ORDER EXECUTION POLICY

August 2020

Introduction

The Board of Directors of Schmiegelow Fondsmæglerselskab A/S (Schmiegelow FMS) has adopted this Order Execution Policy and has defined and outlined the Company's Execution of Orders guidelines, including compliance with the Company's "best execution" obligation.

The Company executes orders in securities and other financial instruments on behalf of the Company's customers through a number of cooperating banks/stockbrokers, and the transactions are executed via a bank chosen by the customer. All trading costs will be borne by the custodian of the order.

Schmiegelow FMS has no income in connection with the execution of trades.

The policy applies to employees of the company who are involved in the execution of orders on behalf of the company's customers.

Definitions

" **Settlement probability"** means the probability that a transaction will be completed at the stated price.

" **Best Execution"** means that Schmiegelow FMS shall take all reasonable measures to achieve the best possible result for its customers in the execution of an order (as defined below), taking into account price, costs, speed, probability of execution and settlement, scope, nature and other factors relevant to the execution of the order.

 "Brokerage" of orders means a trading process whereby Schmiegelow FMS receives a trading instruction from one of its clients, which is forwarded to a securities dealer.

 "Trading venue" means a regulated market, a multilateral trading facility (**'MTF'**), an organised trading facility (**'OTF'**), a systematic internaliser, a market maker or other liquidity provider, or an entity performing a function in a third country similar to that performed by one of the foregoing.

"Passive **order"** means an order entered in the order book that provided liquidity to the client. "Aggressive **order"** means an order entered in the order book and which took up liquidity with the customer.

" **Directed order"** means an order where the customer has specified a specific trading venue prior to the execution of the order.

Goals and policy

Schmiegelow FMS works purposefully to create the best environment for its customers. The Order Execution Policy describes the guidelines established by the Company to ensure Best Execution (as defined below).

Schmiegelow FMS observes Best Execution based on an assessment of:

• The client's characteristics, including the client's account setup, custodians and the client's classification as a retail client, professional client or authorised counterparty.

• Order features.

• Characteristics of the financial instruments included in the order.

Process description

An order is always executed in compliance with the Best Execution provisions of this policy and applicable law.

When executing orders, the best possible result will always be sought for the customer. Best Execution is always determined on the basis of the total consideration (i.e. the price of the financial instruments and the costs (commissions, fees, etc.) associated with executing the client's order). This applies to both retail customers and professional customers, unless the company receives specific instructions to the contrary, cf. immediately below.

If there is a specific instruction from a customer, the company is obliged to execute the order in accordance with the customer's instructions. A specific instruction from a customer may thus prevent the company from fulfilling its obligation to ensure Best Execution, and the company is thus not obliged to comply with the requirements for Best Execution.

Order types

Schmiegelow FMS uses the order type that is deemed to be most appropriate in relation to Best Execution, based on the criteria mentioned above.

The company uses the following order types:

• Immediate order: The order is executed immediately and at a price/price that is known in advance. The partner sets the price.

• Market Order: The Company requests the business partner to execute the order based on the current price/price in the market.

• Limit order: A market order with a maximum bid price or a minimum ask price added.

• Exchange order: A limit order with instructions that the order be placed directly on a specific exchange.

• Average order: the order is settled at an average price within the day.

The choice of order type depends on the chosen business partner, and further descriptions of order types can be obtained from the individual banks.

The company can trade through several partners to maintain the high degree of independence, but most often the customer decides who is traded through.

Trading posts

As a general rule, Schmiegelow FMS mediates a customer order at one of the trading venues specified in Appendix 1 of the policy.

Obligations to the customer

Schmiegelow FMS's customers are informed of this policy via the Company's website, at the following link: www.Schmiegelow.dk

Schmiegelow FMS must provide customers with detailed information about this order fulfillment policy before orders are executed. In addition, customers must be provided with appropriate information about the company and the services and devices chosen for the execution of the order. This is ensured by referring to the order execution policy on the website in Schmiegelow FMS's customer agreements, whereby the order execution policy is included in the contractual basis.

Schmiegelow FMS is not licensed to practice discretionary portfolio management. Thus, the Company can only execute orders on specific instructions from the Company's customers.

Responsibility

The Company's management is responsible for updating this policy and submitting it (and future updates) to the Board of Directors for approval.

Appendix 1 – Trading posts

	FX - Instrumenter	Derivater	Pengemmarkedsinstrumenter	Obligationer	Aktrier	Investerings foreninger
Nordnet	X	X	X	X	X	X
Nordea Bank	X	X	X	X	X	X
Danske Bank	X	X	X	X	X	X
Saxo Bank	X	X	X	X	X	X
Jyske Bank	X	X	X	X	X	X
Nyjredit Bank	X	X	X	X	X	X

Appendix 1 – Trading posts