ARTHUR STEVEN ASSET MANAGEMENT LIMITED

BEST EXECUTION POLICY

1/1/2021

Table of Content

1 INTRODUCTION

1.1 This policy is issued pursuant to, and in compliance with, NSE Directive that applies to Arthur Steven Asset Management

1.2 In our dealings with you, we have a general duty to act honestly, fairly and professionally, taking into account your best interest. In relation to order execution, Arthur Steven is required to take all reasonable steps to obtain the best possible result when executing client orders or when placing orders with, or transmitting orders to, other entities to execute. The definition of best possible result will vary and Arthur Steven must take into account a range of execution factors and determine their relative importance based on the characteristics of our clients, the orders that we receive and the markets in which we operate. These factors are further described in this policy.

1.3 This policy provides an overview of how Arthur Steven executes orders on behalf of clients, the factors that can affect the timing of execution and the way in which market volatility plays a part in handling orders when buying or selling a financial instrument.

1.4 This policy applies to Arthur Steven execution of orders on behalf of retail clients and professional clients as defined by the Rules.

1.5 Upon acceptance of a client order and when there is no specific client instruction regarding the execution method, Arthur Steven will execute an order in accordance with this policy.

2 FINANCIAL INSTRUMENTS TO WHICH THIS POLICY APPLIES

2.1 This policy applies to financial instruments and products as defined by the Rules, including Stocks, Bonds, Exchange Traded Funds ("ETFs"), Futures, Options, Foreign Exchange Forwards (including rolling FX Spot), Foreign Exchange Options, Contracts for Difference ("CFDs"), Certificates, Warrants and Mutual Funds.

3 ARTHUR STEVEN APPROACH TO BEST EXECUTION

3.1 When executing orders, Arthur Steven will take all reasonable steps to obtain the best possible result under the circumstances for the client, taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order ("Best Execution").

3.2 When considering the best executing factors, Arthur Steven takes into account:
    the characteristics of the client order;

the characteristics of the financial instruments that are subject to that order (in particular in relation to Over-the-Counter "OTC" financial instruments);

the characteristics of the execution venues to which that order can be directed; and

the prevailing level of liquidity at the time of execution

3.3 When Arthur Steven executes orders on behalf of retail clients, Best Execution is determined on the basis of the total consideration paid by the client, unless the objective of execution of the order dictates otherwise. Total consideration is the price of the financial instrument and the costs related to execution, including all expenses incurred by the client which are directly related to the execution of the order such as venue execution fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order.

3.4 Whenever there is a specific instruction from or on behalf of a client, Arthur Steven will – to the extent possible - execute the order in accordance with the specific instruction. A specific instruction from a client may prevent Arthur Steven from taking the steps that it has described in this policy to obtain the best possible result for the execution of orders. Trading rules for specific markets may prevent Arthur Steven from following certain of the client's instructions. To the extent that a client instruction is not complete, Arthur Steven will determine any non-specified components of the execution in accordance with this policy.

4 ELEMENTS OF BEST EXECUTION

4.1 The procedure for routing determinations is mainly based on four criteria and is regularly reviewed by Arthur Steven. Hence to determine the best way to execute an order for a client, Arthur Steven takes into consideration:

4.1.1 Speed and Likelihood of the Execution: Due to the levels of volatility affecting both price and volume, Arthur Steven seeks to provide client orders with the fastest execution reasonably possible although delays may occur. It is for this reason we have RFQ (request for quote on markets) and price list.

4.1.2 Price Improvement and Overall Consideration of Costs: Where orders are routed to market makers and/or market centres where opportunities for price improvement exist. The criteria used by other market-makers and/or market centres include:

automatically matching incoming market and limit orders to pending limit orders;

crossing transactions where price improvement can be offered to one or both sides of the trade.

4.1.3 Size Improvement: In routing orders, Arthur Steven seeks markets that provide the greatest liquidity and thus potential for execution of large orders.

Arthur Steven also seeks opportunities for client orders to benefit from order-size commitments offered by third parties.

4.1.4 Overall Execution Quality: When determining how and where to route or execute an order, Arthur Steven traders draw on extensive day-to-day experience with various markets and market makers, focusing on prompt, sequential, high quality and reliable execution.

5 RANKING OF EXECUTION FACTORS

5.1 The relative ranking of the different execution factors will be dependent upon, for example, the nature of the asset class traded, the liquidity of the relevant market and the time of the trade. This ranking reflects the nuances and differences between markets and exchanges, notably when looking at trading on exchange versus products.

The ranking of execution factors is:
1. Price
2. Expected impact of execution
3. Likelihood of execution and settlement
4. Order size & type
5. Costs
6. Speed
7. Other factors

6 EXECUTION OF CLIENT ORDERS

6.1 Arthur Steven uses automated systems to route and execute client orders. When a client order is received by Arthur Steven, it is routed to the execution venue that Arthur Steven considers to generally provide the Best Execution or kept in house for products which Arthur Steven trades against its own proprietary desk (e.g. some OTC products). Arthur Steven may execute orders outside regulated markets and multilateral trading facilities.

6.2 For instruments admitted to trading and official listing on a regulated market or stock exchange and where Arthur Steven acts as Agent,
Arthur Steven routes orders to the exchange, a multilateral trading facility or the like or to selected third parties (see Section 7) for execution.

6.3 For OTC products, Arthur Steven will trade (as principal) against its own proprietary desk and may in turn route its own orders to other market maker firms. Single Stock are routed to a regulated market, a Multilateral Trading Facility (MTF) or a Broker Crossing Network (BCN).

6.4 There may be delays in execution of orders, including orders placed through online trading. Some orders placed through online trading systems may be handled manually. When high traffic in electronic orders causes a back log, Arthur Steven, as well as market makers to which orders are sent for execution, must sometimes discontinue normal automatic execution procedures and turn to manual execution, leading to possible delay in execution. In order to minimize such a risk, Arthur Steven has in place procedures and arrangements which to

the furthest extent possible provide for the prompt, fair and expeditious execution of client orders.

EXECUTION VENUES CURRENTLY USED

7.1 Arthur Steven is a member of NSE Lagos and FMDQ , NASD and additionally uses a number of external financial institutions and brokers in the process of receiving and relaying orders or to directly execute listed financial instruments which are not listed on a member of NSE Lagos.

7.2 Arthur Steven has access to a number of exchanges and other execution venues through its order routing vendors.

8 EFFECTS ON ORDER EXECUTION

8.1 Clients should be aware of the following risks associated with volatile markets, especially at or near the open or close of the standard trading session:

> Execution at a substantially different price from the quoted bid or offer or the last reported sale price at the time of order entry, as well as partial executions or execution of large orders in several transactions at different prices.

> Delays in executing orders for financial instruments that Arthur Steven must send to external market maker and manually routed or manually executed orders.

> Opening prices that may differ substantially from the previous day's close.

> Locked (the bid equals the offer) and crossed (the bid is higher than the offer) markets, which prevent the execution of client trades.

> Price volatility is one factor that can affect order execution. When clients place a high volume of orders with brokers, order imbalances and back logs can occur. This implies that more time is needed to execute the pending orders. Such delays are usually caused by the occurrence of different factors: (i) the number and size of orders to be processed, (ii) the speed at which current quotations (or last-sale information) are provided to Arthur Steven and other brokerage firms; and (iii) the system capacity constraints applicable to the given exchange, as well as to Arthur Steven and other firms.

8.2 Arthur Steven is obligated to take necessary steps to keep an orderly market. Therefore Arthur Steven operate with "Compliance" order filters, such Compliance order filters are also present at exchanges and other brokers that might be used by Arthur Steven to route the order to the designated market. The filters might result in orders with a large expected market impact are paused or traded using an algorithm potentially causing slippage from the expected arrival price. Stop out or Stop Traded orders are also at Arthur Steven discretion grouped into larger orders and then traded as an algorithm to prevent cascading market impact or large market impact in general. Arthur Steven

cannot be held liable for the arrival price slippage caused by acting to keep an orderly market.

9 TYPES OF ORDERS

9.1 Given the risks that arise when trading in volatile markets, the client may want to consider using different types of orders to limit risk and manage investment strategies. (It should be noted that the following descriptions of order types may apply only to some and not all types of financial instruments).

9.2 Market order: With a market order, the client instructs a financial institution or trading counterparty to execute a trade of a certain size as promptly as possible at the prevailing market price. Financial institutions are required to execute market orders without regard to price changes. Therefore, if the market price moves significantly during the time it takes to fill a client's order, the order will most likely be exposed to the risk of execution at a price substantially different from the price when the order was entered.

Certain exchanges do not support market orders. If the client places a market order in these markets, Arthur Steven will automatically translate the order to an aggressive limit order within a certain percentage limit "in the money". It is the clients' own responsibility to check if the order is traded in the market after order entry. If the client experiences or suspects any errors with his/her order the client should contact Arthur Steven immediately.

9.3 Limit order: With a limit order, the client sets the maximum purchase price, or minimum sale price, at which the trade is to be executed. As a limit order may be entered away from the current market price, it may not be executed immediately. A client that leaves a limit order must be aware that he/she is giving up the certainty of immediate execution in exchange for the expectation of getting an improved price in the future. Limit orders may be routed to an exchange without human intervention.

9.4 Stop order: Different from a limit order, a stop order allows selling below the current market price or buying above the current market price if the stop price is reached or breached. A stop order is therefore a "sleeping" order until the stop price is reached or breached.

9.4.1 Trailing stop order: The trailing stop order is a stop order as described in Section 9.4 but the trailing stop price moves according to parameters set by the client. This way the trailing stop can be used to sell if the price drops more than a specified distance from the highest price traded or to buy if the price trades above a set level from the lowest traded price.

9.4.2 Stop Limit Order: A stop limit order is a variation of a stop order as described in Section 9.4 with a lower (higher) limit price to suspend trading if the price falls (rises) too far before the order is filled restricting trading to a pre-defined price range.

9.4.3 Spread Filters: In order to ensure that the client's Stop Orders is not filled at unreliable prices during short termed periods with abnormally wide bid/ask spreads caused by for instance release of key economic figures, Arthur Steven has implemented spread filters preventing order execution when spreads

exceed certain levels. Having the spread filters in place will in general benefit the client, but can in rare instances be in the disfavour of the client.

9.5 Algorithmic order: An Algorithmic Order is an order executed by an automated strategy according to specific parameters or conditions. Algorithmic Orders are intended to minimize the market impact created from placing larger orders or achieving a recognized trading benchmark. The orders can also be used to follow a volume participation or in general to achieve a better overall execution. Arthur Steven facilitates a number of different algorithmic order types, specific information about these can be found in the information text on the Arthur Steven Trader.

10 DEALING ON QUOTES

10.1 When trading OTC derivatives with Arthur Steven, you are trading on our price. There are a number of factors that can be used to con-struct a derivative price, and these will vary depending on the asset class traded, the nature of the market and the characteristics and terms of the transaction and any special market or credit risks posed by it. We will apply a standardized method of calculation for these types of derivatives to ensure that the price that we are offering at any given time is always considered the best price we can obtain on your behalf. In monitoring best execution for these types of instruments, we will monitor the calculation method to ensure that it is applied consistently at all times.

11 AGGREGATION AND SPLIT

11.1 The client's orders may at the discretion of Arthur Steven be aggregated with Arthur Steven own orders, orders of any of Arthur Steven associates and/or other clients. Furthermore Arthur Steven may split the client's orders as well as aggregate orders before executing such. Orders will only be aggregated or split where Arthur Steven reasonably believes it to be unlikely that the aggregation or split generally will be detrimental to the client. Aggregation and split may in single occasions result in the client obtaining a less favourable price that if the client's orders had been executed separately or together, as applicable. Aggregated orders placed by an Introducing Broker are allocated to clients in accordance with a predetermined allocation key. Arthur Steven settles any partially filled orders pro rata at an average price.

12 REGULAR REVIEW OF EXECUTION QUALITY AND OF EXECUTION VENUES

12.1 Arthur Steven will review this policy annually and whenever a material change occurs that affects Arthur Steven ability to obtain the best possible result for the execution of client orders.

12.2 Arthur Steven regularly reviews the overall quality of its order executions and its order routing practices, including its order routing vendors and the

available exchanges. Arthur Steven will amend this policy on the basis of such reviews if it considers it to be necessary. Any new policy will be made available on Arthur Steven websites and will be in force as from publication.

13 ARTHUR STEVEN GENERAL BUSINESS TERMS
13.1 This policy is subject to Arthur Steven General Business Terms and other business terms from time to time governing the relationship between the client and Arthur Steven. Further information on order execution.

This policy is effective from January 2019 and shall remain effective until a more recent version is released.

ARTHUR STEVEN ASSET MANAGEMENT 86, RAYMOND NJOKU STREET OFF AWOLOWO ROAD, IKOYI

APPROVED BY:

MD/CEO   **DIRECTOR**