ORDER EXECUTION POLICY (RIIL)

FOR PROFESSIONAL USE ONLY

EMEA COMPLIANCE POLICY – LEVEL 1

Contents

Version control

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VERSION NUMBER	DATE OF CHANGE	SUMMARY OF CHANGE	PERSON RESPONSIBLE
1	September 2023	Changes required to migrate from UCITS Manco to MiFID Investment firm; specifically out of scope instruments; reflect delegation and broker appointments.	Karl Burden
2	October 2024	Annual Review, better reflecting that RIIL does not execute trades, no material changes RIIL Board Approval 04/12/2024	Karl Burden

Scope

In this document we use “we” or “us” to refer to Russell Investments Ireland Limited (“RIIL”) and we refer to clients as “you”.

This document gives you information on our best execution policy in accordance with applicable rules and regulations.

Best Execution

Best execution is the requirement for firms managing investment funds or client portfolios to obtain the best possible result on a consistent basis when executing orders for financial instruments on behalf of clients or passing them to other firms for execution. These rules are derived from EU directives, namely the Markets in Financial Instruments Directive (2014/65/EC) (MiFID II) and its implementing measures.

Best execution requirements apply to all financial instruments in a manner that takes into account the different circumstances associated with the execution of orders related to particular types of financial instruments. The definitions of financial instruments includes transferable securities, ie. shares or bonds, units in collective investment undertakings, as well as most financial derivatives.

The following are not considered financial instruments and are therefore considered out of scope of best execution requirements: A spot contract (meaning a contract for the sale of a commodity, asset or right) under the terms of which delivery is scheduled to be made within two days or less. However, when executing spot contracts, we apply a similar standard of care and auditable trading process as we do with all other trading that is subject to best execution standards.

RIIL is authorised by the Central Bank of Ireland to provide investment services – Reception and transmission or orders; Portfolio Management and investment advice. RIIL is not authorised to execute trades. RIIL has delegated its portfolio management duties to affiliates within the Russell Investments Group, namely Russell Investments Limited and Russell Investments Implementation Services Limited (“the affiliates”). The affiliates may appoint Russell Investments Implementation Services LLC, to perform trade execution services to fulfil such delegated services. The affiliates may also appoint third-party money managers to manage specific portfolios. This policy acts as guidance to the affiliates and their appointed money managers on appropriate terms for the management of trade execution.

RIIL maintains sights of the Order Execution Policy and Order Placement Policy in place at the affiliates.

Execution considerations

Although RIIL does not execute trades directly, it seeks to ensure that any delegate investment manager has a policy in place that will set out the strategy for executing, transmitting or placing orders for execution, taking into consideration certain factors, as appropriate, dependent upon the characteristics of the order and the prevailing market conditions, such as:

- the price available;
- transaction costs (i.e. the fees charged for executing an order on a particular venue and clearing and settlement costs) which are passed on to clients whether directly or indirectly;
- speed of execution on the market;
- likelihood of execution and settlement (e.g. market liquidity for the particular product);
- size and nature of the order;
- market impact of the order; and
- any other consideration relevant to the execution of the order.

In determining the relative importance of these factors, our delegates take into account each client's objectives, the specific financial instruments to which the order relates and the execution venues and/or brokers available for such orders. We expect our delegates to use commercial experience and judgment in all cases.

Trading venues and brokers

Delegated affiliated portfolio managers or their appointed third-party money managers use a range of venues, which will depend on the type of order being executed. Examples of venues used by money managers are:

- Money managers themselves (when they cross two matching opposite orders for two different portfolios managed by the money manager);
- EEA regulated markets and non-EEA stock exchanges to which the money managers have access;
- Multilateral trading facilities (which operate like an investment exchange) to which the money managers have access;
- Systematic internaliser, a market maker, a transfer agent or other liquidity provider (or an entity that performs a similar function in a non-EEA country to the functions performed by any of the foregoing); or
- Third party brokers or vendors/sellers buying/selling off exchange (OTC).

Money managers will likely use a range of brokers to ensure better long-term returns. Money managers will typically analyse the return on the portfolios that they manage and will seek to achieve the best possible results on a consistent basis.

Contracting for best execution with third-party money managers

Where it is executing an order for a client portfolio, a third-party money manager shall be required by Russell Investments' affiliates to take all reasonable steps to obtain the best possible result taking into account the factors set out above. Orders will be executed on venues or placed with other brokers in a manner consistent with this policy. The affiliates have oversight responsibility of these delegated money managers and shall be responsible for ensuring that a money manager has taken the appropriate measures in order to comply with these requirements.

The money manager will determine the execution venue/entity on behalf of the client portfolio based on their execution policy, which must be consistent with this policy. Alternatively, the money manager will satisfy itself that another broker/dealer has arrangements in place to comply with its obligations to Russell Investments and the relevant client portfolio.

Reviewing and amending this policy

We review our policy and procedures annually or because of material changes to execution arrangements affecting execution quality. This policy may be amended because of this review.