



Best Execution Policy

1 PURPOSE

- 1.1** The business of FSDH Capital Limited (hereinafter referred to as “FSDH”) is built on trust and integrity as perceived by our stakeholders, especially our clients, shareholders, and regulators.
- 1.2** An important element of trust and integrity is ensuring that FSDH conducts its business in accordance with the values and Code of Conduct and Ethics that FSDH has adopted, and in compliance with applicable laws, rules, and standards.
- 1.3** FSDH Best Execution Policy (“the Policy”) is designed to comply with the Nigerian Stock Exchange (“NSE”) Rules on Order Handling and Best Execution as well as other applicable statutory and regulatory obligations, ensuring that:
- 1.3.1** Best execution is always sought when purchasing or selling securities on behalf of FSDH clients.
- 1.3.2** reasonable steps are taken to obtain the best available result for FSDH clients within the shortest time frame, provided that FSDH does not deviate from the client’s mandate.

2 POLICY

2.1 Scope

This Policy applies to all trades on financial instruments executed or placed by the firm on the Nigerian Stock Exchange, NASD Plc, FMDQ or any other Exchange or Capital Trade Point recognized and authorized by Securities and Exchange Commission, Nigeria.

2.2 Best Execution

- 2.2.1** FSDH shall always, when acting on behalf of clients on the purchase or sale of securities, adhere to this Policy by taking reasonable steps to obtain the best available results for the client within the shortest time frame in accordance with the terms and conditions of the mandate from the client.
- 2.2.2** FSDH is obligated to deliver the best possible result when executing client mandates on all types of securities.

2.2.3 FSDH shall apply this Policy in a manner that considers the different circumstances associated with the execution of mandates related to types of securities.

2.2.4 When executing an order, FSDH shall take reasonable steps to obtain the best possible results under the circumstances while taking into consideration key execution factors. These key factors include but not limited to price, costs, speed, likelihood of execution and settlement, size, nature, market liquidity, improvement, market impact or any other consideration relevant to the execution of a client's mandate.

2.2.5 FSDH shall establish and implement this Policy to each client's mandate.

2.3 Client Order Handling

2.3.1 FSDH shall treat clients' instructions in the order in which they are received to ensure a fair and expeditious execution.

2.3.2 FSDH shall whilst carrying out clients' mandates, ensure that mandates executed on behalf of clients are promptly and accurately recorded and allocated.

2.3.3 FSDH shall not execute a client's mandate in aggregation with another client's mandate.

2.3.4 FSDH shall not aggregate a client's mandate with a transaction for its proprietary account.

2.3.5 FSDH shall not misuse information relating to pending client orders and shall take all reasonable steps to prevent the misuse of such information.

2.4 Direct Market Access (DMA)

Where a client chooses to execute an order using FSDH's DMA, the client will select the parameters of the trade. In such situations, FSDH will treat this as the client having given specific instructions in relation to the execution of his or her order as the order goes immediately into the market. FSDH will therefore be deemed to have satisfied its best execution obligations. All trading activities executed by the client shall comply with all applicable laws and regulations, including but not limited to the NSE's Rules and Regulations.

2.5 Notification

2.5.1 FSDH shall display relevant extracts of the Policy on its website.

2.5.2 FSDH shall notify its clients of the regulatory provisions of this Policy, any changes therein and its effect to their transactions.

2.5.3 FSDH shall promptly inform its clients of any material difficulty relevant to the proper execution of mandates upon becoming aware of the difficulty.

2.6 Audit Trail

2.6.1 FSDH shall ensure that a system for tracking and monitoring orders is established and maintained.

2.6.2 Evidence of audit trail shall be maintained.

2.7 Monitoring

2.7.1 FSDH shall monitor the effectiveness of its order execution arrangements and this Policy on a regular basis to identify and, where appropriate, correct any deficiencies.

3 DEFINITIONS

3.1 Client Mandate/Order:

This is an authorization from a client to FSDH to trade securities in its registered trading account. The client is the beneficial owner of the securities traded.

3.2 Best Execution

“Best execution” refers to the obligation on FSDH, when executing or arranging the execution of a client’s order, to take all reasonable steps to achieve the best possible result in the least possible time for its clients.

3.3 Direct Market Access

An electronic trading facility for investors, who are clients of FSDH and wishes to trade in financial instruments, to interact directly with the order book of the Exchange.

4 POLICY ADMINISTRATION

Contact Person:

Title: Chief Compliance Officer

Department: Compliance

Email: fsdhcompliance@fsdhgroup.com