



HENDERSON ROWE

Order Execution Policy (including RTS 28 Disclosure) August 2020

Order Execution

This Order Execution Policy and RTS 28 Disclosure applies to Henderson Rowe Limited (“Henderson Rowe”, “us”, “we”).

The purpose of this Policy is to provide clients of Henderson Rowe information about our Order Execution Policy. By signing the Client Agreement, you have provided consent to this Policy.

The EU Markets in Financial Instruments Directive II (“MIFID II”) requires investment firms to have in place an Order Execution Policy. As a MIFID II investment firm, Henderson Rowe has an obligation to take all sufficient steps to obtain the best possible results (known as “best execution”) for our clients. Clients, for the purpose of this Policy, refer to Retail and Professional Clients as defined by the Financial Conduct Authority (“FCA”).

This Policy covers the following types of financial instruments which we trade on behalf of our clients:

- Equities
- Fixed Income
- Exchange-traded funds
- Foreign exchanges

We have a contractual arrangement in place with Platform Securities who carries out the execution of trades. Platform Securities has an obligation to execute the trades by taking into account the execution factors including price, costs, speed, likelihood of execution and settlement size, nature or any other consideration relevant to the execution of the order.

In order to ensure that the regulatory obligations are met, Henderson Rowe has reviewed the Order Execution Policy of Platform Securities and processes have been put in place to regularly monitor the prices achieved for clients. We are satisfied that Platform Securities is providing the execution of trades to our clients in line with the FCA regulations.

Regulatory Technical Standards 28 (“RTS 28”)

In accordance with RTS 28, investment firms, as part of their best execution obligations, must make an annual public disclosure which sets out their top five execution venues for all trading on behalf of clients.

As the execution of trades is undertaken by Platform Securities, we have attached a link to their website where you can view their Order Execution Policy at <https://empower1.figlobal.com/rs/650-KGE-239/images/Platform-Securities-Order-Execution-Policy-v6.0.pdf> and RTS 28 Disclosure at <https://empower1.figlobal.com/rs/650-KGE-239/images/Platform-Securities-RTS-28-2019.pdf>