

**ITEM 3**

**Ashmore Investment Management Limited and  
Ashmore Investment Advisors Limited**

**Order Execution Policy**

**June 2025**

## About this Document

### Purpose

The purpose of this policy (the “Policy”) is to set out the responsibilities of Ashmore and all employees in observing our commitment to meeting the requirements of Order Execution.

### Overview

The Markets in Financial Instruments Directive II (“MiFID II”) requires firms to establish and implement an Order Execution Policy to take all sufficient steps to obtain the best possible results on behalf of their clients when executing client’s orders. This policy outlines the obligations for Ashmore Investment Management Limited (“AIML”) and Ashmore Investment Advisors Limited (“AIAL”) (collectively “Ashmore”) in observing and upholding our obligation to seek best execution under MiFID II and as a Fiduciary as Registered Investment Advisers under the Securities and Exchange Commission (SEC).

### Audience

This policy is specifically applicable to all employees directing, receiving and/or executing orders on behalf of Ashmore.

### Accountability

The Group Head of Trading has primary responsibility for the oversight of best execution and is the owner of this policy. This policy is reviewed on an annual basis with any significant material changes agreed and approved by the members of the Best Execution Committee.

### Contact

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## Information on Order Execution Policy

### A: Overview

#### 1.1 Best execution obligation and purpose

This policy applies to the execution of orders in Financial Instruments as defined by MiFID II resulting from investment decisions by Ashmore Investment Management Limited (AIML) and Ashmore Investment Advisors Limited (AIAL) (collectively “Ashmore”). Ashmore is required to take all sufficient steps to obtain the best possible result when placing orders on behalf of its clients with other entities for execution or executing such orders on behalf of its clients. This obligation is applied in the context of applicable markets, seeking to balance the different factors affecting execution with a view to providing its clients with the best possible result on a consistent basis.

This overarching obligation to seek the best possible result for clients is referred to in this document as the obligation of “Best Execution”.

This document

1. sets out information on Ashmore’s Order Execution Policy and approach to providing “best execution” as required under MiFID and the AIFMD, as well as a being a Fiduciary as Investment Adviser(s) registered with the SEC.
2. applies to Professional Clients; and
3. covers dealing in investments performed by AIML and AIAL<sup>1</sup>

As part of its compliance with the FCA’s Rules on best execution, Ashmore is required to

- (a) maintain an order execution policy.
- (b) provide appropriate information to its clients on its order execution policy;  
and
- (c) obtain their prior consent to the policy.

The purpose of this document is to provide you with appropriate information on Ashmore’s order execution policy and obtain your consent to it.

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<sup>1</sup> Other Ashmore Group Companies will operate their own order execution policies

## 1.2 Scope

Ashmore will be executing orders on a client's behalf, where the Client legitimately relies on Ashmore to protect its interests in relation to the pricing, execution quality and/ or other aspects of the transactions that may be affected by how Ashmore executes the orders. Examples are when Ashmore:

- executes an order by dealing as agent; or
- "works" an order on a client's behalf.

Ashmore will apply its order execution policy only in relation to orders in Financial Instruments, taking into account of the different circumstances associated with the execution of orders as set out below.

## 1.3 Relevant factors affecting execution

Subject to any specific instruction given by a client when executing an order on a client's behalf, Ashmore will take all sufficient steps to obtain the best possible result for its client taking account of various execution factors, which include:

- Price;
- Costs;
- Speed;
- Likelihood of execution and settlement;
- Size and nature of the order;
- Market impact, or any other consideration relevant to the execution of the order; and
- Any other factor(s) relevant to the efficient execution of the order.

Ordinarily, price will merit a high relative importance in obtaining the best possible result. Depending on the circumstances Ashmore may appropriately determine that other execution factors are more important than solely price in obtaining the best possible execution result.

Ashmore will determine the relative importance of the execution factors by using its commercial judgement and experience considering market information available and considering the following Execution Criteria:

- the Client;
- the order;
- the Financial Instruments that are the subject of the order; and
- the Execution Venue to which that order can be directed.

## 1.4 Execution Venues

Information on Execution Venues used by Ashmore in respect of each class of Financial Instruments can be found in Appendix.

This list of Execution Venues comprises those counterparties on which Ashmore places significant reliance, but it is not exhaustive. Ashmore reserves the right to use other Execution Venues where it deems it appropriate in accordance with its order execution policy and may add or remove Execution Venues from this list as deemed appropriate.

Ashmore will regularly assess the Execution Venues available in respect of Financial Instruments that it trades to identify those that will enable it, on a consistent basis, to obtain the best possible result for its clients. The list of Execution Venues will be updated, where necessary, following an assessment.

The factors used by Ashmore to select an Execution Venue and execution strategies include:

- Access to liquidity
- Pricing and any relevant costs
- Size of transaction
- Execution experience and expertise
- Access to bespoke markets
- Track record when trading for Ashmore

The processes used by Ashmore to monitor Execution Venues and execution strategies includes:

- Ongoing evaluation by Ashmore investment professionals
- Internal compliance monitoring
- Best Execution Committee oversight

## 1.5 Types of transactions where best execution has limited scope

In some cases, best execution technically applies but has limited scope; because of the nature of the order, the obligation is in effect satisfied. These include;

- single venue transactions – where the nature of the transaction results in their being one venue and therefore the key consideration is timing of the execution. In these circumstances the use of comparable prices can be precluded.
- highly structured, off-exchange transactions – where it is not possible to provide comparisons with other transactions or instruments. Different considerations apply where the transaction involves, for example, a customised OTC financial instrument tailored to individual circumstances. MiFID acknowledges that, whilst best execution still applies, there is little or nothing to compare the transaction against.

## 1.6 Specific Client Instructions

Where a client provides Ashmore with a specific instruction as to the execution of an order, Ashmore will execute the order in accordance with those specific instructions.

Where a client's instructions relate to only part of the order, Ashmore will continue to apply its order execution policy to those aspects of the order not covered by such specific instructions.

Clients should be aware that providing specific instructions to Ashmore in relation to the execution of a particular order may prevent it from taking the ordinary steps as set out in the order execution policy and therefore limit the ability for Ashmore to obtain the best possible result in respect of the elements covered by those instructions.

## 1.7 Executing Orders Outside of a Trading Venue

For Financial Instruments that can be traded on a regulated market, a Multilateral Trading Facility ("MTF"), or on an Organised Trading Facility ("OTF"), a client should note that in order to obtain best execution, Ashmore may execute orders on a client's behalf outside of a regulated market, an MTF or an OTF.

## 1.8 Monitoring, record keeping, review and notifications to Clients

### 1.8.1 Monitoring

Ashmore has implemented a governance framework through which it monitors the effectiveness of its order execution arrangements (including this policy) to identify and, where appropriate, correct deficiencies. Traders act as the first line of defence by actively monitoring and implementing the best execution strategy. Any trade executions that fall outside established tolerance thresholds are identified and investigated by the trading desk. As the second line of control, the Compliance function reviews these exceptions to ensure that adequate justification has been provided regarding the execution factors, thereby evidencing the delivery of best execution.

The Best Execution Committee meets at least twice a year and provides a focus for the determination of best execution related matters. This policy, as set out, has been approved by the AIML and AIAL Boards of Directors and is reviewed periodically to ensure it remains relevant.

The Best Execution Committee will review best execution monitoring performance during the previous period and key market initiatives including industry and regulatory developments.

Ashmore will periodically assess whether its chosen execution venues are providing the best possible results and make changes to our execution arrangements whenever necessary.

### 1.8.2 Record Keeping

Ashmore will retain records of its trading activities for a minimum of five years and in accordance with FCA Rules and in-line with the recordkeeping requirements under SEC Rule 204-2.

### 1.8.3 Review and notifications to Clients

This Order Execution Policy will be reviewed at least annually and updated as necessary. If a material change occurs that affects Ashmore's ability to continue to obtain the best possible results for clients, clients will be notified by Ashmore, including by, but not limited to, Ashmore disseminating an updated version of this policy.

## 1.9 Conflicts of interest

Ashmore is an independent fund manager with no affiliates through which it undertakes security transactions.

Trades are subject to regulatory rules (but in many cases not limited to the FCA Rules) regarding best execution and fair treatment of clients in the prioritisation and allocation of orders. Ashmore operates an Aggregation and Allocation Policy, which governs situations where orders for more than one Client are being placed including where partial executions are required.

### 1.10 Delegation of investment management

In certain circumstances, Ashmore, where permitted under a relevant investment management agreement, may delegate all or part of the discretionary management of a client portfolio (including delegation to Ashmore's affiliates) but the principles of best execution may apply to such delegate as permitted by local law and regulation. In addition, in such circumstances, Ashmore will require and seek to ensure that the service provided to its Client is performed in accordance with the best interests of the Client and Ashmore shall take all sufficient steps to ensure that its selection of the delegate and the overall management of the portfolio meet this requirement on an ongoing basis. Further, Ashmore shall ensure that any such delegation shall be governed by the terms of an appropriate service provider agreement between Ashmore and the firm concerned.

### 1.11 Consent

A client must consent to this Order Execution Policy and to Ashmore executing orders for you outside of a Trading Venue.



## **B. Instruments / asset specific**

### **1.1 Overview**

Ashmore manages client funds across a broad range of instruments and asset types. Section B of the policy supplements section A, and whilst not covering all asset types / scenarios, seeks to provide information on order execution in several different asset classes.

Subject to any specific instructions that may be given by a Client, Ashmore will execute an order by one of the following methods or combination of methods:

- where it has obtained a client's prior express consent, outside a Regulated Market or Multilateral Trading Facility (MTF) by executing the order; or
- in respect of a Regulated Market or MTF, with a third-party participant with whom it has entered into an agreement for handling orders for that Regulated Market or MTF.

### **1.2 Trading Strategy to achieve best possible outcome**

When seeking to obtain the best possible client results, Ashmore will consider a range of factors relevant to where and how to execute. The key factors of consideration typically being consistent liquidity, pricing and execution quality. Other factors taken into consideration are competitiveness of spreads, promptness of execution and history in effectively executing orders.

Transactions are usually executed on MTF's with approved counterparties. In most cases competitive quotes are sought from different counterparties or venues.

However, for certain transactions, including larger transactions and/or those in less liquid markets, a single counterparty may be approached based on that counterparty's suitability for the transaction. This is especially true in cases where Ashmore believes that approaching multiple counterparties may be detrimental to its clients' interests.

Ashmore has full discretion in determining the most appropriate venue and trading strategy on an order-by-order basis, subject to mandate restrictions and specific Client instructions.

Trading strategies may include individual execution of a single order; pooled orders of the same bond; aggregated orders of different bonds; crossing via a broker<sup>2</sup>; and contingent orders:

- Single Order – each order is traded separately;

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<sup>2</sup> It should be noted that "Cross Trades" are not permitted in certain jurisdictions or in certain Ashmore managed investment vehicles.

- Pooled orders – orders for more than one client in the same bond are aggregated together and dealt as one trade. A better price can sometimes be negotiated due to economies of scale;
- Aggregated orders – two or more orders in similar products are grouped together and dealt as one package. In certain situations, grouped orders will receive a better overall price than orders traded separately;
- Crossing – Clients permitting, and subject to regulatory restrictions and requirements, where Ashmore has a buy and sell order for the same bond, we may cross these orders via a broker at an appropriate price. The price applied will be either the prevailing mid-market price or the average of at least two quoted prices from market makers. In such situations, each Client will normally receive a better price than could have been obtained in the market;
- Contingent Orders – single purchase and a single sell order in two related products are traded together (for example a corporate bond and its underlying government benchmark bond).

### 1.3 Local Currency

#### 1.3.1 Fixed Income

We may on occasion trade Total Return Swaps (TRS) and Interest Rate Swaps (IRS), and execution of such transactions would be under our Order execution policy.

#### 1.3.2 Foreign Exchange

Algorithmic trading - indirect access via banks (brokers) to interbank liquidity pools

### 1.4 Cash Management

Transactions in money market instruments are usually affected via a money broker, an investment bank (direct or as an intermediary) or direct with other banks. Under Cash Management the instruments used are primarily deposits and repurchase agreements (repo).

The three main factors for consideration in best execution are:

- rate
- credit
- liquidity

Due to the volumes involved and short settlement cycles in Money Market transactions, emphasis is also placed on the effectiveness of settlement and clearing when trading.

#### 1.4.1 Deposits

Where Ashmore places deposits on behalf of Clients, it seeks the most competitive rates from the Ashmore approved counterparties. Therefore, an appropriate and actively reviewed

approved counterparty list is maintained. Additionally, Ashmore operates a strict deposit diversification policy among counterparties to seek to ensure it does not carry unnecessary credit exposure. This policy, to an extent, can limit where deposits may be placed and in what quantities.

A money broker may be used occasionally for deposits placed on behalf of Ashmore Clients, but some direct relationships are also maintained and used. Deposits are placed in Client named accounts.

Reasons for using a money broker for deposits is due to their ability to:

- recommend new counterparties;
- give accurate coverage of Money Markets;
- gauge market sentiment.
- deal in a variety volumes;
- achieve the best rate; and
- time efficiencies.

When placing a deposit, rates are obtained from several of the approved deposit takers where the investment can be placed (subject to diversification limits). In addition, consideration is given as to whether the credit of the potential investments is suitable.

#### 1.4.2 Repurchase Agreements

Ashmore engages in “repo” activity on behalf of a few managed funds directly with a selected group of approved counterparties.

Information is regularly obtained from the banks used in repo activity on, for example:

- Bonds Trading Special
- Current General Collateral (GC) rates

From the above information it can be determined which bonds can be used to achieve the most cost-effective funding i.e. using ‘Special’ bonds to raise funds rather than bonds trading at GC. However, liquidity and settlement concerns are also considered. The liquidity of a bond is very important i.e. if it is on repo at a special rate and the bond is required back, it must be returned. Accordingly, Ashmore has a low tolerance for failing trades due to the settlement issues that can arise.

## Appendix 1 – List of Approved Counterparties and Execution Venues

Updated: June 2025

This list is not exhaustive but comprises those Approved Counterparties and Execution Venues on which Ashmore places significant reliance. These lists are kept under review and updated in accordance with Ashmore's order execution policy. From time-to-time different arrangements, requirements and restrictions may be in place with one or more of the Approved Counterparties or Execution Venues listed here.

### Approved Counterparties

Counterparty	Equity	Fixed	FX	Derivatives
Absa Group Ltd	✓	✓		
African Alliance Securities Trading Pty Ltd	✓			
Anand Rathi Financial Services	✓			
Arqam Capital Ltd/United Arab Emirates	✓	✓		
Auerbach Grayson & Co LLC	✓			
Auriga Global Investors Societ		✓		
Australia & New Zealand Banking Group Ltd		✓	✓	✓
Avendus Capital Pvt Ltd	✓			
Avior Capital Markets Pty Ltd	✓			
Axis Bank Ltd	✓			
Banco Bilbao Vizcaya Argentaria SA	✓	✓		✓
Banco Bradesco SA	✓	✓		
Banco Santander SA	✓	✓	✓	✓
Bancolombia SA	✓	✓		
Bank of America Corp	✓	✓	✓	✓
Bank of Nova Scotia/The	✓	✓		
Barclays PLC	✓	✓	✓	✓
BCP Securities LLC		✓		
Beltone Securities Brokerage S.A.E.	✓			
BNP Paribas SA	✓	✓	✓	✓
BTG Pactual Group	✓	✓		
Canaccord Genuity Group Inc	✓	✓		
Canadian Imperial Bank of Commerce	✓	✓		
Canton of Zurich		✓		
CFG Marchés	✓			
China CITIC Bank International Ltd		✓		
CIMB Group Holdings Bhd		✓		
Citigroup Inc	✓	✓	✓	✓
Commercial International Bank - Egypt (CIB)	✓			
Condor Trading LP		✓		
Credicorp	✓	✓		
Credit Agricole Groupe		✓		
DBS Group Holdings Ltd		✓		
Deutsche Bank AG		✓	✓	✓
Dragon Capital Cyprus Ltd		✓		

Counterparty	Equity	Fixed	FX	Derivatives
Edelweiss Financial Services Ltd	✓			
EFG Holding S.A.E.	✓	✓		
Emkay Global Financial Services Limited	✓			
Erste Group Bank AG		✓		
FCMB Group Plc	✓			
First Abu Dhabi Bank PJSC		✓		
FirstRand Ltd		✓	✓	
Forte Securities Ltd	✓			
Goldman Sachs Group Inc/The	✓	✓	✓	✓
Grupo Cibest SA		✓		
Guotai Junan Securities Co Ltd		✓		
Haitong Securities Co Ltd		✓		
Ho Chi Minh City Securities Corp	✓			
HSBC Holdings PLC	✓	✓	✓	✓
ICBC Standard Bank PLC		✓	✓	
ICICI Bank Ltd	✓	✓		
IIFL Finance Ltd	✓			
Imperial Capital Group LLC	✓	✓		
Industrial & Commercial Bank of China Ltd		✓		
ING Groep NV	✓	✓	✓	✓
Intesa Sanpaolo SpA		✓		
Investec Ltd	✓			
Itau Unibanco Holding SA	✓	✓		
Itausa SA		✓		
Jane Street Group LLC		✓		
Jefferies Financial Group Inc	✓	✓		
JM Financial Ltd	✓			
JPMorgan Chase & Co	✓	✓	✓	✓
Kng Securities LLP	✓	✓		
Korea Investment Holdings Co Ltd	✓			
Kotak Mahindra Bank Ltd	✓			
Larrain Vial SA	✓	✓		
MarketAxess Holdings Inc		✓		
Mitsubishi UFJ Financial Group Inc		✓		
Mizuho Financial Group Inc		✓		
Morgan Stanley	✓	✓	✓	✓
Natwest Markets PLC	✓	✓	✓	✓
Nomura Holdings Inc		✓	✓	
Northern Trust Corp			✓	✓
Om Residual UK Ltd		✓		
Oppenheimer & Co Inc		✓		
Oversea-Chinese Banking Corp Ltd		✓		
Passionate Investment Management Pvt Ltd	✓			
Qatar National Bank QPSC	✓	✓		
Raiffeisen Bank International AG		✓		
SC Lowy Financial HK Ltd		✓		
Seaport Group LLC/The	✓	✓		

Counterparty	Equity	Fixed	FX	Derivatives
Societe Generale SA		✓	✓	
SSI Securities Corp	✓			
Standard Bank Group Ltd	✓			
Standard Chartered PLC	✓	✓	✓	✓
State Street Bank			✓	
Stifel Financial Corp		✓		
StoneX Group Inc	✓	✓		
Sumitomo Mitsui Financial Group Inc		✓		
The Toronto-Dominion Bank	✓	✓		
TP ICAP Group PLC		✓		
TPCG Financial Services Agente de Valores SA		✓		
UBS Group AG	✓	✓	✓	✓
UniCredit SpA		✓		
Vietcap Securities JSC	✓			
Wells Fargo & Co		✓		
Wood & Co Financial Services AS.	✓			
XP Holdings International LLC	✓	✓		
Yuanta Financial Holding Co Ltd	✓			

## Execution Venues

Ashmore places reliance on the following Executions venues:

- Bloomberg
- Tradeweb
- MarketAxess
- LSEG FXall

Ashmore reserves the right to use other Approved Counterparties or Execution Venues than those listed above where it deems it appropriate in accordance with its order execution policy and remove any counterparties/venues from the list.

## Appendix 2 – Definitions

**AIFMD** – means Directive 2011/61/EU of the European Parliament and the Council on Alternative Investment Fund Managers.

**Client** – means any natural or legal person to whom Ashmore provides investment services.

**Execution Criteria** - means those factors listed in 1.3 of this document.

**Execution Factors** – means those factors listed in 1.3 of this document.

**Execution Venue** – means a Regulated Market, MTF, OTF, systematic internaliser, market maker or other liquidity provider where client orders are executed.

**Financial Instruments** – means those investments specified in Section C to Annex I of MiFID and includes:

- Transferable securities;
- Money market instruments;
- Units in collective investment undertakings;
- Certain options, futures, swaps, forward rate agreements and any other derivative contracts relating to securities, currencies, interest rates or yields, or other derivative instruments, financial indices, financial measures or commodities;
- Derivative instruments for the transfer of credit risk; and
- Financial contracts for differences.

**FCA** – means the UK Financial Conduct Authority.

**SEC** – means U.S. Securities and Exchange Commission

**FCA Rules** – means the rules from time to time of the FCA set out in the FCA Handbook.

**MiFID II** – means Directive 2014/65/EU of the European Parliament and the Council of 15 May 2014 on Markets in Financial Instruments and any implementing directives and regulations.

**Multilateral Trading Facility (“MTF”)** – refers to a financial trading venue that brings together multiple third-party buying and selling interests in Financial Instruments on an electronic platform operated by an investment firm or market operator.

**Organised Trading Facility (“OTF”)** - refers to a multilateral system that facilitates the trading of non-equity instruments such as bonds, derivatives and structured finance products. The operator has discretion over order execution – unlike MTFs or regulated markets.

**Professional Client** - means a client meeting the criteria laid down in Annex II of MiFID.

**Regulated Market** – refers to a multilateral trading venue authorised and supervised under MiFID, where financial instruments are admitted to trading in accordance with non-discretionary, transparent rules. Its operated and managed by a market operator.

**Trading Venue** – means an OTF, MTF or Regulated Market.