



BEST EXECUTION POLICY

CCLA INVESTMENT MANAGEMENT LIMITED

1) **Background**

The EU's Markets in Financial Instruments Directive (MiFID) requires CCLA to put in place an order execution policy for the purpose of achieving the best outcome when executing orders on behalf of clients.

2) **Scope**

CCLA's MiFID Order Execution Policy applies to all transactions in eligible financial instruments for both professional and retail clients. This includes:

- a) The execution of orders on a client's behalf, and
- b) Receiving and transmitting client orders.

"Executing orders on a client's behalf" relates to the orders generated by CCLA in its role as discretionary fund manager.

"Receiving and transmitting orders" relates to the instances where, at the request of a client, CCLA arranges the sale of securities in order that the proceeds may be invested in a COIF or CBF Fund, and the execution of transactions under non – discretionary fund management agreements.

3) **Best Execution**

When executing orders, CCLA will take all reasonable steps to achieve the best outcome. Consideration will be given to factors such as price, overall cost, size of order, speed of execution, likelihood of execution, and any other relevant items. We will use our professional judgement and experience to determine the relative importance of these factors. When receiving and transmitting orders CCLA will usually place orders at "best" with a broker. In other circumstances, e.g. when positions are large or illiquid, or when we are executing "programme" or "portfolio" trades, we will probably employ one of several algorithmic trading methods, such as one that targets Volume Weighted Average Price (VWAP) or a proportion of Average Daily Volume (ADV).

4) **Eligible Financial Instruments**

Eligible financial instruments comprise transferable securities (e.g. equities & bonds), money market instruments (e.g. certificates of deposit), units in regulated collective investment undertakings, options, futures and other financial derivatives. For clarity, eligible securities do not include direct property, unregulated collective investment schemes, cash accounts, money market deposits and foreign exchange transactions.

Explicit client consent will be obtained before investing in non eligible instruments.

5) Execution venues

Execution venues are the centres through which securities transactions are ultimately facilitated. For CCLA, these are the major regulated securities exchanges, Market Makers, the UK Money Market, and the managers of collective investment schemes. CCLA does not undertake transactions in eligible financial securities outside regulated markets. A current list of Execution Venues used by CCLA is given in appendix 1.

6) Method of execution

- a) Where CCLA is “Executing orders on a client’s behalf” it will use one or more of the following methods:
 - i) Direct with a regulated market (e.g. SETS, for UK Equities).
 - ii) Direct with a Market Maker.
 - iii) Via an agency broker.

- b) Where CCLA is “Receiving and transmitting orders” we will usually use an agency broker.

7) Monitoring

CCLA will monitor compliance with its MiFID Order Execution Policy

8) Regular review

CCLA will regularly review its MiFID Order Execution Policy and will notify clients of any changes. CCLA will review execution venues not less than annually including consideration of the robustness of the regulatory environment, effectiveness/speed of execution, and the quality and experience of brokers. CCLA will also review its MiFID Order Execution Policy should any material change occur which may affect the policy’s ability to continue to return the best overall results for clients. CCLA’s MiFID Order Execution Policy and list of execution venues are available to all clients upon request.

9) CCLA’s list of Execution Venues

CCLA’s current list of Execution Venues comprises:

- a) The UK Money Market
- b) Brokers / Market Makers (listed in appendix 1)
- c) Direct with managers of collective investment schemes
- d) Regulated markets (listed in appendix 1)

This above policy does not relate to client orders for the purchasing or redemption of units of unitised funds managed by CCLA, and these orders are executed as described below.

Order execution in respect of CCLA's Collective Investment Schemes:

CBF Funds

CCLA will execute purchases or redemptions on the instructions of the client at the published offer/bid prices at the valuation point on the dealing day. Shares can only be created or liquidated by CBF Funds Trustee Limited on behalf of the Fund.

COIF Funds

CCLA will execute purchases or redemptions on the instructions of the client at the published offer/bid price at the valuation point on the dealing day. Units can only be created or liquidated through the Corporate Trustee, HSBC Bank plc, on behalf of the Fund.

Disclaimer

CCLA's Order Execution policy does not constitute investment or legal advice. Clients are advised to seek specific advice in relation to any matters that may concern them.

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CCLA's current list of Execution Venues

1. Brokers:

Arbuthnot Securities
 Barclays Capital
 JP Morgan Cazenove
 Cenkos
 Charles Stanley
 Citi
 Collins Stewart
 Credit Suisse Securities
 Dresdner Kleinwort Wasserstein Securities
 Evolution Securities Ltd
 Goldman Sachs Securities
 HSBC
 ICAP
 King & Shaxson
 Merrill Lynch International
 Morgan Stanley
 Newedge Group London
 Northern Trust
 Nomura International plc
 Numis Securities
 Oriel Securities
 Panmure Gordon (UK) Ltd
 Royal Bank of Canada Europe Ltd
 Royal Bank of Scotland
 Sanford C Bernstein
 Sterling International Brokers Ltd.
 Tullett Prebon (Europe) Ltd.
 UBS
 Winterflood Securities Limited

2. Eligible Securities Markets:

Pan-European:

Euronext
 OMX Exchanges

Australia:

Australian Stock Exchange

Austria:

Vienna Stock Exchange

Argentina:

Buenos Aires Stock Exchange

Brazil:

Sao Paulo Stock Exchange

Belgium:

Euronext Brussels

Bulgaria:

Bulgarian Stock Exchange

Canada:

Montreal Exchange
 Toronto Stock Exchange
 TSX Venture Exchange

Chile:

Santiago Stock Exchange

China:

Shanghai Stock Exchange
 Shenzhen Stock Exchange

Cyprus:

Cyprus Stock Exchange

Czech Republic:

Prague Stock Exchange

Denmark:

Copenhagen Stock Exchange

Egypt:

Cairo and Alexandra Stock Exchange (CASE)

Estonia:

OMX Tallinn Stock Exchange

Finland:

HEX Helsinki

France:

Euronext Paris

Germany:

Frankfurt Stock Exchange

Greece:

Athens Stock Exchange

Hong Kong:

Hong Kong Stock Exchanges

Hungary:

Budapest Stock Exchange

Iceland:

OMX Stock Exchange

India:

National Stock Exchange of India
 The Bombay Stock Exchange Limited
 Calcutta Stock Exchange Association Limited

Indonesia:

Jakarta Stock Exchange (JSX)

Ireland:

Irish Stock Exchange
 Irish Enterprise Exchange

Israel:

Tel-Aviv Stock Exchange (TASE)

Italy:

Borsa Italiana

Japan:

Tokyo Stock Exchange
 Osaka Stock Exchange
 Osaka Securities Exchange
 Nagoya Stock Exchange
 Sapporo Stock Exchange
 JASDAQ Securities Exchange

Korea:

Korea Exchange Incorporated

Latvia:

Rega Stock Exchange

Lithuania:

Vilnius Stock Exchange

Luxembourg:

Bourse de Luxembourg

Malaysia:

Malaysia Exchange, MYX

México:

Mexican Stock Exchange

Netherlands:

Euronext Amsterdam

New Zealand:

New Zealand Stock Exchange

Norway:

Oslo Bors

Pakistan:

Karachi Stock Exchange
Islamabad Stock Exchange

Philippines:

The Philippine Stock Exchange

Poland:

Warsaw Stock Exchange

Portugal:

Euronext Lisbon

Romania:

Bucharest Stock Exchange

Russia:

Moscow Interbank Currency Exchange
The Russian Trading System

Singapore:

Singapore Exchange

Slovakia:

Bratislava Stock Exchange

Slovenia:

Ljubljana Stock Exchange

South Africa:

JSE Securities Exchange
Bond Exchange of South Africa

Spain:

Madrid Stock Exchange

Sweden:

Stockholm Stock Exchange

Switzerland:

SWX Swiss Exchange

Taiwan:

Taiwan Stock Exchange

Thailand:

The Stock Exchange of Thailand

Turkey:

Istanbul Stock Exchange

UK:

London Stock Exchange
The Alternative Investment Market (AIM)

USA:

USA - Any Exchange registered with the SEC as a National Stock Exchange, NASDAQ, the Over-the-Counter Markets regulated by the National Association of Securities Dealers Inc., and the market in transferable securities issued by or on behalf of the Government of the USA conducted through those persons for the time being recognised and supervised by the Federal Reserve Bank of New York and known as primary dealers. USA - The OTC market in US government securities conducted by primary dealers selected by the Federal Reserve Bank of New York

3. Eligible Derivatives Markets:

American Stock Exchange
Chicago Board of Trade
Chicago Board Options Exchange
Chicago Mercantile Exchange
Eu Eurolist Brussels
Eurex
Eurolist Amsterdam
Eurolist Paris
Eurolist Lisbon
Euronext liffe
Euronext Paris
European Options Exchange
Hong Kong Futures Exchange
IDEM (Italy) Market Association
Irish SE (IFOX)
Korea Exchange Incorporated (KRX)
Kuala Lumpur Options and Financial Futures Exchange
London International Financial Futures and Options Exchange (LIFFE)
MEFF Renta Fija
Mercato Italiano Futures
Montreal Stock Exchange
New York Futures Exchange
New York Mercantile Exchange
New York Stock Exchange
OMX
Osaka Securities Exchange
Oslo Boers
Philadelphia Board of Trade
Philadelphia Stock Exchange
Stockholm OM Futures Market
SWX Exchange
The London Securities and Derivatives Exchange Limited
The South African Futures Exchange (Safex)
The Swiss Electronic Exchange (Elektronische Borse Schweiz (EBS))
Toronto Stock Exchange
TSX Ventures Exchange