

BEST EXECUTION POLICY
APRIL 2019

Overview

Squared Financial Services Limited (hereinafter, the “Squared Pro”) is an Investment Firm incorporated and registered under the laws of the Republic of Ireland. The Company is authorised as an Investment Firm under Regulation 8 (3) and deemed authorised under Regulation 5 (2) of the Statutory Instrument No. 375/2017 European Union (Markets in Financial Instruments) Regulations 2017.

This is the **Best Execution Policy** and should be read in conjunction with the **Execution Quality Summary Statement** available on the Company website. The objective of the Best Execution Policy is to inform clients how SquaredPro aim to achieve the most favourable economic outcome for the orders that we receive and transmit.

Several key factors are considered in determining the best venue for best execution, notably:

- Price (highest bid or lowest offer)
- Cost (execution and clearing fees)
- Speed of execution
- Likelihood of execution (predominantly linked to volume on the venue)

The term “venue” in this document encompasses regulated markets, multilateral trading facilities, and market makers.

The purpose of this document is to inform clients and potential clients of which venues are available to clients, the decision process in assessing and obtaining best execution, the monitoring process, and the review process for best execution.

1) Instruments available for trading via Squared Pro

- Spot FX
- Spot precious metals
- Options on spot FX
- Options on precious metals
- Futures (worldwide, essentially all instruments)
- Spot crude oil
- CFD's

Corresponding venues available for trading the aforementioned instruments are as follows:

The top five trading venues used by SquaredPro are published in the **Execution Quality Summary Statement** and in the RTS 28 disclosure available on the website.

II) Justification of choice of venues

A) OTC markets

The firm seeks to send client orders to the venue, or venues, which normally achieves a large daily volume, and which offers tight bid/ask spreads. On OTC markets, venues exhibiting large daily volumes are chosen, and this coincides with tight bid/ask spreads. This choice of venue ensures that the client will most likely attain the best price as well as likelihood of execution.

When selecting counterparties to deal with the firm will consider:

- Order execution arrangements and order execution policies
- Creditworthiness
- Reputation
- Access to markets
- Service level (speed of execution and response time)
- Competitiveness of costs and charges
- Depth of liquidity
- Consistency of spreads

III) Assessment of Best Execution criteria

Speed of execution of client orders is calculated and tracked on the platform account along with any rejected orders. In the event that a given venue were to lag significantly in speed, or demonstrate a notable reject rate, the firm would have the opportunity to correct the problem with the venue or to remove the venue from the firm's order book.

Fees charged to clients are contracted by instrument, and not by venue, and are often charged as an "all in price" included in the bid/ask spread. Therefore, the client is no better or no worse off regardless of which venue upon the order is executed.

IV) Monitoring of Best Execution Criteria

Regarding OTC markets, the firm's order book includes multiple market makers, many of which are top tier institutional liquidity providers, and the firm's matching engine operates on a pricetime priority basis. As a result, Best execution criteria is ensured on an on-going basis.

Nonetheless, the firm regularly monitors the quantity of rejected orders as well as the speed of execution for each venue. In the event that a venue displays abnormally slow execution or an abnormally high rate of rejected orders, the firm will endeavour to either rectify the issue with the venue or remove the venue from its order book.

V) Review of Best Execution Policy and Venues

At least once a year, and whenever either a negative issue arises with a venue or a new venue is available, the firm will consider its options and take the course of action which ultimately provides the client with the best possible execution.

VI) Possibility of executing client orders outside a regulated market or MTF

By definition, all OTC instruments are traded outside of a regulated market. Furthermore, the firm may execute MiFiD instruments off exchange or outside of a regulated market as well if the firm deems that this would provide a Best Execution for the client.

By opening an account with Squared Financial and placing orders with the firm, the client consents to trading outside of a regulated market or a multilateral trading facility.

VII) Execution chains

In some instances, Squared Financial will pass the order on to another intermediary having a direct relationship with the venue. In these instances, it is understood that these other intermediaries will have their own Best Execution policies and procedures which may vary from the policies and procedures of Squared Financial.

In instances where Squared Financial deals directly with the venue on behalf of the client, only this Best Execution policy shall apply.

VIII) Specific client instructions

Whenever a client gives specific instructions to the firm, whether by telephone or over the electronic trading platform, such specific instruction will override the firm's discretion in regards to best execution, even if the client's specific instruction is not the most favourable decision in regards to Best Execution results.

No Fiduciary Relationship

The Firm's commitment to provide clients with "best execution" does not mean that it owes clients any fiduciary responsibilities over and above the specific regulatory obligations placed upon it or as may be otherwise contracted between the Firm and clients.

Clients remain responsible for their own investment decisions and the Firm will not be responsible for any market trading loss clients suffer as a result of those decisions.