



19 Trident Park, Blackburn, Lancashire, BB1 3NU
Tel: 01254 699333 Web www.Hedleyandco.co.uk Email: info@hedleyandco.co.uk

Best Execution Policy

We are authorised by the Financial Conduct Authority (FCA) to deal in Investments for our clients who are classed as either retail or professional clients.

Because we have this permission, we are required to produce a Best Execution Policy.

We are required to provide you with information outlining what steps we take to consistently obtain the best possible result when we trade in investments for and on behalf of our clients.

Venue

We transmit all of our client's orders to one venue, Platform Securities LLP, who are also authorised by the Financial Conduct Authority under firm reference number 214206. Platform Securities have demonstrated that they enable us to provide the best possible results for the execution of our client's orders on a consistent basis.

Platform Securities LLP provide us with dealing and safe custody services for our clients.

Platform Securities LLP produces its own best execution policy which we monitor, this can be read at;

<https://empower1.fisglobal.com/resource-centre.html>

Execution Factors

When we receive an instruction to trade from you or when we make a decision to trade for our discretionary clients we submit that order, usually electronically, to Platform Securities LLP.

All orders received by us will be submitted to Platform Securities in an orderly, prompt and timely manner.

Once Platform Securities LLP receive the order from us they execute the order taking into account the following execution factors:

Share Price, Costs of Execution, Speed of Execution, Number of Shares and liquidity in the market, Likelihood of Execution and Settlement, the Credit Worthiness and Performance of the Institution whom they could trade with and any other consideration relevant to the execution of the order.

If you provide us with specific instructions for execution of a transaction, we may not be able to arrange for your trade to be executed in line with our best execution policy and achieve the best possible result.

If you place an order with a specified limit in terms of price and, or size, we may not always be able to arrange for that order to be executed immediately under prevailing market conditions. Platform Securities LLP are required to make that order public (i.e. show the order to the market) unless you expressly instruct us otherwise.

Aggregation

When we make a decision to trade for our discretionary clients we may combine the instruction with other clients who we have made the same decision for, to execute as one single order. Aggregation under this arrangement on rare occasions may result in you obtaining a less favourable price.

Monitoring

We will monitor compliance with our order execution arrangement and policy at least annually. We will also assess whether the execution venue in our policy provide the best possible result for our clients. Any review may result in an update to our execution venues and we will notify clients of any material changes to our order execution policy.

Consent

The Financial Conduct Authority require that we must obtain your consent to our execution policy. Unless you have provided a written objection to us adopting this policy, we will deem you to have provided such consent for us to continue to trade on your behalf.

This policy came into force on January 3rd 2018 and was updated 2nd November 2020, with no material changes.