**Best Execution Policy**

**Introduction:**

This Execution Policy should be read in conjunction with TTA's Client Agreement, when you agree with our Client Agreement, you agree to our Best Execution Policy as well. This policy applies to the execution of all products and services offered by TTA. Depen ding on the region, some products are not available due to regulatory restrictions. Please contact TTA for more information r egarding these restrictions.

TTA ("We" "Us" "Our") refers to TradeTech Alpha Limited, which is registered in England and Wales (Company Number: 08663212) and is authorized and regulated by the Financial Conduct Authority (FCA reference number: 607305).

All Customers are advised that trading spot foreign exchange ("spot FX"), Contracts for Difference ("CFDs"), Spread Betting, a nd any other investment products which are also leveraged, carry a high level of risk. These products are not suitable for all investors. It is possible to lose more than your initial investment. The risks of trading must be understood prior to trading.

**Best Execution Policy:**

When trading any of the above mentioned contracts, TTA acts as a principal and not as an agent on your b ehalf unless we inform you otherwise. That means that all of your orders are executed directly with TTA who are counterparty to all transactions. Subjec t to prior written agreement, trading charges may be incorporated as an addition to bid/offer price (the difference between the price at which we take a principal position and the transaction execution price with you). TTA may alternatively agree to charge a commission o r a combination of commission and mark-up or mark-down. TTA charges are not taken into account in determining best execution prices. We are required to take a number of factors into account when considering how to give you best execution including price, cos ts, size, liquidity of the underlying market, speed and likelihood of execution and s ettlement. The way in which we will ensure that you obtain best execution is by ensuring that in our calculation of our bid/offer prices we pay due consideration to the market price fo r the underlying referenced product. We have various different data sources through which we ascertain the fair market price that we use to form a fair, tradable TTA bid/offer. A detailed breakdown of TTA's pricing conventions follows:

TTA derives its prices for **Spot FX** from liquidity providers in the wholesale market. TTA uses this liquidity as guidance in determining bid/offer prices, but is not bound to use this liquidity in any particular manner. TTA's bid/offer spread may be tighter or w ider than these wholesale prices, and is dictated by overall liquidity and demand in the market as well as in the TTA flow. The bid/offer price of a particular price feed is universal for all Clients who subscribe to that feed. Some price feeds display a discounted spread and subscribers to some of these discounted feeds may be charged a commission, which is disclosed to those Clients using that specific price feed

TTA's prices for **futures based Indices** are derived from the underlying futures of the instrument. In the case of **cash Indices**, an adjustment called a fair value adjustment is made to take account of financing costs and dividends anticipated to occur during the period between the present, and the maturity date of the underlying future.

Where TTA continues to quote prices outside of the market hours of the underlying Index future, TTA creates its cash and futu res Index prices by taking into account such factors as the current prices of other worldwide indices, commodities or Spot FX marke ts as well as Client flow, and may be subject to restrictions in maximum size and increased spreads, as well as, maximum size at which exec ution will be automated and not referred to dealing desk. A mid-price is derived from these prices, then an TTA spread is added to the mid-price to create a bid and offer price.

TTA's prices for **futures based Commodities** are derived from the underlying futures prices to which they relate. In the case of **spot Commodities**, a fair value adjustment is made to take into account costs such as, but not exclusively, financing and storage, that may occur during the period between the present and the maturity date of the relevant underlying future. In some cases, variation s of future based cash instruments will be quoted, this information can be found in our Market Information Sheets ("MIS"). A mid-price is derived from these prices and then an TTA spread is added to the mid-price to create a bid and offer price.

TTA derives its prices for **bonds futures instruments** from the underlying futures prices to which they relate. TTA's pricing convention might be slightly different from that of the relevant underlying exchange, for further information refer to the MIS, but the pricing itself is in line with underlying market. A mid-price is derived from these prices and then an TTA spread is added to the mid-price to create a bid and offer price.

TTA derives its prices for **interest rate futures** from the underlying futures prices to which they relate. A mid-price is derived from these prices, and TTA spread is added to the mid-price to create a bid and offer price.

TTA derives its prices for **single stock CFDs/Spread Bets** from the underlying equity prices to which they relate. In the case of CFDs, a bid/offer price is derived from these prices and passed on to the Client and then TTA's commission is added to the trade to create overall execution price. In the case of Spread Bets, a bid/offer price is derived from these prices, TTA's spread is then added to this bid/offer price and passed on to the Client.

TTA derives its prices from one or more data sources that reflect the underlying exchange's prices. Where this data is unavailable, TTA will base its prices on the last traded price of the underlying instrument. All cash instruments are subject to daily financing (this does not apply to futures contracts).

In relation to some financial instruments, at the time at which you submit an order there may be no functioning or open market, or exchange on which the reference product is traded. In such cases, we set out to determine a fair underlying price based on a number of factors such as price movements on associated markets and other market influences and information about our Client's orders. Also, at such times when the market may be illiquid, trade halted or suspended and it is not reasonable to expect fair derivation of the price, we reserve the right not to execute your order. All execution is symmetrical which means if the price is not available on a stop order and the order is executed at next available price, same will happen to limit orders and they will be improved. Regular reviews of execution levels are conducted by TTA.

**Order types**

TTA order types include:

- Market Orders: Market Orders are executed at the best available, market price. The price that appears on Client's screen prior to submission is the last price only and does not constitute the actual execution price. Once the submitted order is received it will be executed at the market rate at the time.
- Instant execution: Instant execution orders are typically price specific. Orders are executed at requested price or the order is rejected. A slippage tolerance can be set on instant execution orders.
- Stop Orders: Stop Orders are executed at the price designated by the Client or, in the case of gapping, the first available price. Buy Stop orders are executed at the next available offer price and Sell Stop orders are executed at the next available bid price.
- Limit Orders: Limit Orders are executed at the Client requested price or better, if the price is available.
- Attached Stop Orders and Attached Limit Orders: the user may specify the attached order level by indicating the price at which the attached order should be booked or the number of points from the parent order level at which the attached order should be booked. In the latter case, if the parent order is a Market Order, Stop Order or Limit Order, the attached order will be booked the specified number of points away from the price at which the parent order was submitted and not from the price at which the parent order was executed.

TTA's descriptions of the various types of orders are summaries, and do not describe all aspects of each order. If you have any questions as to how any of the types of orders will be executed, please call our representative for an explanation.

**Execution venues**

As mentioned above, TTA acts as a principal on all Client trades and therefore execution sits with TTA. We allow Clients to execute through various venues: our proprietary platforms (desktop, web and mobile versions), the MT4 platform, phone orders to our dealing desk or through some chat functions (Bloomberg, Reuters, etc.). Each Client is responsible for all orders placed by that Client, or on behalf of the Client by an Agent, and should fully understand the mechanics and method of execution of each order before placing it.

TTA uses automated systems to route and execute Client orders. TTA will act as a principal to Client orders, including where orders are directly routed to TTA's liquidity providers, whereupon Client execution may depend on the execution TTA receives from its liquidity providers. We will use liquidity providers that we consider of highest quality and that provide Best Execution in-line with the terms of this Best Execution Policy. These liquidity providers will be reviewed regularly and any potential issues will be reported to senior management and reviewed in detail.

In some rare circumstances, there may be delays in execution of orders, including orders placed through on-line trading systems. Some orders placed through on-line trading systems may be handled manually in circumstances where high traffic in electronic orders causes a back log due to, but not exclusively, excessive volatility causing illiquidity in underlying markets. In such circumstances TTA may discontinue normal automatic execution procedures and turn to manual execution, leading to possible delay in execution. In order to minimize such a risk, TTA has in place procedures and arrangements which to the furthest extent possible provide for the prompt, fair and expeditious execution of Client orders.

Clients should be aware of the following risks associated with volatile markets, especially at or near the open or close of the standard trading session:

- Slippage or execution at a substantially different price from the quoted bid or offer, as well as partial executions or execution of large orders in several transactions at different prices. The possibility of slippage increases during fundamental announcements, at illiquid times, and at times of extreme market volatility. The release of fundamental data and extreme world events may cause increased volatility in the market. When economic data or world events are announced, the market may "gap" in a particular direction. This means that there are no tradable prices between the actual price at which the market was trading prior to a fundamental announcement, or world event, and the price available after the market has adjusted, following the announcement or event. Prices move very quickly and orders are executed in some cases at prices very far away from the stop price. As mentioned above, all execution will be symmetrical and market and limit orders will be treated in the same way as stop orders. This means that gaps in the market may work against the Client as well as in Client's favour.

- Delays in executing orders for financial instruments that are directly routed to TTA's liquidity providers, and manually routed or manually executed orders. Prices at which orders are executed may be different from that requested, but TTA will always aim to act in Client's best interest and achieve the best fill possible.

- If positions and orders are left overnight, opening prices may differ substantially from the previous day's close, depending on where the underlying instruments opens on the following day.

- "Locked" (the bid equals the offer) and "crossed" (the bid is higher than the offer) markets on the exchange or other market participants, which prevent the execution of Client trades are also a risk. This includes limit up/down situations on some underlying futures markets and suspension of shares due to an imminent news announcement. This also includes technical issues with underlying exchanges.

- Price volatility is one factor that can affect order execution. When Clients place a high volume of orders with brokers, order imbalances and backlogs can occur. This implies that more time is needed to execute the pending orders. Such delays are usually caused by the occurrence of different factors:
  a) Number and size of orders to be processed (usually due to major economic announcement);
  b) Speed at which current quotations (or last sale information) are provided to TTA; and/or
  c) System capacity constraints applicable to the given exchange, as well as to TTA.

TTA does not permit the practice of arbitrage, nor does it allow clients to take advantage of price latency due to internet delays (See Invalid Prices and palpable errors, below). Transactions that rely on price latency or arbitrage opportunities may be revoked. TTA reserves the right to make the necessary corrections or adjustments on the Account(s) involved, including, but not limited to, withholding any profits made by Client while using these trading tactics. Accounts that rely on arbitrage strategies may at the sole discretion of TTA be subject to TTA's intervention and manual approval of all Orders.

**Invalid prices and palpable errors**

Invalid prices occur when incorrect price information is entered into the trading platform. Internet, connectivity delays, and price feed errors may create a situation where the prices displayed on the trading platform do not accurately reflect market rates. Invalid prices are removed from the price charts to alleviate confusion. Should any orders be executed basis an invalid price, the resultant trades will be invalid and reversed so that no P/L occurs, and commissions (if any) credited back to Client's account.

Palpable error is defined as a clear mispricing of any instrument by TTA. When declaring a palpable error, TTA will act reasonably and may, without limitation, take into account the exchange price of the underlying asset at the time of the error, and/or any error or lack of clarity within any pronouncement or information upon which TTA relied in order to derive a bid/offer price.

In case of palpable error, any trade that resulted due to an order being filled basis such palpable error, will be invalid and reversed so that no P/L occurs, and commissions (if any) credited back to Client's account.

**Extreme market conditions and market events outside TTA control**

In an event of extreme market conditions and unusual trading circumstances caused by, but not limited to, central bank interventions, natural catastrophe, or war, TTA will endeavour to provide bid and offer prices, and if able, as close to normal market conditions as possible. We cannot however guarantee that we will be able to provide pricing if liquidity in the underlying markets is suspended or for some other reason not available. We will mimic, as close as possible, underlying market conditions and come back online as soon as reasonably possible. Prices, execution and trading times will often depend on those that the TTA is getting from its liquidity providers.

**Review and monitoring of the policy**

We will monitor the effectiveness of our order execution policy. We will assess, from time to time, whether the venues used by us in pricing of our instruments and executing transactions on your behalf allow us to achieve best execution on a consistent basis or whether we need to make changes to our execution arrangements. If any changes are made, the Best Execution Policy will reflect them. We will also review our order execution arrangements and order execution policy in respect of material changes either in respect of one of our chosen pricing venues or that otherwise affect our ability to continue to achieve best execution. Should there be any material changes to our order execution arrangements or order execution policy, we will notify you.