

# Co-investment and Order Allocation Policy

## Background and general principle

Amati currently manages client assets under five different mandates: Amati AIM VCT plc ("AMAT"), the WS Amati UK Listed Smaller Companies Fund ("SMCO"), the WS Amati Strategic Metals Fund ("ASMF"), the WS Amati Global Innovation Fund ("AGIF") and the Amati AIM IHT Portfolio Service ("AIHT"). The overriding principle of allocation between the various funds is that each fund should be treated fairly and transparently in accordance with its investment mandate.

## Transactions

Normal transactions, whether buying or selling, are conducted at the discretion of the managers at a time which best suits the fund(s) in question. The starting point for any order is calculating the desired resultant weighting for each fund, which will be determined by reference to the mandate for each fund, with the general principle of allocation for trades across funds being that the allocation for each fund will represent a similar percentage of the net assets to the other fund(s). For the purposes of the dealing system this principle of allocation is described as "NAV".

In the case of AIHT, trades are executed on the investment platform operated by James Brearley ("JB") and are not 'booked out' as such through the dealing system in the usual way. However, where a stock is being bought or sold in the IHT portfolio at the same time as in any of the other funds, the details of the trade as well as the justification for the allocation within the IHT portfolio will be recorded in the settlement notes and used for reconciliation and compliance purposes.

There will be no assumption that a trade deemed suitable for one investment mandate will necessarily be deemed suitable for funds with a different mandate. The principle of allocation will be recorded in the Amati Online Dealing System whenever a deal is initiated, which will describe how the allocation was calculated in relation to these funds. Partial fills of orders will be allocated pro-rata in proportion to the size of the intended allocation for each fund.

AMAT, SMCO, ASMF and AGIF have different investment mandates, although there is some crossover between AMAT and SMCO, and in turn between SMCO and ASMF. SMCO, ASMF and AGIF are unlikely to invest in any qualifying investments being made by AMAT, and non-qualifying investments in AMAT will generally comprise investments in SMCO, or other UCITS funds at the discretion of the AMAT directors.

AIHT has a different mandate to AMAT, SMCO, ASMF or AGIF, being limited to AIM-quoted stocks potentially eligible for Building Property Relief (BPR). Any security within the portfolio

would also generally need to be able to be held within an ISA, depending on the specific wrapper applied to client portfolios. The purpose of the investment is different and thus the risk profile of the end client is also likely to be significantly different from that of a shareholder in AMAT, SMCO, ASMF or AGIF. The IHT portfolio is also likely to be more concentrated, with around 25-40 stocks. This approach would favour high quality, mature, structural growth stocks at the higher end of the AIM liquidity spectrum, stocks more conducive to being held for extended periods, as opposed to less mature or 'trading' stocks, where a shorter time frame might in some cases be deemed appropriate. These factors together serve to ensure that the majority of trades executed for AIHT are done so independently of the other funds, notwithstanding some commonality of holdings.

Any dispute between the fund managers or between client funds over decisions which are marginal or where subjectivity is needed, will be settled by Amati's Head of Risk and Compliance. Any such disputes and the resolution thereof will be fully documented.

## **Execution of orders**

### **AMAT/SMCO/ASMF/AGIF**

Where an intended allocation is for more than one fund, dealing will be done at the same time and the order will be aggregated and placed in the market together. In the event of an order being only partially executed, each fund will receive an allocation calculated pro-rata in respect of the intended allocation. In the event of an order being completed in stages and at different prices, each fund will be treated as having dealt at the same weighted average price.

The Amati Online Dealing System will automatically allocate an order between the funds based on their intended allocations, which are input into the system for each fund at the start of each order.

### **AIHT**

Trades in AIHT take place on the platform operated by JB, independently of the dealing system. However, in the case of allocations in the IHT portfolio aggregated with another fund or funds, execution will take place at the same time as the other funds (through the same third party broker), albeit that the trade will not be 'booked out' as such in the dealing system in respect of the IHT portfolio. Details of the trade and the allocation should however be recorded in the settlement notes for reconciliation and compliance purposes.

## **Records and approvals**

The Amati Online Dealing System maintains a record of allocations applied for and those received, the allocation principle being followed in respect of the various funds, together with notes to explain any deviations from the above policy.

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