

RBS Collective Investment Funds Limited

Best Execution Policy

Best Execution Policy – RBS Collective Investments Funds Limited

RBS Collective Investments Funds Limited (“RBSCIFL”) acts as the Authorised Fund Manager (“AFM”) of the following Investment Company with Variable Capital (“ICVC”) and their funds (the “Schemes”).

- RBS Investment Funds ICVC (UCITS qualifying Scheme)
- RBS Stakeholder Investment Fund ICVC (UCITS qualifying Scheme)
- RBS Investment Options ICVC (Non UCITS Retail Scheme)

As AFM, we are responsible for the investment management of the underlying assets of the funds and, as such, we are subject to the rules of our regulator, the Financial Conduct Authority (FCA), that apply to operators of collective investment schemes. These require an AFM to meet the requirements relating to best execution when carrying out scheme management activity for its funds.

In view of this, we are required to treat the Schemes as our clients. We are also required to have an order execution policy in place detailing how we will act in the best interests of the Schemes and take all reasonable steps to obtain the best possible results for the schemes when we directly execute an order, place an order with, or transmit an order to, another entity for execution.

Our approach to Order Execution

The AFM must act in the best interests of the Schemes when directly executing orders to deal on behalf of them and take all reasonable steps to obtain the best possible result for the Schemes, on a consistent basis, taking into account price, costs, speed, likelihood of execution and settlement, size and nature of the order or any other consideration relevant to the execution of the order.

We must also act in the best interests of the Schemes when placing orders with, or transmitting orders to, other entities for execution where these result from our decisions to deal in financial instruments on behalf of the Schemes.

In practice, we have delegated the investment management of the funds within the Schemes to the Investment Manager (“IM”), Aviva Investors Global Services Limited.

We have an Investment Management Agreement in place with the IM, under which they manage the Schemes in accordance with the Scheme Prospectus and the investment policy and objectives. In line with the FCA rules, the IM is required to provide us with best execution (as detailed within the Key Factors) in relation to orders they execute on our behalf, or place or transmit to another entity for execution.

We have received and accepted the order execution policy for the IM and we are, therefore, able to satisfy our best execution requirements through placing reliance on this order execution policy.

For the avoidance of doubt, costs for research incurred by the IM are not charged to the Funds. A summary of the IM’s order execution policy is available on request.

Key Factors

The order execution policy of the IM takes into account the following factors:

- Price;
- Cost;
- Speed;
- Likelihood of execution and settlement;
- Size and nature of the order; and
- Any other consideration relevant to the execution of the order.

The relative importance of the execution factors will be determined by the IM based on the market experience and judgement of their investment professionals and in light of all available information at the time of executing the order, including the execution criteria.

Given the difference in the structures of both markets and financial instruments, the IM will apply the execution criteria in a manner that takes into account the differing circumstances in the execution of client orders.

There may be occasions where the IM executes orders outside of a regulated market or a multi-lateral trading facility.

Regular Review

Commercial & Private Banking Fund Governance and Oversight will monitor on an annual basis the effectiveness of the fund manager’s order execution policy and, in particular, the overall quality of the IM, and, where appropriate, we will correct any deficiencies. This will form part of C&PB Fund Governance and Oversight annual monitoring review. Ad hoc reviews will be undertaken where there is a material change that affects our ability to obtain the best possible result for our clients.

We will carry out a review of our order execution policy annually. We will also do so where there is a material change that affects our ability to obtain the best possible result for our clients.



If you would like this information in Braille, large print or audio format please contact us on **03457 24 24 24** (Minicom 0800 404 6160).