

Order Execution Policy

1. Introduction

- 1.1. **6i Group Ltd** (hereafter "6iTrade" or the "Company") is an Investment Firm incorporated and registered under the laws of the Republic of Vanuatu with registration number 40374. The Company is authorised and regulated by the Vanuatu Financial Services Commission ("VFSC").
- 1.2. This notice is provided to the Clients in accordance with the "Dealers in Securities (Licensing) Act of Vanuatu", because they are considering dealing with the Company in certain derivative "Financial Instruments" provided by the Company ("Financial Instruments" also known as "Financial Securities").
- 1.3. The Company attempts to take all the necessary steps to obtain the best possible results for its Clients, either when executing Client Orders/Transactions or receiving and transmitting Orders/Transactions for execution in relation to Financial Instruments. This is referred to as providing Clients with the "Best Execution".
- 1.4. The Company shall consider a range of factors and provide its Clients with a summarised 'Order Execution Policy' (hereafter the "Policy"). This Policy sets out the Company's approach for carrying out Orders from Origination to Execution and an explanation of how the different factors influence our execution approach.
- 1.5. The Prospective Client hereby acknowledges and agrees that by trading with the Company He demonstrates His acceptance and understanding of this Policy, as well as, the 'Terms and Conditions' document.
- 1.6. This Policy forms part of the Client's Agreement, namely, the 'Terms and Conditions' with the Company, thus the Client is also bound by the terms of the Policy, as set out herein.

2. Types of Financial Instruments

- 2.1. The Policy applies when Clients execute Orders on Financial Instruments offered by the Company. It is at the Company's discretion to decide which types of Financial Instruments to make available and to publish the prices of the Financial Instruments which can be traded.
- 2.2. The Financial Instruments offered by the Company fall under the class of derivatives called 'Over The Counter (OTC)'. More specifically the Company specialises in offering 'Contracts for Difference (CFDs)' on the following 'Asset' classes:
 - a) foreign currency pairs or 'FOREX' or 'FX';
 - b) spot metals or 'METALS';
 - c) crypto currencies or 'CRYPTOS'
 - d) stock market indices or 'INDICES'
 - e) energy commodities or 'ENERGIES'
- 2.3. All the Financial Instruments provided by the Company use 'Leverage' and as such carry a higher degree of risk. Clients should not trade, unless they understand the nature of the Transaction they are entering into. Clients should read and understand all the 'Legal Documents' provided by the Company, The Company does not provide Investment Advice and Clients should seek advice from an independent and/or authorized financial advisor if necessary.

3. Best Execution

- 3.1.** The Company attempts to take all the necessary steps to obtain the best possible results for its Clients, either when executing Client orders or receiving and transmitting orders for execution in relation to Financial Instruments.
- 3.2.** If the Company is unable to guarantee that Best Execution will occur in respect of every order; then the Company will provide the best possible result on a consistent basis.
- 3.3.** Client instructions may take precedence over this Policy, and such instructions are communicated by the Client and subsequently recorded by the Company.
- 3.4.** The Company takes into account the following criteria when determining the relative importance of the Best Execution factors:
- a) the characteristics of the Client, including the Client Categorisation of the Client (Retail or Professional);
 - b) the characteristics of the Client's Order (SL/TP, Time of Order, etc.);
 - c) the characteristics of the Financial Instrument that is the subject of the Order (Asset Class, High/Low Liquidity Asset, etc.);
 - d) the characteristics of the Execution Venues to which that order can be directed (Ability, Availability, etc.).
- 3.5.** As well as the assessment of the above characteristics for each Order, the Company may consider general Criteria when examining Best Execution, such as;
- a) the Price of Execution;
 - b) the Speed of Execution;
 - c) the Likelihood of Execution;
 - d) the Costs of Execution;
 - e) the Size of the Order;
 - f) the Nature of the Order;
- 3.6.** The Company attempts to deliver the best possible results in terms of the 'Total Consideration' for each Client circumstance and may give precedence to factors other than the immediate Speed or Costs, and it is at the Company's own discretion to do so. For a Retail Client, Speed may take priority, however for a Professional Client, Costs may take significance.

4. Criteria of Execution

- 4.1.** Price: The Company will provide its own tradable Prices that are derived from its various Liquidity Providers. It will ensure that the streaming of the Bid / Ask Spread, for each Financial Instrument, is compared to a range of underlying price Liquidity Providers and Data Sources.
- 4.2.** Speed: The tradable prices are distributed via the Company's Trading Platform and therefore the technology used by the Client to communicate with the Company is very important. The Company focuses on technology as part of their key goals. The Company aims to execute all orders within milliseconds and attempts to maintain an average of less than 1 second of the order being received into the Company Electronic Systems. To improve

connection still further Clients should use good internet speed as delays from the Client are not the responsibility of the Company.

- 4.3.** Likelihood: All client orders are executed at the available current market prices meaning, under certain market conditions Orders may not be filled at the exact price requested but at the next best available market price offered by the Company derived from its Liquidity Providers. This may occur during news announcements, during periods of volatile market conditions, on opening gaps or on possible gaps where the underlying instrument has been suspended or restricted on a particular market. The Company provides a 'Deep Liquidity Pool' of many top tier Prime Brokerage Providers to increase the Client's chances of the Likelihood of Execution on the next best available price.
- 4.4.** Cost: The Company makes all Costs of Execution available to the Client before the Client Executes any Orders. The Company continually seeks to reduce Costs to the benefit of its Clients.
- 4.5.** Size: All orders are placed in lot sizes. A lot is a unit that measures the transaction amount and it is different per each Financial Instrument. If the Client wishes to execute a large size Order, in some cases the price may become less favorable considering the liquidity in the market. The Company reserves the right not to accept a Client Order in case the size of the Order is large and cannot be filled by the Company.
- 4.6.** Nature: The characteristics of an Order can affect the Execution of Client Order. The Client can give the following different kinds of orders:
- a) Market Order: This is an Order to buy or sell at the price available at a given time. The Order will usually be filled at the price the client sees on the Company's Trading Platform. If the market has moved while the Client is placing the Order, the price may differ;
 - b) Pending Order: This is an Order to buy or sell a Financial Instrument at a future, best available, price. The Execution will occur once a certain price is reached, if this price is never achieved the Pending Order remains unfulfilled and can be deleted by the Client. The six types of pending orders are, Stop Loss, Take Profit, Buy Limit, Buy Stop, Sell Limit and Sell Stop.
 - c) Trailing Stop Order: This is an Order that the Client can place on an open position and works as a 'Moving Stop Loss', which automatically updates to lock in profit while the market moves in the Client's favor. Clients must be aware that the Trailing Stop works in the Client Terminal of the Trading Platform and not in the Company 'Server' Platform (just as trading Expert Advisors). The Trailing Stop only works if the Client Terminal remains constantly open therefore the Company bears no responsibility if this type of order does not function properly.

5. Application

- 5.1.** Every Client Order which the Company may take is accepted and executed on the basis that the Company is acting on its own account as principal and not as an agent for the Client. It should be noted that the Company does not guarantee that when executing a transaction, the Client's Price will be more favorable than one which might be available elsewhere.
- 5.2.** The Company applies the Policy upon acceptance of a Client Order when a Client does not give a specific instruction about the said Order. However, if the Company receives a specific instruction from a Client on an

Order then the Company will follow and execute such instruction even if this may prevent the Company from implementing the policy in order to obtain the best possible result for the Execution of the Order.

6. Execution Venues

- 6.1.** Execution Venues are the entities to which the Orders are placed or to which the Company transmits Orders for Execution.
- 6.2.** The Company reserves the right to:
 - a) internalise Client Orders, where the Company becomes the Execution Venue;
 - b) transmit Client Orders for Execution with another 6i Group Owned Entity or 6i Group Sister Company;
 - c) transmit Client Orders for Execution with another third-party Prime Brokerage Provider.
- 6.3.** In all of the above cases the Company follows a strict assessment process prior the selection of an Execution Venue and the establishment of a business relationship. The Company takes into consideration the above 'Criteria of Execution'. The Company also ensures to avoid or actively manage any 'Conflict of Interest'.
- 6.4.** Assessment and monitoring are carried out on a continuous basis, not only for the choice of Execution Venues, but for any of the Company's Liquidity Providers and Data Feeders.
- 6.5.** The objective of constant review is to identify changes in Execution arrangements that could improve the quality of the Execution service the Company provides to its Clients.

7. Evaluation

- 7.1.** The Company will evaluate the effectiveness of this Policy at least annually or when there is a material change with a view to identifying and, where appropriate, correcting any deficiencies revealed by the review. The Company will assess whether the Execution Venues and Brokerages to whom Orders are transmitted provide the Client with the best possible result on a consistent basis.
- 7.2.** The Client will not be notified of any amendments to this Policy and it is the Client's responsibility to visit the Company's Website and review the Policy as well as the other 'Legal Documents' made available to the Client on a regular basis.

8. Record Keeping

- 8.1.** For the purpose of this Policy, the Company shall maintain records of all Client Orders, for a minimum period of 5 years.
- 8.2.** The Company shall also keep records which evidence ongoing monitoring of Best Execution and which demonstrate our willingness to provide with Best Execution to our Clients.

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