

The Rules for Work Organization and Assurance of Compliance Function
Annex no. 11

**INVESTMENT DECISIONS EXECUTION
POLICY**

I. General part

This Investment Decisions Execution Policy (hereinafter – the **Policy**) regulates investment decisions execution, while managing portfolios of financial instruments for discretionary asset management clients and mutual funds. The policy determines the places of orders execution, brokers and causes leading to the selection of places and brokers.

Dovre Forvaltning, UAB (hereinafter – the **Company**) goal is to ensure that orders are executed on the best terms for the client / mutual fund.

If the client specifically tells the Company how the investment decision shall be executed, it shall be executed in accordance with the client's instructions. Such specific instruction may mean that the Company, when executing the client's instruction, may not comply with this Policy in whole or in part. If the Company executes the investment decision is in compliance with the relevant instructions of the client, it shall be deemed to have made every effort to execute the investment decision in the best possible manner.

When submitting orders these factors are taken into account:

- Market price of the financial instrument;
- Peculiarities of the financial instrument;
- Trading hours of the place of execution of investment decisions;
- Speed of order execution;
- Market liquidity;
- The likelihood of execution and payment of the order;
- Size of the order;
- The costs of implementing the transaction;
- Order type;
- Restrictions given by the client in advance;
- Disclosure of the order in the market;
- Quality of broker's recommendations;
- Other factors that affect the efficient execution of an order.

These circumstances are not listed in the order of importance, because the importance of each parameter can vary according to the specificities of financial instruments. To ensure the best execution of an order overall impact of these factors is considered.

For discretionary asset management clients the relative importance of the above mentioned parameters is assessed on the basis of the following criteria:

- Client's characteristics, including category of the client to which the client is assigned (professional or retail);
- Investment decision's characteristics;
- The characteristics of the financial instrument that is the subject of the investment decision;
- The characteristics of the execution venues where the investment decision can be executed.

In managing a portfolio of retail clients' financial instruments, the best possible result is determined by the total settlement amount, which includes the price of the financial instrument and the costs of implementing the investment decision. The costs of implementing the investment decision include all customer's costs directly related to the execution of the investment decision, including enforcement costs, clearing and settlement fees, and all other related fees payable to third parties involved in the execution of the investment decision.

For mutual funds the relative importance of the above mentioned parameters is assessed on the basis of the following criteria:

- Mutual fund's objectives, investment policy and risks as it is referred in the mutual fund's establishment documents;
- Investment decision's characteristics;
- The characteristics of financial instrument's regarding which the decision was taken and is executed;
- Orders execution places whereas the investment decision may be executed characteristics.

II. Classes of financial instrument

Classes of financial instruments, into which the asset of mutual fund's/financial instruments' portfolio can be invested:

- Transferable securities;
- Money market instruments;
- Collective investment undertakings units and shares;
- Derivative financial instruments.

The Company may forward the investment decisions for the following classes of financial instruments to any broker mentioned in the relevant fund's prospectus. A specific broker is selected in accordance with chapter III provisions.

In the case of portfolio management of financial instruments, investment decisions shall be delegated to an intermediary listed in the list of intermediaries set out in Annex I to this Policy.

Investment fund's assets may also be invested in deposits. Contract for the deposit may be signed with the fund's custodian or with the selected bank and fund's custodian.

III. Brokers

When choosing order execution mediators (brokers) the Company assesses:

- The transparency of the broker's activity;

- The quality of broker's recommendations;
- Ability of the broker to execute the order;
- Timeliness of order execution;
- The cost level;
- Other relevant factors.

The main mediators of the Company's orders shall be:

- Banks;
- Brokerage firms;
- Other intermediary that satisfy the requirements.

The number of the Company's mediators should be sufficient to ensure the order execution in the best terms for the client / mutual fund.

The Intermediaries selected by the Company execute investment decisions in accordance with its own rules and Order Execution Policy and therefore the Company cannot control the investment decision execution process or guarantee execution in accordance with the terms, conditions and principles of this Policy. However, the Company is guided by the terms, conditions and principles of this Policy when transmitting investment decisions to intermediaries and deciding which intermediary will provide the client / investment fund with the best performance for the investment decision.

Intermediaries selected by the Company and the transmission of investment decisions to such intermediaries shall be evaluated on a regular basis at least annually in order to determine the ability of the relevant Intermediary to ensure the best execution result for the Company's clients / investment funds. Such assessment shall take into account, inter alia, the parameters set out in paragraph 1 of this Policy and the following factors:

- Trading venues where the intermediary executes orders;
- Whether the intermediary knows and understands the needs and priorities of the Company's clients / investment funds;
- Whether the Company knows and trusts the intermediary;
- What is the intermediary's execution policy and how clients are informed of any changes of it.

IV. Places of the order executions

The Company chooses the places for order execution regarding to:

- Liquidity and accessibility to the Company and other market participants;
- The transparency of price formation;
- The likelihood to execute the investment decision;
- Timeliness of order execution;
- The cost level;
- The restrictions of order size;
- Other relevant factors.

The main places for the Company's orders shall be:

- Regulated markets;
- Electronic multilateral trading systems managed by brokerage companies;
- Brokerage firms that are carrying out a systematic trading;
- Other eligible places.

The Company selects one or more order execution places for each financial instrument class, indicated in the part 2 of this Policy. In most cases investment decisions are executed through intermediary (including electronic access provided by the intermediary) in regulated market and (or) multilateral trading facility where participant is intermediary and where the financial instrument is registered and traded. Because investment decisions are usually executed through an intermediary (including electronic access provided by the intermediary), who executes investment decisions in accordance with its own rules and Order Execution Policy, the Company does not establish a specific list of investment execution venues in this Policy.

V. Order submission

An order can be submitted:

1. Online through an electronic platform (provided by the broker);
2. By telephone;
3. By e-mail;
4. By fax;
5. Alternatively, in agreement with the venue or intermediary of the investment decision.

The specific method of an order submission is arranged with investment decision's execution place or the broker. All orders are recorded and stored in the investment decisions registration journal. The portfolio manager is responsible for ensuring that investment decisions are filed in a separate document as part of the Investment decision making policy prior to their registration in the investment decision registration journal.

VI. Investment decisions management

Similar investment decisions are made on a time-priority basis (sequentially, one by one) unless this is impracticable due to the nature of the investment decision and / or prevailing market conditions, or when it is contrary to the client's interests.

Unless otherwise provided when adopting investment decision, the investment decision shall be executed immediately after its adoption.

The Company shall inform retail investors of any material impediment to the execution of the investment decision as soon as the Company becomes aware of such information.

VII. Joint orders

In order to ensure equal treatment of clients and mutual funds, when the portfolio manager makes an investment decision on a particular financial instrument purchase / sale for clients / mutual funds of the same category he issues a joint order. In cases where there is a decision to include a certain investment instrument into a different category portfolio, orders for these portfolios are included in a joint order.

Joint order is given only when there is no reason to believe that joining the investment decisions will negatively affect any of the fund's or other client's (on who's expenses these decisions will be made) interests. Although a joint order is only made where there is no reason to believe that joining of investment decisions will adversely affect the interests of any of the investment funds or other clients at whose expense the investment decisions are intended to be joined, it cannot be guaranteed that will not be disadvantageous to the investment fund or any other client.

In case of failing to buy / sell the requested amount of financial instruments as the consequent allocation of the transaction in proportion to all clients and / or mutual funds, the certain clients / mutual funds would suffer unreasonably high transaction costs, the joint order is executed in the following ways:

1. A financial instrument is bought / sold only for small investors*;
2. A financial instrument is bought / sold only for big investors**.

Concrete method is chosen by the Manager.

* Small investors - a client or a mutual fund whose portfolio is of a small size, and therefore, the allocation of partly received financial instruments on a pro rata basis would have unreasonably high costs.

**Big investor – a client or a mutual fund whose portfolio size is large enough that the allocation of partly received financial instruments on a pro rata basis would not have unreasonably high costs.

The Company does not combine investment decisions taken on the behalf of investment funds' or clients' with the investment decisions taken on the behalf of the Company.

VIII. Investment decisions accounting and distribution

Measures and procedures to ensure that the mutual fund's investment decisions are promptly and accurately recorded and distributed:

- Accounting is being done according to the Net asset value calculation methodology (checking the balance, etc.);
- Distribution is ensured by specifying the mutual fund's account in the order. In case of a joint order, the distribution is done according to preliminary calculations, if the full amount is not received - on a pro rata basis.

Financial instruments and cash received after the settlement of an executed investment decision are promptly and correctly accounted in the corresponding client or investment fund's account, if applicable, the sub-fund's or class of units and (or) series account.

The Company has no right to misuse information relating to pending investment decisions, and must take all necessary steps, that none of the related persons could abuse this information.

IX. Final provisions

The Company constantly monitors the effectiveness of this Policy. If there are some weaknesses found, the Company takes actions that are necessary to correct them.

This Policy and list of intermediaries and arrangements for the execution of investment decisions shall be reviewed at least once a year and every time a material change that could affect the Company's ability to achieve the best result for the investment fund / clients. Material changes are cases where the Company can no longer guarantee the best result for the client / investment fund and / or the list of trading venues and / or intermediaries listed in the annexes to this Policy needs to be amended.

The Company must act in such a way that at any time it could prove that the investment decision has been transferred to another entity to carry out in accordance with the Policy.

Appendix No. 1 of Investment decision execution policy

LIST OF FINANCIAL INTERMEDIARIES

Intermediaries	Financial instrument class
Name – Arctic Securities ASA Legal entity code – 991125175 Address - Haakon VII's gate 5, 0161 Oslo, Norway Type of company – a joint-stock company	Transferable securities
Name – Carnegie ASA Legal entity code – 936310974 Address - Stranden 1, 0250 Oslo, Norway Type of company – a joint-stock company	Transferable securities
Name – Netfonds Bank ASA Legal entity code – 976546180 Address - Stenersgata 2, 0184 Oslo, Norway Type of company – a joint-stock company	Transferable securities
Name – ABG Sundal Collier Legal entity code – 883603362 Address - Munkedamsveien 45 E, 0250 Oslo, Norway Type of company – a joint-stock company	Transferable securities
Name – Pareto Securities AS Legal entity code – 956632374 Address - Olav Kyrres gate 22, 5014 Bergen, Norway Type of company – a joint-stock company	Transferable securities
Name – DNB Bank ASA Legal entity code – 981276957 Address - Stranden 21, Aker Brygge, Oslo, Norway Type of company – a joint-stock company	Transferable securities
Name – Fokus Bank (filial av Danske Bank) Legal entity code – 977074010 Address - Søndre gate 13-15, 7466 Trondheim, Norway Type of company – a joint-stock company	Transferable securities
Name – Norne Securities Legal entity code – 992881828 Address – Fortunen 1, 5013 Bergen, Norway Type of company – a joint-stock company	Transferable securities
Name – Nordea Bank Norge Legal entity code – 911044110 Address – Middelthuns gate 17, 0107 Oslo, Norway Type of company – a joint-stock company	Transferable securities
Name – SEB Enskilda	Transferable securities

Legal entity code - 938318999 Address - Filipstad Brygge 1, 0123 Oslo, Norway Type of company - a joint-stock company	
Name - SpareBank 1 Markets Legal entity code - 992999101 Address - Olav V's gt. 5, 0161 Oslo, Norway Type of company - a joint-stock company	Transferable securities
Name - Neonet Securities AB Legal entity code - 556530-4804 Address - Kungsgatan 33, P.O. Box 7545, SE-103 93, Stockholm, Sweden Type of company - a joint-stock company	Transferable securities
Name - Fearnley Fonds ASA Legal entity code - 945757647 Address - P.O. Box 1158 Sentrum 0107 Oslo, Norway Type of company - a joint-stock company	Transferable securities
Name - Fondsinans ASA Legal entity code - 911752271 Address - P.O. Box 1782 Vika 0122 Oslo, Norway Type of company - a joint-stock company	Transferable securities
Name - RS Platou Markets AS Legal entity code - 942274238 Address - P.O. Box 1474 Vika 0116 Oslo, Norway Type of company - a joint-stock company	Transferable securities
Name - Swedbank First Securities ASA Legal entity code - 880 824 872 Address - Postboks 1441 Vika, 0115 Oslo, Norway Type of company - a joint-stock company	Transferable securities
Name - Nordnet Bank AB Legal entity code - 982 503 868 Address - Akersgata 45, 0158 Oslo, Norway Type of company - a joint-stock company	Transferable securities