



**H2O**  
Asset Management

# H2O AM

## Best Execution

## COMPANY CONFIDENTIAL

**Issue:** 8  
**Revision:** 8.0  
**Author/s:** Jean-noel Alba  
**Title:** Best Execution  
**Description:** This document defines the Best Execution for H2O AM

Issue	Date	Revision Description	Author/Revised by	Executive Approval	Committee
1.0	28/12/2010	Annual review	Jean-Noel Mulcahy / Alba/Julie	28/12/2010	
2.0	27/01/2011	Annual review	Jean-Noel Mulcahy / Alba/Julie	28/01/2011	
3.0	15/12/2012	Annual review	Jean-Noel Mulcahy / Alba/Julie	19/12/2012	
4.0	02/05/2014	Annual Review and Update	Jean-Noel Vincent Chailley / Alba/	02/05/2014	
4.1	01/07/2014	Revision	Jean-Noel Mulcahy / Alba/ Julie	01/07/2014	
5.0	09/02/2015	Annual Review and Update	Jean-Noel Mulcahy / Alba/Julie	09/02/2015	
5.1	05/06/2015	Revision	Jean-Noel Mulcahy / Alba/Julie	05/06/2015	
6.0	17/12/2015	Annual review	Jean-Noel Mulcahy / Alba/Julie	11/01/2016	
6.1	11/07/2016	Review and Update	Jean-Noel Mulcahy / Alba/Julie	22/07/2016	
7.0	05/03/2017	Annual Review and Update	Prashan Noe / Vara/ Jean Alba	03/05/2017	
8.0	01/03/2018	Annual Review and Update	Prashan Noe / Vara/ Jean Alba	03/03/2018	
9.0	08/04/2019	Annual Review and Update	Stephane Leclerc / Sophie Mourton	13/11/2019	

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## Contents

1. Introduction .....	3
2. Execution factors.....	3
3. Asset Types .....	4
4. Execution venues.....	5
5. Broker selection where orders to deal are placed with other entities to execute .7	
6. Counterparty selection for Over-The-Counter transactions ... <b>Error! Bookmark not defined.</b>	
7. Policy review of this policy .....	8
a) Material changes leading to a reassessment and update of the policy .....	8
b) Methodology for the update .....	8
8. Arrangements for ensuring compliance with best execution .....	7
9. Best Execution and Related Controls..... <b>Error! Bookmark not defined.</b>	

## 1. Introduction

H2O AM is a management company that manages funds and mandates on behalf of a diversified clients. All H2O clients are classified as “professional” according to Mifid regulation. The relevant requirements deriving from the EU UCITS directive, AIFMD<sup>1</sup> and other applicable regulations related to Luxembourg, Ireland, France and UK funds domiciliation:

- Level 1 – EU MIFID Directive 2014/65 : Article 27
- Level 2 – Delegated Regulation 2017/565 (article 64 to 66)
  - Delegated Regulation 2017/575 (RTS27)
  - Delegated Regulation 2017/576 (RTS28)
- Level 3 -
  - CSSF Regulation 10-4 – Article 28 and 29
  - CBI Guidance UCITS 16 – Paragraphs 18 to 31
  - FCA Handbook – COBS 11.2.B
  - AMF General Handbook
  - ESMA Q&A

When executing decisions to deal, or when placing orders to deal, H2O AM must act in the best interests of the Funds and Mandates it manages.

Therefore, H2O is obliged to establish and implement effective arrangements for complying with best execution and maintain a best execution policy to demonstrate – for example, to investment companies, unit holders and the regulator – that we have executed or placed orders on behalf of Funds/Mandates in accordance with this policy.

This policy is applicable to:

- H2O AM LLP
- Arctic Blue Capital Ltd.
- H2O (Monaco) S.A.M.
- H2O AM Europe
- H2O AM Asia Pte. Ltd

Together “H2O”.

## 2. Execution factors

H2O must take all reasonable steps to obtain the best possible result, when executing or placing orders to deal on behalf of the Funds and Mandates it manages. To achieve this, policies and procedures take into account the following execution factors:

- The price and explicit costs of executing the order
- The speed and likelihood of execution

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<sup>1</sup> Commission Directive 2010/43/EU, Articles 25 and 26 and Commission Delegated Regulation (EU) No 231/2013, Articles 27 & 28

- The likelihood of settlement
- The size of the order
- Any other consideration that we consider relevant at the time

H2O expects that price will normally be the predominant factor in obtaining the best possible result for Funds and Mandates. However, the relative importance of the above execution factors will be determined by:

- The objectives, investment policy and risks specific to the Fund, as indicated in the prospectus or the fund rules, Articles of Association of the Fund or offering documents
- The characteristics of the order – for example its size or particular instruction
- The characteristics of the financial instruments – which may include not only the type of instrument or asset class but its liquidity and other market characteristics
- The characteristics of the execution venues to which the order can be directed

H2O will also consider when choosing an executing counterparty, the explicit cost of a transaction measured against other venues which include:

- Commissions passed on by intermediaries
- Fees
- Taxes
- Exchange fees
- Clearing and settlement cost

Execution fees when paid by the fund (Futures, Equities) are aligned for all counterparties. Brokerage paid, given the large volume, is systematically negotiated with our counterparties at the fairest price to benefit the unitholders of our funds.

TCA (Transaction Cost Analysis) is periodically undertaken to choose the best vehicle for execution. H2O never structure charges or commissions in such a way as to discriminate between execution venues or brokers to the detriment of a Fund.

### **3. Asset Types**

H2O trades the following asset types:

Figure 1 Asset Types sept 2019:

Percentage	Description
1.18%	Fixed income securities
4.76%	Cash transfer (Margin, collateral...)
0.00%	Credit Default Swap
18.47%	CFD on Equities
0.53%	Listed Equities
0.09%	OTC Derivatives on equity markets
0.81%	Listed Futures on Commodities
26.20%	Listed futures on equity indices
24.30%	Listed futures on gvt bonds
4.15%	Fx Forward
1.15%	Fx Swap for ccy hedged shares
0.40%	Fx Forward for ccy hedged shares
3.46%	Non deliverable forward
5.74%	Fx Spot
4.35%	Fx Swap
0.06%	Interest Rate Swap
2.03%	Listed options on equity indices
1.31%	listed option on gvt bond futures
0.03%	OTC option on equity indices
0.85%	OTC option on Fx
0.02%	OTC vol and var swaps
0.04%	Repo and reverse repo
0.09%	Swaption
100.00%	

Listed market and Fx transactions account for more than 90% of total volume. IRS, Swaptions and OTC derivatives account for less than 1.5% of total number of trades.

#### 4. Execution venues

Execution venues include regulated markets, multilateral trading facilities, market makers or other liquidity providers.

H2O trades on multiple markets across different trading venues. Trades are directly executed by portfolio managers (PMs). As there is no execution desk, PMs have direct access to various trading venues where they can execute and allocate their trades. Our trade repository (H2O Blotter) is fed either automatically with executed allocations (from most trading venues) or manually by PMs. The execution venues chosen must be those likely to achieve the best possible result for the funds having regard to the execution factors.

For each financial instrument there must be sufficient choice of venues to facilitate best execution, taking account the nature of the instrument and market concerned.

Electronic platforms currently represent up to 90 % of trades for listed derivatives and Forex trades, including spot, forwards, swap.

All trades are executed as much as possible on electronic platforms, in order to provide an audit trail, with all relevant data stored and made available, including the amount, price, time stamps and allocation.

Portfolio Managers input into the platforms all portfolios which may be eligible to their trades, i.e. all portfolios which are covered by the ISDA governing the relations with the bank providing the electronic platform. Portfolio managers are requested to make their electronic platforms available for audit purposes to H2O Risk and Compliance.

The operational platform and controls have been organised to adapt to the break own of by instrument type as futures listed derivatives and forex represent up to 90% of the total trades depending on portfolios, and are traded on electronic platforms provided by investment banks, the execution and controls processes have been built based on the connectivity with those platforms.

The other transactions are cash management transactions including repos and short term instruments, OTC derivatives, as well as cash bonds and cash equities which are mostly executed using electronic platforms and venues as well.

Since all trades are executed directly by Portfolio Managers, it is their initial responsibility that an audit trail is made available for all trades. Additionally, as all trades are processed on trade date, all trade details are input into the systems before matching with counterparties by the operations of H2O.

As of April 2019, H2O AM places significant reliance on the following execution venues:

- Frankfurt Stock Exchange
- Bourse Suisse - SWX
- Chicago Board of Trade
- Chicago Mercantile Exchange
- Dublin (Irish SE)
- EUREX-DTB
- EURONEXT AMSTERDAM
- EURONEXT BRUXELLES
- Euronext Lisbonne
- EURONEXT PARIS
- ICE Futures Europe Equity Products Division
- LSE
- MEFF (Mercado Español de Futuros Financieros)
- MILAN
- NASDAQ Stock Market
- New York Mercantile Exchange
- NEW YORK STOCK EXCHANGE
- SIMEX
- Tokyo (Tokyo Shoken Torihikijo)
- XETRA

The above table lists the source of trades booked in the blotter. Most of them are booked via straight through processing (STP). As of August 2019, 70% of transactions are processed real-time via FIX, 25% are imported via flat file transfer and only 5% are booked manually into the system.

## **5. Broker selection where orders to deal are placed with other entities to execute**

The nature of the investments, the large volume imposes a large list of counterparties that should be reviewed periodically. Please refer to the H2O Broker Selection policy for further information.

## **6. Order outside trading venue**

Following the entry into force of MiFID II on January 3rd, 2018 several counterparties of H2O reached out to us to get our express consent on the execution of trades outside of trading venues (A Trading Venue means a Regulated Market, Multilateral Trading Facility (MTF) or an Organised Trading Facility (OTF), as defined under MiFID II and, in particular, related national implementing measures). H2O gave such consents to the counterparties.

## **7. Arrangements for ensuring compliance with best execution**

H2O has a strong commitment to implement best execution for all trades and instruments. This part is now documented in the Control Trades procedure owned by H2O Compliance.

- For Forex and futures trades, as the trading pools offer deep liquidity, and the Bid/Ask spread is narrow (usually one or two pips), it is assumed that the best execution control is not as relevant as is the case for securities. But it is nevertheless monitored against various benchmarks, such as open, close high and low, every day.
- For equities, the execution is monitored against a basket of open, close, high and low prices, as appearing on Bloomberg. TCA monitoring is undertaken by the Portfolio Manager when relevant, i.e. when the price action slippage may be significant given the market knowledge of the Portfolio Manager.
- For bonds or other fixed income securities, the control shows that the Portfolio Manager has requested two or three different prices from various sources, and executed the trade at the best price.

When Portfolio Managers undertake transactions, they have to check that an audit trail is available. Controls on execution aim at controlling that an audit trail is available for each trade, and that all trades are undertaken by authorised persons at H2O within the list of brokers, or authorised exceptions, with a timely execution and allocation, and ensure best execution.

Portfolio Managers undertaken transactions must notify H2O Compliance immediately of significant breaches of this policy.

## **8. Policy review of this policy**

### **a) Material changes leading to a reassessment and update of the policy**

The following, non exhaustive, list shows some situations that could lead to an update of the policy:

- Regulatory updates
- Substantial changes to the counterparties used
- Substantial changes in trading workflow
- Substantial changes to the operational framework

### **b) Methodology for the update**

The procedure is updated on an annual basis at least. To perform the updates, the different teams of H2O will reflect in the most accurate way the relevant changes relative to the use and trading venues. They will also base their review on the outcome of relevant audits and on regulatory updates.