

MERCER GLOBAL INVESTMENTS EUROPE LIMITED ORDER EXECUTION POLICY

SCOPE

Mercer Global Investments Europe Limited (“MGIE”) has established and implements this order execution policy to ensure it obtains, for client orders, the best possible result in accordance with its regulatory requirements.

AUTHORISATION STATUS AND REGULATORY FRAMEWORK

MGIE was incorporated in Ireland as a private limited company on 8 March 2006 under registration number 416688 and is authorised by the Central Bank of Ireland pursuant to the European Union (Markets in Financial Instruments) Regulations 2017 (the “MiFID II Regulations”), as a MiFID Investment Firm. The MiFID Regulations give effect to Directive 2014/65/EU (“MiFID II Directive”) and Commission Delegated Directive (EU) 2017/593 (“Commission Delegated Directive”) in Ireland. Commission Delegated Regulation 2017/565 (“Commission Delegated Regulation”) also includes requirements for investment firms relating to order execution and execution policies and has been taken into account for the purposes of this policy.

MGIE’S BEST EXECUTION OBLIGATIONS

As a MiFID firm, MGIE is authorised to carry out the following MiFID services:

- The reception and transmission of orders in relation to one or more financial instruments
- Portfolio management
- Investment advice

MGIE is not authorised to execute client orders. MGIE only provides services to professional clients and does not receive orders from clients for execution on a trading/execution venue.

The Commission Delegated Regulation requires MGIE:

1. When providing the service of portfolio management, to act in accordance with the best interest of its clients when placing orders with other entities for execution that result from decisions by MGIE to deal in financial instruments on behalf of its clients; and
2. When providing the service of reception and transmission of orders, to act in accordance with the best interests of its clients when transmitting client orders to other entities for execution.

MGIE is required to ensure it take all sufficient steps to obtain the best possible result for clients taking into account price, costs, speed, likelihood of execution, and settlement, size, nature and any other consideration relevant to the execution of the order, unless there is a specific instruction from a client whereby the firm must execute the order in line with that instruction. Any specific instructions from a client may prevent the firm from taking the steps that it has designed and implemented in this execution policy to obtain the best possible result for the execution of those orders in respect of the elements covered by those instructions.

MGIE does not receive any remuneration, discount or non-monetary benefit for routing client orders to a particular trading venue or an execution venue which would infringe on its requirements relating to conflicts of interest or inducements.

The various types of transaction engaged in by MGIE (or its delegate) on behalf of the funds under management and/or clients of MGIE are set out below, along with MGIE's strategy in respect of each transaction type to ensure compliance with its MiFID Best Execution obligations.

MGIE AS THE APPOINTED INVESTMENT MANAGER TO FUNDS

MGIE has been appointed as investment manager to the Mercer Funds and has been appointed by Mercer Global Investment Management Limited to provide or procure the provision of discretionary investment management to the Mercer Funds. MGIE has also been appointed as the investment manager to other external funds in similar arrangements. In practice, MGIE delegates the discretionary investment management for the these funds to third party investment managers based in countries such as Ireland, UK and USA and those sub-investment managers will manage either a sub-Fund or certain segments of a sub-Fund of such a Fund.

As MGIE delegates discretionary management of the sub-Funds to sub-Investment Managers, except for specific circumstances outlined below, MGIE does not place execution orders with other entities to deal in financial instruments on behalf of the firm's clients. Our portfolio specialists' expertise is in identifying, selecting and combining the "best of class" fund managers who are best placed and resourced to deliver outperformance for our multi-manager funds and clients.

FUND INVESTMENTS IN UNDERLYING ASSETS (SEGREGATED MANDATES)

The funds managed by MGIE invest in the full spectrum of asset classes. Discretionary management of the sub-Funds is delegated to sub-Investment Managers who are contractually obliged to comply with the MiFID requirements when managing the fund or portion of the fund allocated to them. Each sub-Investment Manager is, prior to appointment, subjected to a rigorous due diligence process which includes obtaining a copy of such sub-Investment Manager's own Best Execution Policy to ensure it has arrangements in place to ensure it takes all sufficient steps to achieve the best results for clients.

MGIE also requires that all sub-investment managers are subject to an Operational Risk Assessment (“ORA”) carried out by Mercer Sentinel before being appointed. This ORA process includes, inter alia, a review of the execution arrangements in place to ensure sub-investment managers take all sufficient steps to obtain the best results for the Mercer Funds. As part of Sentinel’s standard framework, the assessment includes a review of each Managers processes and controls around pre-trade compliance, trade execution and post trade processes, including trade error policies, best execution and transaction cost analysis (TCA) and allocation procedures. The process continuously evolves depending on the latest regulatory and industry trends. As well as an initial review, once on-boarded, Sentinel conducts reviews on all sub-investment managers on a rolling three year cycle.

Sub-Investment Managers are also required to provide their Best Execution Policies should a material amendment to such policy be made. MGIE will review such changes on a case by case basis.

FUND OF FUNDS

Certain funds managed by MGIE are established as fund of funds whereby MGIE invests in other collective investment schemes on their behalf. This entails transactions which comprise the subscription, redemption or conversion of units in a fund through such fund’s transfer agent at Net Asset Value, which are not subject to Best Execution criteria under MiFID. Where, however, such underlying funds are Exchange Traded Funds (“ETFs”), the transactions are executed by an appointed sub-investment manager which is MiFID authorised and, therefore, subject to MiFID Best Execution requirements.

FOREIGN EXCHANGE TRANSACTIONS

MGIE has been appointed as currency manager for the Mercer Funds. In turn, MGIE has entered into agreements with State Street Bank Europe Limited (who delegates this function to State Street associates) and Irish Life Investment Managers who execute such Foreign Exchange transactions.

Where the executing entities use their discretion in executing Foreign Exchange transactions, such transactions are executed in line with the Best Execution policies of the executing entities.

BEST EXECUTION MONITORING

As part of its oversight model, on a quarterly basis, MGIE receives a confirmation from sub-IMs that they have a MiFID II compliant best execution policy in place and that there were no material exceptions identified in consideration of orders executed on funds managed on behalf of Mercer.

MGIE also completes monthly reviews of sub-Investment Managers to ensure they can demonstrate compliance with their own order execution policies.

REVIEW OF BEST EXECUTION POLICY

This Policy will be reviewed annually and whenever a material event or change in procedure takes place. Such review takes into account MGIE's continuing ability to deliver to its clients the best possible results. It also considers whether MGIE could deliver best execution to its clients if, for example, it included additional or alternative executing entities or made other amendments to its policy.

AVAILABILITY OF THIS POLICY

MGIE's Best Execution policy is provided to all clients before the provision of relevant services and is also available on <https://www.delegated-solutions.mercer.com/>.

OTHER INFORMATION

The MiFID II Regulations require firms to publish information on their top five execution venues or where the firm selects other firms to provide execution services, the top five investment firms, in terms of trading volumes where orders are transmitted. For discretionary clients, all orders are sent to the appointed transfer agent of the Mercer Funds, State Street Fund Services (Ireland) Limited or the transfer agent of any external fund in cases where MGIE receives explicit instruction to invest in a non-Mercer Fund. Such trades are therefore not in scope for this policy.

For orders executed within the Mercer Funds by sub-Investment Managers, the information on the top five execution venues used by the sub-Investment Managers will be made available on their websites. Details on the sub-Investment Managers of each Mercer Fund may be found in the relevant annual financial statements.