

Order & Best Execution Policy

1. Purpose

Following the implementation of the EU's Markets in Financial Instruments Directive (MiFID 1&2), KVB Prime (UK) Limited (hereafter referred to as "KVB PRIME") is required to take all sufficient steps, when executing Orders, to acquire the best possible result for our clients.

The purpose of this Order & Best Execution Policy is to provide our clients with information on our order and best execution policy

This policy has been produced in accordance with the Financial Conduct Authority's rules and requirements, and in order to provide our clients with a transparent overview of our business practices.

This should be read in conjunction with the Terms of Business, but its terms do not constitute contractual obligations of KVB PRIME under the Agreement.

This means that when we accept an order from a client, and when there is no specific instruction regarding the execution method, we will make best endeavours to execute that Order in accordance with this policy.

2. Scope and its application

This Order & Best Execution Policy is applicable to financial instruments and where we execute the order on your behalf. After which you will be reliant on KVB PRIME that it will protect your best interests in relation to the pricing or other aspects of the transaction that may be affected by how we execute the Order for the client.

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.

This Order & Best Execution Policy applies to our execution of Orders on behalf of Retail Clients and Professional Clients.

It is this policy's intention to provide you with the best execution by, in 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 you should note that the variety in those markets and instruments, and the kind of Orders that you may place with us mean different factors are at play which can then lead to differing execution strategies. So for example, as there is no formal market

or settlement framework for over-the-counter transactions; it may be that timing is more important than any other factor if there is high volatility in price, or perhaps there has been a transaction with exceptionally low liquidity meaning so to execute is in itself, the best execution strategy.

So you can see that KVB PRIME may decide, in their absolute discretion, that in certain circumstances, other factors; such as the need for timely execution of the order, are more important in determining the best possible results. This may depend on the type of order, the financial instrument or the market involved.

3. Order Execution

Unless specific instructions have been given by you, KVB PRIME will take all sufficient steps to obtain the best possible result for you, having considered the Execution Factors below. This means that KVB PRIME will endeavour to execute any Order received in a prompt and fair manner, ensuring that potential conflicts of interest between clients or between the client and KVB PRIME are managed effectively.

Please note that should there be a lapse of time between KVB PRIME's first quote and the client's acceptance which causes delay or in the case that the market conditions have changed, KVB PRIME will still be within its rights to execute the order; provided the quote is not significantly out of date and that it still would have met the best execution requirements.

When executing Orders for Retail clients the best execution is determined on the basis of the aggregate consideration representing the price of the Financial Instrument(s) and the costs associated to that execution.

Generally speaking KVB PRIME will record and execute comparable Orders sequentially on the basis of the time of the receipt of the Order, unless the characteristics of the Order or market conditions make it impractical to do so; or if your interests demand otherwise. Orders received in a different media cannot be defined as otherwise comparable.

Whilst we take sufficient steps based on the resources available to us to satisfy ourselves that we have processes in place that can sufficiently be expected to deliver 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.

4. Execution Factors

The following are execution factors that we will take into account for Financial Instruments:

- i. Client type;
- ii. price;

- iii. costs
- iv. likelihood of execution settlement;
- v. size; and
- vi. nature or any other consideration relevant to the execution of an order.

Whilst it is true that price is the foremost factor to achieve the best result for the client we may still need to use the other factors as part of our decision making process.

One important point is that when are determining the best execution outcome for you, we will not make comparisons on fees that may have been accrued by you should you have used another investment firm, nor shall we compare the differences between our own commissions and fees.

5. Execution Venue

Depending on the type of financial instrument, the execution venue could be; regulated markets, MTF's, market makers and other liquidity providers.

Unless you have stipulated otherwise, we will assess the available Execution Venues at the time and choose the most appropriate Execution Venue based on the Execution Factors (4) and the Execution Criteria (7). If only one Execution Venue is available for a financial instrument then we would assume best execution.

As it is in the best interests of our clients, we will regularly monitor the Execution Venues available to us in respect of the financial instruments that we offer, and determine those that provide the best outcome when executing Orders.

6. Methods of Execution

Depending upon circumstances, KVB PRIME may execute orders outside Regulated Markets or Multi-Lateral Trading Facilities ("MTF's"). KVB PRIME believes that by restricting the execution orders to Regulated Markets or MTFs it may adversely affect the quality of the execution and liquidity.

7. Execution Criteria

The Execution Criteria that will be considered are described as:

- a. the client and client's classification, whether retail or professional;
- b. the nature of the client order;
- c. the Financial Instrument(s) that are subject to that order; and
- d. the Execution Venue to which that Order can be directed.

KVB PRIME is committed to provide you the best execution however this does not mean we owe any fiduciary responsibilities over and above the specific regulatory obligations we are obliged to undertake or otherwise contracted between us.

8. Other Factors that may affect the Execution of the Order

Under certain market conditions we do reserve the right to modify our spread, including major market announcements, where there is high volatility in price or relatively low liquidity.

In the vast majority, the transactions should be automatically priced and executed over the Trading Platform. However there may be certain instances where we may have to wholly or partly, manually priced and/or executed. This may occur where we see unusual market conditions or the size or nature of your order.

In 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.

9. Client limit orders

As part of our regulatory obligations we will publish limit orders given by you should we not be able to execute your order immediately. By accepting the Agreement you expressly consent that you agree that when you place a limit order with us that is not immediately executable, we are authorised to exercise our discretion not to publish such an order to a Regulated Market or MTF.

10. 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 sufficiently 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 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.

10. 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 has satisfied the following conditions:

- (a) It is unlikely that the aggregation of orders will work to the disadvantage of any client whose order is to be aggregated;
- (b) It has been disclosed to each client whose order is to be aggregated that the effect of the aggregation may work to its disadvantage in relation to a particular order; and
- (c) It has been established and effectively implemented an order allocation policy. This policy should provide in sufficiently precise terms for the fair allocation of aggregated orders and transactions, including but not limited to how the volume and price of orders determines allocations and the treatment of partial executions.

11. 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 publishing an updated version of this document on our Website.

12. Consent

Under MiFID we are required to obtain your consent to our Best Execution Policy and other matters as outlined above. We will consider that, by your placing of an order with us, you have consented to agreeing to such Best Execution Policy.

We are however required to obtain your express consent for execution of your order outside Regulated Markets or MTFs and for exercising our judgement in the matter of publishing your Limit Orders. By signing this Agreement, you expressly give this consent.