

COUNTERPARTY SELECTION AND EVALUATION POLICY

Updated 23 April 2015

Selection. In accordance with applicable regulations¹, and with a view to serving its clients' best interests, Anaxis Asset Management uses various criteria to carefully select the brokers and counterparties responsible for executing the orders placed by the company. Before an intermediary is included on the list of approved brokers, Anaxis AM collects and reviews information to gain satisfactory knowledge of the intermediary in question.

Evaluation. The composition and relevance of the list of approved brokers are reviewed each year, and also whenever called for as a result of a specific event or specific information. Each broker is given an overall score ranging from 1 (very good) to 4 (inadequate) based on five weighted qualitative and quantitative criteria, such as relevance of quotes provided, costs and execution quality. Where a criterion is not relevant, its weight is proportionately reallocated to the other criteria.

In exceptional circumstances and in the best interests of its managed funds, Anaxis AM reserves the right to temporarily use an intermediary meeting specific criteria that is not on the approved list.

¹ Due to the nature of its activities, Anaxis AM is not subject to best execution obligations.