



Order Execution and Handling Policy

UK Branch

Purpose

In our dealings with our clients, we have a general duty to act honestly, fairly and professionally, taking into account their best interest. In relation to order execution, the UK Branch of Silicon Valley Bank (“SVB”) is required to take all steps sufficient to obtain the best possible result for client orders, subject to and taking into account any specific instructions received, the nature of the orders and the nature of the markets and the products concerned. This Order Execution and Handling Policy explains the processes and procedures in place to meet these requirements.

The Policy will be published and kept up to date on our website at <https://www.svb.com/uk/foreign-exchange/>.

Scope

Clients

This Order Execution and Handling Policy applies to orders executed on behalf of retail and professional clients by SVB in accordance with our legal and regulatory requirements. You will have received a formal notification from us informing you of your client categorisation when you requested to use SVB’s Foreign Exchange (FX) services. Unless otherwise stated, this policy applies to clients in the same way, regardless of whether you are a professional client or retail client.

SVB will be executing orders on your behalf where you legitimately rely on SVB to protect your interests in relation to the pricing or other aspects of the order e.g. when executing a limit order.

Note that this policy does not apply to contracts with eligible counterparties unless we expressly agree otherwise.

Products

This Order Execution and Handling Policy will apply every time we execute an order with or for clients in “financial instruments” as defined in the Financial Conduct Authority (FCA) Handbook. For SVB this includes financial contracts such as options, forwards and swaps, whether traded on a venue or not.

Other non-MiFID business, for example FX spot transactions and business concerning loan agreements and deposits, which are not considered “financial instruments” are not covered by this policy.

Where clients are classified by SVB as a professional client, best execution obligations are unlikely to apply where we are asked for a quote (Request For Quote), as we take the view that such clients have researched the market, the FX market is predominantly liquid and clients are not placing legitimate reliance on SVB to protect their interests.

Geographical

This Order Execution and Handling Policy applies to all clients where SVB books a trade through a UK branch account, without making a distinction on whether the client is resident in the EEA and regardless of where the transaction is executed. Where services are provided or trades are booked on non-UK branch accounts, this Order Execution and Handling Policy does not apply.



Order Execution

At SVB, Clients may execute FX transactions through the following trading media:

- SVB's voice trading facility
- SVB's electronic trading platforms
- Bloomberg chat
- Email

Execution factors

When trading OTC derivatives with us, clients are trading on 'our' price (SVB is the counterparty to the transaction). There are a number of factors that can be used to construct a derivative price and these will vary depending on the asset class traded, the nature of the market, and the characteristics and terms of the transaction and any special market or credit risks posed by it.

Subject to any specific instructions, taking into account the criteria above, we will take the following execution factors into account:

- Price;
- Cost;
- Speed;
- Likelihood of execution and settlement;
- Size, nature or any other consideration relevant to the execution of a transaction

See Annex for priority of execution factors.

For retail clients, the best possible result will be determined in terms of the total consideration, representing the price of the financial instrument and the costs related to execution.

Specific client instructions

Where SVB is given a specific instruction on how all or part of an order should be executed (for example choice of venue or the timing), the relevant execution will be effected in accordance with such instructions. **Clients should be aware that providing specific instructions may prevent Silicon Valley Bank UK Branch (in whole or in part) from taking the steps set out in this Order Execution and Handling Policy to obtain the best possible result for the execution of an order.**

Where a client's instruction relates to only part of the order, we will continue to apply the Order Execution and Handling Policy to the parts of the order not covered by the specific instructions.

Execution venues

SVB will enter into all transactions with our clients as principal (counterparty) and act as the sole execution venue for all client orders. SVB regularly reviews the market participants (including brokers, venues and banks) it uses for its own risk management, looking at post trade analytics and periodic monitoring, in addition to reviewing the selection process for new and additional execution venues.

Any order accepted may be transmitted outside of the EEA and/or executed on a market other than an EU Multilateral Trading Facility (MTF) or Organised Trading Facility (OTF).

See the Annex to this Order Execution and Handling Policy for the execution venues and hedging venues for each class of financial instrument.

Interest rate derivatives

When offering Interest rate derivatives, Silicon Valley Bank will transmit orders to an approved third party broker for execution. In doing so, we will provide specific instructions, so discretion in relation to the execution of the order will remain with Silicon Valley Bank. We will act at all times in our client's best interests.



Client order handling

Order priority and timely execution

SVB will execute each client's order in a prompt, fair and expeditious manner and will generally seek to execute comparable orders in the sequence in which they are received, unless for example the characteristics of the order or prevailing market conditions make this impracticable and as a consequence a deviation from this principle can be justified.

In every instance, SVB will ensure that client orders take precedence over SVB orders and that the client order will be handled in an equitable manner, and to the client's best advantage.

Where SVB experiences material difficulties in carrying out a client order promptly, we will inform you as soon as we become aware of the difficulty.

Where you would like to query the execution of an order, you can request SVB to demonstrate that it has been executed in compliance with this policy.

Aggregation and allocation of orders

We may aggregate your order with the orders of other clients, or with transactions for our own account only where it is unlikely to work to the overall disadvantage of the clients concerned. We will make every effort to ensure the client is not disadvantaged, but there may be instances where they are, due to reasons outside our direct control such as external market forces.

Monitoring and reviewing

We will regularly monitor the effectiveness of this Order Execution and Handling Policy and our order execution arrangements to identify and, where appropriate, correct any deficiencies. In particular, we will assess on a regular basis whether the execution venues and liquidity sources relied upon by us in pricing any instrument allow us to achieve best execution on a consistent basis. Furthermore our Market Risk Solutions team, through whom client orders are executed, will be monitored to ensure the final prices obtained from order executions fit within acceptable tolerances in relation to the mid-market price at the time of execution,

Clients will be able to view our performance in regards to Best Execution under MiFID II via our quarterly RTS27 and annual RTS28 reports. These reports are published alongside this policy on our website: <https://www.svb.com/uk/foreign-exchange/>

We will formally review this Order Execution and Handling Policy and the relevant order execution arrangements at least annually or whenever a material change occurs either in respect of one of our chosen pricing venues or otherwise that affects our ability to continue to achieve best execution. Should there be any material changes to our order execution arrangements or to this Order Execution and Handling Policy, we will notify clients of such change.

Misuse of information

SVB will not misuse information relating to or between pending client orders. SVB will take all reasonable steps to prevent the misuse of such information by any relevant persons or employees.

Any use by the firm of information relating to a pending client order, in order to deal on own account in the financial instruments to which the client order relates, or in any related financial instrument, will be considered a misuse of that information.

Consent

Where a client has received this Order Execution and Handling Policy and subsequently submits an order to SVB for execution, SVB will consider that client to have consented:

- To this Order Execution and Handling Policy; and
- That orders may be executed outside a trading venue (being a regulated market, a multilateral trading facility or an organised trading facility). Orders will typically be executed outside a trading venue in relation to currency markets where you execute directly with SVB acting as principal.



Annex

List of “financial instruments” to which SVB Order Execution and Handling Policy applies:

- i) All non-spot FX and interest rate derivative transactions.

Execution venues

Class of financial instrument	Execution venue	Hedging venue
Foreign exchange derivatives	Silicon Valley Bank (UK Branch)	Inter-bank market
Interest rate derivatives	Silicon Valley Bank (UK Branch)	Inter-bank market

Priority of execution factors

The below table demonstrates the prioritisation of execution factors that SVB endeavours to abide by under normal circumstances. SVB may be required to execute using a different prioritisation in exceptional circumstances, in order to ensure that client orders meet applicable best execution requirements.

	Foreign Exchange Derivatives	Interest Rate Derivatives
Price	1	1
Speed of execution	2	3
Likelihood of execution	3	2
Cost	4	5
Size, nature	5	4