

POLICY ON THE BEST EXECUTION PRINCIPLE WITHIN SOCIETE GENERALE PRIVATE BANKING (SWITZERLAND) LTD

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1. PRINCIPLE AND OBJECTIVE

In accordance with the Federal Act on Financial Services (hereinafter: FinSA) and the Federal Ordinance on Financial Services (hereinafter: FinSO), SOCIETE GENERALE Private Banking (Switzerland) Ltd (hereinafter: SGPBS) ensures, when executing its clients' orders, that it obtains the best possible result in terms of costs, speed and quality.

2. SCOPE

The principle of best execution applies if the client in question is considered a retail client or professional client within the meaning of FinSA. It does not apply if the client concerned is an institutional client or if, irrespective of its classification, it gives specific instructions contrary to the best execution principle.

3. BEST ORDER EXECUTION

As part of best execution of its clients' orders, SGPBS ensures that:

- Client orders are immediately and correctly recorded and distributed;
- Similar orders will be executed immediately, in the order in which they are received, unless the nature of the order or market conditions do not allow it or it is not in the interest of the client;
- The grouping of orders from different clients or of orders from clients with their own transactions, and the allocation of related transactions to each other, preserves the interests of the clients concerned and does not disadvantage them;
- Retail clients shall be informed immediately of the occurrence of any serious difficulty that may affect the proper execution of an order.

SGPBS will therefore take all appropriate measures to achieve the best possible result for the client by considering the following criteria and factors.

4. EXECUTION CRITERIA

Unless otherwise specified by the client concerned, SGPBS takes the following criteria into consideration when executing client orders:

1. The classification of the client (retail or professional client);
2. The characteristics of the client's order (e.g. the size or type of order);
3. The financial instruments that are the subject of the order; and
4. Possible execution entities and platforms (i.e. to whom the order can be transmitted).

5. BEST EXECUTION CRITERIA

SGPBS will take into consideration the following criteria when selecting the execution platform in order to ensure optimal execution of client orders:

1. The price of the proposed financial instrument;
2. Direct and indirect costs related to execution of the financial instrument in question, i.e. expenses directly related to execution of the order, delivery costs and costs related to the places where the order is executed;
3. Speed of execution of the order;
4. The likelihood of the order and settlement of the order;
5. The size of the order; and
6. The nature of the transaction or any other relevant factor relating to the order.

SGPBS checks the effectiveness of these criteria at least once a year.

6. EXECUTION PLATFORMS

On request, SGPBS provides its clients with a list of the main execution platforms it has selected. This list is not exhaustive and is subject to change. SGPBS reserves the right to use other execution platforms if they are considered appropriate, in accordance with the criteria and factors set out below.

SGPBS regularly monitors the main execution platforms to ensure that they offer sufficient guarantees to obtain best execution of orders.

7. LIMITATIONS OF THE BEST EXECUTION PRINCIPLE

Express instructions from the client

In the event of express instructions from the client, SGPBS will execute the order in accordance with such instructions for the purpose of executing the order (e.g. direct market access orders entered through an electronic system) and will therefore not be obliged to provide best execution given that the order has been executed in accordance with the specific express instructions given by the client. This limit does not apply to the part of the order not covered by the client's express instructions.

Execution methods: receipt and transmission of orders

SGPBS may transfer an order to any other Société Générale Group entity or third party (e.g. an external broker) to execute the order. In this context, SGPBS will ensure that the intermediary can demonstrate that it applies the principle of order execution in an appropriate manner similar to this policy.

Good faith

The principle of best execution will not apply where the client does not expect SGPBS to act to protect its interests in relation to one or more aspects of the execution of the order. This type of circumstance arises when SGPBS does not act on behalf of the client concerned when executing the order.

8. MONITORING AND CONTROLS

The SGPBS monitors compliance with the best execution principle and carries out regular controls to ensure that this principle is properly applied. SGPBS will notify the relevant client of the occurrence of any substantial change. These controls include ensuring:

- correct transmission, execution and accounting of transactions;
- adequacy of the charges levied with the charges specified in the investment fund documentation;
- compliance with the deadlines for fund operations;
- control of the validation of operations;
- compliance with regulatory obligations relating to the content, format and timetable for sending performance information/announcements to the client;
- compliance with the “best execution” policy and the selection of intermediaries;
- that all transactions carried out in the context of advisory management are based on a client instruction.

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