

Banco Comercial Português, S.A. - Guidelines for Executing Orders

Guidelines for Executing Orders

In its guidelines for executing orders, Banco Comercial Português S.A., hereinafter referred to as "the Bank", adopts all reasonable measures to achieve the best execution according to its analysis, bearing in mind the client's instructions.

These guidelines for the execution of orders only comprise the reception and transmission of orders on Financial Instruments, mentioned in Section C of Annex I to Directive 2004/39/EC, of the European Parliament and of the Council, of 21 April 2004 and apply to all Clients considered non-professional and professional, not applying to Clients considered Eligible Counterparty.

Execution factors

The Bank took into account price, total costs of the transaction, speed, likelihood of execution and settlement, size and nature of the order while choosing its trading platform for executing orders on behalf of its clients. These factors are not ranked, and the Bank shall determine the relative importance of each factor, based on the features of the orders and of the clients.

Execution Channels

- **Clients of the Execution of Orders**

Orders issued by clients, regardless of the transmission channel used (internet, networks or call-centres), shall be processed as follows:

In orders issued for markets of which BCP is not a member, the Bank shall send the orders to another intermediary, which will be obliged to pursue all reasonable measures to achieve the best result for the client.

The orders given to this intermediary shall be sent to the relevant market. The intermediary will consider as relevant market the primary market where the security was listed.

If the intermediary that receives the Bank's orders does not use the relevant organized market, it shall guarantee the same execution price or better than the one applied in that market at the time of the order's execution.

All orders received to be executed regarding investment funds or equivalents shall be placed directly or indirectly with the Managing Companies.

While executing orders received for instruments not negotiable in organized markets, the structure and features if the negotiation included in the prospectus or product files shall be made available commercially.

- **Custody Clients**

For Custody Clients, the Bank only provides a service that assists them in selling Financial Instruments resulting from corporate events on assets under this Institution's custody, which have difficulties being placed using the normal negotiation channels, i.e., the brokerage companies.

On rare occasions, the Bank may help purchase Financial Instruments, namely rights to corporate events, so as to enable the client to exercise the remaining rights in a more efficient manner.

The list of suppliers used by the Bank to execute orders in markets of which it is not a member may be found in the Bank's website: www.millenniumbcp.pt or at the Bank's branches.

This list will be updated when deemed necessary.

Specific instructions of the Clients

The Bank commits itself to comply with the specific instructions to execute orders given by its Clients, except when regarding instruments, markets or platforms that the Bank does not have available.

Yet, the Bank warns that, by giving specific instructions to execute a certain order, the Client may jeopardize the Bank's execution policy, as stated in the Execution Factors.

Monitoring

The application of our execution policy will be monitored by the existing internal systems.

Revision of processes

Periodically, at least once a year or whenever deemed necessary, The Bank shall revise its processes so as to evaluate the execution conditions of its Clients' orders.

EXECUTION MARKETS

The Bank chose the following relevant markets based on their liquidity and representativeness.

1) Cash Markets

a) The Bank has direct access to the following trading platforms (regulated markets and Multilateral Trading Facilities):

- France – NYSE Euronext Paris
- Portugal – NYSE Euronext Lisbon, PEX* (stocks, warrants and certificates)
- Netherlands – NYSE Euronext Amsterdam
- Belgium – NYSE Euronext Brussels

*MTF – Multilateral Trading Facilities. The Bank only sends to the PEX orders on stocks, warrants and certificates that are not listed for trading in a regulated market.

ii) The Bank has indirect access to the following trading platforms:

- Germany - Deutsche Boerse (Xetra)
- Austria - Wiener Boerse (Xetra)
- Denmark - Kobenhavns Fondsbors (Electra)
- Spain – Bolsa Madrid (Sibe)

- Finland - Helsingin Arvopaperipörssi (Omx)
- Ireland - Irish Stock Exchange (Xetra)
- Italy – Borsa Italiana (Affari)
- Norway – Oslo Bors (Saxess)
- United Kingdom – London Stock Exchange (Sets)
- Sweden – OMX Stockholm Exchange (Sax)
- Switzerland – Swiss Exchange (SWX)
- USA – AMEX, NASDAQ, NYSE

2) Futures and Options Markets

The Bank has direct access to the following trading platforms:

- Eurex

ii) The Bank has indirect access to the following trading platforms:

- NYSE Liffe
- CME - Chicago Mercantile Exchange
- CBOT - Chicago Board of Trade
- NYMEX – New York Mercantile Exchange
- ICE – Intercontinental Exchange (Futures and OTC traders)
- MEFF – Mercado Oficial Español de Futuros y Opciones
- ISE– International Securities Exchange (Options)

3) Over-the-counter markets

The Bank acts as an intermediary in over-the-counter operations for the following financial instruments:

- Interbank Money Market
- Foreign Exchange Interbank Market
- Treasury Bonds
- Corporate bonds
- Structured bonds
- Interest rate derivatives
- Foreign exchange derivatives
- Commodities derivatives
- Stock derivatives