

## Theta Capital Management B.V.

### Order Handling Procedure

Theta Capital Management B.V. (Theta) is a fund and asset manager under an AIFMD license and MIFID top-up that facilitates reception and transmission of orders for its advisory and portfolio management services.

#### Placing orders with third parties

This procedure details how Theta handles the reception and transmission of client orders and how Theta ensures a sufficient level of duty of care in ensuring the best outcome for its clients.

#### Order Handling Parameters

Theta takes all sufficient steps to obtain, when receiving and transmitting orders an determining the order routing, the best possible result for their clients taking into account in relation to the order execution:

- accessibility
- price
- costs
- speed
- likelihood of execution and settlement
- size
- nature or any other consideration relevant to the (eventual) execution of the order.

#### Venues for order execution

Theta might facilitate orders to be transmitted outside of Trading Venues. In case orders are transmitted to/executed via a Trading Venue, the overview underneath indicates which venues are used for which Financial Instrument types.

Where only one Venue is selected, Theta indicates how selecting this execution venue ensures obtaining the best possible result for the client.

| # | Financial Instrument Type  | Relation to Theta Service | Venues selected | Rationale   |
|---|--|---------------------------|-----------------|---|
| 1 | AIFs: reception and transmission of client orders                            | All Mifid Services        | N/A             |   |
| 2 | FX Forwards: reception and transmission of client orders (Other Derivatives) | All Mifid Services        | Northern Trust  | Periodic review of Northern trust <a href="#">Best Execution Policy</a> |

#### Access to the Order Handling Procedure of Theta Partners

This Order Handling Procedure will be available on request or via the Theta website.

## **Conflicts of Interest**

Theta does not receive any remuneration, discount or non-monetary benefit for routing client orders to a particular trading venue or execution venue.

## **Monitoring of the Order Handling**

Monitoring of the order execution policy

Theta monitors the effectiveness of its order handling policy, including the following elements:

- whether client orders are received, transmitted and executed in compliance with the order handling procedure;
- the quality obtained in received, transmitted and executed orders;
- the possible price for execution for each financial instrument class taking into account a reference dataset. Where available, investment firms may use information for the reference dataset from consolidated tape providers;
- all other factors relevant to the execution of the order as set out in Article 27(1) of Directive 2014/65/EU;
- other relevant indicators to assess compliance with the order handling procedure.

## **Reporting on order Handling**

Theta will periodically update its website with relevant reports on the outcome of its monitoring on Order Handling, on at least an annual basis or whenever a material change occurs. A material change shall be any significant event that could impact parameters of best execution such as cost, price, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

## Annex Classes of financial instruments & indication of Material Changes

### Classes of financial instruments

- Shares and depositary receipts The ‘transferable securities’ referred to Article 4(1), point (44)(a), of Directive 2014/65/EU.
- Exchange traded funds, exchange traded notes and exchange traded commodities ‘Exchange traded funds’ as defined in Article 4(1), point (46), of Directive 2014/65/EU. ‘Exchange traded commodities’ and ‘exchange traded notes’ as referred to in Table 2 of Annex IV of Commission Delegated Regulation (EU) 2017/58316 and further specified in Table 2.4 of Annex III thereof.
- Certificates and other equity-like financial instruments ‘Certificates’ as defined in Article 2(1)(27) of Regulation (EU) No 600/201417 . ‘Other equity-like financial instrument’ as referred to in Table 2 of Annex III of Commission Delegated Regulation (EU) 2017/58718 .
- Bonds and money-market instruments For ‘bonds’, the transferable securities referred to in Article 4(1), point (44)(b), of Directive 2014/65/EU. ‘Money-market instruments’ as defined in Article 4(1), point (17), of Directive 2014/65/EU.
- Structured finance products As defined in Article 2(1), point (28), of Regulation (EU) No 600/2014.
- Options and futures admitted to trading on a trading venue ‘Options’ and ‘futures’ as referred to in Section C (4) to (7) and (10) of Annex I of Directive 2014/65/EU.
- Other derivatives Financial instruments as referred to in Section C (4) to (8) and (10) of Annex I of Directive 2014/65/EU, except options and futures admitted to trading on a trading venue.
- Contracts for difference Financial instruments as referred to in Section C (9) of Annex I of Directive 2014/65/EU.
- Emission allowances Financial instruments as referred to in Section C (11) of Annex I of Directive 2014/65/EU.
- Other instruments Financial instruments that do not fall within the definition of the classes (a) to (i) above