

Best Execution and Order Allocation Policy

for



**Wealth Fund
Partners**

18th of August 2026

PURPOSE

§ 1

The Board of Directors of Wealth Fund Partners A/S (the “Company”) has adopted this policy to ensure that, the Company in its capacity as both an investment company and a management company, the Company executes transactions on behalf of the funds (including any sub-funds) and other entities under its management (collectively, the “Managed Funds”) in a manner that serves the best interests of the Managed Funds and their investors at all times.

This policy has been developed and implemented in accordance with the following applicable legislation:

- Commission Delegated Regulation (EU) No 231/2013 of 19 December 2012, supplementing Directive 2011/61/EU of the European Parliament and of the Council with respect to exemptions, general operating conditions, depositaries, leverage, transparency, and supervisory requirements; and
- Danish Executive Order of 2 July 2014 on the management, control, and administration of Danish UCITS.

EXECUTION OF DECISIONS TO DEAL ON BEHALF OF A MANAGED FUND

§ 2

The Company shall act in the best interests of the Managed Funds or the investors in the Managed Funds when executing decisions to deal on behalf of the Managed Funds in the context of the management of their portfolio.

Whenever The Company buys or sells financial instruments or other assets for which best execution is relevant, they shall take all reasonable steps to obtain the best possible result for the Managed Funds or the investors in the Managed Funds, taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

The relative importance of such factors shall be determined by reference to the following criteria:

- 1) the objectives, investment policy and risks specific to the Managed Funds, as indicated in the Managed Fund’s rules or articles of association, prospectus or offering documents of the Managed Fund;
- 2) the characteristics of the order;
- 3) the characteristics of the financial instruments or other assets that are the subject of that order;
- 4) the characteristics of the execution venues to which that order can be directed.

Based on the investment policies and the applicable prospectus or offering documents of the Managed Fund, the Company has identified, as reflected in the table below, the factors that are generally considered most decisive, depending on the nature of the financial instrument involved, when

selecting an executing broker or counterparty. This assessment applies to the Company itself, as well as to any external fund manager to whom portfolio management has been delegated, cf. clause 6.

Where two or more executing brokers or counterparties are assessed as equivalent against the relevant criteria set out below for a given transaction, the price of the financial instrument and the associated transaction costs shall be the primary determining factors.

Financial instrument	Dominating factor(s)
Equity	Price, Speed
Fixed Income	Price, Costs, Liquidity
Money Market	Price, Liquidity
ETFs	Costs
Exchange-traded derivatives and FX	Reliable settlement
Other instruments	Price, Speed

The obligations above shall not apply whenever there is no choice of different execution venues. However, The Company shall be able to demonstrate that there is no choice of different execution venues.

PLACING ORDERS TO DEAL ON BEHALF OF THE ADMINISTERED FUNDS WITH OTHER ENTITIES FOR EXECUTION

BROKER SELECTION

§ 3

Depending on the type of Managed Funds and/or the fund managers The Company can execute orders itself or through other financial intermediaries (brokers) on behalf of the Managed Funds resulting from investment decisions.

The execution venue may differ, depending on the type of financial instrument in question. Equity orders are usually traded by brokers through exchanges. Orders in bonds are usually fulfilled by brokers out of their own inventory or through further brokers.

The Company ensures best execution of orders through a careful selection of brokers. For this reason, The Company chooses a selection of brokers to which employees (or external fund managers to whom the portfolio management has been outsourced cf. clause 6) are bound when selecting a venue for order execution.

The Company shall only enter into arrangements for execution where such arrangements are consistent with the obligations laid down in this Policy. The Company only makes use of brokers and counterparties who, after thorough due diligence, are deemed able to consistently fulfill such obligations. The Company periodically reviews the execution of orders on behalf of the Managed Funds by the approved brokers and counterparties.

Many brokers and counterparties offer additional services, such as research, financial analysis, and market- and quote information. The choice of a broker or counterparty may be influenced by the offering of these services, as long as this corresponds to the interests of the Managed Funds and/or constitutes a significant contribution to the investment decision making process.

BEST EXECUTION

§ 4

Whenever The Company buys or sells financial instruments or other assets for which best execution is relevant, it shall act in the best interest of the Managed Funds or the investors in the Managed Funds when placing orders to deal on behalf of the Managed Funds with brokers and counterparties for execution, in the context of the management of their portfolio.

The Company shall take all reasonable steps to obtain the best possible result for the Managed Funds or the investors in the Managed Funds taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order. The relative importance of such factors shall be determined in accordance with clause 2.

Furthermore, the Company shall maintain adequate policies and procedures to ensure the immediate, fair, and expeditious execution of trades on behalf of the Managed Funds. This includes ensuring that trading orders are recorded and allocated promptly and accurately, and that trades which are otherwise comparable are executed sequentially and without undue delay, unless the nature of the order, prevailing market conditions, or the best interests of the Managed Funds justify a different approach.

Financial instruments and funds received upon settlement of executed transactions shall be promptly and correctly credited to the accounts of the relevant Managed Fund.

The obligations referred to above shall not apply whenever there is no choice of different execution venues. However, The Company shall be able to demonstrate that there is no choice of different execution venues.

AGGREGATION AND ALLOCATION OF TRADING ORDERS

§ 5

The Company can only carry out an order on behalf of a Managed Fund in aggregate with an order of another Managed Fund or with an order made when investing their own funds where:

- 1) it can be reasonably expected that the aggregation of orders will not work overall to the disadvantage of any Managed Fund whose order is to be aggregated;
- 2) the below allocation policy is implemented and followed, providing sufficiently precise terms for the fair allocation of aggregated orders, including how the volume and price of orders determines allocations and the treatment of partial executions.

Where The Company aggregates an order on behalf of a Managed Fund with one or more orders of another Managed Fund and the aggregated order is partially executed, it shall allocate the related trades in accordance with its order allocation policy.

Where The Company aggregates transactions for its own account with one or more orders of a Managed Fund, it shall not allocate the related trades in a way that is detrimental to the Managed Funds. Furthermore, the aggregation of orders shall not be carried out in a way that results in the allocation of trades to the disadvantage of any Managed Fund participating in the transaction.



Where The Company aggregates an order of a Managed Funds with a transaction for its own account and the aggregated order is partially executed, it shall allocate the related trades to the Managed Funds in priority over those for own account. Where multiple Managed Funds participate in an aggregated order that is only partially executed, the allocation shall be affected on a pro rata basis, reflecting each Managed Fund's relative share of the total order.

However, if The Company is able to demonstrate to the Managed Funds on reasonable grounds that it would not have been able to carry out the order on such advantageous terms without aggregation, or at all, it may allocate the transaction for its own account proportionally, in accordance with its order allocation policy.

ORDER HANDLING

§ 6

The Company shall provide for the prompt, fair and expeditious execution of orders on behalf of the Managed Funds. When doing so The Company shall ensure that:

- 1) orders executed on behalf of the Managed Funds are promptly and accurately recorded and allocated and
- 2) otherwise comparable orders on behalf of the Managed Funds are executed sequentially and promptly unless the characteristics of the order or prevailing market conditions make this impracticable, or the interests of the Managed Fund or of the investors in the Managed Funds require otherwise.

The financial instruments, sums of money or other assets received in settlement of the executed orders shall be promptly and correctly delivered to or registered in the account of the relevant Managed Fund.

The Company shall not misuse information related to pending orders on behalf of a Managed Fund and shall take all reasonable steps to prevent the misuse of such information by any of their relevant persons (as such are defined in the Regulation and the Executive Order).

OUTSOURCING OF PORTFOLIO MANAGEMENT

§ 7

Where the Company elects to delegate the portfolio management of a Managed Fund to an external fund manager, it shall, prior to the delegation taking effect, carry out appropriate due diligence to assess whether the external fund manager's execution arrangements and principles are aligned with, and equivalent to, the standards set out in this Policy.

MONITORING

§ 8

The Company shall, at least annually, assess the effectiveness of its execution arrangements and the adequacy of this Policy, with particular focus on the quality of order execution provided by external

fund managers, brokers, and counterparties. The monitoring process shall be designed to identify, assess, and remediate any deficiencies in the established framework or in the quality of trade execution. Where material shortcomings are identified in the execution services provided by external fund managers, the Company shall engage in a timely and appropriate dialogue with the relevant external party to ensure that adequate remedial measures are implemented.

Furthermore, as part of its ongoing delegation oversight framework, the Company shall verify that external fund managers maintain policies, procedures, and controls that are adequate and appropriate for the services performed. Such verification shall, at a minimum, include obtaining periodic attestations from the external fund managers confirming the existence and ongoing maintenance of the relevant governance and control documentation.

COMPLIANCE

§ 9

The Company shall, upon request from the Managed Funds or their investors, produce documentation demonstrating that the Company, or, where applicable, an external fund manager, has executed or placed orders on behalf of the Managed Funds in accordance with this Policy.

Conflicts of Interest

§ 10

The Company shall ensure that any identified actual or potential conflicts of interest are identified, managed, and, where appropriate, mitigated in accordance with the Company's applicable conflict-of-interest policies and procedures.

Furthermore, the Company shall not act upon, disclose, or otherwise make improper use of information relating to unexecuted trading orders of the Managed Funds.

In addition, the Company shall implement and maintain all reasonable measures to prevent employees and other relevant persons from misusing information obtained in connection with the execution of trades on behalf of the Managed Funds.

CONSENT AND PUBLICATION

§ 11

The Company shall obtain each managed UCITS fund's prior approval to this Policy.

The Company shall make this Policy, as well as information about material changes to the Policy, available to the investors in the Managed Funds on the website of each Administered Fund.

REVIEWS

§ 12

The Board shall review this Policy on at least an annual basis. A review shall however also be carried out whenever a material change occurs that affects The Company's ability to continue to obtain the best possible result for the Managed Funds.

Approved by the board on 18th of August 2026.

Version log

Version	Basis	Valid as of	Changes
4.0	Compliance and legal review of the policy	18.08.2026	Following a review of the policy, the following amendments have been made: § 2: Clarified determining factors for execution decisions. § 4: Further specified best execution obligations. § 5: Clarified allocation rules for partially executed orders. § 7: Introduced initial due diligence requirement for external fund managers. § 8: Implemented dialogue-based monitoring of execution quality and included a control as part of the delegation oversight process. § 9: Clarified rights to request trade execution documentation. § 10: Added conflict of interest handling provision.
3.0	Annual review	19.08.2025	Revision of the policy
2.0	Annual review	20.08.2024	Policy adapted to the new policy template
1.0	Annual review	23.08.2023	Annual review of the policy