



ADMIRAL MARKETS AS BEST EXECUTION RULES

1. General provisions

- 1.1. These Best Execution Rules (hereinafter **"Rules"**) shall stipulate the terms, conditions and principles, based on which Admiral Markets AS (**"Investment Firm"**) shall execute and transmit the orders (**"Order"**) in financial instruments of professional and retail clients of the Investment Firm.
- 1.2. Please note that, while the Investment Firm will take all reasonable measures based on the resources available to deliver the best execution of the clients' Orders, the Investment Firm cannot guarantee that it will always be able to provide best execution of every Order executed on behalf or on account of the clients.
- 1.3. All clients of the Investment Firm are required to familiarise themselves with these Rules and to make sure that the principles specified in the Rules are acceptable to the clients. The Investment Firm shall, to the extent possible, adhere to these Rules when executing Orders.

2. Specific instructions from clients

- 2.1. If a client provides specific instructions on full or partial execution of the client's Order, the Order shall be executed according to such instructions. Provision of specific instructions of the client to the Investment Firm may prevent the Investment Firm from following the principles and procedures entailed in the Rules, which aim at producing the best possible result for clients.
- 2.2. The Investment Firm shall be considered to have offered the best execution of an Order as long as it has acted in accordance with the relevant client instructions.
- 2.3. Upon entering into an agreement for the provision of investment services or ancillary investment services to a retail client and receipt of the instructions, referred to in clause 2.1 of the Rules, from a retail client, the Investment Firm shall warn the client that the specific instructions received from the client may prevent the Investment Firm, with regard to the content of the relevant instructions, from taking measures it has developed and implemented in the Rules for the best

execution of client orders in order to achieve the best result in the execution of the relevant orders.

3. Important factors of best execution of Orders

- 3.1. The Investment Firm shall consider the following factors when executing and transmitting Orders:
 - 3.1.1. total consideration (the sum of the price of the financial instrument and the costs related to execution, including all expenses incurred by the client, which are directly related to the execution of the Order, such as trading venue fees, clearing and settlement fees, and any other fees paid to third parties involved in the execution of the Order);
 - 3.1.2. speed of execution and settlement;
 - 3.1.3. likelihood of execution and settlement;
 - 3.1.4. the type and size of the Order and transaction and its market impact;
 - 3.1.5. other factors that the Investment Firm believes to have significance for the execution of the Order.
- 3.2. For retail clients the best possible result is determined in terms of the total consideration. Total consideration is the sum of the price of the financial instrument and the costs related to execution, including all expenses incurred by the client, which are directly related to the execution of the Order, such as trading venue fees, clearing and settlement fees, and any other fees paid to third parties involved in the execution of the Order.
- 3.3. For professional clients the best possible result is also determined in terms of the total consideration. If, arising from a specific Order, the broker has reason to believe or the client declares that, due to the nature of the Order or factors pertaining to the client, other factors, such as the likelihood and speed of execution and settlement, have greater significance, the broker shall take into account such factors in the execution. In such case the broker shall assess, whether executing the transaction on the basis of total consideration would ensure fast and full execution of the transaction. If it is not ensured, the broker shall assess, whether partial execution of the Order on the basis of total consideration would be more beneficial for the client than full execution of the order on the basis of the criterion of likelihood of



execution and settlement. If not, the broker shall use the criterion of execution of transaction and settlement. The broker shall also assess the potential negative impact of the execution time (speed) for the client and the extent of the associated risk of damage. If such damage exceeds the gains achievable on the basis of total consideration, the criterion of speed shall be used.

- 3.4. Upon entering into an agreement for the provision of investment services or ancillary investment services to a retail client and receipt of an Order from a retail client, the Investment Firm shall notify the client that the best possible result of the client's Order will be determined according to clause 3.2 of the Rules, except when the client issues different specific instructions.

4. Trading venues

- 4.1. When a financial instrument is traded on more than one regulated market or other trading venues, the Investment Firm shall choose for execution the regulated market or venue where the probability of settlement is highest.
- 4.2. The Investment Firm cannot and will not reassess the likelihood of settlement in all trading venues each time it begins with the execution of a client Order. The Investment Firm shall choose the trading venue and assess the likelihood of settlement based on past indicators in general.
- 4.3. For specific financial instruments there may be only one trading venue included in the list of venues used by the Investment Firm. When executing an Order on such single trading venue, it is assumed that the Investment Firm has offered the best possible result.
- 4.4. The Orders pertaining to an initial public offering (IPO) shall be received by the Investment Firm and transmitted to the issuer or its representative according to the conditions of issue.
- 4.5. The annex to the Rules includes a current list of the main trading venues of the Investment Firm. The current list of trading venues is also published on the web site of the Investment Firm at www.admiralmarkets.com.

5. General rules of Order execution

- 5.1. The Investment Firm may execute an Order:
 - 5.1.1. on a regulated market or on a multilateral trading facility;
 - 5.1.2. outside a regulated market or a multilateral trading facility.
- 5.2. If a client Order is executed on a regulated market or on a multilateral trading facility, the Order shall be matched against another party's Order in accordance with the trading rules of the trading venue.
- 5.3. In case the client submits a limit Order in respect of financial instruments admitted to trading on a regulated market, which is not immediately executed under prevailing market conditions, the Investment Firm shall not be obligated to make public such a limit Order, unless the Investment Firm decides to do so or the client so requests.
- 5.4. Trading outside a regulated market or a multilateral trading facility make take place through a client Order:
 - 5.4.1. being matched against another client's Order;
 - 5.4.2. being executed against the Investment Firm;
 - 5.4.3. being executed against a third party.
- 5.5. The Investment Firm shall have the right to execute the client Orders outside a regulated market or a multilateral trading facility, except where the client has notified the Investment firm that the Order in question may not be executed outside a regulated market and the instrument is traded on a regulated market or a multilateral trading facility, which the Investment Firm has access to (either directly or via a broker).

6. Execution of Orders regarding shares and other financial instruments admitted to trading on a regulated market

- 6.1. The Investment Firm shall execute the orders regarding financial instruments traded on a regulated market or on a multilateral trading facility (e.g., shares, standardised derivatives, shares of an investment fund which have been regulated for quoted trading) ordinarily according to the following procedure:



- 6.1.1. The Order shall be executed as soon as possible, but no later than two minutes after receiving the Order, by sending the Order to the trading venue, which, in the opinion of the Investment Firm, provides the client with the best result;
- 6.1.2. The Investment Firm has a right to delay the sending the Order or to send it in successive parts (the Investment Firm may delay if it believes that, due to market conditions or liquidity or the size or nature of the Order, this would be the most beneficial solution for the client);
- 6.1.3. The Orders may be aggregated to be submitted as an aggregate Order in accordance with the procedures of the Investment Firm for handling of conflicts of interests, processing of transaction orders and execution of personal transactions;
- 6.1.4. If an Order is executed against the Investment Firm or against the Order of another client, it shall be executed at a price, which corresponds to the market price;
- 6.1.5. The Order shall be forwarded for execution in accordance with section 10 of the Rules.

7. Execution of Orders regarding financial instruments traded outside a regulated market and a multilateral trading facility

- 7.1. Section 7 shall be applied to the processing of Orders, which are traded directly (over-the-counter) against instruments of a sole counter-party, for example:
 - 7.1.1. bonds;
 - 7.1.2. money market instruments;
 - 7.1.3. fixed-income derivatives, currency derivatives and other over-the-counter instruments.
- 7.2. Upon receiving such Orders, the Investment Firm normally quotes indicative or fixed prices directly to the client. Afterwards the parties conclude a purchase agreement – either when the client accepts the fixed price quoted by the Investment Firm or, in the case of indicative prices, when the Investment firm confirms the price to the client and the client accepts the price. Since in such a case an agreement is concluded between the Investment Firm and the client, the Investment Firm does not

execute or transmit the Order on behalf of the client and does not use its discretion when executing the client's Order. Consequently, these Rules are not applicable in such situations. However, the Investment Firm shall be required to act in the best interests of the client and to avoid any conflicts of interests.

- 7.3. If the Investment Firm is to execute an Order on behalf or account of a client, the Investment Firm will normally execute the Order against the Investment Firm at a price which corresponds to the market price, which is calculated based on external reference prices for corresponding underlying assets, in so far as appropriate and such prices are available, plus a mark-up for a commercial profit margin and costs for use of capital and counter-party risks.

8. Execution of Orders regarding shares of investment funds not admitted to trading on a regulated market and a multilateral trading facility

- 8.1. The Investment Firm shall execute the Orders regarding shares of investment funds not admitted to trading on a regulated market or a multilateral trading facility by sending the Order to the relevant investment fund management company (or equivalent person) for execution in accordance with rules (or equivalent requirements) of the investment fund. Additional information on prices can be obtained from the management company of the respective investment fund.

9. Negotiated transactions

- 9.1. In certain cases, the Investment firm quotes an indicative or fixed price, for example, a risk price, directly to the client. In such cases the parties conclude a purchase agreement, either when the client accepts the fixed price quoted by the Investment Firm or, in the case of indicative prices, when the Investment firm confirms the price to the client and the client accepts the price.
- 9.2. In other cases the client approaches the Investment Firm with the intent to enter into a specific agreement with or relating to financial instruments (for example, but not limited to, securities financing transactions). In such cases, the Investment Firm may, after negotiations, decide to enter into the relevant



agreement with the client on the negotiated terms and conditions.

- 9.3. Since in the abovementioned cases an agreement is concluded between the Investment Firm and the client, the Investment Firm does not execute or transmit the Order on behalf or on account of the client and does not use its discretion when executing the client's Order. Consequently, these Rules are not applicable in such situations. However, the Investment Firm shall be required to act in the best interests of the client and to avoid any conflicts of interests.

10. Transmission of Orders

- 10.1. For the execution of Orders in instruments traded on trading venues other than those which the Investment Firm has direct access to (where the Investment Firm does not trade directly), the Investment Firm shall transmit the order to a broker, which in turn executes the Order in accordance with its own rules and policies on a regulated market or multilateral trading facility, or executes the Order itself as a systematic internaliser, or transmits the Order to a third party broker for such execution.
- 10.2. When the Investment Firm transmits Orders to other parties for execution, the Investment Firm cannot control the execution process nor guarantee execution on the terms, conditions and principles stipulated in these Rules. However, the Investment Firm shall adhere to the terms, conditions and principles set out in these Rules when transmitting Orders to third parties and when deciding which third party should carry out the Order in a manner most beneficial for the client. The Investment Firm shall make every effort to ensure best execution of the Order by the broker, but cannot guarantee best execution for each individual brokered trade.
- 10.3. The brokers to whom the Investment Firm transmits Orders are listed on the web site at www.admiralmarkets.com.

11. Tradable financial instruments, permitted Order types and Order validity period

- 11.1. The Investment Firm may limit the range of financial instruments, which the clients can trade in (i.e., the clients may not be able to

trade in all financial instruments, which are admitted to trading on all the venues which the Investment Firm has direct or indirect access to).

- 11.2. The Investment Firm has the right to limit the types of Orders available for the client (e.g., market Orders and limit Orders are usually available), even if the venue on which the specific instrument is traded offers a larger variety of Order types.
- 11.3. A limit Order is an Order submitted to the Investment Firm to buy or sell a specific number of financial instruments at a price specified by the client or at a better price. Limit Orders may receive partial execution.
- 11.4. A market Order is an Order submitted to the Investment Firm to buy or sell a specific number of financial instruments immediately at the best available current price. Market Orders may receive partial execution if the market depth is not sufficient to execute the entire Order, there are trading venue limitations or other obstacles to executing the entire Order. If it is not possible to execute the entire Order, the Investment Firm shall execute the Order in so far as possible and then cancel the Order.
- 11.5. The Investment Firm may limit the validity period of client Orders and effect shorter validity periods as compared to the validity periods allowed by the trading venue where the respective Order is sent for execution.

12. Review and amendment of the Rules

- 12.1. The Investment Firm shall assess regularly and at least once a year whether the choice of trading venues, brokers and Rules of the Investment Firm is adequate to achieve the best result for the clients in the execution of Orders.
- 12.2. During the assessment, the Investment Firm shall review the following:
- 12.2.1. whether a better result for the clients could be achieved by executing Orders in other or additional trading venues or by transmitting the Orders to other or additional brokers;
- 12.2.2. whether the trading venue where the likelihood of settlement is highest generally provides the client with the best result.



12.3. The assessment of brokers shall be based on the following considerations:

12.3.1. the principles specified in section 3 of the Rules;

12.3.2. trading venues used by the broker;

12.3.3. the broker's awareness and understanding of the wishes and priorities of the clients of the Investment Firm;

12.3.4. which other services, such as advice and analysis, the broker is able to offer to the clients of the Investment Firm;

12.3.5. whether the Investment Firm is familiar with the broker and has confidence in the broker;

12.3.6. how the broker's best execution rules is formulated and how the clients are informed of the rules.

12.4. Any amendments to the Rules shall be published on the web site of the Investment Firm at www.admiralmarkets.com. Amendments shall be applicable from the date of publication on the web site.