TRADE | CAPITAL MARKETS

ORDER EXECUTION POLICY

TRADE CAPITAL MARKETS (TCM) LTD

CONTENTS

1. INTRODUCTION

Trade Capital Markets (TCM) Limited, is a Cyprus Investment Firm licensed and regulated by the Cyprus Securities and the Exchange Commission under license no. 277/14 and authorized by the FSCA, South Africa (FSP No. 47857).

Trade Capital Markets (TCM) Limited (hereinafter, "the Company" or "TCM"), has established the "Order Execution Policy" (hereinafter called the "Policy") which applies to all its Clients, both retail and professional, when executing their orders in MiFID II.

The Policy does not apply to Clients who have been classified as Eligible Counterparties.

2. LEGAL AND REGULATORY FRAMEWORK

This Policy is drafted and reviewed pursuant to, and in compliance with the requirements of:

- Directive 2014/65/EU of the European Parliament and the Council of 15 May 2014 on markets in financial instruments;
- The Law of the Republic of Cyprus No. 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets;
- The Commission Delegated Regulation (EU) 2017/575, supplementing Directive 2014/65/EU of the European Parliament and of the Council on markets in financial instruments with regard to regulatory technical standards concerning the data to be published by execution venues on the quality of execution of transactions;
- Circular C343 of the Cyprus Securities and Exchange Commission of 25 October 2019, regarding the thematic review of best execution obligations of Cyprus Investment Firms.

For the purpose of this Policy, any of the above legislation, regulation or guidelines will be referred to as 'Regulation(s)'.

3. SCOPE

The Policy sets out the execution procedures for the financial instruments offered by the Company. The Company has a duty to act honestly, fairly and professionally, considering its Clients' best interest. The Company will take all sufficient steps to obtain the best possible results (or "best execution") on behalf of its Clients, either when executing Clients' orders or receiving and transmitting orders for execution.

This Policy applies when the Company is executing orders on behalf of retail Clients and professional Clients.

When the Company is executing Clients' orders for Contracts for Differences ('CFDs'), the Company is acting on a matched principal basis (back-to-back trading). Such activities are regarded as acting as principal and are subject to the requirements of this Policy in relation to execution of orders on behalf of Clients.

In regard to Direct Market Access ("DMA") trading, when the Company receives a Client's order, that order is transmitted to the respective Executing Broker. In the case of DMA trading, Clients are contracting with the Company, however orders are transmitted to another Execution Venue.

Clients must ensure that they have read, understood and consent to the content of this Policy prior their initiation of trading with the Company.

TCM recognises that it has a duty to take all reasonable steps to obtain the meet its best execution obligations when handling and executing Clients' orders. This means that the Company has in place policies and procedures that are designed to obtain the best outcome for Clients when executing orders on their behalf, subject to, and taking into account, any specific instructions from the Client, the nature of the particular orders and the nature of the markets concerned, but is not a guarantee of such results in all transactions.

4. DEFINITIONS

"**Instrument**" and "**Financial Instrument**" means any share, futures contract, forward or option contract, commodity, precious metal, Exchange Rate, interest rate, debt instrument or other index, or other investment in respect of which we or our Financial Intermediaries offer to deal in Transactions.

Market Order (trade request) – A market order is an order to buy or sell a financial instrument at the current market price. Execution of this order results in opening or closing a position.

Limit Order (Pending Order) – A Pending order is an order that allows the Client to buy or sell a financial instrument at a pre-defined price in the future. These Pending Orders are executed once the price reaches the requested level:

i. **Close at Loss Order (Stop Loss Order)** This order is used for minimizing of losses if the financial instrument's price has started to move in an unprofitable direction. If the financial instrument's price reaches this level, the whole position will be closed automatically;

ii. **Close at Profit Order (Take Profit Order)** Take Profit order is intended for gaining the profit when the financial instrument price has reached a certain level. Execution of this order results in the complete closure of the entire position.

Execution Venue and **Liquidity Provider** – An Execution Venue is a regulated market, an MTF, an OTF, a Systematic Internaliser, or a market maker or other liquidity provider, or an entity that performs a similar function in a third country to the functions performed by any of the foregoing. It should be noted that the terms "Execution Venue" and "Liquidity Provider", can be used interchangeably.

Executing Broker – An Executing Broker is a financial intermediary that processes an order on behalf of a Client.

"Material Change" means a significant event that could affect the Company's ability to continue to obtain the best possible result for the execution of its Clients' orders on a consistent basis. The Company considers material changes the following events:

1. **Operational risk events:**

i. Complete disconnection within the Company's platforms (for any reason) that results to a disruption of the offered feed, that in turn results in Client orders being rejected because instruments are not pricing, or because orders cannot be filled and processed for execution;

ii. Feed disruption that affects only a few instruments/ a few asset classes, that results in Client orders being rejected because instruments are not pricing, or because orders cannot be filled and processed for execution;

2. **Instrument-level events:**

i. Should there be excessive market volatility and Clients have set pending orders, there is a possibility that such orders are not executed at the specified price, which results in slippage and impacts the execution price;

ii. If instruments open with a gap that exceeds the price-level of the set pending order, then the pending order will be executed at the next best available price;

iii. A gap in the opening of an instrument might also trigger spike filters within the system and cause orders to be rejected, in order to provide protection due to the movement of the instrument's price;

iv. At times of low liquidity, spreads might widen and there might be delayed execution or a complete rejection to the order;

v. Cryptocurrencies are traded via unregulated exchanges, which means that pricing is dependent on the exchange itself. Should the exchange impose limitations to trading, then Clients will be affected, both on closing existing positions and also in the effort to open new positions;

vi. Corporate actions that affect shares can have a material change to a Client's existing positions. Corporate actions include delisting, dividend issue, stock split/reverse stock split, spin-off and rights issue (corporate actions on shares may not necessarily affect the principle of Best Execution as such, but they do have an impact on the instrument's price and trading availability).

Over-the-counter (OTC) trading is trading that occurs between two counterparties, outside of formal exchanges and which is regulated on a lesser degree. OTC trading is done in over-the-counter markets, which are decentralized markets with no physical locations, via dealer networks.

Slippage is the difference between the expected price of an Order, and the price the Order is actually executed at. If the execution price is better than the price requested by the Client, this is referred to as positive slippage. If the executed price is worse than the price requested by the Client, this is referred to as negative slippage.

Price Feed – A Price Feed is a mechanism that provides live quotations.

Liquidity Hub – A Liquidity Hub is a specialized software that connects different Price Feeds on a centralized location.

5. ORDER HANDLING AND ORDER EXECUTION

5.1. OTC Transactions (CFDs)

Trade Capital Markets (TCM) Limited deals with its Clients as principal when executing their orders. The Company is therefore the only "execution venue" for its Clients. This means that the Client transacts directly with the Company and not on any exchange or other external market or venue.

Client orders are executed with No-dealing Desk Execution. This means that the Company uses automated execution engines where the process and execution of orders are managed by the system based on parameters implemented by the Company.

The Client is provided with as recent as technically possible market quotes. This is achieved through different channels including the introduction of a Liquidity Hub. When a Client sends an order request, this request is first executed by the Company as the counterparty to the Client, and simultaneously executed as an identical request to the designated Liquidity Provider, fulfilling the Company's execution model of acting on a matched principal basis (back-to-back trading).

5.2. DMA (Direct Market Access)

At the time of opening an account for trading of Shares, Options, Futures, Exchange Trades Funds, Warrants, Structured Products, Fixed Income products and Mutual Funds, the Client becomes subject to the Order Execution Policy of the Financial Intermediary, the Company partners with.

Only in situations in which the customer transmits orders directly to the Company, in order for the Company to perform the service of reception and transmission of orders, the Company is deemed to be acting on behalf of its Clients.

The Financial Intermediaries for the provision of those products, is Interactive Brokers (U.K.) Limited authorised and regulated by the Financial Conduct Authority.

For more information on the Order Execution Policy and Procedures of Interactive Brokers, please refer to the Company's Client Agreement which is accessible here.

6. EXECUTION CRITERIA

When executing Client orders, the Company considers the following criteria:

- The characteristics of the Client's order such as the potential for it to have an impact on the market including whether any specific instructions are given;
- The characteristics of the financial instruments that are subject to that order such as market liquidity for that order;
- The characteristics of the execution venue at the time of execution;
- The prevailing level of liquidity at the time of execution.

7. LIQUIDITY PROVIDERS AND SELECTION PROCESS

TCM maintains arrangements with liquidity providers which ensure that orders transmitted by the Company for execution, comply with its obligations under the MiFID II framework. Notwithstanding the aforementioned statement, and as depicted in Section 5.1, the Company is the sole execution venue for its Clients' orders in terms of OTC transactions for CFDs.

7.1. CFD Liquidity Providers

As aforementioned in various sections within the Policy, the Company is the sole execution venue for its Clients, with relevant details indicated below:

Liquidity Provider	LEI	Competent Authority
Trade Capital Markets (TCM) Ltd	549300REMV7VLGS16J07	CySEC

8. EXECUTION FACTORS FOR CFDS TRANSACTIONS

In providing best execution the Company is required to consider certain execution factors, as outlined below, whereby the following factors refer only to CFD transactions.

8.1. Price

The price for a given contract is calculated by reference to the price of the relevant underlying financial instrument. For any given CFD, the Company will quote two prices: the higher price (ASK) at which the Client can buy (go long) that CFD, and the lower price (BID) at which the Client can sell (go short) that CFD. Collectively, the ASK and BID prices are referred to as the Company's prices and can be found on the Company's trading platforms. The difference between the lower and the higher price of a given CFD is the spread.

The Company calculates its prices by reference to the price of the relevant underlying financial instrument, which it obtains from third party external reference sources. The Company reviews its third-party external reference sources at least once a year, to ensure that the data obtained continue to be competitive. The review is performed by the Dealing Department and it evaluates statics on the prices collected through the previous year. The Company updates its prices as soon as technically possible.

Despite taking sufficient steps to obtain the best possible results for Clients, the Company is unable to guarantee, when executing orders, that its quoted prices will be at a price which is as good, or better, than a price that may been available elsewhere.

8.2. Costs

The following table shows the different types of costs related to trading CFDs. Additional details of these costs are available here.

Frequency and Type of Cost and Charge		Applicability	Definition	Further Details	Scope
One-off entry or exit costs	Commission	Applicable only to CFDs on Shares and CFDs on Cryptocurrencies	A commission is charged on the opening and closing of a position on CFDs on Shares and CFDs on Cryptocurrencies, with the said instruments being offered at raw spreads.	1) Dependent on investor's account type and charged per leg. 2) Ranges from 50 basis points ("**bps**") to 8 bps, with a minimum of 10 USD depending on account type and product.	Cost and Charge associated with a financial instrument.
	Spread		A spread in trading is the difference between the	1) Dependent on investor's account type.	

			buy (offer) and sell (bid) prices quoted for an asset.	2) Offered spreads are variable, subject to a minimum amount, and can vary depending on market conditions.	Cost and Charge associated with a financial instrument.
	Currency Conversion Fee		This is the cost for converting realized profits and losses as well as any costs and charges that are denominated in a currency other than the base currency of an investor's trading account.	1) Fixed fee set at 2.0%.	Cost and Charge associated with a financial instrument.
Ongoing costs	Swap (Financing Fee)	Applicable to all instruments	This cost results from keeping investor positions open overnight. The swap cost can be positive or negative depending on the instrument to be traded.	1) Instrument and asset class dependent. 2) Charged daily at 22:00 GMT (21:00 GMT during summer time) on all open positions as at the aforementioned times.	Cost and Charge associated with a financial instrument.
	Inactivity Fee		Inactivity fees are applied when no trading activity occurs for a period of time. A monthly fee is charged if no trading activity occurs for a period of 90 days or more, and an annual inactivity fee is charged if no trading activity occurs for a period exceeding 12 months.	1) 25 USD is charged on a monthly basis if no trading activity has occurred for 90 days or more. 2) 100 USD is charged per quarter for inactivity exceeding 12 months, less any monthly inactivity fees already charged.	Cost and Charge related to ancillary services.
	Rollover Adjustment	Applicable only to futures contracts	A rollover refers to the process of closing out open positions in soon-to-expire contracts in favor of contracts with later expiration dates, resulting in a rollover adjustment being performed. A spread is paid upon the rollover occurring.	1) Spread paid is dependent on investor's account type. 2) The rollover adjustment can be positive or negative to offset artificial losses or profits. 3) Artificial losses or profits are dependent on the price difference and the direction held on the instrument.	Cost and Charge associated with a financial instrument.

8.3. Speed of Execution

Due to the levels of volatility affecting both price and volume, the Company seeks to provide Client orders with the fastest execution reasonably possible. In certain circumstances, for example low internet speed or market volatility, the quoted price may no longer be representative of the underlying market price and may result in the Client placing his/her Order at a delay.

8.4. Likelihood of Execution

The likelihood of execution may depend on the available liquidity in the market. In some instances, the Company reserves the right to decline an order of any type or to offer the Client a new price for "market order" under certain market conditions such as excessive volatility being present, opening gaps on the beginning of trading sessions, during news announcements, on gaps where the underline instrument has been suspended or restricted on a particular market, if there is insufficient liquidity for the execution of the specific volume at the requested price.

8.5. Size

In routing orders, the Company seeks markets that provide the greatest liquidity and thus potential for execution of large orders. The Company reserves the right to decline a Client's order if it is too large and cannot be filled by the Company.

8.6. Overall Execution Quality

8.6.1. Total Consideration

TCM regularly monitors the quality of execution to ensure that the aforementioned metric is kept at a consistently high quality and is reliable throughout for all the Clients of the Company.

When the Company executes orders on behalf of retail Clients, Best Execution is determined based on the total consideration paid by the Client, unless the objective of execution of the order dictates otherwise. Total consideration is the price of the financial instrument and the costs related to execution, including all expenses incurred by the Client that are directly related to the execution of the order.

In certain circumstances, therefore, the Company may determine that the speed, and likelihood of execution and settlement for example may take precedence over immediate price and cost factors if they are instrumental in delivering the best possible result. This may be the case for example for large Client orders or when a stop has been triggered.

If the Client is a Professional Client, price will ordinarily merit a high relative importance in obtaining the best possible result. However, in some circumstances and for some Clients, Orders, Financial Instruments or markets, we may appropriately determine that other execution factors are more important than price in obtaining the best possible execution result.

8.6.2. Relative Importance

The Company, always taking into consideration the interests of its Clients, constantly monitors the delivered execution quality. Proper and adequate monitoring is achieved by taking into consideration the following execution factors, with each factor having an associated relative importance attached to it, taking into consideration characteristics such as the size of the orders, orders received, and also the underlying instruments for which CFD trading is offered.

The Price, Costs and Speed of Execution factors are the most relatively important execution factors for the Company's Clients. Therefore, in assessing the most appropriate route to carry out Clients orders the Company will consider the following parameters, depending on the scenario and situation of both Clients and orders:

On a continuous basis, the Company strives to ensure that all the following factors do not hinder the execution of a Client's order, however there cannot be a firm guarantee that the offered pricing during the opening or the closing of a position is always superior than from other sources.

Factors	Importance	Description
Price	High	Price is considered to be the most important factor for the Company when assessing Best Execution. Daily monitoring is conducted by the Company's Dealing Department, to assess whether the price feeds allow for Best Execution on Client orders on a consistent basis. The methodology used is regularly audited and adjusted should it be deemed necessary. Furthermore, monthly Best Execution reports are performed to ensure that the actual execution prices obtained by investors are in line with the preliminary requested prices.
Costs	High	The Company has established and implemented a Liquidity Hub which primarily aims to keep Client transaction costs low and competitive. In addition, the Liquidity Hub facilitates in optimizing the existing trading infrastructure and eliminating certain elements such as intermediaries or counterparties whose presence is not justified for the overall execution quality and thus making the execution process as cost-effective as possible. The Company operates on the notion of being transparent, particularly on the charges and fees applicable to its investors. To this effect, all charges and fees are available on the "Charges and Fees" section of the Company's website.
Speed of Execution	High	All Client orders are executed with "no-dealing desk execution", meaning that automated execution engines are utilized by the Company to ensure that manual intervention in order execution is avoided and thus the possibility of delays is minimized. Speed of execution is assessed on a daily basis by the Company's Dealing Department, with any failures or erroneous execution speeds being investigated and subsequently rectified. The Company has proceeded to optimize its trading infrastructure by using reliable data centers such as LD4, NY4 and TY3, and has ensured optimal connections are established with the respective LPs and market data vendors. The above mentioned actions guarantee that the Company's clients are provided with stable and fast connections to the trading platforms, as well as faster execution and real-time market data.
Likelihood of Execution	Medium	The Company's trading platforms either accept or reject orders, depending on market or other underlying factors. The likelihood of execution generally depends on the liquidity available in the market and the depth of liquidity pools. Low liquidity and abnormal trading conditions contribute to increased order rejections which affect the investors. An assessment of likelihood of execution is conducted on a daily basis by the Company's Dealing Department.

Size	Low	The Company ensures that execution arrangements remain uniform when performing execution on unusually large orders, and that all factors influencing the potential outcome of an order being filled remain the same, at all times, irrespective of the order type.
Other Factors	As applicable	Varies depending on the arising circumstances.

8.7. Other Considerations

8.7.1. Slippage Limitation

Slippage is the difference between the expected price of an Order, and the price the Order is actually executed at. In some situations, at the time an Order is presented for execution, the specific price shown to the Client may not be available; therefore, the Order will be executed close to or a number of pips away from the Client's requested price.

A Slippage Limitation is a trigger event, determined as a percentage of the underlying instrument's spread, upon occurrence of which the order will be rejected. This limitation is placed for the Clients and the Company's protection so as, in cases of high volatility, to avoid the execution of an order at a price significantly different than the price specified in the order.

If the difference of the price requested and the current market price is within the limitation, the Client will always receive the market price. If the difference is more than the limitation, the order will be rejected. Slippage Limitation always apply symmetrically.

8.7.2. Use of Single Execution Venue

MiFID II does not prohibit firms from selecting only one execution venue to execute Client orders in a given class of financial instruments where they are able to demonstrate that such a choice enables them to consistently get the best results for their Clients.

The Company may use a single Execution Venue or execution entity when executing or transmitting Client orders for a specific asset class of financial instrument. A single execution venue or executing entity will only be used when the Company is able to demonstrate that such choice provides the best possible results for its Clients on a consistent basis.

In adherence to complying with the requirement under Article 24(1) of MiFID II to act in the best interests of its Clients, the Company assesses on an annual basis the execution quality it offers to its Clients to ensure that it is continuously succeeding in the providing a superior quality of execution in adherence to the fundamental principles of Best Execution.

This assessment involves the use of metrics available under RTS 27 and from any other relevant source of data for the creation of benchmarks, as explained in the sections below. The assessments take into consideration factors such as direct, indirect or implicit costs, counterparty risk, operational risk, and instrument price benchmarks.

8.7.3. Intra-Group Entities and Connected Parties

The Company has taken all sufficient steps as outlined by both CySEC and ESMA in order to ensure that in the case that an Execution Venue is used that is considered to be an intra-group entity or a connected party, that the said Execution Venue fulfils the Company's order execution requirements and yields the best possible results on a consistent basis.

Should order execution quality deteriorate, the Company, via its continuous monitoring and strict requirements, aims to always be in a position to consider alternative Execution Venues. Such monitoring is conducted on an interdepartmental basis and consists of daily monitoring, as well as monthly reports and both annual and bi-annual assessments per asset class and instrument level.
Moreover, the Company has established independent oversight of its execution arrangements, with continuous monitoring taking place by various Departments, on an internal basis. The monitoring conducted

on this internal interdepartmental basis supplements each other and set a concrete basis by which erroneous activity is reported, escalated and ultimately mitigated.

Due to the use of modern technology and software, such as the Liquidity Hub, the Company is able to monitor and challenge execution prices provided by the counterparty on both pre and post execution timeframes. Furthermore, constant monitoring is conducted on a daily basis on the pricing received per on an instrument, to conduct a comparative analysis on the competitiveness in the market.

Stringent bi-annual assessments take into consideration multiple pricing related factors which affect the offered financial instruments. In addition, monthly reports are generated which provide a holistic review of the Company's arrangements in Clients' order execution, with the salient figures providing an indication of the order execution quality offered to Clients.

8.8. Cancellation of Trades and Closure of Positions

The Company in certain cases is required to cancel Clients 'orders or close their open positions. The reasons are explained below.

8.8.1. Maintenance Margin and Margin Close Out

Maintenance Margin refers to the minimum equity (funds) the Client needs to maintain on their accounts to keep their positions open. The margin close out is 50%. This means that if the margin level falls under this percentage, the positions will be closed prior notification starting from the positions which are most unprofitable.

8.8.2. Off-Market Price

When a trade unexpectedly hits a stop-loss point and the Client generates a loss from an off-market price, or close their position by hand at the off-market price resulting in a loss, TCM gives the Client the option to experience:

- A positive adjustment and reinstatement of the position;
- Only a positive adjustment.

Clients who have a pending order triggered those results in their position being closed in a profit, or closed their position by hand in profit, are informed that they are going to experience:

- A negative adjustment and reinstatement of the position;
- Receive a negative adjustment.

8.8.3. Corporate Actions

If a particular instrument (as well as underlying a CFD), is no longer offered by the Company, because the instrument is affected by a delisting or a merger/acquisition, or bankruptcy, or any other situation that causes it from not being listed in the exchange a notification is sent to affected Clients. The notification email informs the Clients that the positions are going to be closed at the last available price. After notification emails have been sent, the Company proceeds to close the relevant positions.

8.8.4. CFDs on Cryptocurrencies

The Company may, at its sole discretion, set an expiration date for CFDs on Cryptocurrencies. Such a date shall for example be the date failing at least seven days after the date of opening by the Client a position in such CFD.

Unless the Client closes a position in any CFD in Cryptocurrency before its expiration date, such a position will be closed by the Company having regard to its best execution obligations.

8.8.5. Client Request

Clients may communicate to the Company via phone that they wish for a particular position to be closed.

9. INDUCEMENTS

The Company does not receive any remuneration, rebates or non-monetary benefits for the execution of Client transactions on a particular Execution venue which would infringe any conflicts of interest or inducement requirements under MiFID II, e.g. the Company cannot receive payments for order flow which would result in a conflict of interest.

10. SPECIFIC INSTRUCTIONS (LIMITED SCOPE OF BEST EXECUTION)

When a Client provides specific instructions as to how to execute an order, the Company shall take all sufficient steps to obtain the best possible result when executing that order, by following the Client's instructions.

Any specific instructions from a Client may prevent the Company from taking the steps that it has designed and implemented in its execution policy to obtain the best possible result for the execution of those orders in respect of the elements covered by those instructions.

Where a Client gives instructions, specifying the price at which a position is to be closed if the market moves against them, those instructions take precedence over other aspects of the Company's Order Execution Policy.

To the extent that specific instructions do not cover every aspect of the order, as is the case with market orders, the Company will apply the Order Execution Policy to those parts or aspects of the order not covered by the Client's instructions.

Upon acceptance of a Client order and when there is no specific instruction regarding the execution method, the Company will execute an order in accordance with this Policy.

11. RISK DISCLOSURE

TCM makes all warnings about the high risk of complex financial instruments, including:

- CFDs are complex instruments and come with a high risk of losing money rapidly due to leverage. You should consider whether you understand how CFDs work and whether you can afford to take the high risk of losing your money.
- The value of shares, ETFs, Fixed Income products and Mutual Funds can fall as well as rise, which could mean getting back less than you originally put in.
- Options, warrants and structured products are complex financial instruments and are not suitable for all investors. Your capital is at risk.
- Futures are not suitable for all investors. The amount you may lose may be greater than your initial investment.

A full explanation of the risks associated with our products is set out in the Risk Disclosure Notice and Clients should ensure that they fully understand such risks.

There are risks associated when trading, particularly with CFDs. Emanated risks include, but are not limited to, the following:

- **CFDs are not traded on regulated exchanges and are not cleared on a central clearinghouse:** TCM acts as the counterparty to Client orders, meaning that any associated exchange and clearinghouse protections and rules do not apply.
- **Credit Risk:** As TCM is the counterparty to Client orders, Clients are exposed to Credit Risk emanating by the Company. In the event that the Company were to become insolvent, it may be unable to fulfil its obligations towards Clients. However, TCM is a member of the Cyprus Investor Compensation Fund ("ICF") and Clients may be entitled to compensation from the ICF.
- **Market Risk:** CFDs being derivatives, carry a high level of risk due to market volatility. CFDs are available on a plethora of asset classes including but not limited to shares, indices, commodities and currency pairs. Each particular asset class has its own degree of risk and volatility associated to it,

and as such Clients must be aware and understand that different circumstances may affect price fluctuations and market liquidity. Market Risk includes Equity Risk, Commodity Risk, Interest Rate Risk and Foreign Exchange Risk.

- **Liquidity Risk:** TCM may at its own discretion cease quoting of CFDs. Moreover, the Company cannot guarantee a continuous availability of quotations, and may also prevent new transactions from occurring at any time, due to factors including but not limited to market volatility, instrument suspension, illiquidity and technical issues.

12. PUBLICATION OF DATA

The Company complies with the requirement to publish information on the quality of execution of transactions. This information will allow Clients to assess the quality of execution and will help them to assess the effectiveness of the monitoring of execution policy carried out.

The information is published in a machine-readable electronic format, available for downloading by the public, on the Company's website.

Based on relevant regulatory requirements, the Company publishes every quarter a report that contains data on its execution quality at as follows:

a. by 31 March, information regarding the time period 1 October to 31 December;

b. by 30 June, information regarding the time period 1 January to 31 March;

c. by 30 September, information regarding the time period 1 April to 30 June;

d. by 31 December, information regarding the time period 1 July to 30 September;

Those reports can be accessed here, specifically in the section titled "Best Execution Disclosures – RTS27".

Furthermore, the Company summarises and makes public on an annual basis, 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. This annual report can be found here, in the section titled "Best Execution Disclosures – RTS28".

13. MONITORING & REVIEW ARRANGEMENTS

This Policy shall be reviewed at least annually by the Compliance Department in collaboration with the Dealing Department and be approved by the Company's Board of Directors.

Such a review shall also be carried out whenever a significant material change occurs, that affects the ability of the Company to continue to obtain the best possible result when executing Client's orders.

Whether a material change has occurred, the Company shall consider making changes based on the importance of the best execution factors affected in meeting its best execution requirements.

TCM will amend this Policy on the basis of periodic reviews, if it considers it to be necessary. Any new policy will be made available on the Company's website and will be in force as from the date of its publication. Whenever a material change is introduced that alters the terms of this Policy and that affects Client rights and obligations, the Company will notify Clients of such changes prior to them taking effect.

The Company shall monitor on a regular basis the effectiveness of this policy and where appropriate correct any deficiency. The monitoring shall be conducted on ex-ante and ex-post basis, for example:

- Review statistics related to frequency of order rejections;
- Monitor the symmetry of any observed slippages (positive vs negative);
- Monitor any complaints related to the quality of execution.

The Company has established a robust monitoring program and procedure which is performed on a daily basis by the Dealing Department and reviewed on a monthly basis by the Compliance Department of the

Company. The monitoring program includes, among other parameters, comparison of the Company's order execution against specific benchmarks.

The monitoring assessment is conducted on a continuous basis by the Company's Dealing Department, with an additional and more stringent approach being taken by the Compliance Department in order to challenge any potential additional findings. Transactions that occur on at least a monthly basis are taken into consideration when performing a quantitative analysis on the best execution factors as aforementioned within this Policy, in order to determine adherence to and correct implementation of the Best Execution principles. Such procedures allows TCM to monitor the effectiveness of its order execution arrangements, to identify and correct any deficiency. The deficiencies identified by both the Dealing and Compliance Departments, along with any actions taken by the Dealing Department are raised to the Senior Management of the Company.

For the purpose of this Policy, the Company shall maintain records as evidence of its ongoing monitoring of best execution and which demonstrate its compliance with best execution obligations to any Competent Authority.

14. CONSENT

Trade Capital Markets (TCM) Limited is required by its regulator (Cyprus Securities and the Exchange Commission) to obtain prior Client consent to its Order Execution Policy. Clients will be deemed to have provided such consent when accepting the Company's terms and conditions.

15. CONTACT INFORMATION

Questions regarding this Policy should be addressed, in the first instance, to our Customer Support Department via email at support@heromarkets.com. The Company should answer clearly and within a reasonable time to all Clients about any questions the latter may have on the Company's policies and arrangements and how they are reviewed.

Clients may file a complaint by submitting the Complaints Form via post or by hand at: 148 Strovolos Avenue, 1st Floor, Strovolos 2048 Nicosia, Cyprus, or via email at: compliance@tradecapitalmarkets.com.

All complaints will be treated strictly confidential. If you believe that your complaint has not been handled in a fair and equitable manner by the Company you have the right to refer the matter to the Financial Ombudsman of the Republic of Cyprus (complaints@financialombudsman.gov.cy), ADR Mechanism, or the relevant Courts.