

# Details of our Order Execution Policy.

Harvest Financial Services Limited (Harvest) is deemed authorised under Regulation 5(2) of the European Union (Markets in Financial Instruments) Regulations 2017 (as amended) (MiFID) for the provision of the investment services of:

- i. investment advice; and
- ii. the reception and transmission of orders in relation to transferable securities, money-market instruments and units in collective investments undertakings.

Under MiFID, we:

- are not authorised to execute orders;
- have a duty to act in the best interests of our retail clients when carrying out the reception and transmission of orders to other entities for execution e.g. stockbrokers;
- transmit orders with / without specific instructions to other entities for execution. These entities must take all sufficient steps to obtain the best possible result for our retail clients taking into account the price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order;
- have a policy to only transmit orders for execution to those entities with which our retail clients hold an account;
- monitor the execution quality of these entities by checking a sample of the orders to verify that the best possible results were obtained for our retail clients on a consistent basis;
- review this policy at least annually and whenever a material change occurs to this policy;
- deem retail clients to have provided consent to our order execution policy when retail clients give us an order to transmit;
- receive fees for transmitting orders to certain stockbrokers (details provided on our website);
- have to provide information on our website regarding the execution venues used by other entities;
- do not misuse information relating to orders received from our retail clients;
- have a procedure in place where the Compliance Department must pre approve any orders our staff wish us to transmit;
- have a conflicts of interest policy (details provided on our website);
- provide our retail clients, in a timely manner, with warnings for each order received e.g.:
  - where we are not required to assess the suitability of the non-complex financial instrument;
  - where we consider the complex financial instrument not to be appropriate;
  - where we are unable to carry out an appropriateness test to determine if the complex financial instrument is appropriate or not; and
- provide our retail clients, in a timely manner, with the stockbroker's contract notes for each order received and transmitted to stockbrokers.

Our retail clients should review the documentation that they have received from the entity they hold an account with (i.e. terms of business / conditions) for clarification of the entity's order execution policy, best execution policy, order allocation policy, order handling procedure, details of the execution venues the entity uses and details of when orders are executed outside a trading venue.

**The legislative information contained herein is based on our understanding of current practice as at April 2018 and may be subject to change in the future.**

**Warning: Any specific instructions from a retail client may prevent another entity from taking the steps that it has designed and implemented in its execution policy to obtain the best possible result for the execution of those orders in respect of the elements covered by those instructions.**

Harvest Financial Services Limited.  
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04.72.04.18.

