ii. Monthly compliance review; and
- iii. Quarterly board level review.

14 Limit orders

If you give us an investment instruction at a specified price limit and for a specified size (a "limit order"), then it may not always be possible to execute that order under the prevailing market conditions. We would be required to make your order public (i.e. show the order to the market) unless you agree that we need not do so. We believe it

is in your best interests if we exercise our discretion as to whether or not we make your order public. By agreeing to the Best Execution Policy you agree to us not making your orders public, unless we consider it is in your best interests for us to do so.

15 What information about best execution will we report to you and how will we report it?

As required by MiFID II we will report to you:

- i. The top five brokers we have used for each asset class in terms of volumes (this excludes instances where you, our client have instructed us to use a particular broker including, in accordance with paragraph 9 where your custodian arrangements mean we can only execute via your custodian; and
- ii. Information on the quality of our execution

These will be reported on our website www.cernocapital.com

16 Further Information

If you would like any further information about our best execution policy please contact your usual account executive.

17 Amendments to this policy

We may amend our Best Execution Policy from time to time. A formal review will take place at least annually but this may not result in any changes to the policy. When we make a material change to the Policy we will notify you of the changes before such changes come into force.

18 Glossary

MiFID II

MiFID II comprises Markets in Financial Instruments (MiFID II) - Directive 2014/65/EU and Markets in Financial Instruments (MiFIR) - Regulation (EU) No 600/2014 together with the relevant regulatory technical standards (RTS)

Multilateral trading Facility

A multilateral 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 a contract.

Organised Trading Facility

An OTF is 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 the Directive.

Trading Venue (TV)

EU trading venue = Regulated Market, Multilateral Trading Facility or Organised Trading Facility.

Recognised non-EU trading venue = Non-EU trading venues that are recognised by ESMA as third-country venues for the purpose of transparency under MiFID II / MiFIR.

Appendix 1

CERNO CAPITAL

OPERATIONS SUMMARY: TRADING, SETTLEMENT & REPORTING

Updated 19th September 2025

HM – Hashim Mustafa
JS – James Spence
JZ – Jeny Zhu
FR – Fay Ren
MF - Michael Flitton
NH- Nick Hornby
JJ – Joseph Joyce
FS – Fergus Shaw
IS - Ion Sioras
SS – Shivani Solanki
KD – Katie Dodd
CL – Clinton Lionnet
CR – Chris Richards

THESIS NURS Funds

ACD – Thesis Unit Trust Management (Tutman)
Administrator – Northern Trust Global Services (NTGS)
Custodian – Northern Trust Company (NTC)

DUBLIN Funds

Administrator – Northern Trust
Custodian – Northern Trust

Buying/selling collective investment schemes (CIS) – Thesis NURS Funds/Dublin Funds (red for new CIS) –

1- Clearstream

- i) If it is a new CIS, FS & JJ will do compliance checks to ensure it is an eligible investment for a NURS.
- ii) HM/JZ will then email the ISIN to Fund_Execution_New_assets@ntrs.com to see if it is already in their system. If its not, then the subscription form and prospectus should be emailed to Fund_Execution_New_assets@ntrs.com along with the below table:

New Fund ISIN	
Fund Legal Name	
Share Class (if applicable)	
Country of Quotation	

Pricing Currency	
Agency Code*	
Northern Trust Custody Portfolio Code	
Intended date for initial subscription	

- iii) **Once opened**, or if the ISIN is already in Clearstream then a trade can be placed via TOE (Trade Order Execution) by either HM/SS/JZ after receiving the trade instruction via email from a PM.
- iv) One of HM/JZ will then authorize the trade in TOE.
- v) The trade is then monitored on Passport, and once executed, the trade should be entered in Enfusion so NTGS are informed of the trade.

2- Power of Attorney

- i) **If it is a new CIS, FS & JJ will do compliance checks to ensure it is an eligible investment for a NURS.**
- ii) **The following information will then need to be emailed to UTSettstba@ntrs.com, along with the latest Signature List, Prospectus and Application Form.**

Portfolio code/Designation details –

ISIN –

Fund Name –

Share Class/Class of Units

Name and Address of Transfer Agent –

Client Residency – UK

Dealing Authority – (To include company number and Authorized Signatory List) – Cerno Capital Partners LLP, ASL attached

Dividend instructions (Cash/Stock) – Stock

Special Arrangements (Details for Statements and contracts for distribution) – all contract notes to be sent to trades@cernocapital.com

Coverall Required – (Y/N)

Agency code – Cerno Capital

- iii) **HM will chase NTC to establish whether the account has been opened. If it has, an order instruction can then be faxed directly to the manager along with pre-funding if necessary (via a fax to NTC).** This is signed by one of the authorised signatories (either JS or NH).
- iv) HM will chase the contract note. Upon receipt, he will check this against the original order instructions and enter the trade into Enfusion. This will ensure NT Admin are updated about the trade. For NT Admin, helpdesk will need to be emailed as the trade would have been entered after the cut-off time.

- v) HM/JZ will then fax settlement instructions to NTC if it's a Northern Trust trade (an instruction saying funds have already been remitted needs to be sent if NT sent the funds during the account opening process), which needs to be signed by two authorised signatories (JS/JZ/NH/JJ/FS) which must include at least one of either JS, FS or NH.

Buying/selling exchange-traded securities – UK and Dublin Funds

- i) A PM will send an initial instruction to trades@Cernocapital.com
- ii) One of HM/SSJZ will scale the trade (including choosing which broker to trade with) via the InGrid Report and OEMS in Enfusion, and then reply to the email asking for the trade to be reviewed in Enfusion. If the security traded is an ETF, JZ/SS/HM will speak to brokers first to determine an agreed price on the quantity traded. Once agreed, the broker can be chosen in the OEMS.
- iii) The PM will then review the trade in Enfusion and confirm this via email.
- iv) Then another individual from HM/SS/JZ will then stage the order to the broker.
- v) Once the contract note is received HM/SS/JZ should check all the details including settlement location against the trade in the trade blotter. If it matches, then the booking status should be changed to complete. This needs to be done before 10:15am for T-1 trades at NT. Should you want a file to be sent outside of the scheduled time, then this can be done via the Tools>System Jobs function, after adding the trade ID to the relevant export file.

Foreign exchange forwards– UK and Dublin Funds

- i) A PM will send an initial instruction to trades@Cernocapital.com
- ii) One of HM/SS/JZ will scale the trade via the OEMS in Enfusion, and then reply to the email asking for the trade to be reviewed in Enfusion.
- iii) The PM will then review the trade in Enfusion and confirm this via email.
- iv) Then another individual from HM/SS/JZ will then stage the order to FXGO.

Clients at Credo

- i) JS/NH/FS emails trades@cernocapital.com with proposed trades
- ii) SS/HM will calculate the exact trade details and reply to email
- iii) JS/NH/FS will then review and respond with approved
- iv) SS/HM will then enter the trade in the portal and another member will then approve it.
- v) No further action is required from Cerno other than to check the trade confirmation from Credo matches the original trade instruction sent by JS/NH/FS

Clients at Julius Baer (JB)

- i) JS/NH/FS emails trades@cernocapital.com with proposed trades
- ii) HM/IS will calculate the exact trade details and reply to email
- iii) JS/NH/FS will then review and respond with approved
- iv) HM/JZ/JJ/IS will then forward the trade instruction to JB to process
- v) No further action is required from Cerno other than to check the trade confirmation from JB matches the original trade instruction sent by JS/NH/FS

Clients at Caceis

- i) JS emails trades@cernocapital.com with proposed trades
- ii) HM/IS/JZ will calculate the exact trade details and reply to email
- iii) JS will then review and respond with approved
- iv) HM/JZ will then trade either via EMSX or via the Caceis platform if it's a fund.
- v) Once the confirmation arrives, HM/JZ will enter the trade in Caceis portal for settlement. HM/JZ will then approve it.

Clients at State Street

- vi) JS emails trades@cernocapital.com with proposed trades
- vii) HM/IS/JZ will calculate the exact trade details and reply to email
- viii) JS will then review and respond with approved
- ix) JZ/IS will then enter the trade into EMSX and before routing to market, will get a PM to approve the trade via email or physically be present when it is being routed.
- x) Once the contract note arrives, HM to email IFS ifs-firsttrust-mo@statestreet.com the trade details.
- xi) HM/JZ will then send a fax to State Street of the settlement instructions for each trade.
- xii) An FX is required to be sent via fax (once approval is obtained via the normal method) if a security is traded in a currency that is not CHF, CCK, EUR, GBP, JPY, SEK.

Clients at UBS

- i) All UBS clients are contracted under discretionary mandates. Investment instructions are emailed to trades by HM/JJ/JZ/SS/KD to obtain approval from a PM.
- ii) Once approved the trade is entered into the UBS portal and approved by HM/JJ/JZ/SS. If the commission will be greater than £500 then the initial instruction should be forwarded to UBS with the password quoting that commissions should be capped at £500.
- iii) For new funds, we first ensure that UBS are permitted to hold them on their platform. In addition, we will fill in the initial application form.

Clients at Multrees

- iv) CR emails trades@cernocapital.com with proposed trades
- v) CL/SS/HM/JZ will enter the trade into Multrees and reply to the email
- vi) CR will then review and approve the trade on the Multrees platform

Derivative Trading with Marex:

Marex is the counterparty for derivative trading. Trades are placed, executed and settled with Marex. The administrator and fund accountant receive statements from Marex on a daily basis for portfolio valuation.

When decision is made by the portfolio manager on derivative trades, the trading team (JZ or HM) calculate the margin/premium required to fund the trades and check if cash required will breach the limit for each account for compliance, if the cash required is within the limit an email will be sent to the portfolio manager for approval. Once approved instruction will be sent to Thesis or to transfer cash to the Marex accounts to fund investment, this normally takes 1-2 days.

Instructions are given to Marex through Bloomberg chat by JZ or HM based on the instruction provided by portfolio manager. Once trades are executed the units will be allocated to various accounts if needed. The broker will send the trade confirmation following execution. JZ or HM will then enter the trade in Enfusion. Settlements are done at ED&F and the new trade will be reflected in the ED&F daily statement next day. JZ and HM review the Marex statement to check if it reflects the trade correctly.

General points

1. All trade related emails should be copied to trades@cernocapital.com
2. Where possible, trade instructions etc. should be signed by the lead portfolio manager for the account in question i.e. –

TM Cerno Select – JS & FS
TM Cerno Global Leaders – JS & FS
Cerno Select Dublin – JS & FS
Cerno Global Leaders Dublin – FS & JS
TM Cerno Pacific & Emerging – MF & FR

Lime Grove – NH & IS
Staderas – NH
Hector – JS & IS
Dunnottar – JS & IS
Skiwi – NH & IS
John Booth – JS
JBCF – JS
Barbican – JS
The Galacum Fund – JS
Generosity Limited - JS

3. All references to designations (e.g. SWK01) should be accompanied with the full name (e.g. Skiwi Fund).
4. Whenever JS/NH/FS/MF/FR are asked to sign a trade instruction, the salient points should be explicitly pointed out. Equally, JS/NH/FS should be asked to confirm they know what the trade relates to.

Execution factors

In assessing the most appropriate route to carry out your order we will consider the following criteria:

- a) Price;
- b) Costs;
- c) Speed of execution;
- d) Likelihood of execution and settlement;
- e) Size and Nature of the order; and
- f) Any other consideration relevant to the execution of the order

Cerno Capital does not charge any commissions for executing orders.

Appendix 1 – Execution Venues by Asset Class

Asset Class	Execution Venue...
Equities	The Alternative Investment Market of the London Stock Exchange
	All eligible markets in any EEA State
	ASX Group
	Wiener Borse – Vienna Stock Exchange
	BM&F BOVESPA
	Toronto Stock Exchange
	TSX Venture Exchange
	Montreal Exchange
	Channel Islands Stock Exchange (CISX)
	Shanghai Stock Exchange
	Shenzhen Stock Exchange
	Zagreb Stock Exchange
	Eurex Deutschland
	Frankfurt Stock Exchange
	Hong Kong Stock Exchange
	National Stock Exchange of India
	Bombay Stock Exchange (BSE)
	Indonesia Stock Exchange IDX
	Italiana Borsa
	Tokyo Stock Exchange
	Osaka Securities Exchange
	Nagoya Stock Exchange
	JASDAQ Securities Exchange
	Amman Stock Exchange
	Korea Composite Stock Price Index

	Korea Exchange (KRX)
	Bursa Malaysia Securities
	Bolsa Mexicana de Valores (BMV)
	New Zealand Stock Exchange (NZX)
	Oslo Stock Exchange
	Philippine Stock Exchange
	RTS Stock Exchange
	Singapore Exchange (SGX)
	JSE Limited
	MEFF (Renta Variable & Fija)
	Spanish Exchanges BME
	NASDAQ OMX Stockholm AB
	SIX Swiss Exchange AG
	Taiwan Stock Exchange
	Taipei Exchange
	Stock Exchange of Thailand (SET)
	Borsa Istanbul
	NASDAQ Dubai
	Ho Chi Minh Stock Exchange
	NASDAQ
	Any exchange registered with the Securities and Exchange Commission as a national stock exchange in the USA.
Derivatives	The OTC market regulated by the National Association of Securities Dealers Inc.
	Sydney Futures Exchange (Part of the ASX)
	ASX Group

	BM&F BOVESPA
	Hong Kong Exchange
	Italy Equities Derivatives Market (IDEM)
	Futures Market for Government Securities (MIF)
	Tokyo Financial Exchange
	Osaka Securities Exchange
	Bursa Malaysia Derivatives
	Bolsa Mexicana de Valores (BMV)
	New Zealand Stock Exchanges
	South African Futures Exchange (SAFEX)
	JSE Limited
	Korea Exchange (KRX)
	SIX Swiss Exchange (SWX)
	Eurex Zurich
	Euronext
	London International Financial Futures and Options Exchange (LIFFE)
	London Securities & Derivatives Exchange Ltd (OMLX)
	NYSE LIFFE
	EDX
	CME Group Inc.
	NASDAQ OMX Futures
	New York Mercantile Exchange (NYMEX)
	NYSE Amex Options
	Chicago Board Options Exchange
	Chicago Mercantile Exchange
	OTC BB Markets
	NASDAQ OMX NFX

	NYSE Arca
	NASDAQ OMX PHLX
Fixed Income bonds and notes	Tradeweb, Bondvision, Bloomberg
OTC Derivatives	Same as derivatives above