

BEST EXECUTION POLICY DISCLOSURE

1. INTRODUCTION

The purpose of this document is to detail our Best Execution policy ("BE Policy") when executing trades in respect of our product offerings and fund/portfolio management activities.

2. SCOPE

The BE Policy applies to us, BOS Wealth Management Malaysia Berhad, as per the applicable regulatory requirements and the best practice we adopted. The BE Policy will set the guiding principles for our best execution processes.

3. GOVERNANCE & MANAGEMENT SUPERVISION

We will monitor best execution arrangements on an on-going basis (at least annually) to identify and implement any appropriate enhancements.

We reserve the right to amend this document from time to time as it deems necessary. Any material changes to the BE Policy shall be updated here.

4. APPLICABILITY OF BEST EXECUTION

The BE Policy applies with respect to all fund/mandate order within the scope of "best execution" as per the applicable regulatory requirements.

We have in place a policy and framework which are designed to deliver the best possible execution for our clients, subject to the fund/mandate order and taking into account the nature of the client's transactions, the execution venues available for such financial instruments and the priorities the client places upon us to execute those transactions. While we will take all reasonable steps to achieve best execution, we do not guarantee that it will be able to achieve best execution for every transaction or confirm that every transaction will be executed in full.

5. POLICY REQUIREMENTS

Where applicable, we shall consider the following factors when executing transactions for the mandate(s) and fund(s) that we manage and offer:

- I. Price
- II. Costs
- III. Speed
- IV. Likelihood of execution
- V. Likelihood of settlement
- VI. Size of the order(s)
- VII. Nature of the order(s)
- VIII. Other aspects of the order(s)

Notwithstanding this, there are certain situations in which these factors may change. These may include, but are not limited to, the following:

- Type of transaction(s)
- Type of financial instrument(s)
- Specific request that the client provides
- General prevailing conditions in the market at the time of the transaction

6. SPECIFIC INVESTMENT REQUEST

Where specific requests are given by our client(s) regarding the execution of a transaction or a part of the transaction, we will ensure that we execute the client(s)' request in accordance with their specifications. In this circumstance, we will consider as having satisfied our obligations in best execution with respect to the part of the client(s)' request to which the instruction relates, when those instructions have been carried out as specifically requested.

In circumstances where specific requests are given, these requests may result in a transaction that is less satisfactory than what may have been achieved in the absence of such request.

Where a client provides specific request covering only part of a trade, we will not consider ourselves released from the best execution obligations for the parts of the trade which are not covered by the client's request. In such case, we will be obliged to comply with our BE policy in respect to that part of the transaction not covered by the client's request.

Where specific request given by the client cannot be met, we will inform the client of the reason(s) before executing your requests.

7. INVESTMENT HANDLING

We have further procedures in place to ensure that we execute and allocate transactions promptly and fairly, taking into account the need to manage any potential conflicts of interest that may exist between us and our other clients.

There may be cases where a client's request will be subject to validation checks (such as eligibility checks) before the transaction is deemed valid and accepted for execution¹.

We will execute a client's request in line with other comparable clients' request sequentially and promptly, unless (i) the characteristics of the transaction or prevailing market

¹ Orders for a fund may be subject to a fund specific order cut-off time applicable for each dealing day. Following the validation and acceptance of a fund order, the transaction will be placed for the next available dealing day. The timing of your request and time required to validate the order may mean that the validated order may or may not be placed on the same day as your instructions.

conditions make this impracticable²; or (ii) our clients' interests require otherwise.

Where no specific instruction is provided, we will execute and allocate the transaction as soon as reasonably practicable.

When we execute a client's request, we may decide to aggregate the transactions with a transaction for our fund(s) or mandate(s). Such aggregation will be undertaken, for example, to provide a better price to you or to reduce transaction costs by allowing us to execute in a larger size. We will only aggregate transactions if it is unlikely that the aggregation will work overall to the clients' disadvantage. Where we are unable to fill an aggregated transaction in full, we will allocate the executed notional on a fair and equitable basis.

We will endeavor to communicate the trade execution and allocation status of requests to the client as soon as reasonably practicable.

8. MATTERS OUTSIDE OF THE OUR CONTROL

In some cases, whether as a result of system failures, disrupted markets or otherwise, it may be necessary to execute your request in a different manner as documented for the financial instrument in question. In such circumstances, we will still seek to achieve the best possible result available in the prevailing circumstances.

9. AFFILIATES & THIRD PARTIES

Where we use affiliates and third parties to execute transactions (incidentally for our product & service offerings), any potential conflicts of interest that may arise are managed in accordance with our internal policies, to fulfill our best execution obligation.

For non-discretionary private mandate, our counterparties are limited to our affiliates, particularly for (a) deposit placements; (b) structured investments; (c) foreign bonds; and (d) foreign exchange spot and forward transactions. If prices are sourced using system(s), the best quote is provided to you in accordance with our BE Policy. If a quote from an affiliate is the only available one on the system(s):-

- (i) we will not be able to inform our client of this on a per transaction basis; and
- (ii) we will execute the transaction if he/she agrees to the quote.

For market transactions, we will execute the transaction without prior notification to the client on a per trade basis even if there is only one quote from our affiliate.

² For example, it may not be practical for client requests that are received by different means (e.g. voice versus electronic) to be carried out sequentially.

Notwithstanding this, the practice of best execution will still be applicable, and we may conduct ongoing monitoring over execution outcomes of the selected counterparties.

10. CONTACT DETAILS FOR YOUR QUESTIONS

For queries, please contact your Relationship Manager.