



Aggregation and Allocation Guideline 2023

GIB Asset Management (“GIB AM”) GIB Asset Management, trading name of Gulf International Bank (UK) Limited (“GIB”). GIB is authorised by the Prudential Regulation Authority (“PRA”) and regulated by the Financial Conduct Authority (“FRN 124772”)

Overview

This guideline applies to all financial instruments that GIB AM executes as an Investment Manager for client portfolios and funds.

The aggregation and allocation of orders must be effected in a manner which is fair and equitable to all.

Aggregation

GIB AM does not trade on its own account but acts as the discretionary investment manager for client portfolios and funds.

When carrying out its discretionary investment management activities, GIB AM may make single investment decisions on behalf of multiple clients.

Allocations are predetermined by the portfolio manager responsible for the individual portfolio in accordance with the relevant client agreement. These are reflected in GIB AM’s Portfolio Management system Simcorp Dimension as orders and routed to the Dealing desk for execution.

The Dealing desk will receive the orders into their OMS inbox where any suitable orders (same stock/bond and direction) for aggregation are highlighted by the system and will be aggregated by the Dealer. They will then be executed as an aggregated block order.

Where orders are aggregated with other client portfolio orders, these orders will be allocated in a fair and reasonable basis. Aggregation of orders is common practice and should provide GIB AM opportunity to return a consistent and fair execution.

In limited circumstances where by certain markets don’t allow aggregation due to them requiring the underlying ID to be disclosed, there may be a difference in orders achieving the same price.

Post-trade Allocation

Executed aggregated orders will be then be allocated in accordance with the original planned pre-allocation.

If the aggregated orders can be executed only partially, i.e. where, due to market conditions, the whole of the transaction cannot be satisfied and hence only provides the client with a part of the transaction, GIB AM allocates on a pro rata basis. This means that a client will receive its proportion of the partially executed order taking into account the best possible final result and the equal treatment of all client portfolios.

The subsequent related orders required to complete the original aggregated order must be allocated on the same basis as the original order.

GIB AM may deviate from the pro rata allocation if it justifiably believes that the expected benefits of the executed aggregated order cannot be realised by receiving a pro rata allocation.

In such circumstances, the relevant portfolio manager will be required to seek prior written approval from the Head of Fixed Income or Head of Equities by submitting a detailed explanation of the rationale for the deviation.

Where liquidity is low and there is a possibility that uncompleted orders may constitute a guideline breach to a client portfolio/fund, discretion may be given to the Head of Equity/Fixed Income to prioritise some or all of the order to try and minimise impact

Given the currently simplicity and size of GIB's structure, in the event that more fixed income portfolios are on boarded, these guidelines may need to be adjusted with reference to joint participation and allocating primary market issuance. Minimum tradeable amounts can sometimes cause smaller funds/portfolios when aggregated with larger ones to unintentionally miss out on allocations. This will require monitoring and discretion from the Trading Desk, Head of Fixed Income and Compliance.

Record Keeping

GIB AM shall use its order management system to maintain a record of allocations by client portfolio. Compliance monitor the pro rata allocations of trades comparing pre and post trade amounts.

Communication to Clients

This guideline may be updated from time to time, shall be available to GIB AM's clients via its website at <https://gibam.com/about/governance> . GIB AM will inform clients of any material changes to the guideline and upon request, GIB AM will provide further explanation about it to clients.

Reviewing this Guideline

The guideline is formally reviewed on an annual basis. Modifications to this guideline could occur as a direct result of the review or as a consequence of a material change in GIB AM's Best Execution Policy, aggregation and allocation arrangements or regulatory obligations..