



Order Execution Policy

(Cayman Islands)

INTRODUCTION

This document contains the most important and relevant elements of ATC BROKERS LIMITED (“ATC”) order execution policy and arrangements to enable clients to make a properly informed decision about the use of ATC’s transaction execution services.

APPLICATION OF BEST EXECUTION OBLIGATION

ATC is obliged to take all sufficient steps to obtain, when executing orders, the best possible result for its clients (“best execution”) taking into account the execution factors where ATC acts on behalf of a client.

This does not mean that we must obtain the best possible result for you or every single occasion that you trade. However, it does require us to verify on an outgoing basis that our order execution arrangements are working well and are designed to obtain the best possible results for you.

Whenever there is a specific instruction from a client, ATC shall execute the order following the specific instruction and compliance with that specific instruction will be treated as satisfaction of the best execution obligation (if a specific instruction only covers part of an order the remainder of the order will still be covered by this Order Execution Policy). In absence of specific instructions from the client, ATC will exercise its own discretion in determining the factors that ATC needs to take into account for the purpose of providing you with “best execution”.

BEST EXECUTION FACTORS AND CRITERIA

When executing a client order, ATC may take into account the following criteria for determining the relative importance of price, costs, speed, likelihood of execution and settlement, size and any other consideration relevant to order execution (the “execution factors”):

- the characteristics of the client including their classification as private or professional;
- the characteristics of the client order;
- the characteristics of the financial instruments that are the subject of that order;
- the characteristics of the execution venues to which that order can be directed;

Differences in market structure and the structure of financial instruments results in the satisfaction of ATC’s best execution obligations in different ways. While ATC 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, ATC cannot guarantee that it will always be able to provide best execution of every order executed on your behalf.

EXECUTION VENUES AND LIQUIDITY PROVIDERS

The following applies to private and professional clients. Subject to any specific instructions from a client, ATC may use one or more venues and basis of execution to enable it to obtain the best possible result on a consistent basis when executing an order on the client's behalf.

In selecting the most appropriate venues for the purpose of executing your orders, ATC will take into full account the factors relevant to the order;

- what ATC reasonably assess to be your best interests in terms of executing your orders; and
- such other factors as may be appropriate, including the ability of the venue to manage complex orders, the speed of execution, the creditworthiness of the venue and the quality of any related clearing and settlement facilities.

In providing the client 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 it execute your orders. However, the diversity in those markets and instruments and the kind of orders that you may place with it mean that different factors will have to be taken into account when ATC assess the nature of our execution policy in the context of different instruments and different markets. For example, there is no formalised market or settlement infrastructure for over-the-counter transactions. ATC receives electronically real time executable prices from Liquidity Providers. 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.

ORDER EXECUTION RISKS

SLIPPAGE

ATC takes sufficient steps to ensure that execution of our quoted prices will obtain the best possible result for clients at the time the quote is provided, however fast moving markets may result in execution of a transaction at a price which has ceased to be the best market price.

GAPPING/VOLATILITY

There may be significant market movement after a news announcement or economic event or between the close and re-opening of a market which will have a significant impact on the execution of a pending order. Clients should be aware of the following risks associated with volatile markets, especially at or near the close of the standard trading session:

- an order may be executed at a substantially different price from the quoted bid or offer, or the last reported trade price at the time of order entry, or an order may be only partially executed or may be executed in several shapes at different prices; and
- opening prices may differ significantly from the previous day's close;

TRADING SYSTEM OR INTERNET CONNECTIVITY EXECUTION DELAYS

Delays in execution beyond our control may occur as a result of technical failures or malfunctions in connection with use of the Trading Facility or internet connectivity or processing speed for which ATC does not accept responsibility.

ORDER HANDLING

ORDER TYPES

Market Order – Is an instruction to buy or sell at the next available market price. Please note that pursuant to market conditions there may be a difference between the price selected on ATC's Trading Facility and the final execution price received. This difference may be less favourable or more favourable than the original quoted price and is a function of market liquidity.

Limit Order on MT4 Program – Trades placed on the MT4 platform are held on ATC servers. An MT4 limit order is an order to buy or sell at a specified price and may be used to open or close a position. Please note that MT4 limit order may be triggered by the market trading through, or gapping over a client's specified price. In the event that market conditions trigger a client's MT4 limit order for execution, it will become a market order upon execution. This means that a client's final execution price may be less favourable, or more favourable depending on market conditions.

Stop Order on MT4 Program – Trades placed on the MT4 platform are held on ATC servers. An MT4 stop order is an order to buy or sell at a specified price and may be used to open or close a position. Please note that MT4 stop order may be triggered by the market trading through, or gapping over a client's specified price. In the event that market conditions trigger a client's MT4 stop order for execution, it will become a market order upon execution. This means that a client's final execution price may be less favourable, or more favourable depending on market conditions.

Limit Order on GUI and FIX – Trades placed on the GUI or through FIX are held on the aggregation engine. The limit order is an instruction to buy or sell at your specified price or better and may be used to either open or close a position. Please note that a limit order may be triggered by the market trading

through, or gapping over your specified price. In the event that market conditions trigger a client's limit order for execution it may only execute at a price equal to or better than a client's specified rate.

Stop Order on GUI and FIX – A stop order is an order to buy or sell at a specified price and may be used to open or close a position. Please note that a stop order maybe triggered by the market trading through, or gapping over a client's specified price. In the event that market conditions trigger a client's stop order for execution, it will become a market order upon execution. This means that a client's final execution price may be less favourable, or more favourable depending on market conditions.

MONITORING & REVIEW

ATC will monitor the effectiveness of its order execution arrangements and this policy and regularly assess whether or not the execution venues it accesses continue to provide the best possible results for orders it executes on behalf of clients.

ATC will review, at least annually or when a material change occurs, both its order execution arrangements and this Policy. Material changes to this Policy will be notified through the ATC website and be available to actual and potential clients.

By entering into ATC's Customer Agreement, client consents to this Order Execution Policy.