

ORDER EXECUTION POLICY

INTRODUCTION

1. iCFD Limited, operating under the brand name 'iFOREX' (the "**Company**"), is an Investment Firm regulated by the Cyprus Securities and Exchange Commission (license number 143/11).
2. This notice is provided to you in accordance the provisions of the Investment Services and Activities and Regulated Markets Law number 144(I) of 2007 and in accordance with the Markets in Financial Instrument Directive (MiFID) of the European Parliament and Council pursuant to which the Company is required to provide its clients and potential clients with appropriate information on its Order Execution Policy (hereinafter the "**Policy**").
3. This Policy forms an integral part of the client's trading agreement with the Company. Therefore, by entering into an agreement with the Company, the client also agrees to the terms of this Policy which should be read in conjunction with the trading agreement. In any conflict between the Policy and the terms of the trading agreement, the terms of the trading agreement shall prevail.

Further to this, the Client also agrees to the fact that the Company's financial products are offered on an over-the-counter basis and not through a regulated market or a Multilateral Trading Facility (MTF) and that the Company acts as a principal to the client's trades. This means that the client must open and close every trade with the Company and cannot close an open trade with a third party.

The Company is therefore the sole execution venue for trades executed by it for the client.

4. The Client should further be aware that the Company holds a negative balance protections policy which guarantees that in any event the Client will not lose more than its deposit amount.

SCOPE OF THIS POLICY

5. This Policy applies to both Retail and Professional Clients (as defined in the Company's Client Classification Policy). If the Company classifies a Client as an Eligible Counterparty, this Policy does not apply to such a Client.
6. This Policy applies when executing transactions with a client for the Contracts for Difference ("**CFDs**") and Binary Options offered by the Company. The Company is always the counterparty (or principal) to every trade.

GENERAL

7. All price quotes offered by the Company are provided to the Company by Formula Investment House Ltd (“FIH”), a company within the iFOREX Group and each trade between the company and the client is automatically fully hedged through the FXnet trading platform with an identical trade between the Company and FIH.

TYPE OF ORDERS IN CFDs

8. The Company accepts two types of Orders:

Market Order (trade request) – an order to open or close a CFD Transaction at the price currently indicated in the platform. The Company shall endeavor to fill that order as soon as reasonably practicable after the order is accepted and in accordance with best execution obligations.

Limit Order (future orders) – an order to open or close a CFD Transaction at a price that may be available in the future. The Company shall only fill the client’s order when that particular level has been reached, subject to this best execution policy.

The Company decides which assets to quote and the times in which the financial instrument based on such assets are traded. The Company will not quote any price outside the Company’s trading times, and no orders can be placed by the Customer during that time.

BEST EXECUTION FACTORS

9. The Company shall take all reasonable steps to obtain the best possible results for its clients taking into account the following factors when executing clients’ orders against the Company’s quoted prices:

The Company shall take all reasonable steps to obtain the best possible results for its clients taking into account the following factors when executing clients’ orders against the Company’s quoted prices:

- (a) Price;
- (b) Transaction costs (in the CFD context this would be the spread, as explained above) and risks relevant to the execution (in the CFD context the risks relevant to execution are in regard primarily to (c) and (d) below);
- (c) Speed of execution;
- (d) Likelihood of execution and settlement;
- (e) Size and nature of the order;
- (f) Likely market impact;
- (g) Nature of the market for the financial instrument; and
- (h) Any other consideration deemed relevant to the execution of an order.

10. In order to determine the relative importance of the Execution Factors, we will take into account the factors set out at Best Execution Criteria section 11, below. The most important of these factors are discussed below, before setting out how these are applied and prioritized in relation to different circumstances, such as client classification.

a. **Price in CFDs:** For any given CFD, the Company will quote two prices: the higher price (ASK) at which the Customer can buy (go long) that CFD, and the lower price (BID) at which a client can sell (go short) that CFD. Collectively, the ASK and BID prices are referred to as the Company's price. The difference between the lower and the higher price of a given CFD is the spread plus a markup (if applicable). Such orders as Buy Limit, Buy Stop and Stop Loss, Take profit for opened short position are executed at ASK price. Such orders as Sell Limit, Sell Stop and Stop Loss, Take profit for opened long position are executed at BID price.

b. **For Binary Options:** the Company will make available, by posting on the Company's Website and/or the Trading Platform, the following options:

i. CALL (Above) – to buy a call option;

ii. PUT (Below) – to buy a put option;

At the current price applicable to a currency pair, commodity, index, share or any other financial asset or instrument, and offer the Client the opportunity to submit a CALL or PUT Order in respect of such asset. Each Transaction shall be for a specified expiry time. The Company expects that the current prices will be reasonably related to the actual prices of such Underlying Assets available in the market. The Company makes no warranty, express or implies, that the quoted prices represent prevailing market prices.

The prices for any financial instrument are calculated by reference to the price of the relevant underlying asset which is obtained through FIH from independent market data providers. Price feeds are monitored independently by the Company and separately by FIH against other price quotes received from other independent market data providers in order to ensure the accuracy and consistency of the data, to provide a competitive and fair reflection of the market price to clients and avoid the possibility of arbitrage. Such price may differ from the price provided by such market data providers due to the Company's minimum spread requirements, interest adjustments, connection speed or other relevant factors.

The Company's prices, reflecting the minimum spreads that can be granted to its clients, can be found on the Company's website. The Company updates its prices as frequently as the limitations of technology and communications links allow. The Company reviews its third party external reference sources from time to time to ensure that the data obtained continues to remain competitive. The Company will not quote any price outside the Company's operations time (see execution venue below) therefore no orders can be placed by a client during that time.

- c. **Costs:** The Company utilizes a spread pricing model. The minimum spread offered for each instrument is detailed on the Company's website. The spread is dynamic and may widen due to market conditions, liquidity and market volatility. Certain open CFD transactions (FX and shares CFDs) are automatically rolled over upon reaching their value date. In such cases, the client's transaction or equity are credited or debited with interest adjustments calculated on the basis of the relevant inter-bank interest rates (including a mark-up spread) and the relevant periods. For further details see the [Company's Trading Conditions](#) available on the Company's website.
- d. **Speed of Execution:** The Company acts as principal and not as agent on the client's behalf. Therefore, the Company is the sole Execution Venue (as defined in Commission Directive 2006/73/EC implementing MiFID) for the execution of the Client's orders for the financial instruments offered by the Company. The Company places a significant importance when executing client's orders and strives to offer high speed of execution within the limitations of technology and communications links.
- e. **Likelihood of Execution and Settlement :**

Client's market orders (trade requests) are executed at the price that is in effect on the Company's trading platform (client side) at the exact time of execution, provided that such price is within a predetermined tolerance level from the underlying price of the asset as indicated in the Company's server and irrespective if the underlying price is above or below the price indicated in the trading platform (What You See Is What You Get, or WYSIWYG). In the event that the price indicated in the trading platform (client side) exceeds the above tolerance level, for example, due to movements in the underlying assets between the time a client placed its order and the time it is received and executed, high markets volatility and communication latency, the order will be executed at the price indicated in the Company's server (Market Price) on a symmetrical basis.

Client's limit orders (future orders) are executed at the market price indicated at the Company's server which may be different than the price indicated in the order ("Slippage"). Slippage may occur in the event where the price indicated in the order is not available in the server, for example, due to high markets volatility and gaps in the market prices. In such event, the order will be executed at the first available price, irrespective of the direction of the slippage, either to the client's favor or not, in a symmetrical and transparent manner (Symmetrical Slippage).

It is important to note that the Company holds a negative balance protections policy which guarantees that in any event the Client will not lose more than its deposit amount. Slippage does not affect the Negative Balance Protection and therefore a client will never lose more than the amount invested, even if a Slippage occurs. In addition, transactions

in some CFDs or Rolling Forex (currencies) which the respective underlying asset is not traded on a 24 hours basis, may experience a market gap on a daily basis and are therefore more susceptible to Slippage.

f. **Size and Nature:**

In General, the Company does not take into consideration the size of a client's order in acceptance, scheduling or prioritization of execution. However, order execution is subject to size considerations, including a minimum deal size, maximum deal size and maximum net exposure for the instrument. Minimum deal size and maximum exposure limitations per each products can be found under Product Details in the Trading Conditions located in the Company's website.

The Company does not execute partial trades.

- g. **Market Impact:** Some factors may rapidly affect the price of the underlying instruments/products from which the Company's quoted price is derived and may also affect other factors listed herein. The Company will take all reasonable steps to obtain the best possible result for its clients*.

*The Company does not consider the above list exhaustive and the order in which the above factors are presented shall not be taken as priority factor. Nevertheless, whenever there is a specific instruction from the client, the Company shall make sure that the client's order shall be executed following the specific instruction.

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

BEST EXECUTION CRITERIA

11. The Company is the sole Execution Venue for the execution of the clients' orders owing to the fact that the Company acts as principal and not as agent on the clients' behalf, but the Company may in turn route its own orders to FIH.

The Company determined the relative importance of the above execution factors on the basis of its commercial judgment and experience and in the light of information available on the market. When executing a client's order, the Company will take into account the following criteria for determining the relative importance of the execution factors, however not all of these criteria will be relevant in every case.

- (a) the characteristics of the client including the categorization of the client as retail or professional;

- (b) the characteristics of the client’s order;
- (c) the characteristics of the financial instruments that are the subject of that order;
- (d) the characteristics of the execution venues to which that order can be directed.

Where the Company executes an order on behalf of a retail client, the best possible result must be determined in terms of the total consideration, representing the price of the financial instrument and the costs related to execution, which must include all expenses incurred by the client which are directly related to the execution of the order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order.

In view of the above, the Company assigns the following importance level for the above Best Execution Factors:

Factor	Importance
Price	High
Cost	High
Speed of Execution	High
Likelihood of Execution and Settlement	High
Size and Nature	Low

12. For retail clients, the best possible result shall be determined in terms of the total consideration, representing the price of the financial instrument and the costs related to execution, which shall include all expenses incurred by a client which are directly related to the execution of the order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order.

APPLICATION TO ASSET CLASSES

13. FX CFDs

The Company (and FIH), sources prices from independent market data providers (to ensure appropriate price discovery and comparison), these data feeds provided by market data providers are prioritized in terms of previous experience in terms of robust, accurate and continuous service, which the Company continuously monitors (as described below).

14. Futures and Equity CFDs

Equity CFDs are priced by the company by reference to the level of the relevant underlying equity price, via price feeds from various independent financial market data providers, (to both ensure a spread of reliance and price discovery) these data feeds provided by market providers are

prioritized in terms of previous experience in terms of robust, accurate and continuous service, which the Company continuously monitors (as described below).

EXECUTION OF CLIENT ORDERS

15. The Company shall satisfy the following conditions when carrying out client orders:
- a. ensures that orders executed on behalf of clients are promptly and accurately recorded and allocated;
 - b. carries out otherwise comparable client orders sequentially and promptly unless the characteristics of the order or prevailing market conditions make this impracticable, or the interests of the client require otherwise;
 - c. Informs a retail client about any material difficulty relevant to the proper carrying out of orders promptly upon becoming aware of the difficulty.

SPECIFIC INSTRUCTIONS

16. Where a client gives the Company specific instructions, including specifying the opening or closing price of a transaction (for example, limit orders), the Company will execute that order in accordance with such instruction, provided that the requested price is available. This will be deemed to be best execution, superseding all other aspects of this Policy. To the extent that specific instructions do not cover every aspect of the order (for example, in market orders), the Company will apply this Policy to those parts or aspects of the order not covered by the client's instructions.

AGGREGATION

17. The Company does not aggregate one client's trade(s) with that of any other clients during execution.

MONITORING AND REVIEW

18. The Company regularly monitors compliance and effectiveness of the Policy for relevant order execution arrangements to assess whether it enables it to continuously provide the best possible result for our clients, focusing mainly on monitoring price, cost and speed. Specifically, the Company carries out monitoring in the following manner:
- (a) Real-time monitoring of the price feeds; and
 - (b) T+1 reports indicating the execution price and server price for each transactions.

In accordance with the frequencies set out above the Company monitors best execution in the following way:

- (a) FIH sources data from independent market data providers to ensure adequate price discovery and comparison;
- (b) The data feeds/sources are monitored continuously by the Company (and FIH) in relation to the asset classes and instruments offered to clients by the Company, this monitoring includes price movement. In order to achieve this monitoring the Company carries out sample reviews on instrument prices and developed a set of alerts which constantly monitors the prices quality and availability;
- (c) The alerts used by the Company as part of its monitoring program, include (as noted above) price movements. Where a price movement occurs outside of a pre-defined parameter this is analyzed in order to understand why such movement has occurred. For example, whether the movement is referable to market volatility or event driven news.

Monitoring and investigations are carried out by FIH together with other Group entities at individual financial instrument level, before being sent to the Company and its clients, an in parallel by the Company's risk management team (in Cyprus) and material anomalies are escalated both internally within Risk and the Company, to the Board if appropriate (to the extent that they cannot be resolved).

AMENDMENTS

- 19. From time to time the Company will amend the Policy to take into account changes in law, regulation, and market structure or business model and will notify the clients in advance of any material change in the Policy, as per the provisions of the Client Agreement.