



# Best Execution Policy

## Dragon Investment Managers

### Overview

It is in the interests of our clients and our firm that we obtain the best possible result when placing orders with other firms e.g. third-party brokers and fund managers for the execution of client orders or when transmitting orders on behalf of clients. We are required to take all reasonable steps to provide best execution when carrying out such transactions and, on your request, to provide you with a copy of the policy that we have adopted to achieve that objective.

This best execution policy applies to orders in financial instruments such as funds and other securities. You should read this policy in conjunction with your discretionary management agreement.

### Execution Factors

When placing or transmitting orders, we will make every effort to ensure the best possible result for our clients, taking into account the following factors:

- Price
- Cost
- Speed
- Likelihood of execution and settlement
- Size
- Nature of the order
- Any other relevant consideration

For retail clients, the price and cost of execution of the order will normally be the most important aspect in obtaining the best possible result. We will therefore assume this is the most important outcome for your transaction unless you tell us otherwise.

### Executing your order

In arranging for the execution of your order:

- We will use a platform to execute your order.

### Staff understanding

All relevant staff are made aware of this policy to highlight and emphasise the importance of best execution.



## **Execution venues**

All orders placed by us are usually executed through an appropriate investment platform, which will be detailed to you prior to the order being placed. We are not limited to specific platforms and will identify those that will enable us, on a consistent basis, to obtain the best possible result when arranging the execution of your orders.

The third parties have responsibilities in relation to best execution and client order handling themselves. We will undertake periodic monitoring to ensure that they are meeting the relevant requirements.

The investment platforms we mainly use is Raymond James. We have obtained their best execution policy, which is kept centrally and is in line with how we would expect the investment platform to conduct executions.

## **Client Specific Instructions**

If you have given instructions that price is not the most important factor in executing your instructions, we will make every effort to comply with your instructions but cannot guarantee this. This may be due to either the nature of the order, or the type of financial instrument you wish to trade in.

We will agree directly with you where the orders are to be placed in relation to the execution venue. Should we accept any client specific instructions relating to the placing of orders, you should be aware that this may prevent us from following the processes set out in this policy, which has been designed to obtain the best possible results for the execution of those orders; in respect of the elements covered by those specific instructions.

## **Charges**

It is our policy that commission and charging structures will not influence either the selection of execution venues, or the order flow that follows as a result of the execution process. We will therefore not discriminate between the execution venues we use to arrange execution of your orders.

## **Monitoring and review of our execution policy**

We will regularly monitor the effectiveness of our best execution policy to identify and, where appropriate, correct any deficiencies. This will cover the execution quality of any third parties referred to in the policy.

This review should be carried out regularly (on at least an annual basis) or whenever a material change occurs that affects our ability to continue to obtain the best possible result for our clients.

## **Policy Review**

This policy was reviewed March 2025.