1. Introduction
   This order execution policy describes how, at Jyske Bank, we handle client orders for all financial instruments with the aim of securing the client the best possible order execution under the circumstances. The policy applies to execution, passing on, aggregation and distribution of orders and applies to both retail and professional clients, including clients covered by portfolio management agreements. The policy only applies to eligible counterparties to the extent agreed upon with the Bank.

   Jyske Bank will follow this policy unless the client specifically instructs the Bank on how to execute the order. Because of a specific instruction from a client, Jyske Bank may not be able to adhere to the current order execution policy at Jyske Bank to achieve the best possible transaction for the client.

   At least once a year, Jyske Bank’s order execution policy will be reviewed by a central best execution committee with a view to ensuring the optimum execution of all types of client orders. In addition, the best execution committee will review business partners, execution venues and other circumstances that affect the order execution at Jyske Bank on an on-going basis. If material amendments are made to the order execution policy, an announcement will be made on Jyske Bank’s website. The order execution policy in force will always be available on Jyske Bank’s website through this link: www.jyskebank.dk/investmentinfo

2. General guidelines for order execution at Jyske Bank - best execution and summary for retail clients
   When you trade through Jyske Bank, we will take all sufficient steps to achieve best execution, when executing your orders and, if possible, according to your wishes. Before investing in financial instruments, we categorize all our clients as retail clients, professional clients or eligible counterparties.

2.1. Order execution
   When executing your order, we will take all sufficient steps to achieve the best possible result for you under the circumstances. Among other things, we will consider price, costs, the speed of order execution, liquidity, the likelihood of execution and settlement, form of settlement, the size and nature of the order and any other consideration relevant to the efficient execution of your order (Best Execution Factors).

   When executing client orders, we will also take the following factors into account:
   - Client category
   - Order type to be used
   - Financial instruments to be traded
   - Characteristics of the execution venues to which the order can be directed.

   Are you a retail client, the best possible result is determined in terms of the total consideration, i.e. the price of the financial instrument and any costs relating directly to the execution of the order including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order.

   Are you a professional client, the weighting of the best execution factors may vary, and will often depend on the individual terms and conditions you have agreed with us. Price and costs are still important factors but, depending on your needs, we may consider speed of execution as equally important factors in our efforts to ensure best execution for you.

   This order execution policy does not apply to you if you are an eligible counterparty. We are however, still obliged to act honestly, fairly and professionally when executing your orders, and we may agree with you that the order execution policy applies - partly or in its entirety.

   On your request we will document, that we have executed your order in line with this order execution policy.

2.2. Systematic internaliser (SI)
   Jyske Bank is a systematic internaliser in those financial instruments, which we trade on an organized, frequent systematic and substantial basis outside a trading venue.

   As an SI, Jyske Bank is obliged to - under normal market conditions - to post firm quotes for its clients up to order sizes defined by the EU Commission. When you accept our firm quotes, we characterize such accepts as “spot orders.” On a quarterly basis, we publish an overview of those instruments where we act as an SI as well as the size or sizes at which we quote. The overview is available at Jyske Bank’s website at this link: www.jyskebank.dk/investmentinfo

2.3. Execution venues and business partners
   Jyske Bank has the option to execute your order outside a trading venue (OTC trading), cf. also section 5 below.

   A trading venue is defined as a regulated market, a multilateral trading facility or an organized trading facility. Execution venues, however, is a broader term including systematic internalisers, market makers and other liquidity providers.

   Trading and member rules on the trading venue where your order is executed may prohibit us in executing the order in line with your instructions. In such cases, you will receive a notification prior to a potential trade.

   When your orders are executed outside a trading venue, it will in most cases happen with Jyske Bank as your counterparty. This means that you will be trading the financial instrument directly with us. On your request, we will provide you with further information regarding the consequences of trading outside a trading venue.
Your order may be passed on to business partners if this is deemed best for the overall execution. Execution venues are selected in consideration of the “Best Execution factors” stated. When making this selection, the execution venues available in the market that Jyske Bank uses for each class of financial instruments are considered. When selecting execution venue, Jyske Bank will take into consideration the bank’s own provisions and any other costs associated with executing your order at each execution venue. When evaluating the execution venues on a continuous basis, in order to ensure best execution of your order. If your order relates to a financial instrument traded or admitted to trading on a trading venue, we can choose to execute the order at the relevant trading venue or trade with you as a direct counterparty. Generally, we will trade as your counterparty unless we deem this will not meet our best execution standards.

Jyske Bank publishes an annual overview of the top five execution venues for each class of financial instruments. Further, we publish a quarterly report on the quality of execution for those instruments where we act as an SI or as a market maker (first time after 2nd quarter of 2018), as well as a complete list of the execution venues used by Jyske Bank. The overview and reports are available on our website through the following link: www.jyskebank.dk/investmentinfo

2.4. Partial settlement
In the event that your order cannot be executed in its entirety due to lack of liquidity in the market, the bank shall not be under the obligation to carry out partial settlement. If possible, you will prior to a transaction be asked to decide whether you wish partial settlement.

2.5. Aggregating orders
Your order may be aggregated with other client orders or the bank orders when we assess that, on the whole, this will be to the advantage of our clients. If an aggregated order is executed in part, the individual orders will be settled pro rata at the average price, and client orders will normally be executed before the bank’s own orders.

In cases where we receive several client orders at the same price, generally it will be the time of receipt of the individual client order that will decide the order in which the client orders are executed and settled.

2.6. Internal order matching
Matching opposing orders between clients covered by portfolio management agreements in Jyske Capital may occur. We only apply internal order matching if we can make sure that no client would be worse off had internal order matching not been applied, and provided, among other things, that prices are actual market prices.

Jyske Bank does not systematically match orders internally in financial instruments where we act as an SI.

2.7. Order types
Which order types you can use will generally depend on the order types made available by the individual execution venue. However, Jyske Bank reserves the right not to accept order types of an execution venue if the bank’s systems do not support the desired order type.

Particularly when using the order type stop loss, you should be aware that the desired stop loss price is not equal to the settlement price as factors such as market liquidity and trading volume will affect the final settlement price.

Placing of orders must meet the general terms and conditions for placing orders with Jyske Bank, which are described on the bank’s website in the document ‘Order types at Jyske Bank’. This document describes the types of orders that are offered by Jyske Bank. The document is available on our website through this link: www.jyskebank.dk/investmentinfo

2.8. Right not to execute an order
Jyske Bank may refuse to execute your order in the event we suspect market abuse.

3. Special circumstances
If it is possible to trade during force majeure situations, exceptional market conditions and system breakdowns, the Bank may not be able to follow the guidelines for the order execution policy.

Trading under power of attorney agreements and wholesale agreements may deviate from the guidelines set out in the order execution policy, and reference is made to the terms and conditions governing the individual agreements.

Trading venues and execution venues reserve the right to cancel trades, for instance, in cases where they have been executed on the basis of technical or manual errors. The rules about cancellation, etc. are described in detail in the member rules of the individual trading venues and execution venues. Jyske Bank reserves the right to cancel such trades as may be cancelled under these rules and assumes therefore no liability for such cancellations.

Jyske Bank reserves the right to cancel transactions made on the basis of technical or manual errors, as well as the right not to execute orders in connection with orders where there are suspicion or proof of circumstances covered by the rules on market abuse or money laundering.

Under exceptional market conditions, Jyske Bank reserves the right not to provide firm quotes in instruments where we are acting as an SI, cf. also section 2 above.

3.1. Tax-favored savings
In connection with investments under this type of savings (pension, children’s savings and savings related to home financing), Jyske Bank can solely trade shares or bonds admitted to trading on a venue outside the EU/EEA, if such venue is a member of the WFE (World Federation of Exchanges) or by Jyske Bank is considered as an third-country equivalent market. A list of third country venues, which Jyske Bank considers as equivalent markets, is available at www.jyskebank.dk/investmentinfo

4. Special circumstances relating to order handling in regulated markets or similar execution venues
This section describes circumstances especially applying to the trading of shares and equity-like instruments. The special circumstances stated below supplement the policies described under section 2) and 3), which will always apply.

You decide how you wish to trade with Jyske Bank. In relation to the individual order types available to you we refer to our general terms, cf. section 2.7 above.

For all instruments, we have the option to execute your “at best” orders with the Bank as a counterparty. When using at best orders you shall be aware that – in contrast to spot orders - delays in settlement can occur in connection with periods without observable prices in the market.

The most relevant best execution factors when execution orders in equities and equity-like instruments is normally
the price of the financial instrument and the costs associated with the execution of the order, including any fees paid to third parties. Depending on your requirements, likelihood of execution and the speed of execution may also be considered as a significant factor.

4.1. Trading of equities

Jyske Bank may assess that the market conditions or the attributes of the order you have placed, justifies that we split your order into several minor orders. This would be the case if your order is large and we assess a single order execution would have a negative effect on the execution price.

Jyske Bank is not obliged to quote spot prices for orders in excess of the standard market size. Standard market size is determined on the basis of turnover data published on a quarterly basis by the European Supervisory Authority ESMA.

4.1.1. Trading via Smart Order Routing (SOR)

A number of our business partners and Nasdaq OMX Denmark, Sweden and Finland offer the possibility of trading via a functionality called Smart Order Routing (SOR) in connection with large cap equities/CCP cleared equities traded through them. Basically, we make use of these offers. SOR is a functionality that can be used in connection with all order types - except for spot orders. When SOR is used, the functionality will search pre-defined execution venues to find the best price for the specific share requested and execute the purchase/sale where the price is best.

4.1.2. Trading of foreign equities via e-trading solutions

In those cases where you are offered access to trade foreign shares through our e-trading solutions, your orders are placed with one or several of our business partners and subsequently booked as a trade with Jyske Bank as a counterparty.

4.2. Trading of Danish investment funds

When handling orders for investment funds, Jyske Bank will trade the order on the market for investment funds under Nasdaq or place the order with the market maker or administrative company behind the investment association/mutual fund or investment fund. Jyske Bank may also choose to be counterparty for the trade if this is assessed not to be to the disadvantage of the client.

For investment funds where we act as an SI, we will make public firm quotes on a regular and continuous basis. In case of events in the market that Jyske Bank considers has a significant effect on the NAV (exceptional market conditions), we reserve the right not to post firm quotes in such periods where a new NAV is being calculated.

4.3. Trading of certificates and ETFs

When you trade certificates admitted to trading on Nasdaq Copenhagen, we will normally execute your order directly on the market. Consequently, you will normally not be trading with us as your counterparty. If your order pertains to foreign certificates, we will execute your order via one of our business partners.

When you trade ETFs we will normally execute your order via one of our business partners. You will normally not be trading with us as your counterpart.

We evaluate our business partners on a continuous basis, including their ability to deliver satisfactory prices, so we can continue to provide best execution to you.

An updated overview of business partners and execution venues used by Jyske Bank can be found on our website at this link: www.jyskebank.dk/investmentinfo

5. Special circumstances relating to orders in non-equities

This section describes circumstances especially applying to the trading of non-equities. The below stated special circumstances supplements the policies described under section 2) and 3), which will always apply.

For non-equity instruments, we have the option to execute your “at best” orders with the Bank as a counterparty, considering the best execution factors. When using ad best orders you shall be aware that - in contrast to spot orders - delays in settlement can occur in connection with periods without observable prices in the market.

The most relevant best execution factors when executing orders in non-equities is normally the price of the financial instrument and the costs associated with the execution, including any fees paid to third parties. Depending on your requirements, likelihood of execution and the speed of execution may also be considered as a significant factor.

Trading of non-equities often takes place on dealer markets (quote-driven markets). By trading on a dealer market, you are not as a professional client necessarily entitled to receive best execution. The determination hereof depends on such factors as who has initiated the trade, normal market practice, your access to price transparency and the general terms and conditions of your agreement with the Bank. As a starting point, retail clients will however always be entitled to best execution.

Are you trading OTC- or bespoke products, e.g. financial instruments which are not admitted to or traded on a trading venue, we will control the fairness of the price by reference to accessible market data and by comparison with similar products.

The pricing of OTC- or bespoke products will typically be based on the market value or intrinsic value of the underlying financial instruments. When pricing such products Jyske Bank will furthermore take into account factors such as the Bank’s costs relating to credit risk and hedging costs.

When Jyske Bank quotes prices on OTC traded non-equity instruments, an agreement between the Bank and the Client is finalized when the client accepts the quoted price.

5.1. Trading of Danish mortgage bonds

The price formation on the Danish market for mortgage bonds is normally determined on the institutional OTC markets. Consequently, Danish mortgage bonds do not always have an observable market price because they are not traded on the trading venue where they are admitted for trading. Therefore, when you trade with us as a counterparty, our prices are based on our own internal price models, which - among other things - are built upon accessible market data and models for future interest rate development.

For Danish mortgage bonds where we act as an SI, we will make public firm quotes on a regular and continuous basis. In case of events in the market,
which Jyske Bank considers has a significant effect on our internal price models (exceptional market conditions) we reserve the right not to post firm quotes in such periods where sufficient adjustments to our price models are being made.

5.2. Trading of corporate and emerging market (EM) bonds

Client orders relating corporate and EM bonds are normally executed with Jyske Bank as the counterpart, but can also be executed via our business partners, considering the best execution factors, or executed directly on a trading venue.

For certain corporate and EM bonds there is not always an observable market price available. It may be due to lack of liquidity that the bonds are not traded on the trading venue where they are admitted for trading or that the bonds are not admitted for trading or traded on a trading venue. Therefore, when you trade with us as a counterpart, our prices are based upon our own internal price models, which - among other things - are built on accessible market data and models for future interest rate development.

5.3. Trading of government bonds

Client orders relating to government bonds are normally executed with Jyske Bank as the counterpart, but can also be executed via our business partners, considering the best execution factors, or executed directly on a trading venue.

We consider the price as the most important best execution factor.

5.4. Trading of standardized derivatives

Client orders relating to government bonds are normally executed with Jyske Bank as the counterpart, but can also be executed via our business partners, considering the best execution factors, or executed directly on a trading venue.

We consider the price as the most important best execution factor, but speed of execution and likelihood of execution may play a significant role, depending on your needs and the risk you are aiming to minimize/hedge.

5.5. Trading of FX derivatives

Pricing in the FX market takes place on market conditions, which means that basically the transaction is executed at the price at which we can hedge the transaction at the individual market players.

We use recognised external business partners as references in connection with the execution of the client order so that we make sure it is executed at a market price. Moreover, we use Jyske Bank’s own reference prices, which have been calculated on the basis of various factors such as volatility and yield curves.

The execution of client orders relating to FX derivatives normally happens with Jyske Bank as counterparty, and a transaction with our business partners will not necessarily take place.

When using fixed orders for foreign exchange, please see a separate description of this, which is available upon request.

The trading price offered to you may include a margin. The margin is set on the basis of the individual client relationship and the market conditions, including volatility and liquidity. We therefore point out that our clients are not necessarily charged the same margin.

5.6. Trading of commodity derivatives

The execution of orders for commodity derivatives will always happen with Jyske Bank as the counterparty, and a transaction with our business partners will not necessarily take place.

The commodity derivative contract, which you trade, will therefore always be an OTC instrument, reflecting current market prices for the commodity in question. Normally you will therefore not have the option to trade exchange traded commodity derivatives with Jyske Bank.

The pricing of commodity swaps and commodity futures is based on market values, and the transaction will be executed at the price at which we can hedge the transaction in the market. We use recognised external market participants as references in connection with the execution of orders.

5.7. Interest rate derivatives

The pricing in the market for interest-rate derivatives is based on market values, and basically the order will be executed at the price at which we can hedge the transaction in the market or though counterparties in the interbank market. We can also use Jyske Bank’s own price models to calculate a price for orders where the price will be calculated on the basis of market factors such as FX rates, volatility and yield curves.

The execution of orders for interest rate derivatives will normally takes place with Jyske Bank as the counterparty, and a transaction with our business partners will not necessarily take place.

We consider the price as the most important best execution factor, but speed of execution and likelihood of execution may play a significant role, depending on your needs and the risk you are aiming to minimize/hedge.

5.8. Repo transactions

When you enter into repurchase agreements (securities financing transactions) with Jyske Bank, you will always trade with us as the counterparty.

We consider the price the most important best execution factor. The price is primarily determined from the underlying assets, the volatility in the markets, and the size of the transaction as well as credit and yield curves.

5.9. Structured products

Execution of client orders relating to structured products normally takes place with Jyske Bank as the counterparty, and a transaction with our business partners will not necessarily take place.

We consider the price the most important best execution factor.

6. Special circumstances relating to portfolio management

When Jyske Bank provides portfolio management services to you, we are obliged to act in your best interest, and we therefore always follow this order execution policy.

Portfolio management services in Jyske Bank are normally provided by Jyske Capital, which is an business unit of Jyske Bank A/S, operating independently of the other activities of the Bank. As such, Jyske Capital uses a number of business partners and execution venues not used by the other business units of the Bank.
Jyske Capital evaluates those business partners and execution venues it uses on a continuously basis and publishes on quarterly basis a list of such.

7. Additional information
As a client in Jyske Bank you can get an overview of all relevant information in relation to investment and order execution on the financial markets on our website on the following link: www.jyskebank.dk/investmentinfo