



BEST EXECUTION POLICY

The policy has been adopted by the Company in order to be compliant with the European Union and Italian regulations which impose on the SGR the duty to introduce mechanisms that ensure that each order is continuously performed by the Company and is executed in accordance with the *Best Execution* principles. The purpose of this policy is to identify a good practice compliant with the applicable law and regulations and principles concerning the duty of Best Execution.

The Company, considering its structure and organisation, decided to generally adopt an indirect access to the execution venues, this procedure being the more appropriate to its management strategy.

Otherwise, for government and corporate bonds, the Company decided to rely on direct access, considering this method the most suitable for this type of securities.

The policy shall apply to shares, bonds, derivative instruments listed or OTC derivative and shares in investment funds.

The measures identified by the Company for every type of financial instruments in order to obtain the best possible result are the following: i) price and costs for the execution of the order, ii) quickness and probability of the execution and settlement, iii) the size of the order; iv) the nature of the order and v) other considerations of various kind.

In the selection of the counterparties the general order of priority of the various factors of *Best Execution* valid for every kind of financial instruments applied by the Company is : i) high operational standing, ii) economic conditions, iii) operating efficiency.

The only Company's counterparties are those approved by the Board of Director of the SGR in compliance with the execution policy. However, in exceptional cases, a counterparty not yet approved by the Board of Director may be selected within the limits set by the Investment Process and in accordance with a specific procedure in order to obtain the best possible results.

If the duty of Best Execution falls on the Company, the SGR must follow the procedure laid down in this policy; on the contrary, if the transaction is required to the counterparty at market price or is made by the counterparty and then transferred in *give up* mode to the swap or derivative instrument, the burden of *Best Execution* lies on the counterparty and the Company is only required to ensure, periodically, the correct application of the procedure.

In case of delegation of management powers the Company observes the instructions concerning to the choice of the counterparty received by the principal.

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Capitale Sociale 4.200.000 euro interamente versato | iscritta all' albo gestori oicvm al numero 43
iscritta all' albo gestori fia al numero 149 | Aderente al Fondo Nazionale di Garanzia



The precise and constant respect of the Best Execution policy by the Company is monitored by *Compliance* Function on an annual basis.

The Best Execution Policy is brought to the knowledge of the Investors through the pre-contractual information, which is given to them through the subscription of the units of the fund, and the employees of the SGR through the publication of this document into the area intranet of the Company.