

**Ashmore Investment Management Limited and  
Ashmore Investment Advisors Limited**

**Order Execution Policy**

December 2019

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# Information on Order Execution Policy

## A: Overview

### 1.1 Best execution obligation and purpose

In respect of dealings in Financial Instruments resulting from investment decisions by Ashmore Investment Management Limited and Ashmore Investment Advisors Limited (collectively “Ashmore”), Ashmore is required to take all sufficient steps to obtain the best possible result when placing orders on behalf of its Clients with other entities for execution, or executing such orders on behalf of its Clients. This obligation is applied in the context of applicable markets, seeking to balance the different factors affecting execution with a view to providing its clients with the best possible result on a consistent basis.

This overarching obligation to obtain the best possible result for clients is referred to in this document as the obligation of “Best Execution”.

This document

1. sets out information on Ashmore’s Order Execution Policy and approach to providing “best execution” as required under MiFID and the AIFMD;
2. applies to Professional Clients; and
3. covers dealing in investments performed by AIML and AIAL<sup>1</sup>

As part of its compliance with the FCA’s Rules on best execution, Ashmore is required to

- (a) maintain an order execution policy;
- (b) provide appropriate information to its Clients on its order execution policy; and
- (c) obtain their prior consent to the policy.

The purpose of this document is to provide you with appropriate information on Ashmore’s order execution policy, and obtain your consent to it.

### 1.2 Scope

Ashmore will be executing orders on a Client’s behalf, where the Client legitimately relies on Ashmore to protect its interests in relation to the pricing or other aspects of the transactions that may be affected by how Ashmore executes the orders. Examples are when Ashmore

- executes an order by dealing as agent; or
- “works” an order on a Client’s behalf.

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<sup>1</sup> Other Ashmore Group Companies will operate their own order execution policies

Ashmore will apply its order execution policy only in relation to orders in Financial Instruments. It will apply its order execution policy in a manner that takes account of the different circumstances associated with the execution of orders related to particular types of Financial Instruments as set out below.

### 1.3 Relevant factors affecting execution

Subject to any specific instruction given by a Client when executing an order on a Client's behalf, Ashmore will take all sufficient steps to obtain the best possible result for its Client taking account of various execution factors, which include:

- price;
- costs;
- speed;
- likelihood of execution and settlement;
- size and nature of the order;
- market impact or any other consideration relevant to the execution of the order; and
- any other factor(s) relevant to the efficient execution of the order.

Ordinarily, price will merit a high relative importance in obtaining the best possible result. Depending on the circumstances Ashmore may appropriately determine that other execution factors are more important than solely price in obtaining the best possible execution result.

Ashmore will determine the relative importance of the execution factors by using its commercial judgement and experience in light of market information available and taking into account the following Execution Criteria:

- the Client;
- the order;
- the Financial Instruments that are the subject of the order; and
- the Execution Venue to which that order can be directed.

### 1.4 Execution Venues

Information on Execution Venues used by Ashmore in respect of each class of Financial Instruments can be found in Schedule 2.

This list of Execution Venues comprises those Execution Venues on which Ashmore places significant reliance but it is not exhaustive. Ashmore reserves the right to use other Execution Venues where it deems it appropriate in accordance with its order execution policy and may add or remove Execution Venues from this list.

Ashmore will regularly assess the Execution Venues available in respect of Financial Instruments that it trades to identify those that will enable it, on a consistent basis, to obtain the best possible result for its Clients. The list of Execution Venues will be updated, where necessary, following an assessment.

The factors used by Ashmore to select an Execution Venue and execution strategies include:

- Access to liquidity
- Pricing and any relevant costs

- Size of transaction
- Execution experience and expertise
- Access to bespoke markets
- Track record when trading for Ashmore

The processes used by Ashmore to monitor Execution Venues and execution strategies includes:

- Ongoing evaluation by Ashmore investment professionals
- Internal compliance monitoring
- Best Execution Committee oversight

#### 1.5 Types of transactions where best execution has limited scope

In some cases best execution technically applies but has limited scope; because of the nature of the order, the obligation is in effect satisfied. These include;

- single venue transactions – where the nature of the transaction results in their being one venue and therefore the key consideration is timing of the execution. In these circumstances the use of comparable prices can be precluded;
- highly structured, off-exchange transactions – where it is not possible to provide comparisons with other transactions or instruments. Different considerations apply where the transaction involves, for example, a customised OTC financial instrument tailored to individual circumstances. MiFID acknowledges that, whilst best execution still applies, there is little or nothing to compare the transaction against.

#### 1.6 Specific Client Instructions

Where a Client provides Ashmore with a specific instruction as to the execution of an order, Ashmore will execute the order in accordance with those specific instructions.

Where a Client's instructions relate to only part of the order, Ashmore will continue to apply its order execution policy to those aspects of the order not covered by such specific instructions.

Clients should be aware that providing specific instructions to Ashmore in relation to the execution of a particular order may prevent it from taking the steps set out in its order execution policy to obtain the best possible result in respect of the elements covered by those instructions.

#### 1.7 Executing Orders Outside of a Trading Venue

In respect of Financial Instruments that can be traded on a regulated market, an MTF or on an OTF, you should note that in order to obtain best execution for you we may execute orders on your behalf outside of a regulated market, an MTF or an OTF.

#### 1.8 Publishing information on execution quality

In accordance with the relevant EC and FCA regulations designed to enable the public and investors to evaluate the quality of Ashmore's execution practices, order flow and

to provide the identity of the top five execution venues in terms of trading volumes for our clients in the preceding year Ashmore will publish a report on its top five execution venues. This report provides information on the top five execution venues for each of class of financial instrument executed on behalf of clients. This report will be published on the Ashmore Group website by 30 April each year for the previous 12 months ended 31 December.

#### 1.9 Monitoring, record keeping, review and notifications to Clients

##### (i) Monitoring

Ashmore has implemented a governance framework through which it monitors the effectiveness of its order execution arrangements (including this policy) to identify and, where appropriate, correct deficiencies. The Best Execution Committee meets at least twice a year and provides a focus for the determination of best execution related matters.

The Best Execution Committee will review best execution monitoring performance during the previous period and key market initiatives including industry and regulatory developments.

Ashmore will periodically assess whether its chosen execution venues are providing the best possible results and make changes to our execution arrangements whenever necessary.

##### (ii) Record Keeping

Ashmore will retain records of its trading activities for a minimum of five years and in accordance with FCA Rules.

##### (iii) Review and notifications to Clients

This Order Execution Policy will be updated at least annually. In the event that a material change occurs that affects Ashmore's ability to continue to obtain the best possible results Clients will be notified by updated version of this policy.

#### 1.10 Conflicts of interest

Ashmore is an independent fund manager with no associates through which it undertakes security transactions.

Trades are subject to regulatory rules (in particular but in many cases not limited to the FCA Rules) regarding best execution and fair treatment of clients in the prioritisation and allocation of orders. Ashmore operates an Aggregation and Allocation Policy, which governs situations where orders for more than one Client are being placed including where partial executions are required.

#### 1.11 Delegation of investment management

In certain circumstances, Ashmore may delegate all or part of the discretionary management of a client portfolio (including delegation to Ashmore's associates). In such circumstances it will ensure that such delegation is permitted in its contractual arrangements with the Client. Any such delegate may be subject to the rules of a

regulator in its jurisdiction (including a jurisdiction outside the EEA), and may not be subject to the FCA Rules and / or required to maintain an order execution policy similar in form and substance to this policy. In such circumstances, Ashmore will in any event require and seek to ensure that the service provided to its Client is performed in accordance with the best interests of the Client and Ashmore shall take all sufficient steps to ensure that its selection of the delegate and the overall management of the portfolio meet this requirement on an ongoing basis. Further, Ashmore shall ensure that any such delegation shall be governed by the terms of an appropriate service provider agreement between Ashmore and the firm concerned.

## 1.12 Consent

You consent to this Order Execution Policy and to Ashmore executing orders for you outside of a Trading Venue.

### **B. Instruments / asset specific**

Ashmore manages client funds across a broad range of instruments and asset types. This section B supplements section A of this Order Execution Policy and, whilst not covering all asset types / scenarios, provides information on order execution in a number of different asset classes.

Subject to any specific instructions that may be given by a Client, Ashmore will execute an order by one of the following methods or combination of methods:

- where it has obtained a Client's prior express consent, outside a Regulated Market or Multilateral Trading Facility (MTF) by executing the order; or
- in respect of a Regulated Market or MTF, with a third party participant with whom it has entered in to an agreement for handling orders for that Regulated Market or MTF.

## 1.1 External Debt, Corporate Debt and Local Currency, Equities and Foreign Exchange

When seeking to obtain the best possible result Ashmore will take into account a range of factors relevant to where and how to execute. The most important factors will normally be consistent liquidity and pricing. Other factors are competitiveness of spreads, promptness of execution and past history in executing orders.

Transactions are usually executed on MTF's with approved counterparties. In most cases competitive quotes are sought from different counterparties or venues.

However, for larger transactions and/or transactions in less liquid markets, especially in cases where Ashmore considers that approaching multiple counterparties may be detrimental to its Clients' interests, a single counterparty may be approached on the basis of that counterparty's suitability for the transaction.

Ashmore has full discretion in determining the most appropriate venue and trading strategy on an order-by-order basis, subject to mandate restrictions and specific Client instructions.

Trading strategies include: individual execution of a single order; pooled orders of the same bond; aggregated orders of different bonds; crossing via a broker; and contingent orders:

- Single Order – each order is traded separately;
- Pooled orders – orders for more than one client in the same bond are aggregated together and dealt as one trade. A better price can sometimes be negotiated due to economies of scale;
- Aggregated orders – two or more orders in similar products are grouped together and dealt as one package. In certain situations, grouped orders will receive a better overall price than orders traded separately;
- Crossing – Clients permitting, and subject to regulatory restrictions and requirements, where Ashmore has a buy and sell order for the same bond, we may cross these orders via a broker at an appropriate price. The price applied will be either the prevailing mid-market price or the average of at least two quoted prices from market makers. In such situations, each Client will normally receive a better price than could have been obtained in the market;
- Contingent Orders – single purchase and a single sell order in two related products are traded together (for example a corporate bond and its underlying government benchmark bond).

#### 1.1 a) Local Currency Fixed Income

- We may on occasion trade Total Return Swaps (TRS) and Interest Rate Swaps (IRS), and execution of such transactions would be under our best execution policy.

#### 1.1 b) Local Currency Foreign Exchange

- Algorithmic trading - indirect access via banks (brokers) to interbank liquidity pools

#### 1.2 Cash Management

Transactions in money market instruments are usually effected via a money broker, an investment bank (direct or as an intermediary) or direct with other banks. Under Cash Management the instruments used are primarily deposits and repurchase agreements (repo).

The three main factors for consideration in best execution are:

- rate
- credit
- liquidity

Due to the volumes involved and short settlement cycles in Money Market transactions, emphasis is also placed on the effectiveness of settlement and clearing when trading.



## a. Deposits

Where Ashmore places deposits on behalf of Clients, it seeks the most competitive rates from the Ashmore approved counterparties. Therefore, an appropriate and actively reviewed approved counterparty list is maintained. Additionally, Ashmore operates a strict deposit diversification policy among counterparties to seek to ensure it does not carry unnecessary credit exposure. This policy, to an extent, can limit where deposits may be placed and in what quantities.

A money broker may be used occasionally for deposits placed on behalf of Ashmore Clients, but some direct relationships are also maintained and used. Deposits are placed in Client named accounts.

Reasons for using a money broker for deposits is due to their:

- ability to recommend new counterparties;
- ability to give accurate coverage of Money Markets;
- ability to gauge market sentiment;
- ability to deal in a variety volumes;
- ability to achieve the best rate; and
- time efficiencies.

When placing a deposit, rates are obtained from a number of the approved deposit takers where the investment can be placed (subject to diversification limits). In addition, consideration is given as to whether the credit of the potential investments is suitable.

## b. Repurchase Agreements

Ashmore engages in repo activity on behalf of a number of managed funds directly with a selected group of approved counterparties.

Information is regularly obtained from banks used in repo on, for example:

- Bonds Trading Special
- Current General Collateral (GC) rates

From the above information it can be determined which bonds can be used to achieve the most cost-effective funding i.e. using 'Special' bonds to raise funds rather than bonds trading at GC.

However, liquidity and settlement concerns are also considered. The liquidity of a bond is very important i.e. if it is on repo at a special rate and the bond is required back, it must be returned. Accordingly Ashmore has a low tolerance for failing trades due to the settlement issues that can arise.

## C. Annual Publication of the Top Five Execution Venues

Each year Ashmore will publish data on the top five execution venues used during the previous year. The top five venues will be based on trading volume for each class of financial instrument. Ashmore will also publish an annual report on its website providing a summary of the analysis and conclusions drawn from Ashmore's monitoring of the quality of execution obtained from those Execution Venues.

# Schedule 1

## Definitions

**AIFMD** – means Directive 2011/61/EU of the European Parliament and the Council on Alternative Investment Fund Managers.

**Client** – means any natural or legal person to whom Ashmore provides investment services.

**Execution Criteria** - means those factors listed in A 1.3 of this document.

**Execution Factors** – means those factors listed in A 1.3 of this document.

**Execution Venue** – means a Regulated Market, an MTF, a systematic internaliser, or a market maker or other liquidity provider or an entity that performs a similar function in a third country to the functions performed by any of the foregoing.

**Financial Instruments** – means those investments specified in Section C to Annex I of MiFID and includes:

Transferable securities;

Money market instruments;

Units in collective investment undertakings;

Certain options, futures, swaps, forward rate agreements and any other derivative contracts relating to securities, currencies, interest rates or yields, or other derivative instruments, financial indices, financial measures or commodities;

Derivative instruments for the transfer of credit risk; and

Financial contracts for differences.

**FCA** – means the UK Financial Conduct Authority.

**FCA Rules** – means the rules from time to time of the FCA set out in the FCA Handbook.

**MiFID** – means Directive 2014/65/EU of the European Parliament and the Council of 15 May 2014 on Markets in Financial Instruments and any implementing directives and regulations.

**Multilateral Trading Facility (“MTF”)** – means a multilateral system, operated by an investment firm or a market operator, which brings together multiple third-party buying and selling interests in Financial Instruments – in the system and in accordance with non-discretionary rules – in a way that results in a contract in accordance with the provisions of Title II of MiFID.

**Organised Trading Facility (“OTF”)** - means a multilateral system which is not a regulated market or an MTF and in which multiple third-party buying and selling interests in bonds, structured finance products, emission allowances or derivatives are able to interact in the system in a way that results in a contract in accordance with Title II of MiFID.

**Professional Client** - means a client meeting the criteria laid down in Annex II of MiFID.

**Regulated Market** - means a multilateral system operated and/or managed by a market operator which brings together or facilitates the bringing together of multiple third party buying and selling interests in Financial Instruments – in the system and in accordance with its non-discretionary rules – in a way that results in a contract in respect of the financial instruments admitted to trading under its rules and/or systems and which is authorised

and functions regularly and in accordance with the provisions of Title III of MiFID.

**Trading Venue** – means an OTF, MTF or Regulated Market.

## Schedule 2

### Information on Execution Venues

Updated: December 2019

This list is not exhaustive but comprises those Execution Venues on which Ashmore places significant reliance. This list will be kept under review and updated in accordance with Ashmore's order execution policy. From time to time different arrangements, requirements and restrictions may be in place with one or more of the Execution Venues listed here. Ashmore reserves the right to use other Execution Venues than those listed here where it deems it appropriate in accordance with its order execution policy, and remove any venues from the list.

The Execution Venues listed below will be used for orders executed for Professional Clients.

Asset Class	Region	Execution Venue
Fixed income bonds and notes	ALL	<b>Electronic Trading Venues (MTF)</b> Bloomberg (via TSOX/ ALLQ) MarketAxess  <b>Liquidity Providers/ Brokers</b> Merrill Lynch International HSBC Citigroup Global Markets JP Morgan Banco Santander

Asset Class	Region	Execution Venue
Foreign Exchange	ALL	<b>Electronic Trading Venues (MTF)</b> Bloomberg FX MarketAxess  <b>Liquidity Providers/ Brokers</b> HSBC Bank Deutsche Bank BNP Paribas Merrill Lynch International Morgan Stanley

Asset Class	Region	Execution Venue
OTC derivatives, structures	ALL	<b>Liquidity Providers/ Brokers</b> Goldman Sachs JP Morgan Standard Chartered HSBC Bank BNP Paribas

<b>Asset Class</b>	<b>Region</b>	<b>Execution Venue</b>
Money Market (including Deposits/ Repos)	ALL	<b>Liquidity Providers/ Brokers</b> OCBC Mizuho International CIBC ANZ First Abu Dhabi Bank

<b>Asset Class</b>	<b>Region</b>	<b>Execution Venue</b>
Equities & Exchange Traded Funds (ETF's)	ALL	<b>Liquidity Providers/ Brokers</b> Credit Suisse JP Morgan CLSA (UK) UBS AG Morgan Stanley CLSA (Americas) Scotia Capital Edelweiss Securities IIFL Securities Canaccord Genuity

### Schedule 3 – Approved Trading Counterparties

December 2019

#### **Category 1a: Fully Approved**

Australia & New Zealand Banking Group Ltd  
Banco Santander SA.  
Bank of America NA.  
Barclays Bank Ireland PLC  
Barclays Bank PLC  
BNP Paribas SA  
Canadian Imperial Bank of Commerce  
Citibank NA.  
Citigroup Global Markets Europe AG  
Citigroup Global Markets Ltd.  
Credit Suisse AG.  
Credit Suisse International.  
Credit Suisse Securities Europe Ltd  
First Abu Dhabi Bank PJSC  
Hongkong & Shanghai Banking Corp Ltd/The  
HSBC Bank PLC.  
HSBC Bank USA NA.  
HSBC France  
ING Bank NV  
ING Capital Markets LLC.  
JP Morgan AG  
JP Morgan Securities PLC  
JPMorgan Chase Bank NA  
Merrill Lynch International.  
Morgan Stanley & Co International PLC.  
Morgan Stanley Europe SE  
Nomura International PLC  
Societe Generale SA  
Standard Chartered Bank  
Standard Chartered Bank Singapore  
State Street Bank & Trust Co.  
State Street Bank International GmbH  
UBS AG

#### **Category 1b: Short Dated FX (12 mths or less)**

Deutsche Bank AG  
ICBC Standard Bank PLC

### **Category 1c: Special Approval - General**

CLSA Global Markets Pte Ltd  
JP Morgan structured Products BV  
Natwest Markets PLC

### **Category 1d: Special Approval - Cleared Derivatives**

Banco Bilbao Vizcaya Argentaria SA

### **Category 2: DVP**

Absa Bank Ltd  
Actinver Casa de Bolsa SA de CV  
African Alliance Securities Trading Pty Ltd  
Anand Rathi Share & Stock Brokers Ltd  
Arqaam Capital Ltd  
Auerbach Grayson & Co LLC  
Avior Capital Markets International  
Axis Capital Limited  
Banca IMI SPA  
Banco Barclays SA  
Banco Bilbao Vizcaya Argentaria Colombia SA  
Banco BNP Paribas Brasil SA  
Banco Bradesco SA  
Banco Citibank SA.  
Banco Itau Uruguay SA  
Banco JP Morgan SA  
Banco Morgan Stanley SA  
Banco Santander Brasil SA  
Banco Santander Chile  
Banco Santander de Negocios Colombia  
Bancolumbia SA  
Bank Audi SAL  
Bank of America Merrill Lynch  
Bank of America Merrill Lynch Banco Multiplo SA  
Bank of China Ltd  
BCP Securities LLC  
Beltone Securities Brokerage S.A.E.

BNP PARIBAS CHINA LTD.  
BNP Paribas Colombia Corp Financiera SA  
BOCI Securities Ltd  
BofAML Securities Inc  
BRAC EPL Stock Brokerage Ltd  
Brown Brothers Harriman & Co.  
BTG Pactual US Capital LLC  
Canaccord Genuity LLC/United States  
Cantor Fitzgerald Europe.  
Casa de Bolsa Finamex SAB de CV  
CFG Marchés  
China CITIC Bank International Ltd  
China International Capital Corporation Ltd  
CIBC World Markets PLC  
CIMB Bank Bhd  
Citibank Colombia SA  
Citigroup Global Markets Inc  
CLSA Americas, LLC  
CLSA UK  
Commercial International Brokerage Co  
Commerzbank AG.  
Cowen & Co LLC  
Credicorp Capital Colombia SA  
Credicorp Capital Securities Inc  
Credicorp Capital Sociedad Agente de Bolsa SA  
Credit Suisse Securities USA LLC  
CSL Stockbrokers Ltd  
Databank Brokerage Ltd  
DBS Bank Ltd  
DEUTSCHE BANK CHINA CO LTD  
Dragon Capital Cyprus Ltd  
Edelweiss Securities Ltd  
Emkay Global Financial Services Limited  
Exotix Partners LLP.  
FBN Capital Ltd  
Financial Brokerage Group  
FirstRand Bank Ltd  
GMP Securities LLC.  
Guotai Junan Securities Co Ltd  
Haitong International Securities Co Ltd  
Ho Chi Minh City Securities Corp  
HSBC Bank China Co Ltd.



HSBC Securities (USA), Inc  
IDFC Securities Ltd  
IIFL Securities Ltd  
Imperial Capital International  
Industrial & Commercial Bank of China Ltd  
Inter-Horizon Securities Pvt Ltd  
Investec Bank Ltd  
Itau BBA USA Securities Inc.  
Itau Unibanco SA  
Jefferies International Ltd.  
JM Financial Institutional Securities Ltd  
JP Morgan Markets Ltd  
JP Morgan Securities LLC  
JPMorgan Chase Bank China Co Ltd  
JPMorgan Corp Financiera SA  
Korea Investment & Securities Co Ltd  
Kotak Securities Ltd  
Larrain Vial SA Corredora de B  
LarrainVial Securities US LLC  
Liquidity Finance LLP  
Marketaxess Capital Ltd  
MarketAxess Europe Ltd  
Mitsubishi UFJ Trust International Ltd.  
Mizuho Securities Asia Ltd  
Morgan Stanley & Co LLC  
Motilal Oswal Financial Securities Ltd  
MUFG Securities EMEA PLC  
Natixis SA  
Nedbank Ltd  
Oppenheimer & Co Inc  
Pareto Securities AS  
Pharos Securities Brokerage  
Raiffeisen Bank International AG  
Renaissance Capital Ltd  
Reserve Bank of India  
Santander Investment Securities Inc.  
Sberbank CIB UK Ltd.  
Sberbank CIB USA Inc.  
SC Lowy Financial HK Ltd  
SC Lowy Primary Investments Ltd  
Scotia Capital (USA) Inc.  
Scotiabank Europe plc

Seaport Group Europe LLP/The  
Securities & Investment Co BSC  
SMBC Nikko Capital Markets Ltd  
Spark Capital Advisors (India) Private Limited  
SSI Securities Corp  
Standard Chartered Bank China  
Stifel, Nicolaus & Co Inc  
Stifel Nicolaus Europe Ltd  
TPCG Financial Services Agente de Valores SA  
TradeWeb Europe Ltd  
Tullett Prebon Securities Ltd.  
UBS AG  
UBS Securities LLC  
UniCredit Bank AG.  
Valores Bancolombia SA Comisio  
Viet Capital Securities JSC (VCSC)  
VTB Capital PLC.  
Westpac Banking Corp  
Yuanta Securities Co Ltd.

### **Category 3: Deposit**

Arab National Bank  
Credit Agricole Corporate & Investment Bank SA  
Mizuho International PLC  
Oversea-Chinese Banking Corp Ltd  
Qatar National Bank QPSC