

Best Execution Policy (Principles Governing the Execution of Orders)

The following Principles apply to the execution of orders given to us by clients for the purchase or sale of securities or other financial instruments such as options. 'Execution' here means that we undertake a corresponding execution (commission based) transaction with a third party on the basis of the client order and on the client's behalf on a market suitable for that purpose. In cases where we and the client enter directly into a contract of sale of financial instruments at a fixed or determinable price (i. e., a fixed-price transaction) these Principles are of limited application (cf. Section 5), and they do not apply to the issue of shares in investment companies at the issue price or their redemption at the redemption price via the relevant custodian bank.

The following Principles also apply if we purchase or sell financial instruments on behalf of a client in fulfilment of our duties under an asset management contract with the client.

Unless you object to these Principles within 30 days of receipt thereof they will be deemed to meet with your approval.

1. | EXECUTION OF ORDERS/EXECUTION CRITERIA

Client orders may be executed regularly via various execution channels and at various execution venues, for instance at a stock exchange, over-the-counter, via third parties, domestically or abroad. We execute client orders through those execution channels and at those execution venues which as a rule consistently offer the best-possible execution in the client's interests. In so doing we apply the following execution criteria: costs, exchange rates, speed, likelihood of execution and settlement, the volume and nature of the order, taking duly into account the nature of the clients, the order and the financial instrument involved.

When choosing the specific execution venues we act on the assumption that the client's main priority, taking due account of all costs directly associated with the execution transaction, is to achieve the best-possible price. Given that securities are generally subject to price fluctuations and therefore that, in the period after placement of an order, price changes to the client's detriment cannot be ruled out, we give priority to those execution venues where full execution is likely and timely. As well as the criteria set out above we also consider other relevant factors such as the state of the market and the security of the transaction.

| 2. | EXECUTION VENUES

2.1 Selection

As a rule a client order is placed and executed on the domestic stock exchange. Alternatively the order may also be executed on some other market provided equivalent market conditions prevail in the client's interests, especially as regards available liquidity and achievable price. The current list of execution venues at which we regularly execute client orders is included in the annex. Separate notification of any changes to that list will not be given, but the latest list at any given time is available from us or can be consulted on our website at www.raiffeisen.li

2.2 Systematic Internalisers

We reserve the right to execute client orders via so-called systematic internalisers¹ provided this will not in general entail any disadvantage for the client as compared to other execution channels.

2.3 Limit Orders

To achieve the swiftest-possible execution, limit orders will be passed on either to a stock exchange or a multilateral trading facility (MTF)² or handled in accordance with 2.2 above provided notification takes place.

| 3. | EXCEPTIONS TO EXECUTION IN ACCORDANCE WITH THESE PRINCIPLES

3.1 Client's Execution Instructions

Clients may give us instructions as to how they wish their orders to be executed. When such instructions are given they take precedence over the execution Principles set out here. Accordingly we will execute the order according to these special client instructions, **in so doing disregarding these Principles for the best execution of those instructions.**

3.2 Special Market Situation

Exceptional market circumstances or market disruptions may render necessary a departure from the Principles set out here. However, we shall always act in the client's interests to the best of our knowledge and belief.

3.3 Departure from these Principles in Order to Achieve Better Execution on Behalf of the Client

We may depart from the principle of immediate execution of a client order if this leads in individual cases to the achievement of better conditions on behalf of the client (depending on market conditions).

3.4 Pooling

It may happen that several clients want to buy or sell the same security on the same day. The fundamental principle here is that clients' orders are treated equitably and fairly and that client interests take priority in case of doubt. In practice this leads to orders being executed in the sequence in which they come in. However, if pooling of orders is not generally disadvantageous to the client we reserve the right to execute several orders jointly. Pooling may be either advantageous or disadvantageous with respect to a specific order.

| 4. | DELEGATING ORDERS

In certain cases we may not execute a client order ourselves but rather delegate it to another financial service provider for execution. The client order will then be executed by that other financial service provider in accordance with its arrangements for achieving best execution.

| 5. | FIXED-PRICE TRANSACTIONS

When it comes to fixed-price transactions we do not execute client orders according to the Principles set out above. According to contractual agreements in this respect we are solely obliged to furnish the client with the associated financial instruments and duly transfer ownership of them in return for payment of the agreed purchase price. This also applies if we offer securities for subscription via a public or private offering or if we enter into contracts with clients concerning financial instruments (e.g., option transactions) which are not tradable on a stock exchange.

The list of execution venues shows the circumstances under which fixed-price transactions are regularly offered.

| 6. | REGULAR REVIEW

We will review the execution policy underlying these Principles regularly at least once a year in order to determine whether it still leads to the best-possible execution of client orders. If this review indicates that these Principles need adjustment we will make the necessary changes. If we make significant changes we will notify our clients accordingly.

¹ Systematic internaliser = 3rd party financial services provider which, in an organised and systematic way, either regularly trades on its own behalf via the execution of client orders outside regulated markets or operates an MTF.

² Multilateral trading facility = a multilateral system which pools the interests of a large number of third parties in the purchase and sale of financial instruments within the facility according to non-discretionary rules for the conclusion of a contract.

