

Order Execution Policy

Morant Wright Management Limited ("the Firm" or "MWML") manages portfolios of investments on a discretionary basis for two UK domiciled UCITS (the LF Morant Wright Japan Fund and the LF Morant Wright Nippon Yield Fund), two Irish domiciled UCITS (the Morant Wright Sakura Fund and the Morant Wright Fuji Yield Fund) and one Irish domiciled Alternative Investment Fund (the MW Japan Fund) as well as a number of segregated institutional client portfolios (together, "clients").

MWML is authorised and regulated by the Financial Conduct Authority ("FCA") This document sets out MWML's order execution policy, as required by Chapter 11 of the FCA's Conduct of Business Sourcebook

1. Best execution obligations

Order execution

1.1 As an investment manager, MWML makes, and then gives effect to, portfolio management decisions to deal in financial instruments on behalf clients for whom it acts as investment manager. There are two methods of giving effect to those decisions that are distinguished for the purposes of the FCA Rules:

1.1.i MWML can place an order with a third party (e.g. a stockbroker or investment bank) for that third party to execute on behalf of the relevant client. Such third parties are referred to in this Disclosure Statement as "Brokers".

1.1.ii MWML can execute the relevant transaction on behalf of the relevant client directly with a counterparty or on an exchange or other trading system. The counterparty, exchange or trading system with whom the Investment Manager chooses to execute such a transaction is referred to in this summary as an "Execution Venue".

1.2 As an investment manager, MWML is required either: (i) when directly executing orders with or on an Execution Venue on behalf of the relevant client or (ii) when placing orders with Brokers for execution by that Broker on behalf of the relevant client, both:

(i) to act in accordance with the best interests of the client; and

(ii) to take all reasonable steps to obtain the best possible result by reference to the "Execution Factors" (see below) for the client.

Currently, MWML only executes orders through Brokers and does not execute transactions on behalf of its clients directly with a counterparty or on an exchange or other trading system (known as "direct execution"). MWML is not responsible for controlling or influencing the arrangements made by the broker relating to the execution of that order (i.e. MWML does not control the broker's choice of execution venues, such as exchanges, multilateral trading facilities or internal dealing facilities). MWML is not required to duplicate the efforts of the broker to whom an order is passed in ensuring the best possible result.

1.3 MWML shall, on request from a client, demonstrate that it has executed orders on behalf of that client in accordance with the Best Execution Obligation.

2. Execution factors and criteria

2.1 In order to comply with the above obligations, MWML must take all sufficient steps to obtain the best possible result for its clients, taking into account the "execution factors" specified by COBS 11. The specified execution factors are:

- price;
- costs;
- speed;
- likelihood of execution and settlement;
- size;
- nature; or
- any other consideration relevant to execution of the order.

MWML places orders for execution overnight in Tokyo and therefore never deals in a live market. Most orders are placed for guaranteed volume weighted average price ("vwap") and the size of trade is commonly limited to one third of daily volume. MWML's analysis has shown that in terms of price received this is of overall advantage to the client. Orders may take several days to execute. Of the above list, MWML therefore prioritises price (best execution) and costs.

2.2 The execution factors applicable to all brokers in order of importance are the price which is likely to be obtained, willingness to guarantee vwap, cost of commission and other charges (if any) and likelihood of execution and efficiency of settlement.

3. Overview of MWML's order execution policy and procedures

3.1 MWML seeks to ensure compliance with the Best Execution obligation as required by FCA rules on all trades the Firm executes on clients' behalf. MWML also seeks to ensure that the client receives value for money on the dealing commission spent on their behalf. MWML has implemented this policy to enable the Firm to comply with the obligation to take all sufficient steps to obtain the best possible result for its clients.

3.2 Only fund managers may place orders with brokers for execution and they must ensure that they act in accordance with the requirements and guidance set out in this policy.

4. Dealing methodology

4.1 MWML deals on behalf of clients only in listed Japanese equities. MWML does not use derivatives in the management of clients' accounts. (Forward foreign exchange contracts are used to hedge the currency exposure of some share classes of the Sakura, Fuji Yield and MW Japan Funds. This is carried out by Bank of New York Mellon under the authority of the directors of each fund and the scrutiny of the Morant Wright Compliance Officer.)

4.2 All orders to buy and sell such securities are placed by the Firm on a discretionary basis. Orders are placed with one of the Brokers on the Firm's approved list chosen according to the criteria set out above. It is MWML's expectation that orders are executed on the exchange which provides the greatest pool of liquidity and hence the most efficient price formation in the security concerned. Normally, this will be the Tokyo Stock Exchange. Choice of Execution Venue is the responsibility of the Broker to whom the order is given, subject to the requirement to provide Best Execution at all times.

4.3 All orders are placed on an agency basis. Where the broker is not able to offer guaranteed vwap on a particular trade, orders are placed either with a specific price limit or for execution at the Broker's careful discretion. In all cases, the terms of the order are that the Broker must provide Best Execution. It is extremely rare for MWML to participate in IPO's, secondary offerings or block trades, although the Firm will do so where it considers that it is in its client's interests.

4.4 Client orders may be aggregated with those of other clients for execution where the Firm reasonably believes that this is in the overall best interests of clients. Intended allocation of all orders is recorded in advance. Where there is only partial execution of orders, allocation is on a pro rata basis, rounded where necessary to take account of the trading lot size of the security in question.

4.5 Quality of execution of trades is assessed on the day following execution by a fund manager and regularly by the Compliance Officer by checking that vwap has been achieved or by comparing the price achieved against the daily vwap for the security where the order was not one to which guaranteed vwap applied. If the Compliance Officer concludes that there was significant variation from the vwap, he will require that an explanation is obtained from the executing broker on why best execution appeared not to have been achieved (eg because of limited liquidity or volatile market conditions.) The explanation will be recorded on the dealing file.

4.6 It is the Firm's policy never to cross stock between accounts purely by internal transfer. Crosses are always put through a broker at market price at a reduced rate of commission. Cross trades may only be conducted with the approval of the firm's compliance office who must be sent a brief note by the appropriate fund manager detailing the rationale for the trade. The rationale must be retained on the dealing file.

5. Commission

5.1 A standard rate of commission of 0.08% is paid across all brokers on all accounts. Occasionally, this may be reduced, for example for block trades.

5.2 The total amount of commission paid inevitably varies due to client inflows/outflows and bull and bear market conditions. The total amount of commission paid to brokers is kept under regular review.

5.3 Commission is paid purely for execution. Morant Wright pays for all third party research and corporate access out of its own resources.

6. Specific instructions from clients as to how to execute an order

6.1 MWML manages all accounts on an entirely discretionary basis and does not accept specific instructions from a client when placing an order with, or transmitting an order to, another entity for execution, as to how to execute an order.

7. Review of the policy

7.1 MWML will review this policy, and its order execution arrangements, at least twice annually and whenever a material change occurs that affects the firm's ability to continue to obtain the best possible result for its clients on a consistent basis.

8. Provision of information to clients and obtaining client consent

8.1 MWML will provide appropriate information to its clients on this policy and will make it available on its web-site. MWML will also monitor, on a regular basis, the effectiveness of the policy and, in particular, the execution quality of the brokers identified in that policy and, where appropriate, correct any deficiencies.

8.2 To the extent that MWML makes any material changes to this policy (whether pursuant to the review process or otherwise), it is obliged to notify the changes to its clients. The Compliance Officer will ensure that such notifications are made.

ANNEX

The Brokers currently on MWML's approved list for execution are

Daiwa Securities

Mizuho Securities

Tachibana Securities

MUFG Securities

SMBC Nikko Securities

Brokers are assessed at the Firm's 6 monthly Execution Review Meeting and a target percentage of total commission is allocated to each, based on their willingness to guarantee vwap, their competitiveness in bidding for bought deals and quality of service. Financial soundness and certainty of settlement are assessed on a continuing basis and are baseline requirements. As a prerequisite, MWML will only place orders with brokers of sound reputation, financial strength and stability.

Morant Wright Management Limited

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