

Order Handling Policy

Under the EU Markets in Financial Instrument Directive (MiFID); Alliance Trust Savings is required to put in place an Order Handling Policy. The following policy sets out our strategy for obtaining the best possible results when handling your orders.

Our Approach to Order Handling

When we arrange the execution of an order on your behalf, we will take all reasonable steps to obtain the best possible results for you in accordance with the following policy. This will be subject to any specific instructions that you give us and you should be aware that such instructions may prevent us from obtaining the best possible result.

To do this we rely on four core components:

- Technology for routing, executing, settling and monitoring orders
- Careful consideration of the elements of order execution
- Regular examination of overall execution quality
- Selection of execution venues which consistently deliver best execution taking into account the execution factors below.

Execution Factors

The principal factors used to determine how your order is carried out are:

1. **Price** - We understand that price is probably the most important element to you and we will endeavour to achieve the best possible result for your order.
2. **Speed** - We seek to provide you with a facility that allows you the ability to complete your order as quickly as possible according to your method of instruction.
3. **Certainty of execution and settlement** - In some circumstances speed of execution and settlement would not achieve the best result for your order. We endeavour to complete your order ensuring the price, certainty of execution and certainty of settlement is considered according to your method of instruction.
4. **Ability to use automated trading functionality** - We will use wherever possible automated electronic trading platforms, but due to the nature of certain assets and their liquidity this will not always be achievable and so may have delays in execution because of their inherent nature. This applies particularly to the Full SIPP product range of investments.
5. **Any other relevant considerations** - i.e. the size or type of order.

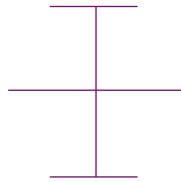
Execution Venues

We have included details of various sources of liquidity which we access for each of the financial instruments covered by MiFID in respect of the handling of orders on behalf of our clients. These sources of liquidity are known as 'Execution Venues' and include: Regulated Markets and Multilateral Trading Facilities (MTFs); Systematic Internalisers (SIs) and market makers.

We have carefully considered the available execution venues for placing your orders and have selected the following organisations as being able to provide the best possible result for the execution of your orders on a consistent basis:

AIM

London Stock Exchange



and their associated Member Firms - collectively referred to as 'market counterparties' (NB: These can be MTFs, SIs and market makers).

Plus Markets

Certain assets will not be tradeable through these venues and so may have delays in execution because of their inherent nature. This applies particularly to the Full SIPP product range of investments.

UK Markets

We use automated systems to request quotes from a number of market counterparties. Upon receipt of these quotes our technology systems will ascertain the best price available from those returned and then automatically transmit your order to the appropriate market counterparty who will execute your order.

We compare these prices against those that are quoted on the appropriate execution venues on which we deal to ensure that the price at which we arrange the execution of your order is obtaining you the best possible result on a consistent basis.

For orders which cannot be completed automatically, for example because the size of your order is greater than that available to trade electronically, you will be given the option of routing the order to one of our dealers who will then contact a market counterparty and negotiate the order on your behalf. Where appropriate the dealer will obtain multiple price quotes to determine the best price available.

Where we arrange the execution of an order on your behalf you instruct us to execute that order consistent with the terms of your plan and the current Order Handling Policy. If you ask us to, or we are obliged to, complete your order you agree and consent to us placing that order with one of our execution venues who may execute your order outside a regulated market or a multilateral trading facility. You also agree that we may trade and transaction report outside a regulated market.

Units in collective undertakings

Your accepted order will be routed to the appropriate fund manager for execution at the next available Assured Valuation Point (AVP) for that particular fund.

Regular review of execution quality and the Order Handling Policy

We regularly evaluate the overall quality of executed orders and our Order Handling Policy to ensure that it allows us to obtain the best overall outcome for our clients and that our high standards are maintained and will take appropriate action if a process can be enhanced.

If, as a result of a review we make any changes to our policy, for example by including a new regulated market or removing an existing regulated market, we will notify you of such changes by publishing the revised policy on our website at www.alliancetrust.co.uk/plan_documents.htm or by writing to you.

Definitions

Client

A retail client of Alliance Trust Savings.

Execution Venue

A Regulated Market, an MTF, a Systematic Internaliser, a market maker or other liquidity provider.

Financial Instruments

These include:

- Transferable securities i.e. shares, bonds, gilts etc.
- Units in collective investment undertakings i.e. UCITS, OEICS etc.

MiFID

The Directive 2004/39/EC of the European Parliament and the Council of 21 April 2004 on the Markets in Financial Instruments and any implementing directives and regulations.

Multilateral Trading Facility (MTF)

A multilateral system, operated by an investment firm or a market operator, which brings together multiple third party buying and selling interests in Financial Instruments – in the system and in accordance with non-discretionary rules – in a way that results in a contract in accordance with the provisions of Title II of MiFID.

Order

An instruction to buy or sell a Financial Instrument which is accepted by Alliance Trust Savings for reception and transmission to a third party for execution.

Regulated Market

A multilateral system operated and/or managed by a market operator, which brings together or facilitates the bringing together of multiple third-party buying and selling interests in financial instruments - in the system and in accordance with its non discretionary rules - in a way that results in a contract, in respect of the financial instruments admitted to trading under its rules and/or systems, and which is authorised and functions regularly and in accordance with the provisions of Title III of MiFID.

Systematic Internaliser

An investment firm which, on an organised, frequent and systematic basis, deals on its own account by executing client orders outside a Regulated Market or an MTF.



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ALLIANCE TRUST ASSET MANAGEMENT

ALLIANCE TRUST PLC

ALLIANCE TRUST SAVINGS

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