



**BATES WEALTH**

**M A N A G E M E N T**

**BEST EXECUTION POLICY**

## **Policy**

This policy is written to be read by clients or potential clients of Bates Wealth Management Ltd. Reference to clients in this document is stated as “you.”

This policy is applicable when we are receiving and carrying out your instructions and it is our policy to obtain the best possible results for you when carrying out transactions on your behalf. This can also be referred to as executing your orders.

The objective of this document is to inform you about our Best Execution policy.

By receiving this document you have confirmed your consent to it.

It is our policy to transact your orders to achieve the best possible results in terms of the price, nature of the products selected, transaction charges, fees, administration, service and shortest time frame.

## **Factors we consider**

In doing so we consider the various factors outlined below in order of importance

- Price to you
- Reasonable costs and charges to you
- Speed of service
- Execution of your business
- Effective administration of where we place your business
- Size and nature of the transaction
- The nature and procedures of the provider chosen
- Any other factors relevant to the execution of your transaction

We will only override the price and cost factors mentioned above if it may assist in delivering enhanced and better results for your specific current needs and circumstances.

In addition, we will also take into consideration

- Your client categorisation and how this affects you
- The nature and characteristics of the transaction
- Where your transaction can be directed and
- Any specific instructions you give us, whether received on an individual basis or as a general instruction to be applied to all your transactions

## **Where we place your business**

Under our policy we will provide you with written details of where we place your business. This is known as an execution venue and can be, for example, a regulated market such as an investment fund or funds, a platform or wrap, or a product provider.

Where your orders are transferred to another business for completion, we shall select such businesses according to our execution policy with a view to achieving the best possible result for you.

In applying our execution policy we may transact business with appropriate companies from the market that we have access to within the United Kingdom. We monitor these companies on an ongoing basis to ensure they are suitable for our clients.

### **Specific Illustrations**

Where we provide regulated financial advice to you, we will provide you with a client specific illustration which will confirm the recommendation and specific funds to be invested. This illustration will also confirm the charges involved in the transaction.

Should the recommendation be accepted, we will then transact the business as soon as possible, in line with this best execution policy, ensuring that the illustration is up to date.

Should there be any changes, or the illustration become out of date, we will produce a new illustration for you prior to completing the transaction.

### **Specific Instructions from you**

When you give us one or more specific instructions relating to a transaction we shall execute your orders according to your instructions. We will need your instructions confirmed in writing or email should this apply.

In this situation, we can only apply our execution policy with a view to achieving the best possible result in respect of those areas where you have provided us with specific instructions.

### **Warnings**

It should be noted that any specific instructions received from you may contradict our execution policy and may not then necessarily lead to the best possible result for you.

We will need your express prior consent in the event that you want us to place business outside of a regulated market. Your consent may be given to us in writing or by email.

You should be aware that some of our services may not allow us to exercise any discretion over the execution of your transaction. In such situations we may not be able to apply this execution policy to any aspect of your instructions and if this is the case we will inform you of this.

### **Recording of your instructions**

All written and email instructions received will be saved on file in line with our record keeping requirements.

Where there are conversations relating to specific orders received from you, either face to face, telephone or web enabled, these will be documented in written format and saved on file.

You are able to request copies of these written notes and these will be supplied upon your request.

### **Monitoring and Reviewing**

Where we need to update or amend this policy we shall do so immediately. In addition, we will formally review this execution policy once a year to assess its effectiveness in achieving the best possible result for you.