

## **Guidelines for best execution and execution of orders**

### **1. Generally**

NRP Finans is amongst others authorized to transmit and execute orders in relation to financial instruments and interests in general partnerships, limited partnerships and internal partnerships. In that relation the firm is subject to the Securities Trading Act section 10-13 and the Securities Trading Regulation section 10-28 et seq. on execution of orders. The firm is also subject to the Securities Trading Act section 10-12 and the Securities Trading Regulation section 10-25 et seq. on best execution.

These Guidelines apply to the handling of both non-professional and professional clients.

These Guidelines apply to all types of investment products offered by NRP Finans to its clients, including real-estate, shipping and offshore/rig projects structured as private limited companies or partnerships, including general partnerships, limited partnerships and internal partnerships. The Guidelines also apply to syndicated real-estate, shipping, offshore/rig-projects structured as private limited companies or partnerships, including general partnerships, limited partnerships and internal partnerships.

NRP Finans' business strategy implies that NRP Finans does not execute orders related to financial instruments listed on a regulated market. NRP Finans is not aware that the relevant financial instruments are traded on any multilateral trading facility.

### **2. Execution of orders**

#### **2.2 Handling of orders**

In executing of orders, NRP Finans shall ensure that orders are registered and allocated immediately and accurately.

Comparable client orders executes immediately and in the chronological order in which they were received, unless the nature of the order or the prevailing market conditions make this impossible or they are in conflict with the client's interests. Clients shall be informed on any significant problems in executing the order as soon as the firm has become aware of such problems.

When carrying out settlement, NRP Finans shall initiate all reasonable measures to ensure that the client's financial instruments or assets received in connection with the settlement are immediately transferred to the account of the client concerned.

NRP Finans shall not misuse information about non-executed orders, and shall initiate all reasonable measures to prevent individuals associated with the firm from misusing such information. The information about such non-executed orders shall be handled in accordance with the routine for handling of information.

## 2.3 Order aggregation

NRP Finans may not execute a client order together with another client order unless:

- it is improbable that aggregation in general will be to the detriment of the client
- each client is apprised that aggregation may be to his detriment.

When aggregation client orders each client's share of the order shall be determined in advance. If such aggregated order is not fulfilled, the clients shall be given a pro rata share in the same proportion as they participated in the aggregated order. Threshold values for the minimum share to each individual client shall be given. Such thresholds shall be based on objective criteria.

If aggregated orders are fulfilled in stages, customers will be given the same average price.

NRP Finans may not allocate or re-allocate trades in violation of these Guidelines in a manner that's not in the Client's interest.

## 3. Best result for transmission and execution of client orders

### 3.1. Generally

When transmitting and executing client orders, NRP Finans must take all reasonable steps to obtain the best possible results for their clients and will take into consideration the price, costs, speed, likelihood of execution and settlement, size, nature and other relevant factors. When determining which one of these factors that will be most important when one specific order is executed, NRP Finans will take into account the characteristics of the client (professional/qualified), the characteristics of the order, the characteristics of the financial instruments or interests that are subject to the order and the characteristics of the execution venues to which that order can be directed.

### 3.2 Best execution of order

When executing orders which by their nature can be executed by using different trading systems or outside a trading system, NRP Finans shall take into account the factors mentioned in section 27.3.1. The same applies to the transmission of orders.

With respect to non-professional clients, the requirement on best execution of orders implies that the orders shall be placed at the lowest possible cost to the client. The "cost" means, in addition to the NRP Finans' charge, direct costs and fees that are triggered by transmission of orders.

If the client has given specific instructions, the order must be executed in accordance with the instructions.

### 3.3 Measures for ensuring best execution

NRP Finans shall have standardized procedures for which orders to be placed to a specific firm, and if possible, which market places to be used. Each employee shall not deviate from these procedures without the consent of the Head of Compliance.

NRP Financial will calculate the same charge for their services regardless of the choice of trading system.

The Head of Compliance shall consider whether the entities, to which NRP Financial transmit orders to, have effective procedures, systems and arrangements that ensures that the clients is ensured the best execution of the order. Investment firms with an authorization to execute orders and which operate in Norway, either by a Norwegian authorization or by cross-border activity/possibly a branch establishment

pursuant to the MiFID directive, should normally be considered to satisfy the requirements of the first paragraph.

NRP Finans will annually consider whether there is a need to make changes in relation the choice of receiver of orders/marketplaces.

a) Order related to subscriptions

Investment-products regulated by these Guidelines are not traded on a regulated market.

NRP Finans may receive subscriptions related to products either as instructed by the client without previous any prior investment advice, or if it is explicitly agreed that the client shall receive investment advice based on such advice.

NRP Finans does not offer a broad specter of investment possibilities from external product-suppliers, but mainly offers its clients to subscribe in different projects managed by NRP Finans or investment companies managed by NRP Finans/funds/syndicates/projects initiated by NRP Finans.

Any possible investment advice is limited to the few investment products NRP Finans offers and is not product specific. The business of NRP Finans does not include advising the client with regard to investment objectives and further investment frames (principles of asset allocation, portfolio composition to achieve the desired diversification, etc.). The client is considered known with this.

NRP Finans will upon receipt of each client order aim to execute the order as soon as possible, and at any time in accordance with prevailing legislation and NRP Finans' other regulations.

b) Orders related to the secondhand market

Order related to secondhand trade of non-listed products may not be executed in a regulated market. NRP Finans is not familiar with any of the relevant products being traded on any multilateral trade facility.

By reception of order regarding purchase and/or sale in the secondhand market related to products, NRP Finans will to its best efforts consider how a best possible result may be achieved for the client. There being no organized market, this will be performed by NRP Finans attempting to obtain a client with an opposite interest and with best possible price.

c) Relevant factors when choosing execution method

When choosing execution method, NRP Finans will take into consideration the orders priority in time, price, size, probability for completion and settlement, character and other relevant circumstances.

Towards non-professional clients, best result will be determined on the basis of the total remuneration payable by or to the client in connection with the execution of the order.

### 3.4 Orders outside regulated marked or MTH

NRP Finans will execute orders for clients in one of the following ways:

- by purchasing from or selling to other clients (client-to-client trading)
- by transmitting orders to another investment firm with which NRP Finans cooperates.

#### **4 About specific instructions from the Client**

NRP Finans will be considered to comply to these Guidelines when NRP Finans adheres to the Client's specific instructions, whether NRP Finans execute the order itself or whether NRP Finans transmits the order to another investment Firm. NRP Finans specifically informs that such specific instructions from the Client may prohibit NRP Finans from being fully compliant with these Guidelines regarding best execution.