



Order Execution Policy

CWG Markets Ltd



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Version

Prepared by

Date

Board Approval

Distribution All staff

Responsible Officer The Management

INTRODUCTION

This Order Execution Policy sets forth information relating to how CWG Markets Ltd (the “Company” “we”, “us”) seeks to provide best execution as required by the Markets in Financial Instruments Directive 2014/65/EC (“MiFID II”) and by the Financial Conduct Authority Conduct of Business Sourcebook (“COBS”), in each case as amended or supplemented from time to time, when executing orders on behalf of clients.

This Order Execution Policy is provided to you as a Retail and Professional client as defined below (the “client”) of the Company regardless of whether you are an elective professional client or a per se professional and it is not applicable to business conducted with eligible counterparties.

In accordance with MiFID II and COBS and where best execution applies, when executing orders, we will take all sufficient steps to obtain the best possible result for its clients, taking into account the Execution Factors as defined herein. In particular, we are required to establish, implement and maintain an order execution policy to allow us to obtain best execution where required.

DEFINITIONS AND INTERPRETATION

In this Order Execution Policy, the following words and phrases shall, unless the context otherwise requires, have the following meaning and may be used in the singular or plural as appropriate:

“Execution Criteria” shall mean those factors highlighted in Section 7 (Execution Criteria) of this Order Execution Policy;

“Execution Factors” shall mean those factors highlighted in Section 0 (Execution Factors) of this Order Execution Policy;

“Execution Venue” shall mean as defined in Section 6 (Execution Venue) and shall include; a market maker, or other liquidity provider or entity that performs a similar function;

“Financial Instruments” shall mean and includes, but is not limited to:

- (a) Contracts for difference;
- (b) Equities;
- (c) Futures and options; and/ or
- (d) Rolling spot forex.

“FCA” shall mean the Financial Conduct Authority in the United Kingdom or any other successor organisation authority for the time being responsible for the regulation of investment business in the United Kingdom;

“MTF” shall mean an abbreviation for ‘multilateral trading facility’, 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 and in a way that results in a contract in accordance with MiFID II;

“Order” shall mean an instruction to buy or sell a Financial Instrument which is accepted by us for execution or transmission to a third party;



“OTC” shall mean an abbreviation of ‘over the counter’ and includes any transaction concerning a commodity, security, currency or other financial instrument or property, including any option, future, or contract for difference which is traded off exchange by the us rather than on a regulated stock or commodities exchange;

“Professional Client” shall mean as defined in the rules of the FCA;

“Retail Client” shall mean as defined in the rules of the FCA;

“Standard Terms of Business” shall mean the agreement(s) entered into, or to be entered into, between you and us for the purpose without limitation of conducting transactions in Financial Instruments with us;

“Trading Platform” shall mean the password protected online or downloadable electronic facility or other communication protocols as made available to you by us from time to time where you can trade with us under the Standard Terms of Business;

“You” shall mean the individual person or legal entity who is, or is applying to become, a client of ours subject to the Standard Terms of Business;

“Website” shall mean [INSERT](#).

Any reference in this Order Execution Policy to “Section” or Schedule” shall be construed as a reference to, respectively, a section or schedule in this Order Execution Policy, unless the context otherwise requires.

References in this Order Execution Policy to any law, statute, regulation or enactment shall include references to any modification, amendment, extension, or re-enactment thereof.

In this Order Execution Policy, references to an individual person shall include body corporates, unincorporated associations, partnerships, and individuals.

Headings and notes in this Order Execution Policy are for reference only and shall not affect the contents and interpretation thereof.

SCOPE AND APPLICATION

This Order Execution Policy applies to Retail Clients and Professional Clients. In accordance with the Company’s obligations to the client, it has notified the client of the client classification that applies to them.

This Order Execution Policy applies to Financial Instruments and where we execute Orders on your behalf. This is where you rely on us to protect your interests in relation to the pricing or other aspects of the transaction that may be affected by how we execute the Order for you. For example, this will be the case where we execute an Order by dealing as agent, or where we execute an Order by dealing as matched principal on your behalf, which will be executed on an over-the-counter basis rather than on a regulated market or MTF.

When Orders are received by us via the Trading Platform, the Orders are automatically routed to an Execution Venue which we have assessed to be the best execution. Therefore, we are not seen as executing Orders on your behalf where we publish a quote to provide a “request for quote” service and you transact with us on the basis of that quote.



When dealing with Retail and Professional Clients, the Company does not differentiate between an 'elective' Professional Client or a 'per se' Professional Client. The Company will apply best execution where it has agency or contractual obligations to the client and also in circumstances where it can be demonstrated that the client is legitimately relying on the Company in relation to the execution of their order.

Our policy, in providing you with best execution, is, so far as possible to exercise the same standards and operate the same processes across all the different markets and financial instruments on which we execute your Orders. However, it must be noted that the diversity in those markets and instruments and the kind of Orders that you may place with us mean that different factors will have to be taken into account when we assess the nature of our execution policy in the context of different Financial Instruments and different markets. For example, there is no formalised market or settlement infrastructure for over-the-counter transactions. In some markets, price volatility may mean that the timeliness of execution is a priority, whereas, in other markets that have low liquidity, the fact of execution may itself constitute best execution. In other cases, our choice of venue may be limited (even to the fact that there may only be one platform/ market upon which we can execute your orders) because of the nature of your Order or of your requirements.

ORDER EXECUTION

Subject to any specific instructions that may be given by you when executing Orders on your behalf, we will take sufficient steps to achieve the best possible result for our clients whilst taking into account the Execution Factors highlighted below. We will determine the relative importance of the Execution Factors by using our commercial judgement and experience in light of market information available and taking into account the Execution Criteria described below.

Regardless of the type of order that the client transacts with the Company, best execution will apply. This will normally include order types commonly used on an execution venue as defined by MiFID II. The order type subject to the Company's best execution policy are Market Orders, Limit Orders and Stop orders.

While we will take all sufficient steps based on those resources available to us to satisfy ourselves that we have processes in place that can reasonably be expected to lead to the delivery of best execution of your Orders, we cannot guarantee that we will always be able to provide best execution of every order executed on your behalf.

This Order Execution Policy does not apply to Eligible Counterparties and as such, the Company will not owe best execution to transactions undertaken by clients classified as such.

EXECUTION FACTORS

The Execution Factors that will be taken into account for Financial Instruments are:

- (a) price and costs;
- (b) speed;
- (c) likelihood of execution settlement;
- (d) size and scope of the Order;
- (e) client type; and
- (f) nature of any other consideration relevant to the execution of the Order.

Price will ordinarily merit a high relative importance in obtaining the best possible result. However, in some circumstances, for some clients, Orders in Financial Instruments or markets, we may appropriately determine that other Execution Factors are more important than price in obtaining the best possible execution result.

In determining the best execution result for you, we will not compare the results that can be achieved for you



on the basis of this Order Execution Policy, and fees with results that may be achieved for you by another investment firm on the basis of that firm's best order execution policy or different structure of commission or fees. Nor will we compare the differences in our own commissions or fees to which are attributable to the nature of the services we are providing to you.

When the fees applied by the Company differ depending on the Execution Venue or entity used, information will be provided to clients to allow them to understand both the advantages and the disadvantages of the Company's choice of one Execution Venue or entity over another. Furthermore, where the Company invites the client to choose the Execution Venue or entity, this information shall be fair, clear, not misleading and sufficient to prevent the client choosing one Execution Venue or entity rather than another on the sole basis of the price policy applied by the Company. For the purposes of delivering best possible result where there is more than one competing Execution Venue, in order to assess and compare the results for the client that would be achieved by executing the order on each of the Execution Venues listed below that is capable of executing that order, the Company's own commissions and the costs for executing the order on each of the eligible Execution Venues shall be taken into account in that assessment.

The Company does not charge different fees or costs depending on the Execution Venue used in order to ensure that costs are transparent and fully disclosed to the client. For all transactions, the Company offers a clear and transparent charging structure, the Company charges a flat fee and it does not apply any additional commission or costs except as set forth below. All implicit costs are therefore disclosed to the client for complete clarity. Additional costs that you should be aware of and which may be applied are:

- Transaction fees;
- Conversion of realized P/L to base currency; and
- Inactivity fees.

The Company does not receive "Payment for Order Flow", meaning that it does not receive commissions or fees for arranging transactions with market makers, thereby ensuring that there is no conflict created by fees in its execution arrangements.

EXECUTION VENUE

The possible Execution Venues for us includes, as appropriate for each Financial Instrument: regulated markets, MTFs, market makers and other liquidity providers (See 'Annex 1 – Execution Venue').

Subject to any specific instruction you may provide, and subject to proper consideration of the Execution Factors and the Execution Criteria, we will select the Execution Venue that we consider the most appropriate if more than one Execution Venue is available. In relation to some Financial Instruments, there may be only one possible Execution Venue. In executing an Order on your behalf in such circumstances, we will assume that we have achieved best execution.

We will regularly assess the Execution Venues available in respect of any Financial Instruments that we offer to identify those that will enable us on a consistent basis, to obtain the best possible result when executing Orders.

EXECUTION CRITERIA

The Execution Criteria that will be taken into account are the characteristics of:

- (a) the client and the client's classification - professional;



- (b) the nature of the client Order;
- (c) the Financial Instrument(s) that are subject to that Order; and
- (d) the Execution Venues to which that Order can be directed.

Our commitment to provide you with best execution does not mean that we owe you any fiduciary responsibilities over and above the specific regulatory obligations placed upon us or as may be otherwise contracted between us.

OTHER FACTORS AFFECTING THE EXECUTION OF YOUR ORDER

We reserve the right to modify our spread under certain market conditions, including but not limited to fundamental market announcements, where there is fast moving market or low liquidity.

The majority of the transactions should be automatically priced and executed over our Trading Platform. However, in certain circumstances, such as for example, unusual market conditions or the size and nature of your Order of a Financial Instrument may be wholly or partly manually priced and/ or an Order may be manually executed.

During times of high demand, manual pricing and/ or execution may cause delays in processing your Order which in turn can have an impact on the price at which your Order is executed at. We have invested substantially in our technology to minimize the risk of such delays.

SPECIFIC CLIENT INSTRUCTIONS

Where you provide us with specific instructions as to the execution of an Order, we will execute the Order in accordance with those specific instructions so far as it is reasonably possible in accordance with those instructions. This may prevent us from taking the steps that we have put in place to obtain the best possible result for the execution of your Orders; however, it will be deemed in compliance with the MiFID II requirements.

Where your instructions relate to only part of the Order or your instructions are incomplete, we will continue to apply the Order Execution Policy to obtain the best possible result in respect of the elements covered by those instructions.

In the absence of express instructions from you, we will exercise our own discretion in determining the factors that we need to take into account for the purpose of providing you with best execution.

We may transmit an Order that we receive from you to an external entity such as a third-party broker for execution. In doing so, we must act in your best interest.

AGGREGATION AND ALLOCATION OF ORDER

The FCA's general principles require regulated firms to implement procedures and processes which provide for the prompt and fair execution of your Order. In carrying out your Order, we strive to ensure that Orders are executed promptly and accurately recorded and allocated.

We do not undertake to carry out your Order for our own account in aggregation with another client Order, unless it is unlikely that the aggregation of Orders will work to the disadvantage of any client whose Order is to be aggregated.

MONITORING



We will review our order execution arrangements regularly. We will also review our Order Execution Policy annually and whenever a material change occurs that affects our ability to continue to obtain the best possible result for our clients.

We will notify you of any material change to our Order Execution Policy by posting an updated version of this document on our Website.

CONSENT

The Order Execution Policy forms part of the Standard Terms of Business and your consent to it will be deemed to be provided when you provide your consent to our Standard Terms of Business.

The Company must act in a client’s best interests taking into account the Execution Factors and Execution Criteria described above including when there is more than one venue competing to execute an order, the Company’s own commissions and costs for executing that order on each eligible venue should be taken into account to assess and compare possible outcomes.

The Company is currently able to transmit order on your behalf to the following Execution Venues and on the following basis:

Execution venue and class of financial instrument	How the venue was selected	Specific execution strategies employed	Procedure used to analyse the quality of the venue
<p>TO INSERT</p>	<p>They operate in the markets in which the Company operates, and in the currencies and financial instruments that they are able to support;</p> <p>Their geographical location and ability to provide real time access to markets;</p> <p>Time availability of prices – in many markets there are lulls and spikes in trading as negotiations align trading interests at different times and different parts of the curve; accordingly, the “last traded” price may not always be available or act as a reliable indicator of current price.</p>	<p>Price and costs of execution: The Company’s Trading Platform will seek out the best overall outcome for the transaction and this is likely to be the most important execution factor to our clients. The Company employs a transparent cost structure with no hidden commissions or fees. All trades incur a pre-agreed fee per lot that is disclosed up front.</p> <p>Likelihood and speed of execution: Through the use of the Company’s Trading Platform, orders will be executed promptly with only rare opportunities for price slippage to occur on some types of orders. Due to the nature of the Trading Platform, it is likely that speed of execution will be of high importance to our clients. The Company aims to update its prices as frequently as reasonably possible; however, its ability to do so may be limited by technological factors, including liquidity providers’ price feed, hardware, software and data</p>	<p>The Company’s procedure in selecting an Execution Venue is based on the following parameters together with the Board’s approval:</p> <ul style="list-style-type: none"> - reputation - market intel - teams in place - product offering - pricing capabilities including depth and spread - efficient electronic offering - reliability



		<p>communications links. The Company executes all trades at the prices communicated to the Company by its liquidity providers and in accordance with its Standard Terms of Business</p> <p>Size, nature and characteristic of the order: A typical transaction consists of a currency or CFD trade. The Trading Platform will seek to provide the client with the best outcome for his/ her order considering the factors described above.</p>	
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This list of Execution Venues may not be exhaustive but comprises those Execution Venues on which the Company places significant reliance. The Company reserves the right to use other Execution Venues where it deems appropriate in accordance with the Company's Order Execution Policy in order to obtain the best overall result for clients and may add or remove any Execution Venues from this list.

Where applicable, the Company will take steps so as to avoid structuring or charging its commissions in such a way as to discriminate unfairly between Execution Venues.

The Company shall summarise and make public on an annual basis, for each class of financial instruments, the top five execution venues in terms of trading volumes where it executed client orders in the preceding year and information on the quality of execution obtained.