

Best Execution Policy Information

Introduction

In accordance with the requirements of the Markets in Financial Instruments Directive 2014/65/EC (MIFID 2), Pioneer Investment Management Limited (“Pioneer”), a company of the Amundi Group, must ensure all sufficient steps are taken to ensure the best possible result when executing orders on behalf of its clients. This document sets out a summary of Pioneer’s framework for seeking to achieve best execution of its clients’ portfolio transactions.

Scope

The policy applies to all Professional Clients of Pioneer when trading in the following financial instruments:

- Equities
- Bonds
- Money market instruments
- Exchange-traded derivatives
- OTC (over the counter) derivatives
- Forward Foreign Exchange/NDF
- Collective Investment Schemes

Best Execution Factors and Criteria

When executing orders, Pioneer’s execution policy ensures that all sufficient steps are taken to obtain the best possible result for its clients, taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other relevant considerations for that order/instrument type.

The following will also be taken into account:

- Information about market conditions;
- The characteristics of the client (including its categorisation, mandate and restrictions);
- The characteristics of the client order, including the size of the trade relative to other trades in the instrument, and the need to minimise possible market impact;
- The characteristics of the financial instruments which are the subject of the client order;
- The characteristics of the Execution Venues to which the client order can be directed.

Execution of Orders

Pioneer may use differing execution venues and methods of execution across the range of instruments and markets it trades, depending on the characteristics of an individual order.

Traditional Stock Exchange – An order may be executed on the exchange of a security using registered brokers as intermediaries.

Multilateral Trading Facilities (‘MTFs’) and Organised Trading Facilities (‘OTF’) – An order may be executed on an MTF or OTF, as these provide an alternative source of liquidity to traditional stock exchanges. These may be operated by an investment firm or a market operator and bring together multiple third-party buying and selling interests in financial instruments. This includes broker algorithms and dark pool trading.

Crossing Networks –an order may be executed on an electronic platform which automatically matches of buy and sell orders for of the same security, providing anonymity and reducing market impact.

Programme/List Trading – used to trade a large number of orders at a lower cost.

Risk Trading - Pioneer may trade with an intermediary acting as ‘principal’, i.e. buying or selling stocks on behalf of clients directly with the intermediary’s own book.

OTC/Off market – an order may be executed off market or OTC where Pioneer believes this will lead to the best result for the client.

Cross trades – Pioneer may cross securities from one fund/client account to another where it is determined that this is in the best interests of both funds/clients. Such trades are facilitated through an intermediary.

Delegation of order to another Pioneer company - where circumstances allow, Pioneer may delegate the execution of orders to selected entities within the Amundi group of companies. Where this occurs, the delegated company must ensure best execution is achieved.

The execution venue is selected based on the best interests of the client/fund for which the transaction is being executed. A list of Pioneer’s execution venues is available on request.

Pioneer assesses on a regular basis its execution venues to ensure that they result in the best possible results for clients/funds. Where required, additional execution venues may be added following an internal due diligence assessment.

Other Considerations in Achieving Best Execution

Client Instructions

Where a client gives specific instructions with respect to the execution of an order, for example the use of a particular intermediary, Pioneer executes the order in accordance with the specific instruction(s) given. On such occasions, executing such instructions satisfies the obligation to take all reasonable steps to obtain the best possible result for the execution of the order.

Order Handling

Pioneer may aggregate orders, on behalf of its funds / clients, provided that this aggregation is unlikely to work to the disadvantage of any fund or client and all funds and/or portfolios are treated in a fair and equitable manner.

Review

Pioneer monitors the effectiveness of this Best Execution policy on a regular basis, at a minimum annually or whenever a material change occurs. In the event of changes, a revised version of the policy is published on Pioneer’s website.