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LYXOR INTERMEDIATION'S EXECUTION AND SELECTION POLICY

LYXOR INTERMEDIATION is an investment firm authorized by the French Prudential Supervisory and Resolution Authority's (ACPR) to provide receipt and transmission of orders and order execution services on behalf of third parties covering all of the financial instruments referred to in Article L. 211-1 of the French Monetary and Financial Code.

The purpose of this document is to set out the order execution policy, and specifically the selection policy implemented by LYXOR INTERMEDIATION.

1. BACKGROUND AND APPLICABLE REGULATIONS

LYXOR INTERMEDIATION is governed by the provisions of Directive 2014/65/EU dated 15 May 2014 regarding markets in financial instruments (known as "MiFID II") and of Regulation 600/2014 dated 15 May 2014 regarding markets in financial instruments (known as "MiFIR"), which entered into effect on 3 January 2018. Article 27 of the MiFID II Directive, and its transposition into French law in Article L. 533-18 of the French Monetary and Financial Code require investment service providers to implement an order execution policy.

LYXOR INTERMEDIATION is drawing up this procedure in order to comply with this obligation, and so act in its clients' best interests.

This policy has been drawn up for the benefit of LYXOR INTERMEDIATION's professional clients, and non-professional clients, where applicable (hereinafter jointly referred to as the "Clients"), and is not intended to apply to relations with eligible counterparties.

At the date when this policy was updated, and within the Société Générale Group, LYXOR INTERMEDIATION is providing its services to Lyxor Asset Management ("LAM"), and Lyxor International Asset Management ("LIAM"), portfolio management companies that represent UCITS, AIFs, and principals. LAM and LIAM are classified in the "Professional Clients" category.

2. EXECUTION POLICY

2.1 Execution criteria

In accordance with the provisions of Article L. 533-18 of the French Monetary and Financial Code, the factors taken into consideration when executing orders and selecting intermediaries are specifically as follows:

- Price
- Costs
- Speed of execution
- Likelihood of execution and settlement
- Size of the transaction
- Nature of the transaction
- Any other considerations relevant to the execution of the order.

The relative importance of these factors is specifically determined in accordance with the provisions of Article 64 of Regulation No. 2017/565 of 25 April 2016, which supplements the MiFID II Directive.

Where LYXOR INTERMEDIATION deals with a company that is related to it (a counterparty or intermediary), LYXOR INTERMEDIATION's policy for managing conflicts of interests applies.

The LYXOR INTERMEDIATION's execution matrix, which specifically shows the relative importance of the factors and execution venues for each class of financial instruments, is featured in APPENDIX 1.

2.2 Execution venues

Clients' orders are executed on various execution venues, including:

- Regulated markets (RMs);
- Multilateral trading facilities (MTFs);
- Organised trading facilities (OTFs);
- Systematic internalisers (SIs);
- The OTC (over-the-counter) market.

LYXOR INTERMEDIATION may use liquidity providers in addition to the execution venues set out above, such as, for instance, but not exclusively, "Market Makers" as in the case of trading in ETF units.

A list of the main trading platforms and systematic internalisers on which LYXOR INTERMEDIATION's orders may be executed is provided in APPENDIX 2.

2.3 Instructions from Clients

In the event that specific instructions are given by a Client when an order is placed, LYXOR INTERMEDIATION will not be bound by the obligation of means arising from the application of this execution policy.

Where the Client's instruction only covers one portion or one aspect of the order, LYXOR INTERMEDIATION will be bound by its best execution obligation for the portion of the order not covered by the instruction. The same rule applies to the specific instructions given to its intermediaries by LYXOR INTERMEDIATION.

The Client may expressly authorise LYXOR INTERMEDIATION to execute an order outside a trading platform. However, the Client may renege on this authorisation at any time, either on a one-off basis, or on a definitive basis.

2.4 Financial instruments traded over-the-counter

LYXOR INTERMEDIATION uses the competitive bidding principle as a priority in order to handle this class of assets.

Accordingly, the terms for this type of financial instruments offered by potential counterparties are usually the subject of checks on their competitiveness compared with the services offered by the competition, including in the framework of requests for quotes (“RFQ”).

Where an RFQ is not possible/relevant, LYXOR INTERMEDIATION usually compares the price offered by the counterparty with benchmark or standard data, or any other relevant proxy.

3. SELECTION POLICY

To obtain the best possible execution of orders, LYXOR INTERMEDIATION has implemented a selection policy for intermediaries, agents, brokers and counterparties (the “Entities”), in accordance with Article L. 533-18 of the French Monetary and Financial Code, and Article 65 of Regulation No. 2017/565 supplementing the MiFID II Directive.

Due to their regulatory obligations, the selected Entities are usually required to offer the best possible execution where they are delivering an investment service to LYXOR INTERMEDIATION.

3.1 Details regarding the selection of the Entities: compilation of a master list

The Entities are selected at an annual Validation Committee (the “Validation Committee”), in accordance with a voting process based on pre-established, relevant, and objective criteria.

One Validation Committee is held for each Client.

The participants in the annual voting process that leads to the selection of the Entities are the following departments (hereinafter the “Members of the Validation Committee”):

- The Head Trader on LYXOR INTERMEDIATION’s trading desk;
- LYXOR INTERMEDIATION’s Chief Executive Officer;
- LYXOR INTERMEDIATION’s Investment Services Compliance Officer (hereinafter the “RCSI”).

Following the annual voting process, the Members of the Validation Committee draw up a master list (the “LI List”) for each class of financial instruments and for each Client.

3.2 Presentation and approval of the LI list by each LI Client

The LI List is presented by LYXOR INTERMEDIATION’s representative at the validation/selection committees for each of its Clients.

After reviewing the statistics for the orders volumes handled over the period just-ended, and presenting the results of the vote on the LI List, a proposed allocation of orders flows is presented for approval to the validation/selection committees of each Client.

Following the vote of the validation/selection committee of the Client, LYXOR INTERMEDIATION reflects any specific features or decisions adopted in each LI List for each Client.

3.3 Change in the list of Entities during the year

LYXOR INTERMEDIATION is responsible for the overall relationship with the selected Entities, and may decide to make the adjustments set out below during the year:

- Deletion of one or several Entities from the LI List during the year: the RCSI may decide to prohibit working with any of the Entities at any time, in the event of serious circumstances, such as (but not limited to) a risk of default, of sanction, or of withdrawal of an authorisation affecting the Entity in question. Furthermore, any Entity may be deleted from the LI List during the year in the case of a serious event, on the recommendation of a Member of the Validation Committee and following the prior validation of the RCSI. In such an event, each adjusted LI List will be sent to each Client.
- Accreditation of a new Entity outside the annual Validation Committee: any request for the accreditation of a new Entity made by LYXOR INTERMEDIATION must be (i) notified to the Client concerned for approval, and (ii) approved beforehand by an exceptional Validation Committee made up of the Members of the Validation Committee. The accreditation may be annual and/or global or more limited (specific period or number of orders, for instance).

In addition to the above, every Client and LYXOR INTERMEDIATION may review the terms and conditions, Entities, and systems proposed to the Client in question for the receipt and transmission, and execution of orders by LYXOR INTERMEDIATION at any time, on the recommendation of either party.

3.4 Selection of Société Générale

Société Générale is one of the Entities selected by LYXOR INTERMEDIATION to provide execution activities. Société Générale may also be selected as a counterparty of transactions on financial instruments handled by Clients' funds or mandates.

3.5 Order transmission procedures

To transmit their orders to LYXOR INTERMEDIATION, and guarantee their traceability, Clients primarily use the "Order Management System" (OMX) that was initially developed by LAM, and for which maintenance and new developments are performed by LYXOR INTERMEDIATION.

In the event of a malfunction that renders the order transmission system (OMX) unusable, LYXOR INTERMEDIATION will inform its Clients that the system has been halted, as well as about the means of replacement organised in accordance with the "Business Continuity Plan" in effect.

3.6 Reports and declarations

The execution notification is included in the OMX order transmission system as soon as the order is finalised,

and is immediately made available to the Client in question's Operations Department, which will check the confirmation of the transaction issued by the selected Entity.

LYXOR INTERMEDIATION prepares a monthly report including statistics for each class of Financial Instrument for each one of its Clients:

- regarding the volume of orders traded during the period under consideration in the current year;
- regarding the number of orders executed by brokers;
- for the equity scope, the amount of execution commissions paid to each broker;
- regarding the monitoring of the execution process in accordance with LYXOR INTERMEDIATION's execution policy.

Furthermore, LYXOR INTERMEDIATION carries out an assessment of its selection process on an annual basis, and prepares a specific report pursuant to Delegated Regulation No. 2017/576 supplementing the MiFID II Directive. This report specifically lists the five main execution venues used during the year just-ended. The finalised report is available on LYXOR INTERMEDIATION's website.

3.7 Partially executed orders

In the event that orders received from several Clients, which have been pre-assigned and previously aggregated, are partly executed, LYXOR INTERMEDIATION will allocate the executed amounts in accordance with the proportional rule calculated according to the amounts of the orders received and assigned beforehand, pursuant to the regulations in effect. This allocation takes into account any minimum restrictions relating to the quantity, amount, or number of securities or assets to be held as a position.

4. REVIEW OF THE EXECUTION AND SELECTION POLICY

Any major change to the terms and conditions offered by one or several selected Entities (e.g. significant amendment to the pricing applied, a deterioration in the execution system (including a decrease in the instruments handled, the loss of access to an electronic platform, restructuring, or alteration of the systems and/or tools, etc.)) may trigger a review of LYXOR INTERMEDIATION's execution and selection policy.

If there are no internal or external events that require its review during the year, LYXOR INTERMEDIATION's execution and selection policy is reviewed on a yearly basis at the time when the annual report on the main execution venues is drawn up.

LYXOR INTERMEDIATION will specifically take account of the following factors and parameters when reviewing the terms and conditions and systems for the execution of orders:

- Scope of the Financial Instruments covered
- Access to the platforms / execution venues
- Execution strategy
- Events during the period
- Level 1 and level 2 controls

In the event of an amendment, the updated version will be immediately available on the Internet, and will amount to a notice to its Clients by LYXOR INTERMEDIATION.

APPENDIX 1 Execution matrix for each asset class handled by LYXOR INTERMEDIATION:

FINANCIAL INSTRUMENT TYPE	EXECUTION VENUE	CONSIDERED FACTORS AND CRITERIA TO OBTAIN BEST EXECUTION						
		Price	Cost	Speed	Likelihood	Size	Nature	Other
Money-Market Instruments and linked derivatives								
Interest rates and inflation linked swaps	MR, OTC	1	1	3	1	2		
Interest rates linked futures and forwards	MR	1	1	2	2			
Equity securities ETF, commodities and linked derivatives								
Equities	MR, IS, Marché Primaire, MTF	1	1	2	1	2	3	
Futures, Options, Warrants, rights - all related to indices	MR	1	1	2	2			
Futures, Options, Warrants, rights - all related to Equities	MR	1	1	2	2			
Certificates	MR, IS, OTC, Primaire	1	1	2	2			
ETF (any type of underlyings)	MR, OTC, IS, Marché Primaire, MTF	1	1	2	1	2	3	
Derivative products on such underlyings (Exchange for physical, options...)	MR, MTF, OTC	1	1		2	2	3	
Debt instruments and related derivatives								
Sovereign bonds, Corporate Bonds, Inflation linked Bonds, Convertible or exchangeable bonds, Asset Swaps	MTF, OTC, IS	1	1	3	1	2		
Derivative products on such underlyings including futures	MR, MTF, IS, OTC	1	1	3	1	2		
Forex and linked derivatives								
Spot, Forward, NDFs and Swap	MTF, OTC, IS	1	1	2	1			
Futures, Options, Warrants, rights - all related to Forex	MR	1	1	2	2			
Other instruments								
Other eligible instruments	MR, MTF, OTC, IS	1	1		1			3. Flexibility
Vanilla swaps	OTC	1	1	3	1	2		
Complex swaps ETFs	OTC	3		2	1	2		1. Industrialisation capacity and cacacity to accept Lyxor constraints
Complex swaps for structured funds, formula funds and granted funds	OTC	2		3	1	3		3. Counterparty capability to show prices on custom structures
Efficient Portfolio Management Techniques (Stock lending, Repurchase Agreements...)	OTC	1	1	3	1	2		
Fund Shares	OTC		1		1			

Definitions and/or further information:

MR: Regulated Market (e.g. the London Stock Exchange, or NYSE Euronext, etc.)

MTF: Multilateral trading facility or organised trading facility

IS: Systematic internaliser that executes Clients' orders outside an RM or MTF, by directly acting as a counterparty, and committing its own equity capital

DMA: Direct market access. A solution based on the use of tools provided by a broker, and that enables orders to be entered for execution on one or several RMs, or MTFs.

OTC: over-the-counter transaction (possible intermediation)

Numbering of the execution factors: the relative importance of the factors is specified by their number (1 is the most important).

APPENDIX 2 – MAIN EXECUTION MARKETS (RMs and MTFs)

AIM ITALIA - MERCATO ALTERNATIVO DEL CAPITALE	HOCHIMINH STOCK EXCHANGE	OFF-EXCHANGE TRANSACTIONS - LISTED INSTRUMENTS
AQUIS EXCHANGE EUROPE	HONG KONG EXCHANGES AND CLEARING LTD	OPTIONS PRICE REPORTING AUTHORITY
ASIA PACIFIC EXCHANGE	HSBC FRANCE - SYSTEMATIC INTERNALISER	OSAKA EXCHANGE
ASX - ALL MARKETS	ICAP EU - OTF	OSLO BORS ASA
ASX - TRADE24	ICE FUTURES U.S.	OTCBB
ATHENS STOCK EXCHANGE	ICE MARKETS EQUITY	PFTS STOCK EXCHANGE
AUREL	IMC - SYSTEMATIC INTERNALISER	PHILIPPINE STOCK EXCHANGE, INC.
AUREL - OTF	INDONESIA STOCK EXCHANGE	PORT MORESBY STOCK EXCHANGE
BANK OF AMERICA MERRILL LYNCH INTERNATIONAL BANK DESIGNATED ACTIVITY CO	INSTINET DESK CROSS	PRAGUE STOCK EXCHANGE
BELGRADE STOCK EXCHANGE	INTER-CONNECTED STOCK EXCHANGE OF INDIA LTD	QATAR EXCHANGE
BLOOMBERG TRADING FACILITY B.V.	INTERCONTINENTAL EXCHANGE	REFINITIV MTF
BME - BOLSAS Y MERCADOS ESPANOLAS	INVESTORS EXCHANGE	REPUBLICAN STOCK EXCHANGE
BNP PARIBAS ARBITRAGE SNC - SYSTEMATIC INTERNALISER	INVESTORS EXCHANGE - DARK	RM-SYSTEM CZECH STOCK EXCHANGE
BNP PARIBAS SA - SYSTEMATIC INTERNALISER	IRISH STOCK EXCHANGE - GLOBAL EXCHANGE MARKET	RWANDA STOCK EXCHANGE
BOFA SECURITIES EUROPE	IRISH STOCK EXCHANGE - ALL MARKET	SANTIAGO STOCK EXCHANGE
BOFA SECURITIES EUROPE - RFQ - SYSTEMATIC INTERNALISER	ITALIAN DERIVATIVES MARKET	SAUDI STOCK EXCHANGE
BOFA SECURITIES EUROPE - SYSTEMATIC INTERNALISER	J.P. MORGAN AG - SYSTEMATIC INTERNALISER	SHANGHAI STOCK EXCHANGE
BOLSA DE BARCELONA	JAMAICA STOCK EXCHANGE	SHANGHAI STOCK EXCHANGE - SHANGHAI - HONG KONG STOCK CONNECT
BOLSA DE MADRID	JOHANNESBURG STOCK EXCHANGE	SHENZHEN STOCK EXCHANGE
BOLSA DE VALORES DE COLOMBIA	JOINT-STOCK COMPANY "STOCK EXCHANGE INNEX"	SHENZHEN STOCK EXCHANGE - SHENZHEN - HONG KONG STOCK CONNECT
BOLSA DE VALORES DE LIMA	KAZAKHSTAN STOCK EXCHANGE	SINGAPORE EXCHANGE
BOLSA DE VALORES DE MONTEVIDEO	KHARTOUM STOCK EXCHANGE	SINGAPORE EXCHANGE DERIVATIVES CLEARING LIMITED
BOLSA DE VALORES DE NICARAGUA	KIEV INTERNATIONAL STOCK EXCHANGE	SIX SWISS EXCHANGE
BOLSA DE VALORES DE QUITO	KOREA EXCHANGE (STOCK MARKET)	SIX SWISS EXCHANGE - BLUE CHIPS SEGMENT
BOLSA MEXICANA DE VALORES (MEXICAN STOCK EXCHANGE)	KOREA EXCHANGE (STOCK MARKET)	SIX SWISS EXCHANGE – STRUCTURED PRODUCTS
BORSA ISTANBUL	KUWAIT STOCK EXCHANGE	SOCIAL STOCK EXCHANGE
BORSA ITALIANA EQUITY MTF	KYRGYZ STOCK EXCHANGE	SOCIETE GENERALE - SYSTEMATIC INTERNALISER
BORSA ITALIANA S.P.A.	LA BOLSA ELECTRONICA DE CHILE	SOUTH PACIFIC STOCK EXCHANGE
BRATISLAVA STOCK EXCHANGE	LBBW - LANDESBANK BADEN-WUERTTEMBERG	STOCK EXCHANGE OF HONG KONG LIMITED - SHANGHAI - HONG KONG STOCK CONNECT
BUDAPEST STOCK EXCHANGE	LJUBLJANA STOCK EXCHANGE (OFFICIAL MARKET)	STOCK EXCHANGE OF HONG KONG LIMITED - SHENZHEN - HONG KONG STOCK CONNECT
BULGARIAN STOCK EXCHANGE	LONDON STOCK EXCHANGE	STOCK EXCHANGE OF MAURITIUS LTD
BURSA MALAYSIA	LONDON STOCK EXCHANGE - APA	STOCK EXCHANGE OF THAILAND
CBOE BYX U.S. EQUITIES EXCHANGE	LONDON STOCK EXCHANGE – CURVEGLOBAL MARKETS	STOCK EXCHANGE OF THAILAND - FOREIGN BOARD
CBOE BXZ U.S. EQUITIES EXCHANGE	LUSAKA STOCK EXCHANGE	STOCK EXCHANGE PERSPECTIVA
CBOE EDGA U.S. EQUITIES EXCHANGE	LUXEMBOURG STOCK EXCHANGE	SUSQUEHANNA INTERNATIONAL SECURITIES LIMITED - SYSTEMATIC INTERNALISER
CBOE EDGX U.S. EQUITIES EXCHANGE	MACEDONIAN STOCK EXCHANGE	SWAZILAND STOCK EXCHANGE
CBOE EUROPE EQUITIES - EUROPEAN EQUITIES (NL)	MADRAS STOCK EXCHANGE	SYDNEY STOCK EXCHANGE LIMITED
CBOE EUROPE REGULATED MARKETS (NL)	MALAWI STOCK EXCHANGE	TAIWAN STOCK EXCHANGE
CBOE FUTURES EXCHANGE	MALDIVES STOCK EXCHANGE	TEL AVIV STOCK EXCHANGE
CBOE STOCK EXCHANGE	MALTA STOCK EXCHANGE	THE GIBRALTAR STOCK EXCHANGE
CHICAGO BOARD OF TRADE	MARKTAXESS NL B.V.	THE INTERNATIONAL STOCK EXCHANGE
CHICAGO BOARD OF TRADE (FLOOR)	MATCH NOW	THE MONTREAL EXCHANGE / BOURSE DE MONTREAL
CHICAGO MERCANTILE EXCHANGE	MCX STOCK EXCHANGE LTD	THE NIGERIAN STOCK EXCHANGE
CHI-X AUSTRALIA	MEFF FINANCIAL DERIVATIVES	TIRANA STOCK EXCHANGE
CHI-X JAPAN	MIZUHO BANK EUROPE N.V. - SYSTEMATIC INTERNALISER	TOKYO STOCK EXCHANGE
CITIGROUP GLOBAL MARKETS EUROPE AG - EMEA TRADING	MIZUHO SECURITIES EUROPE - SYSTEMATIC INTERNALISER	TOKYO STOCK EXCHANGE - TOSTNET-1
CME GLOBEX	MOLDOVA STOCK EXCHANGE	TOKYO STOCK EXCHANGE - TOSTNET-2
COMMERZBANK EQUITY - SYSTEMATIC INTERNALISER	MONTENEGRO STOCK EXCHANGE	TOKYO STOCK EXCHANGE - TOSTNET-3
COMMODITIES EXCHANGE CENTER	MORGAN STANLEY EUROPE S.E.	TOKYO STOCK EXCHANGE JASDAQ
CREDIT AGRICOLE CIB - SYSTEMATIC INTERNALISER	MORGAN STANLEY EUROPE S.E. - SYSTEMATIC INTERNALISER	TOKYO STOCK EXCHANGE-TOKYO PRO MARKET
DEUTSCHE BANK AG - SYSTEMATIC INTERNALISER	MOSCOW STOCK EXCHANGE	TORONTO STOCK EXCHANGE
DEUTSCHE BOERSE AG	NAGOYA STOCK EXCHANGE	TORONTO STOCK EXCHANGE - DRK
DUBAI FINANCIAL MARKET	NAIROBI STOCK EXCHANGE	TP ICAP EU - MTF
ELECTRONIC ETF, ETC/ETN AND OPEN-END FUNDS MARKET	NAMIBIAN STOCK EXCHANGE	TRADEGATE EXCHANGE
ELECTRONIC SHARE MARKET	NASDAQ - ALL MARKETS	TRADEWEB EU BV - MTF
EUREX DEUTSCHLAND	NASDAQ COPENHAGEN A/S	TRADITION PARIS - TSAF
EUREX EXCHANGE ASIA PTE. LTD.	NASDAQ DUBAI	TURQUOISE EUROPE
EURONEXT - EURONEXT AMSTERDAM	NASDAQ HELSINKI LTD	UBS ATS
EURONEXT - EURONEXT BRUSSELS	NASDAQ OMX BX	UKRAINIAN STOCK EXCHANGE
EURONEXT - EURONEXT LISBON	NASDAQ STOCKHOLM AB	UNICREDIT BANK AG - SYSTEMATIC INTERNALISER
EURONEXT - EURONEXT PARIS	NASDAQ/NMS (GLOBAL MARKET)	UNICREDIT SPA - SYSTEMATIC INTERNALISER
EURONEXT DUBLIN	NATIONAL STOCK EXCHANGE OF AUSTRALIA LIMITED	UNITED STOCK EXCHANGE
EURONEXT GROWTH DUBLIN	NATIONAL STOCK EXCHANGE OF INDIA	WARSAW STOCK EXCHANGE/EQUITIES/MAIN MARKET
EURONEXT GROWTH PARIS	NATIXIS - SYSTEMATIC INTERNALISER	WIENER BOERSE AG
EURONEXT PARIS MATIF	NEPAL STOCK EXCHANGE	WIENER BOERSE AG AMTLICHER HANDEL (OFFICIAL MARKET)
EURONEXT PARIS MONEP	NEW YORK MERCANTILE EXCHANGE	WIENER BOERSE AG, WERTPAPIERBOERSE (SECURITIES EXCHANGE)
FINANCIAL AND RISK TRANSACTIONS SERVICES IRELAND LIMITED - FXALL RFQ MTF	NEW YORK STOCK EXCHANGE, INC.	XETRA
FINRA/NASDAQ TRF CARTERET (TRADE REPORTING FACILITY)	NEW ZEALAND EXCHANGE LTD	XETRA - FREIVERKEHR
FLOW TRADERS - SYSTEMATIC INTERNALISER	NILE STOCK EXCHANGE	XETRA - REGULIERTER MARKT
FXALL	NSDQ DARK	XETRA - SCALE
GFI PARIS - OTF	NYSE ARCA	ZAGREB STOCK EXCHANGE
GOLDMAN SACHS BANK EUROPE SE - SYSTEMATIC INTERNALISER	NYSE MKT LLC	
HANOI STOCK EXCHANGE	NYSE NATIONAL, INC.	