

Wrap Platform Order Execution Policy

1. Introduction

This policy applies to all clients and users of the Standard Life Savings Limited **wrap platform** and should be read in conjunction with the Wrap Services Client Terms and Conditions, which are available from your **financial adviser** or by contacting **us** (our contact details are set out in section 13). Words in bold in this policy have the same meaning as attributed to them in the Glossary section of the Wrap Services Client Terms and Conditions.

This policy provides **you** and, if applicable, your **financial adviser** with information about our 'Order Execution Policy' as required by the Markets in Financial Instruments Directive II ('MiFID II') and the Financial Conduct Authority ('FCA'). As a 'retail client' for the purposes of the **FCA's** client categorisation rules, **you** are afforded the maximum protection under the **FCA rules**. This policy provides **you**, and, if applicable, your **financial adviser** with an explanation of how **we** ensure the best possible result or outcome for **you** when receiving and transmitting orders for execution using the **wrap platform** ('Best Execution').

Our **execution-only stockbrokers** are HSBC Global Markets ('HSBC') and Winterflood Securities Limited ('WINS'). We consider our **execution-only stockbrokers** to be our execution venues for the purposes of MiFID II.

2. Types of financial instrument

Currently, the types of financial instrument that we may accept **dealing instructions** for are:

- **mutual funds** such as unit trusts and open-ended investment companies (OEICs)
- **insured funds**
- equities, including exchange traded funds and investment trusts
- fixed interest securities, including corporate bonds and gilts
- any other **investments** that **we** might make available from time to time

Not all instruments are available to all customers. Please refer to your relevant **product terms and conditions** or **policy provisions**.

3. Currency of transactions

Transactions placed through the **wrap platform** are executed in pound sterling ('GBP'). If an instrument is available that transacts in a currency other than GBP, the order will only be placed on the understanding that **you** and the respective **fund manager** or **execution-only stockbroker** will bear the cost and risk of the currency conversion. This applies to settling the trade and also to any agreement to pay future distributions/dividends and to eventually redeeming/selling the holding in GBP. For any international orders that are placed via an **execution-only stockbroker** that require currency conversion, a charge of 0.5% of the order value will be applied by them.

4. Best Execution

4.1 We ensure the best possible outcome for you by regularly monitoring the execution of **dealing instructions** by our **execution-only stockbrokers**. When monitoring our **execution-only stockbrokers'** execution of orders, the following factors are taken into account:

- Price;
- Costs that you will incur;
- The efficiency of transmission and execution;
- The nature of your order;
- The likelihood of successful execution and settlement; and
- Any other considerations that we consider to be relevant.

4.2 As you are a retail client, we will determine the best possible outcome with reference to the price of the **investment** and the total consideration that will be incurred by you (including execution venue fees, clearing and settlement fees and any other fees paid to third parties that are directly linked to the execution of your order).

4.3 **Dealing instructions for mutual funds** are always undertaken directly with the respective Authorised Fund Manager ('AFM') or Authorised Corporate Director ('ACD') and not via exchange trading. In these circumstances, the application of Best Execution is largely limited to the timely and accurate placement of trades. This is due to the more simple nature of pricing of these investments, in line with fixed valuation points, as opposed to the pricing of exchange traded investments which is not fixed and tends to be more variable. Please see section 7 for further information on **mutual funds**.

4.4 Dealing instructions for **insured funds** are always undertaken directly with a **Standard Life Aberdeen group** company which will operate and managed the fund and not via exchange trading. In these circumstances, the application of Best Execution is largely limited to the timely and accurate placement of trades. This is due to the more simple nature of pricing of these investments, in line with fixed valuation points, as opposed to the pricing of exchange traded investments which is not fixed and will tend to be more variable. Please see section 6 for further information on **insured funds**.

5. Listed Securities

5.1 Execution of **dealing instructions** for equities and fixed-interest securities is undertaken for us by our **execution-only stockbrokers** who are members of the London Stock Exchange ('LSE') and trade predominantly in non-complex exchange-traded instruments.

5.2 The following list sets out different types of **listed securities** and the corresponding execution venues which are considered when orders are submitted for these **listed securities**.

Instrument Type	Execution Venue	Selection Rationale
UK Equities, including exchange-traded funds and investment trusts	HSBC, WINS	Our primary venue is HSBC. All orders will initially be routed electronically to HSBC. If an electronic quote isn't provided by HSBC, the order will then be automatically re-routed electronically to WINS. If no quote is provided electronically, a manual order to WINS will be made.
Fixed interest securities including corporate bonds and gilts	WINS	All orders for fixed interest securities will be routed to WINS.
International and non-GBP securities	WINS	All orders for international and non-GBP instruments will be routed electronically to WINS. If a quote isn't provided electronically, a manual order to WINS will be made.
Any other listed security	HSBC, WINS	Our primary venue is HSBC. All orders will initially be routed electronically to HSBC. If an electronic quote isn't provided by HSBC, the order will then be automatically re-routed electronically to WINS. If no quote is provided electronically, a manual order to WINS will be made.

We consider our **execution-only stockbrokers** to be our execution venues. You can obtain a copy of our **execution-only stockbrokers'** order execution policy from their website, which outline how they handle orders we place with them.

6. Insured Funds

We have procedures in place to ensure that your transactions are not unduly delayed and that they are executed successfully at the correct price and within the timescales set out in the Wrap Services Client Terms and Conditions and the relevant **product terms and conditions** or **policy provisions**.

7. Mutual Funds

We operate an aggregated dealing process, meaning your order will be grouped together with similar orders from clients for the same **mutual fund** and executed as a single transaction.

We will disaggregate the proceeds of all transactions and allocate to you the appropriate units or cash in line with your order. If there are any residual units or cash from this process, you may lose or gain fractional values as a result.

We are required to oversee these procedures to ensure that your transactions are not unduly delayed, are executed successfully at the correct price and within the timescales set out in the Wrap Services Client Terms and Conditions and the relevant **product terms and conditions** or **policy provisions**.

8. Order Execution - Listed Securities

8.1 For orders placed directly on the **wrap platform**, our **execution-only stockbrokers** are connected electronically to a wide range of Retail Service Providers ('RSP') who are market makers and liquidity providers in a range of instrument types. When **we** receive a **dealing instruction**, our **execution-only stockbrokers** system will request a quote from all RSPs offering a price in the requested instrument and will select the best quote returned and complete the order.

If an order cannot be executed electronically, it will be routed to a dealer who will negotiate the price with a counterparty by telephone with reference to any currently available electronically-displayed prices.

8.2 **We** regularly monitor the performance of our execution-only stockbrokers by reviewing trades undertaken to ensure that they comply with this policy and with contractual and regulatory duties. This is done by monitoring the prices obtained in relation to our orders and to ensure that they are competitive, taking into account prevailing market conditions. **We** also have policies and procedures in place to ensure **we** route orders to our **execution-only stockbrokers** promptly and appropriately in line with section 5.2.

8.3 **We** also regularly monitor the routing of orders placed on the **wrap platform** to our **execution-only stockbrokers** to ensure that these are not unduly delayed and are executed within the timescales set out in the Wrap Services Client Terms and Conditions and the relevant **product terms and conditions** or **policy provisions**.

8.4 **We** believe that these order execution arrangements ensure that all sufficient steps are taken to meet our Best Execution obligations. **We** consider the factors set out at section 4.1 above in relation to all dealing instructions received from **you** or your **financial adviser**.

9. Order Types - Listed Securities

9.1 **We** generally accept three types of orders from **you** or your **financial adviser**. These are orders to carry out a **dealing instruction** immediately at the best available price ('At Best'), orders to carry out **dealing instructions** at, or better than, a specified price ('At Limit') and orders executed at a known price if a quote is available during market hours and is subsequently accepted ('Advanced').

9.2 Due to system limitations, **dealing instructions** other than Advanced, At Best or At Limit may make it impossible to apply our Order Execution Policy to obtain the best possible outcomes (please see section 11 for more information on how specific instructions from **you** or your **financial adviser** may affect our implementation of this policy). **Dealing instructions** in respect of instruments traded direct with the product issuer will never be Advanced, At Best or At Limit.

10. Listed securities dealing on our investment management functionality

10.1 Where **we** make our separate investment management functionality available to your **financial adviser**, dealing instructions for **listed securities** from the **discretionary investment manager** or your **financial adviser** using this functionality will be grouped together with **dealing instructions** of other clients of that **discretionary investment manager** or **financial adviser** who are trading in the same security in the same wrap product. This means that **you** will benefit from lower trading charges, but it also means that **dealing instructions** placed in this way will not be placed immediately, so **you** could end up better or worse off due to price changes between the times the order is placed and executed.

10.2 **Dealing instructions for listed securities** directed from our investment management functionality are pooled once a day on each business day at around 2pm and sent to our **execution-only stockbroker** as an At Best order for completion. Your order will be grouped together with other client orders within the same **dealing instruction** and passed to the **execution-only stockbroker** to trade in a single transaction at the best possible price in accordance with this policy. Orders of the same type, for the same **listed security** and in the same **wrap product** will be aggregated.

10.3 **We** will disaggregate the shares purchased or cash generated upon confirmation of the price received and completion of the pooled order and allocate to you the maximum number of shares or maximum cash amount your individual order could have purchased or received respectively.

10.4 Any additional shares from the grouped order will be allocated to clients based on the value of their individual order until all residual shares are allocated. One additional share will be allocated to clients with the highest individual order until all residual shares are allocated. Left-over cash from the value of your order that was not used to purchase shares will be credited to your **portfolio cash account**.

11. Specific instruction

Please note that it is not our standard practice to accept specific instructions from **you** or your **financial adviser** in relation to how **you** would like your order to be executed. However, where **we** do accept specific instructions, **we** must execute your order in accordance with these instructions. This means that **we** may not be able to apply some, or any, of the steps designed to ensure the best possible outcome for **you** under this policy.

12. Your consent

In accordance with your acceptance of the Wrap Services Client Terms and Conditions, if **you** or your **financial adviser** gives a **dealing instruction**, **you** will be deemed to have consented to your orders being executed in accordance with this policy.

13. Policy review

We will review this policy at least annually or at any other time when there is a material change to our arrangements or procedures as covered by this policy. **We** will notify **you** of any material changes to this policy by publishing an updated version of this policy on our website referred to in the 'Dealing Services' section of the Wrap Services Client Terms and Conditions or providing you or if applicable, your **financial adviser**, with an updated version of this policy.

14. Contact us

If **you** wish to discuss this policy, please contact **us** by calling 0345 279 1001 (calls and written communications may be recorded or monitored for training and quality purposes; call charges will vary) or writing to **us** at: Platform Customer Centre, Dundas House, 20 Brandon Street, Edinburgh, EH3 5PP.