

AXITRADER

Best Execution Policy

AxiCorp Limited
FCA #509746

36 - 38 Leadenhall Street
London EC3A 1AT
UNITED KINGDOM

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Tel: +44 203 544 9646 / 0800 612 7070

BEST EXECUTION POLICY

INTRODUCTION

The purpose of this document is to provide information on AxiCorp Limited's [AxiCorp] policy on order execution and its approach to achieving the best possible result for you when executing your Trades on a consistent basis. It is required under the EU Markets in Financial Services Directive (MiFID II), and will apply to all of AxiCorp's Retail Clients and Professional Clients.

This document forms part of AxiCorp's Customer Agreement. By accepting the terms of the Customer Agreement, you are deemed to also consent to the terms of the Execution Policy, as summarised here.

In our dealings with you, we have a general duty to act honestly, fairly and professionally, taking into account your best interest. When executing Trades for Contracts for Difference, Spread Trading and other OTC financial derivatives products with you, AxiCorp will take all sufficient steps to achieve the best possible outcome taking into account its Execution Policy and any specific instructions received from you. However, the Execution Policy cannot guarantee that the price at which AxiCorp permits you to execute a Trade will always be the best price available to you in the market at that point in time. Subject to any specific instructions that may be given by you we will take all reasonable steps to obtain the best possible result for our Clients taking into account the Execution Factors listed below.

We will determine the relative importance of the Execution Factors by using our commercial judgement and experience in light of the market information available to us.

EXECUTION FACTORS

The Execution factors that will be taken into account are: price; costs; speed; likelihood of execution and settlement; size; nature or any other consideration relevant to the execution of the order.

For Retail clients, the best possible result for you will be based upon the total consideration payable (including our charges if any are applicable), representing the price of the financial instrument and the costs related to execution. If we are not treating you as a Retail Client we may determine that other Execution Factors are more important than price in obtaining the best possible execution result.

Our charges may be incorporated as a mark-up or mark-down (the difference between the price at which we take a principal position and the transaction execution price with you). We may alternatively agree to charge a commission or a combination of commission and mark-up or mark-down. Our charges are not taken into account in determining best execution prices.

Clients should be aware that there may be regional variations in spreads due to services provided and other third party costs in that area. Any increase in spread is not client specific and is applicable to all clients in that region. All spreads are clearly visible to clients on the trading platform.

EXECUTION CRITERIA

In determining the best way to execute orders or trades for a client, AxiCorp will use its considerable commercial experience and judgement and a variety of considerations which it believes is relevant in accordance with COBS 11.2A.8:

Classification: AxiCorp will take into account the characteristics and expectations of the client and whether they are classified as retail or professional.

Price: Every attempt will be made to fill a client at their requested price. If possible AxiCorp will fill the client at an improved price, but there will be times due to market slippage or a price error when this will not be possible or indeed the fill may be worse than expected.

Cost: We will always endeavour to provide a client with the most cost effective way to trade, where possible paying little or no commission, brokerage or financing.

Speed: As long as there is no interruption to internet connections, unintentional or otherwise, then the client should get a fast and seamless execution of their order or trade. If, however there is delay in that connection causing latency or erroneous pricing then the order or trade may be rejected or filled at a different but correct price at that time.

Size: Depending on the size of the trade there may be restrictions on AxiCorp's ability to fill an order or trade at the requested price. Under normal circumstances AxiCorp will not issue partial fills (except when trading futures markets) and offers its clients a price with a minimum and maximum deal size.

Likelihood: In certain instances, AxiCorp may have a choice in the way in which it chooses to fill a client's order or trade. Where possible AxiCorp will always choose a way which is of benefit to the client.

Hours: Orders and trades can only be filled when the underlying market is open or if AxiCorp is quoting a grey (out of hours) market in that product. This means that when a market re-opens it is likely to gap on the open leading to slippage.

Slippage: Also known as gapping and can occur at any time, over news events or when a market opens. This may result in a client order being triggered and or filled at a different level from where intended. In the case of a stop this will be a worse level, but conversely for a limit order will result in an improved fill price. In either event the price the client is filled at represents the first price available which AxiCorp can reasonably be expected to fill the client at.

Aggregation: The firm will not execute any orders on its own account in aggregation with a client order. If it does so it will not aggregate orders where the likely outcome is to disadvantage the client order.

EXECUTION VENUES

Subject to any specific instructions that may be given by you (and agreed by us), we may transmit an order to a third party broker or dealer, for execution at one or more of the following Execution Venues: a Regulated Market, a Multilateral Trading Facility, a Systematic Internaliser, third party investment firms or other liquidity providers, credit institutions or non-EU entities performing similar functions. In doing so, we must act in your best interests taking into account the execution factors and criteria described above.

We currently use the following financial institutions/execution venues:

- AxiCorp Financial Services Pty Limited (ASIC AFSL No. 318232)

They provide AxiCorp Limited with an aggregated price feed from some of the biggest market makers in the world to enable us to show our clients what we believe is a price that is equal to or better than the underlying market.

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

Publication

In certain instances, AxiCorp may have to publicise an order by placing it onto an exchange where other parties can see the order, but would not know who it is for.

Third Parties

AxiCorp may at his sole discretion pass your order to a third party (broker or such like) in order to facilitate the execution of your order or trade.

AxiCorp Pricing

Please be aware that where you deal on a AxiCorp price, where we are the underlying market maker, then AxiCorp are technically not executing an order on your behalf and as such do not owe a duty of best execution to you as you are transacting with AxiCorp on the basis of that quote.

Monitoring

AxiCorp will at regular intervals monitor the effectiveness of this policy in its Compliance Monitoring Programme using a sample of trades executed for clients and comparing the fills given to them to those of the underlying exchange or market at that time using time and sales.

If there are any material changes that are made to this policy then all clients will be notified in advance except those that occur in a Force Majeure situation.

TRADING OUTSIDE A REGULATED MARKET OR A MULTILATERAL TRADING FACILITY (MTF)

Under the FCA rules where an instrument is admitted to trading on a Regulated Market or MTF, we are required to obtain your prior express consent before we arrange for an order in such instruments to be executed at an alternative venue. By trading on our platform, you express your consent to us arranging for your orders to be executed outside a Regulated Market or MTF.

SPECIFIC CLIENT INSTRUCTIONS

Where you give us a specific instruction as to the execution of an order we will execute the order in accordance with those specific instructions. Where your instructions relate to only part of the order, we will continue to apply our order execution policy to those aspects of the order not covered by your specific instructions.

You should be aware that providing specific instructions to us in relation to the execution of a particular order may prevent us from taking the steps set out in our order execution policy to obtain the best possible result in respect of the elements covered by those instructions.

MONITORING

We will monitor the effectiveness of our order execution arrangements and this order Execution Policy to identify and, where appropriate, correct any deficiencies.

REVIEW

We will assess whether the execution venues included in this Order Execution Policy provide the best possible result for our clients or whether we need to make changes to our execution arrangements. We will review our order execution arrangements and this Order Execution Policy at least annually or whenever a material change occurs that affects our ability to obtain the best result for the execution of orders on a consistent basis using the venues included in this Order Execution Policy.

CONSENT

We are required to obtain your prior consent to our order execution policy. You will be deemed to provide such prior consent when you give us an order.

DEFINITIONS

Execution Venue means a Regulated Market, an MTF, 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 function performed by any of the foregoing.

Multilateral Trading Facility (MTF) means 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 – in the system and in accordance with non-discretionary rules in a way that results in a contract in accordance with the provisions of MiFID II.

Regulated Market means a multilateral system operated and/or managed by a market operator which brings together or facilitates the bringing together of multiple third party buying and selling interests in Financial Instruments – in the system and in accordance with its non-discretionary rules – in a way that results in a contract, in respect of the Financial Instruments admitted to trading under its rules and/or systems, and which is authorised and functions regularly and in accordance with the provisions of MiFID II.

Systematic Internaliser means an investment firm which, on an organised, frequent and systematic basis, deals on own account by executing client orders outside a regulated market or an MTF.