

Pursuant to the principles applied under Directive 2014/65/EU, on markets in financial instruments, and in accordance with the provisions of Act No. 256/2004 Coll., the Act on Capital Market Undertakings, as subsequently amended (the “Act”), **UniCredit Bank Czech Republic and Slovakia, a.s.**, having its registered office in Prague 4 – Michle, Želetavská 1525/1, postal code 140 92, ID 64948242, entered in the Commercial Register maintained by the Metropolitan Court in Prague, Part B, entry 3608 (the “Bank”), hereby issues this Order Execution Policy.

ORDER EXECUTION POLICY

I. Order Execution Policy

The Order Execution Policy (the “Policy”) is a set of rules and principles which the Bank follows handling an order of a Client to whom a respective investment service is provided pursuant to the Act. The aim of the Policy is to establish rules binding upon the Bank and its employees that will ensure that orders of the Bank’s Clients concerning investment instruments will always be executed under terms agreed in advance during the performance of investment services by the Bank, and in particular under the best conditions and in the best manner of execution according to the Client’s instructions.

The Policy contains (i) rules of best execution of Clients’ orders, (ii) rules of transmission of orders to the third parties, (iii) rules of execution of orders on the Bank’s own account, and (iv) rules of execution of Clients’ orders concerning investment instruments from the Bank’s own account.

Orders pursuant to this Policy include exclusively orders related to investment instruments, typically unit trust certificates, bonds, shares, derivative instruments, etc., and to those organisational units of the Bank which perform investment services for Clients.

II. Rules for the Best Execution of Orders

A. General principles: Rules for the best execution of orders

The Bank undertakes always to use due professional care in order to achieve the best result for Clients when executing their orders, or orders on their own account, however, always within the framework of the Bank’s practical possibilities, while spending reasonable costs and within the scope of the global policy for the execution of client orders applied within UniCredit Group, of which the Bank is a member.

Rules for the best execution of orders will be defined by the Bank as rules common for all categories of its Clients (pursuant to the categorization of Clients into retail clients, professional clients and eligible counterparties). This does not, however, exclude that a certain execution venue may require specific parameters of the order, such as, in particular, a volume, etc. (see execution venue criteria below), and therefore, such venue may be accessible only to certain groups of Clients.

Should the Client reasonably concludes based on this Policy that he /she prefers his /her own specific instructions which differ from the rules of execution under this Policy, the Bank will execute such order in accordance with such Client’s instruction. In such case, the Bank will not be held responsible for observing the rules under the Policy to an extent to which the individual instructions regarding the Client’s order differ from this Policy and, in addition, it cannot guarantee that the Client’s order will be executed under the best conditions. A specific order (instruction regarding the order) of the Client will always be given priority over this Policy. The Bank is not obliged to warn the Client in this respect with every individual order that he / she submits, but it does so in general in the form of the aforementioned warning related to all such possible orders of the Client.

This Policy is to determine the best execution venue for every Client order. Pursuant to legal regulations, best execution venues can include a:

- a) European regulated market;
- b) multilateral trading facility (MTF);
- c) organized trading facility (OTF);
- d) systematic internalizator;
- e) market maker or other liquidity provider with the seat in the member state of European Union; or
- f) person or financial instrument market with seat in the state which is not the member state of the European

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Obchodní rejstřík/Commercial Register:
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Směrový kód banky/Bank code: 2700
Swift Code: BACXCZPP

Union, with the similar subject of activity as persons or markets listed in (a) to (e) above (jointly “**execution venues**”).

Execution venues typically include stock exchanges, similar (electronic) market platforms of banks for counterparties or clients (multilateral trading facility), regular counterparties on the interbank or other similar market (systematic internalizers, market makers, etc.).

When determining the best execution venue, specific criteria must be taken into account in selecting the execution venue. The execution venue must ensure the best possible conditions for the execution of an order and, therefore, established criteria must be applied in a certain binding order, in a certain combination, or by the weight of their importance.

Apart from the criteria given below, it is also important to take into account that every investment instrument to which an order relates is traded within the context of specific market segments. Therefore, in addition to the application of general principles, the rules for the execution of orders must be segmented by individual types of assets (see below II.B Rules for Best Execution of Orders – Principles to be applied for individual types of investment instruments).

Particular execution venues must be selected based on the following criteria shown in descending order of their relative importance:

Criteria	Procedure and importance of criteria	Order of importance
a) Price for an investment instrument which can be achieved in the execution venue	The lowest price will be decisive when an investment instrument is purchased. The highest price will be decisive when an investment instrument is sold. The Bank will evaluate pricing mechanisms of execution venues to decide whether the price offered by a respective execution venue is as good as that of competitors. The price depends mainly on the number of market participants, the possibility of qualifying market makers, and the orientation towards the main stock exchange (reference market principle), if available.	1
b) Total fees charged to the Client	When selecting an execution venue, the Bank takes into account the total amount of fees the Client will need to pay. The lowest total amount of fees will be decisive. If the Client's order can be executed in more than one execution venue, and the total volume of the third party's fees charged to the Client is equally favourable, the lower amount of the Bank's own fees will be decisive.	2
c) Quality (credibility) of the execution venue, including of the entity providing settlement	In line with its own risk management rules, the Bank will evaluate execution venues, inclusive of their settlement, by the quality of their services (depth of the market, liquidity, number of market participants, regulatory environment), trustworthiness, history, financial stability, and the like.	3
d) Speed of order execution	Priority is given to higher speed in which an order can be executed and the trade settled.	4
e) Likelihood of successful execution	The Bank will evaluate the current market depth, liquidity, settlement algorithms, open access to suitable market segments, etc.	5
f) Requested trade volume	The Bank considers the volume of a requested trade in connection with the conditions or limits existing in individual execution venues (lot sizes, over limit orders, etc.). If volumes are sufficient, the Bank will use an execution venue's most advantageous market segment.	6
g) Type of order	The Bank will place specific orders (i.e. limit orders, stop-loss, etc.) on the market pursuant to conditions of, and within the rules defined by, the execution venue.	7

If there are several execution venues where an order can be executed, the Bank will proceed by applying the criteria presented above, i.e. from the most significant criteria to the less significant ones. At the moment when it can achieve a better result for the Client in one execution venue relative to its alternatives, it will select just this execution venue. The Bank also takes into account its own fees and the costs associated with executing the order at each available execution venue.

The best possible result will be determined primarily from the viewpoint of overall performance, considering the price of the investment instrument (criterion a)) and costs for executing the order (criteria b)). Costs related to the order execution include all costs charged to the Client directly related with the execution of Client's order, including payment to the execution venue, payments for the settlement of a transaction concluded on the basis of this order and other fees to other persons involved in the execution of this order. Where the Bank executes an order on behalf of the Client, best execution will be determined in terms of overall performance, as represented by the price for the investment instrument and the costs related to execution, which will include all expenses incurred by the Client that are directly related to execution of the order, including fees of the execution venue, clearing and settlement fees, and any other fees paid to third parties involved in executing the order.

The execution venues currently used by the Bank are listed at the Annex 1 of this Policy. The choice of execution venues, however, always considers reasonable accessibility to the given execution venue, such as, in particular, financial costs, technological conditions, geographical accessibility, etc.

B. Principles to be applied to individual types of investment instruments (asset classes) in Rules for Best Execution of Orders

Receipt, transmission or execution of orders concerning domestic shares

The Bank is a member of the Prague Stock Exchange (the "PSE"). Client orders are executed on the XETRA trading platform. Specific procedures and rules for executing trades are stipulated in the Stock Exchange Rules.

The Bank is also entitled to enter into a transaction on its own account pursuant to Article IV.

Receipt, transmission or execution of orders concerning domestic bonds

The Bank is a member of the Czech Bond Dealers Club and a market maker on the interbank market for domestic bonds in MTS system. It is also a Primary Participant in auctions for government bonds. The Bank executes orders concerning domestic bonds on the domestic interbank market. In accordance with the criteria established for selecting an execution venue, the Bank will make a trade under the best possible conditions for the Client that can be achieved under current market conditions.

The Bank is also entitled to enter into a transaction on its own account pursuant to Article IV.

Receipt, transmission or execution of orders concerning foreign shares, bonds, warrants, certificates and other similar investment instruments

If the Bank does not have direct access to a market where a respective investment instrument is quoted, it will convey the order for execution to another firm having access to such market (see the Rules for Conveyance of Orders to Third Parties).

Execution of orders concerning securities¹ issued by the Bank

Orders concerning securities issued by the Bank and not listed on a regulated market are executed directly in the Bank, which is an issuer of such securities. In such case, the Bank is the single execution venue.

In the case of orders concerning securities issued by the Bank and listed on a regulated market, the respective regulated market will be the execution venue. The Bank does not register such issues on more than one regulated market.

Receipt, transmission or execution of orders concerning participation certificates of a collective investment fund

Orders concerning participation certificates of collective investment funds are conveyed directly to the issuer of the unit certificates or to its distributor, a securities dealer or intermediary.

OTC trades in derivative instruments

¹ If the term „securities“ is used in this document, it means both „securities and book-entry securities unless arises otherwise from the nature of the matter.

These are trades transacted between the Bank and the Client on an individual basis. The Bank concludes such transactions on its own account (see details in Executing Orders on the Bank's Own Account).

III. Rules for Transmission of Orders to the Third Parties

If the Bank does not have direct access to a market where investment instruments are traded in respect to which the Client has given an order, the Bank will transmit such order to the third party which may solely be a person or entity having a licence to perform investment services, i.e. a securities dealer or a bank. Such third party is obliged to establish its own execution policy and the Bank is entitled to rely on its observance. Third parties to whom the Bank transmits orders of its Clients are listed at Annex 1 to this Policy and are subject to the same monitoring and evaluation as other execution venues.

IV. Executing Orders on the Bank's Own Account

If the Bank is a single execution venue for a given investment instrument (e.g. OTC derivatives, or issues of its own investment instruments), a trade with a Client made against the Bank's own account will result from mutually agreed individual parameters. The Bank's offer arises primarily from the current market situation and, as appropriate, from the credit scoring of the Client and other similar individual quantities which can be evaluated variously by different dealers. From the Client's viewpoint, the Bank is an execution venue and the criteria relevant for the execution of an order are set by agreement of the contracting parties.

The Bank is entitled to settle the Client's order against its own account, but it will always be obliged to observe rules regulating conflicts of interest and conditions for executing the Client's order must always correspond to the best execution.

V. Rules for executing Clients' orders concerning investment instruments on the Bank's own account

The Bank does not consider transactions between the Bank and the Client when the Bank purchases or sells on its own account to be a material conflict of interest potentially detrimental to a Client. Within the identifying and management of the conflict of interests the Bank has taken the following measures:

A. Organizational setting

Employees trading on the Bank's own account are separated from employees communicating with Clients, receiving orders from Clients to purchase or sell securities and making trades with Clients (the "sales employees"). Employees trading on the Bank's own account are organizationally part of the Treasury Trading ("trading employees"). The separation of trading and sales employees is also connected with the determination of different objectives of these employees.

In the situation when it is not possible to keep the separation of communication with Clients from trading on the Bank's own account at the level of respective sales and trading divisions, the procedure is as follows:

- (i) If a Client's order is received directly by a trading employee, the trade is transacted between such employee and another trading employee,
- (ii) if for personnel reasons the procedure defined above cannot be observed, the conflict of interests is prevented by the below given mechanisms – mechanism of a fair price for the Client and by control mechanisms.

B. Mechanisms for achieving a fair price for the Client

In case of foreign securities not traded on the PSE, execution venues are used in compliance with the Rules for Best Execution of Orders provided that the terms and conditions of a respective commission agent contract are fulfilled. This means there is no conflict of interests between the Bank and the Client in such case.

A fair price of share trades on the PSE is ensured for the Client by observing terms and conditions of a respective commission agent contract. If the Client's order is executed by the right to act as a dealer (to purchase or sale from the Bank's own account), the trade is always made for the currently best market price, or better. With regard to the market transparency and the possibility of the clear determination of the best purchase/sale price, the dealer has an equivalent possibility of selling/purchasing within the market or of executing the Client's order. From the Client's viewpoint, it is proceeded in compliance with the Rules for Best Execution of Orders.

The fair price of bond trades on the PSE is ensured for the Client by:

- (i) observance of terms and conditions of the respective commission agent contract if entered into between

the Bank and the Client (the commission agent contract is made with all non-professional clients and with all professional clients on demand, in addition with certain professional clients). A trading employee sells or purchases securities from a sales employee (representing the Client) always for the up-to-date best market price;

(ii) trading based exclusively on market prices. For bonds trading a commission agent contract with professional clients is not usual. A professional client can, however, compare, due to information available for him, individual market prices and conclude a trade for the best price. The market transparency is ensured by the following communication channels providing an overview of up-to-date prices and allowing their comparison:

- a) independent information channels, such as Reuters and Bloomberg, to which professional clients usually have access
- b) electronic MTS trade platform for bonds trading to which professional clients can also usually have access.

A fair price of primary issues (not primary issues of the Bank's own bonds): The Bank exclusively ensures access to the auction system for Clients (government treasury bonds, government bonds) or the transmission of Clients' orders to the books of the senior manager of the issue in case of corporate securities. This represents no conflict of interests between the Bank and the Client. The Client purchases for a price he demanded or for the average auction price depending on the type of auction/subscription.

C. Control mechanisms

The current control with liquid securities

- a) Control of the fact whether the Bank's securities trades are made based on the market conditions is currently performed by the Risk Management (MRCM). In case of liquid securities the control is made by means of the system monitoring various price resources and volatility of individual securities; based on the defined algorithms the system calculates the maximum spread of market prices.
- b) Any breach of the market conformity (the excess of permitted deviations from the market price) discovered by the system is sent by the MRCM employees to MRMA employees for examination. The MRMA will examine the trade based on market data from independent systems (Reuters, Bloomberg).
- c) If a non-market price is confirmed by the MRMA, the situation is explained directly by the employee who has concluded the transaction concerned.
- d) If the explanation of an employee who has made the transaction is not satisfactory, superior employees are immediately informed with respect to the significance of the discovered excess.

Regular control with non-liquid securities

In case of non-liquid securities the conformity of the trade price is calculated individually based on credit spreads, the level of interest rates and by comparison with similar bonds by respective risk management divisions. If any breach of the market conformity is discovered, the way how the Bank solves the situation is similar to that with liquid securities.

- a) In case of a purchase/sale of non-liquid securities between Clients and/or counterparts (the so-called back to back), there is no conflict of interests although the trade is concluded via the Bank's own account.
- b) In case of a purchase/sale of non-liquid securities from the Bank's own account there is a conflict of interests between the Bank and the Client and the Bank will inform the Client about this fact upon the conclusion of the transaction by means of an employee making such transaction.

D. Further measures rooted in internal rules

Ban on the front running under respective procedures or internal rules.

VI. Specific Cases

To avoid any doubts, the Bank states that it offers certain investment instruments to Clients only on the authorisation of a third party, e.g. portfolio management, some participation certificates, etc. In such case, the execution policy of such third party will be relevant for the Client.

VII. Final Provisions

The Bank regularly examines the effect of its rules for execution of orders, and in particular the quality of order execution by a third party (execution venue), and ensures that any deficiencies are eliminated without undue delay. The rules for execution of orders are examined by the Bank immediately upon any significant change which may have impact on the ability to achieve the best possible result for the Client when executing an order, but in no case less than once per year.

The Bank makes public on annual basis, for each class of financial instruments,

- a) 5 execution venues on which the Client's orders were executed during the last calendar year and which are the most important in regard of the volumes of executed trades, and
- b) summary and conclusions of the analysis resulting from the quality monitoring of the execution venues for investment instruments order execution on which the orders were executed during the last calendar year.

The Bank makes the publication according to the previous paragraph via its web sites in section MiFID available on the web address: <https://www.unicreditbank.cz/cs/ostatni/mifid.html> or on the web address <https://www.unicreditbank.cz/en/ostatni/mifid.html>.

At the Client's request, the Bank will demonstrate that it is executing, or it has executed, his or her order or orders in accordance with these rules of execution of order.

This Policy expressly stipulates that the Bank is entitled to execute Clients' orders also off a regulated market or multilateral trading facility.

Prague, 3 May 2018

Annex no. 1
Execution venues and third parties to whom the orders are transmitted
Identification of execution venue

Identification of the execution venue on which the orders are executed is shown on the order, resp. identification of the execution venue on which the orders were executed is shown on confirmation in abbreviation which is described below.

Execution venue	Abbreviation
UniCredit Bank Czech Republic and Slovakia, a.s.; Želetavská 1525/1; 140 92 Praha 4 - Michle; Česká republika	UCBCZSK
Centrální depozitář cenných papírů, a.s.; Rybná 14; 11000 Praha 1; Česká republika	CDCP_CZ
Centrálny depozitár cenných papierov SR, a.s.; ul. 29. augusta 1/A, 814 80 Bratislava; Slovensko	CDCP_SK
CACEIS Bank S.A., Germany Branch; Lilienthalallee 36; 80939 München; Německo	CACEIS
Clearstream Banking S.A.; 42 Avenue JF Kennedy; L-1855 Luxembourg; Lucembursko	OTC-CBL
Burza cenných papírů Praha	BCPP
Česká národní banka; Na Příkopě 28, Praha 1; Česká republika; Systém krátkodobých dluhopisů	CNBACZPP (SKD - Systém krátkodobých dluhopisů)
Frankfurt Stock Exchange	XETR
Vienna Stock Exchange	XWBO
Zürich Stock Exchange	XSWX
London Stock Exchange International	XLONI
London Stock Exchange Domestic	XLON
Lisbon Stock Exchange	XLIS
BME SPANISH EXCHANGES	BMEX
Borsa Italiana (Milan)	XMIL
Amsterdam Stock Exchange	XAMS
NYSE Euronext	XPAR
Stuttgart Stock Exchange	XSTU
Munich Stock Exchange	XMUN
Dusseldorf Stock Exchange	XDUS
Börse Berlin	XBER
Frankfurt Stock Exchange	XFRA
New York Stock Exchange	XASE
New York Stock Exchange	XNYS
NASDAQ stock exchange	XNAS
BÖAG Börsen AG (Hamburg)	XHAM
UniCredit Bank AG; Arabellastraße 12; 81925 München; Německo	UniCredit Bank AG
UniCredit Bank AG; Arabellastraße 12; 81925 München; Německo; Best execution	XBEX

Securities dealer UniCredit Bank AG

The Bank does not have a direct access to foreign markets on which the investment instruments on which the Client made an order are traded. Therefore the Bank transmits orders to the third party which is authorized to proceed the investment services, namely to the company from the UniCredit Group, German bank UniCredit Bank AG. This company is obliged to implement its own Order Execution Policy on which the Bank can rely on.

Market Identifier Code

The abbreviation of Market Identifier Code is also MIC code if the MIC code was assigned to the execution venue. The execution venue is usually trading system. The MIC code shall be assigned in accordance with ISO 10383. For the avoidance of doubt, it is stated that the Bank is authorized to execute client's orders outside the trading system in accordance with the Order Execution Policy.

Preventing the legalization of proceeds from crime or terrorist financing

The Bank is authorized not to accept or execute the order with which the risk of legalization of proceeds from crime or financing of the terrorism is connected or there exist a suspicion that the trade is subject to the international sanctions. Client's orders are subject of anti-money laundering and terrorism financing screening. This screening can have an impact on the time of transmission of the order to the execution venue or on the time of execution of the order on the execution venue.

Collective investments funds units

The orders on collective investments funds units are transmitted directly to the issuer of the unit or to the distributor of the unit - securities dealer or intermediary.

Investments instruments	Execution venue	Abbreviation
Funds Templeton	Franklin Templeton Investment Service S.A.; 26, boulevard Royal; L-2449 Luxembourg; Luxembourg	FrankT
Funds Invesco	International Financial Data Services (Ireland) Ltd.; Bishop's Square, Redmond's Hill; Dublin 2; Ireland	INVESCO
Funds Pioneer CZ	Amundi Czech Republic Asset Management, a.s.; Želetavská 1525/1; 140 00 Praha 4; Czech Republic	PIO-CZ
Funds Pioneer LUX	Société Générale Bank & Trust; 11, avenue Émile Reuter; L-2420 Luxembourg; Luxembourg	PIO-LUX
Funds Allianz	STATE STREET BANK LUXEMBOURG S.C.A, 49 Avenue J F Kennedy, L-1855, Luxembourg	Allianz2
Funds BlackRock Global	J.P. Morgan Bank Luxembourg S.A.; 6C, route de Trèves; L-2633 Senningerberg; Luxembourg	BlackR1
Funds BlackRock Strategic	J.P. Morgan Bank Luxembourg S.A.; 6C, route de Trèves; L-2633 Senningerberg; Luxembourg	BlackR2
Funds Fidelity	FIL (Luxembourg) S.A.; 2a, rue Albert Borschette; BP 2174; L-1021 Luxembourg; Luxembourg	Fidelity
Funds NN	Brown Brothers Harriman (Luxembourg) S.C.A.; 2-8 Avenue Charles de Gaulle; BP 403; L- Luxembourg; Luxembourg	ING
Funds BNP Parvest	BNP Paribas Securities Services, Luxembourg Branch; 33 Rue de Gasperich; L-5826 Hesperange; Luxembourg	BNP
Funds Schroder	Schroder Investment Management (Luxembourg) S.A.; 5, rue Höhenhof; L-1736 Senningerberg; Luxembourg	Schroder
Funds Pioneer Investments Austria	UniCredit Bank Austria AG; 1010 Vienna; Schottengasse 6-8; Austria	UCB-W-AT
Other funds of third parties	UniCredit Bank Austria AG; 1010 Vienna; Schottengasse 6-8; Austria	UCB-W
Other funds of third parties	CACEIS Bank S.A., Germany Branch; Lilienthalallee 36; 80939 München; Germany	UCB-MUN
Other funds of third parties	HSBC Securities Services (Luxembourg) S.A.; 40, avenue Monterey; L-2014 Luxembourg; Luxembourg	HSBC-Hed

Other third parties to whom the orders to settle are transmitted

Orders to settle the trades with investment instruments can be, especially beyond the above, transmitted to the following third parties, local or foreign, who are authorized to provide relevant investment services or additional investment services, eventually they are authorized to keep central register of investment instruments.

Other third parties to whom the orders to settle are transmitted
UniCredit Bank Austria AG; Schottengasse 6 – 8, 1010 Wien; Austria
UniCredit Bank Hungary Zrt.; Szabadság tér 5-6, H-1054 Budapest; Hungary
Clearstream Banking SA; 42 Avenue JF Kennedy, L-1855 Luxembourg; Luxembourg
Euroclear Bank SA/NV; 1 Boulevard du Roi Albert II, 1210 Brussels; Belgium
Bank of New York Mellon SA/NV; 46 Rue Montoyerstraat, B-1000 Brussels; Belgium
Bank Polska Kasa Opieki S.A.; ul. Grzybowska 53/57, 00-950 Warsaw; Poland
UniCredit Bank Czech Republic and Slovakia, a.s., pobočka zahraničnej banky; Šancová 1/A, 813 33 Bratislava; Slovakia
UniCredit Bulbank AD; 7 Světa Nedelya Square, 1000 Sofia; Bulgaria
Centrální depozitář cenných papírů, a.s.; Rybná 14, 110 05 Praha 1; Czech Republic
Česká národní banka; Na Příkopě 28, 115 03 Praha 1; Czech Republic
Pioneer Asset Management, a.s.; Želetavská 1525/1, 140 00 Praha 4; Czech Republic
Conseq Investment Management, a.s.; Rybná 682/14, 110 05 Praha 1; Czech Republic
ČSOB Asset Management, investiční společnost a.s.; Radlická 333/150, 150 57 Praha 5; Czech Republic
WOOD and Company investiční společnost, a.s.; nám. Republiky 1079/1a, 110 00 Praha 1; Czech Republic