



Order Execution Policy

GTN EUROPE FINANCIAL SERVICES LIMITED

ORDER EXECUTION POLICY

1 Introduction

This provides our clients with information about our Order Execution Policy and seeks your consent for this Policy.

Our Order Execution Policy outlines all the steps we take to make sure we achieve “Best Execution” for you, which means obtaining the best possible results when carrying out transactions on your behalf, sometimes referred to as “executing your Orders”. This means protecting your interests and making sure we always deliver the best results. This includes the prices we buy and sell at and other aspects of the transaction - like the reputation of the other party.

Please note that this information should not be seen as a strict definition of how a particular Order must be dealt with.

If there are terms you do not understand, please refer to the Glossary at the end of this document.

1.1 Client Classification

Our Order Execution Policy applies only to Retail Clients and Professional Clients. We will be executing such Orders either “on your behalf” or passing them to a third-party firm for execution by that firm. In both cases we aim to achieve best execution on a consistent basis.

1.2 Executing Orders on your behalf

We will execute your orders in following ways:

- (i) execute your Order by dealing as agent.
- (ii) execute your Order by dealing as riskless principal on your behalf; and
- (iii) as agent, “work” an Order on your behalf, which occurs where you place an Order with us and we execute it over a period of time using one or more Execution Venues.

1.3 Transmitting

We will transmit an Order to another party for execution by it where:

- (i) we do not have access/membership to a particular execution venue, for example for Orders in securities traded on overseas markets; or

(ii) where we think an external trader could get a better outcome. If we receive a large Order, we might use a Direct Market Access (DMA) provider that can place the trade with multiple Execution Venues to get a better price than placing the whole order with one venue.

1.4 Our obligation to our clients

All our clients - both Retail and Professional - legitimately rely on GTN Europe to deliver the best outcome for their Orders, since our relationship is always on an agent/client basis. We do not deal as “principal” against our clients’ Orders, including for any riskless principal trades, which are also conducted on an agency basis for our clients.

1.5 Order Execution

Subject to any specific instructions that may be given by you when executing Orders on your behalf (see paragraphs 1.17 & 1.18 below), we will take all sufficient steps to obtain the best possible result for you taking into account the execution factors listed in paragraph 7.

We will determine the relative importance of the execution factors by using our commercial judgement and experience in light of market information available and taking into account the execution criteria described in paragraph 6 below.

1.6 Execution Criteria

The execution criteria that will be taken into account are the characteristics of:

- (i) the client, including whether categorised as Retail or Professional;
- (ii) the Order;
- (iii) the Financial Instruments that are the subject of that Order; and
- (iv) the Execution Venues to which that Order can be directed.

1.7 Execution Factors

The execution factors that will be taken into account are:

(i) **price:** for most liquid instruments, market price will be the main factor in achieving best execution, especially for Retail Client Orders. However, this may not always be the case. For example, the costs associated with dealing on a particular execution

venue would mean the total charges would be excessive. In these cases, costs rather than price may be the chief factor.

(ii) **costs:** where particular Execution Venues carry additional charges (such as exchange fees or settlement/custody costs) we may pass these on. If these charges mean the total costs are excessively high for your Order (for example, due to the cost of many small trades on an Order book), then at our discretion this may become the most important factor for us to consider.

(iii) **speed:** similarly, the speed of execution may be important for some types of Order or client. Speed will be a high priority when executing an Order in frequently traded (liquid) shares in a fast-moving market.

(iv) **Likelihood of execution and settlement:** in some instances, our ability to execute the Order at all will be the primary factor to be considered. Where, for example, the Financial Instrument is illiquid (rarely traded) or the size of the Order is unusually large compared to normal trading volumes, our ability to carry out the Order may override other execution factors. Applying the “total consideration” requirement (please see below for more information) may mean that this factor is given precedence over the immediate apparent price of a Financial Instrument where this will – in our opinion – deliver a better overall result for the client.

(v) **Size and nature of the Order:** the best price in a market normally reflects a particular size (number of shares or units), which may not match the size of the client’s Order. Where the Order is bigger than the typical quoted size, the part of the Order executed over and above the threshold, or even the terms offered for the whole Order may be at a less favourable price. There are various strategies for trading large Orders, and we will exercise our discretion where there is no other instruction from the client.

(vi) **Large or illiquid Orders** may be executed on a manual basis using the negotiating skills of our Dealing team. In such cases our dealers will source the best available terms by comparing the prices offered by a variety of Execution Venues (including other firms and Multilateral Trading Facilities (MTFs) and Organised Trading Facilities (OTFs)). We might even need to execute Orders over the course of a day, or a number of days. Once the trade has been placed in full, the Order execution price will be recorded as the average price paid each day.

(vi) any **other consideration** relevant to the execution of the Order: we will take into account any other execution factor relevant to the Order that we believe needs to be considered in terms of how that Order should be executed. This could be simply whether it is a buy or sell Order, the imposition of price limits, non-standard settlement,

whether it is part of a contingent Order, or whether the security is dealt in another market.

1.8 Priority of Execution Factors

The priority of the execution factors may vary, depending on your client classification.

- i. If you are a Retail Client, the best possible result will be determined in terms of the “total consideration”, representing the price of the Financial Instrument together with the costs related to execution (including GTN Europe’s charges). Speed, likelihood of execution and settlement, the size and nature of the Order, market impact and any other implicit transaction costs will have a bigger influence than the immediate price and cost consideration only when they deliver the best possible result in terms of the total costs to you.
- ii. if you are a Professional Client, price will ordinarily merit a high relative importance in obtaining the best possible result. However, in some circumstances, and for some clients, Orders, Financial Instruments or markets, we may decide that other execution factors are more important than price in obtaining the best possible execution result.

1.9 Execution Venues

The main Execution Venues used by us are shown in paragraph 10 below. These Execution Venues are those upon which we place significant reliance. These may be markets where GTN Europe is a direct member (for example, the London Stock Exchange) or other firms and DMA providers we use when transmitting Orders for them to execute on your behalf. We reserve the right to use other Execution Venues where we deem them appropriate in accordance with our Order Execution Policy and may add or remove any Execution Venues

from this list. We will regularly assess the Execution Venues available in respect of any Financial Instruments that we trade to identify those that will allow us to obtain the best possible consistent results when executing Orders. The list of Execution Venues will then be updated, where necessary, following such assessment. Please refer to www.gtn.co.uk from time to time for a current and more detailed list of Execution Venues. You will not be notified separately of any changes to these venues.

When carrying out your Orders, we place significant reliance on the following Execution Venues:

- (i) member firms of the London Stock Exchange;

- (ii) member firms of the International Capital Market Association;
- (iii) member firms of overseas stock exchanges;
- (iv) member firms of trading venues;
- (v) managers and administrators of collective investment schemes and other Investments;
- (vi) other UK and overseas Execution Venues that we deem appropriate and that accord with our Order

1.10 Assessing Execution Venues

Where applicable, we take steps to ensure we do not structure or charge our commissions in such a way as to discriminate unfairly between Execution Venues.

We carry out ongoing assessments of the performance of the Execution Venues we use to determine whether they consistently provide the best possible outcomes for clients and also to review the potential suitability of new Execution Venues. Our assessments are based on our internal best execution monitoring information, as well as execution quality data reported by Execution Venues in accordance with MIFID and its implementing measures. This includes the following factors:

- (i) price
- (ii) liquidity
- (iii) execution and clearing costs
- (iv) clearing arrangements, such as settlement reliability
- (v) Execution Venue trading controls

1.11 Selecting an Execution Venue

In selecting an Execution Venue for an Order, and subject to any specific instructions given by you (see paragraph 1.17 below), we will use the following methodology:

- (i) when carrying out Orders on a Trading Venue we will select the Execution Venue that we consider the most appropriate. The Execution Venue may be the

Trading Venue itself, or a member firm of the Trading Venue.

(ii) for a Financial Instrument admitted to trading on a Trading Venue, where we believe that we can trade to your advantage or at no disadvantage to you, we may transmit an Order to, or execute an Order on, an Execution Venue that is outside a Trading Venue.

(iii) for a Financial Instrument not admitted to trading on a Trading Venue, we will select the Execution Venue that we consider the most appropriate.

(iv) where we believe, we can trade to your advantage or at no disadvantage to you, GTN Europe may be used as the Execution Venue. Where we act ourselves as the Execution Venue, we will consider all sources of reasonably available information, including Trading Venues, Systematic Internalisers, other liquidity providers, exchanges, brokers and data vendors, to obtain the best possible result for your Order.

(v) some Financial Instruments (for example, collective investments such as unit trusts and open-ended investment companies, as well as Structured Products) may have only one possible Execution Venue. With single venue products we will take steps to ensure the fairness of prices offered.

1.12 Executing strategies

Subject to any specific instructions that may be given by you (see paragraph 1.17 below), we will carry out an Order by one of the following execution strategies or combination of strategies:

(i) on a Trading Venue by:

a. executing your Order directly on a Trading Venue. Where we are not a direct member of the relevant Trading Venue, we will use a third party participant with whom we have entered into an agreement for handling Orders for that Regulated Market or MTF/OTF; or

b. executing your Order with, or transmitting it for execution to, a liquidity provider that forms part of a Trading Venue; or

c. executing your Order with a matching Order from another client under the rules of a Trading Venue; and/or

d. acting as the Execution Venue ourselves.

(ii) where we have obtained your prior express consent, outside a Trading Venue

by:

- a. executing your Order with, or transmitting it for execution to, a liquidity provider that is not part of a Trading Venue;
 - b. executing the Order with a matching Order from another client outside the rules of a Trading Venue; and/or
 - c. acting as the Execution Venue ourselves.
- (iii) in respect of a Financial Instrument not admitted to trading on a Trading Venue, we will carry out your Order in the manner that we consider the most appropriate.

1.13 OTC Trading

Whilst we might decide it is beneficial to execute all or part of your Order outside a Trading Venue, because of improved price and/or faster execution, there might be additional risks including:

- (i) Orders may not be subject to the rules of a Trading Venue that have been designed to provide the protection of a fair and orderly market for the execution of Orders;
- (ii) Orders may not benefit from pre- and post-trade transparency that Trading Venues require for Orders to improve price formation; and
- (iii) Orders may not be covered by the relevant clearing and settlement rules of a Trading Venue and non-Order book trades may not benefit from having a Central Counterparty. This means transactions may be subject to a counterparty settlement risk.

1.14 General dealing arrangements

The following information summarises in general terms the execution strategies used for more commonly traded Financial Instruments:

(i) UK Equities (including Investment Trusts): assuming normal market conditions, we will use our automated Order management system to route Orders to a number of competing electronic Retail Service Providers (RSPs) for execution at the best available price. Although this is not guaranteed, prices are normally better than the best available London Stock Exchange (LSE) bid or offer price at time of polling the RSPs. Larger and/or illiquid Orders that exceed the pre-set parameters, and/or cannot be executed via the RSP network, are routed to our dealers for review and execution by them. Subject to the execution criteria and execution factors, the complexity of the Order and any specific client instructions, our dealers will determine how best to execute the Order to achieve the best outcome. This may be via:

- a. the RSP network;
- b. direct negotiation with registered market makers or other member firms of the LSE or NEX exchange;
- c. use of Order books (such as LSE, Chi-X or Turquoise);
- d. transmission via an electronic DMA (Direct Market Access) system or Smart Order Router that provides our dealers with access to Systematic Internalisers and other Execution Venues; and/or
- e. by Agency Cross, where clients are sellers and buyers of the same Financial Instrument.

Larger or more complex Orders may need to be worked over a period of time and might be executed using a combination of the above.

International Equities: Orders are routed directly to our dealers, who will determine how to obtain the best outcome. Orders for Financial Instruments held as CREST Depository Interest will either be executed by RSP or via direct negotiation with London-based market makers. Our normal policy is to deal directly in the local market concerned, we may do this via:

- a. transmission via a DMA platform; and/or
- b. transmission to a brokerage firm in the local market.

Orders in international markets are subject to local market rules. Some clients might request that their Order is executed in its entirety or not at all. Whilst this might be possible for UK Financial Instruments (while at the same time restricting execution venue choice) this is not possible for international Financial Instruments where Order book usage is normal.

(iii) Collective Investment Schemes (OEICs/Unit Trusts): Where possible, Orders in Collective Investment Schemes are routed to our preferred Platform(s). Our policy is to buy the units or share classes with the lowest Ongoing Charges Figure (OCF) that are available to us. Orders executed for clients using external custodians, or in Collectives that are not held on our preferred Platform(s), are placed directly with the fund management groups.

(iv) Debt Securities (such as Government Bonds (Gilts) and Corporate Bonds): Orders are routed directly to our dealers, who will determine how to obtain the best outcome.

- a. Execution of smaller Orders may be via:
 - i. the RSP network; and/or
 - ii. direct negotiation with a registered market maker.
- b. Execution of larger Orders or Orders in debt securities that are illiquid or difficult to source may be via:
 - i. Bloomberg RFQ (the process of requesting a quote from market counterparts on the Bloomberg system).
 - ii. or debt securities that are illiquid or difficult to source, a specialist bond broking firm may be engaged to access sources of liquidity that are not otherwise available to us.
- c. Orders executed via the request-for-quote or specialist bond brokerage firm will normally be executed over the counter (OTC).

(v) Exchange Traded Products (ETPs): We will use our automated execution technology to poll competing RSPs. Larger Orders that fall outside of set parameters are directed to our dealers for execution and may be executed via:

- a. the RSP network;
- b. direct negotiation with a registered market maker;

- c. an electronic request-for-quote service to specialist ETP brokerage firms; and/or
- d. electronic Order books, such as the London Stock Exchange.

(vi) Structured Products and Structured Deposits: Structured Products are executed on an OTC basis, directly with the product provider concerned or via a specialist broker.

(vii) Other asset classes: We will seek to execute Orders for Financial Instruments in other asset classes (for example Debentures, Convertibles, Warrants etc.) on an appropriate Execution Venue. It is likely that venue choice will be very limited and liquidity restricted.

1.15 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 for executing a particular Order may prevent us from obtaining the best possible result in respect of the elements covered by those instructions using our standard procedures. We reserve the right to refuse specific instructions from you where, we believe, such instructions are not practicable, may be contrary to your best interests or where we are, unable or unwilling to transact with a requested venue or counterparty.

1.16 Publishing unexecuted Limit Orders

Limit Orders allow investors to specify the minimum price at which they want to sell shares, or the maximum price at which they want to buy shares, and to tell us how long they want the Limit Order to stay open to meet those requirements. It may not always be possible to execute Limit Orders under the prevailing market conditions. We would then be required to make such Orders public ahead of execution, unless you agree that we need not do so.

We believe that it is in your best interests if we exercise our discretion as to whether or not we make such Orders public. Where you place a Limit Order with us that is not immediately executed, unless we believe that it would be in your best interest to do so, or you expressly request otherwise, we will not publish your unexecuted Limit

Order during the period that it remains unexecuted.

1.17 Reception and transmission of Orders

Subject to any specific instructions that you may give us (see paragraph 1.15 above), we may transmit an Order that we receive from you to another entity, such as a third-party broker, for execution. In doing so, we must act in your best interests and also comply with paragraphs 1.4 & 1.5 above.

1.18 Best Execution Monitoring and Reviewing

We monitor compliance with, and the effectiveness of, our Order Execution Policy. Orders executed on a Trading Venue—whether executed directly by us, transmitted through a third party, or outside a Trading Venue—are benchmarked against the Trading Venues we access and other relevant venues at the time of execution. Regular, ad-hoc, and event-driven post-trade analysis is conducted with oversight from second-line review and senior management.

A summary table of the Key Performance Indicator metrics used in our post trade analysis is provided below.

We review our Order Execution Policy and arrangements at least annually, or and whenever material changes impact our ability to achieve the best outcome for client Orders. Based on these changes, we may adjust the weighting of execution factors to maintain best execution standards.

Material changes to our execution arrangements, including Execution Venues or the Order Execution Policy, will be posted on our website. You will not receive individual notifications of these updates.

You may request proof that your Orders were executed in line with our policy. We will provide clearly and timely responses to reasonable requests for information on our policy, execution arrangements, and reviews.

Upon request, we can also provide tables listing the Execution Venues we rely on for each class of financial instruments, for both retail and professional clients.

Depending on the asset class, market and size of the order our post-trade analysis includes the following Key Performance Indicator metrics:

Key Performance Indicator (KPI)	Definition	Importance
Price Improvement	The difference between the price at which an order is executed and the prevailing market price at the time of execution	Positive price improvement indicates obtaining a more favorable price for the client.
Implementation Shortfall	The difference between the decision price (the price when the decision to trade is made) and the execution price.	A lower implementation shortfall suggests better timing and execution efficiency.
Bid-Ask Spread Impact	Measures the impact of the bid-ask spread on the execution cost.	A lower impact shows the ability to execute trades without causing significant widening of the bid-ask spread.
Fill Ratios	The percentage of the client's order that is filled in the market.	Higher fill ratios indicate more of the order was executed, reducing the risk of partial fills.
Time to Execution	The time taken to execute a trade from the moment the order is submitted.	Faster execution times reduce exposure to price fluctuations, especially in fast-moving markets.
Market Impact	The extent to which the execution of a large order affects the market price.	Lower market impact suggests trades are less likely to significantly influence the market.
Rejections and Errors	The rate at which trades are rejected or encounter errors.	Lower rejection and error rates reflect a more reliable and efficient execution process.
Slippage	The difference between the expected execution price and the actual execution price.	Positive slippage (better than expected) is preferable; negative slippage (worse than expected) indicates execution challenges.
Venue Analysis	Assessment of execution performance across different trading venues.	Helps identify venues providing the best execution for various trades, ensuring optimal venue selection.
Volume-Weighted Average Price (VWAP) Tracking	Measures how closely the broker's execution prices align with the VWAP benchmark.	Closer alignment indicates effective execution relative to market benchmarks.

1.19 Consent

We are required by the Rules of the FCA to obtain your prior consent to our Order Execution Policy. You will be deemed to provide such consent when you first give an Order after receiving these Terms.

For us to achieve the best results for your Orders when we execute them on your behalf, we may sometimes seek to place your Orders with an Execution Venue other than a Trading Venue. However, for a Financial Instrument that is admitted to trading on a Trading Venue, we are required to obtain your prior express consent before we execute an Order in such Financial Instrument outside a Trading Venue (except where no Trading Venue is included in the list of Execution Venues for that Financial Instrument). By signing the account opening document and agreeing to our terms thereby, you will be deemed to have provided such prior express consent.

We are required by the Rules of the FCA to get your express consent to exercise our discretion when deciding whether or not to publish any unexecuted Limit Orders. By signing the account opening document and agreeing to our terms thereby, you will be deemed to have provided such express consent.

If you would like us to publish an unexecuted Limit Order ahead of trading, please include this when you place your Order with us.

2 Glossary

Agency Cross:	where an investment firm acts as agent for both the seller and buyer of a security and crosses their Orders on an exchange at a mutually agreed price.
Agent:	a firm trading on behalf of a client.
Chi-X Europe:	a pan-European stock exchange.
Collective Investment Scheme (CIS):	a collective investment scheme is a pooled investment vehicle, for example a unit trust or an OEIC (Open Ended Investment Company), into which investors can make an investment by purchasing a share, unit or fraction thereof, in the fund.
CREST:	a UK based electronic settlement system (central securities depository) owned and operated by Euroclear UK & Ireland and approved as the operator under the Uncertificated Securities Regulations 2001
CREST Depository Interest (CDI):	a special kind of security issued under English law by CREST Depository Ltd, a company wholly owned by Euroclear UK & Ireland, and which represents an entitlement to an overseas Investment held by CREST in an overseas share registration or settlement system.
Direct Market Access (DMA):	Another firm's electronic trading platform that gives other firms access to liquidity in financial instruments via various markets and against its own book position but provides the user with control over how an Order is executed.
Equity:	equities represent ownership interest in a firm, typically referred to as "shares".
ESMA:	means the European Securities and Markets Authority, which is a European Union financial regulatory institution and European Supervisory Authority, located in Paris.
Exchange:	a marketplace in which securities, commodities, derivatives and other financial instruments are traded. The core function of an exchange – such as a stock exchange – is to ensure fair and orderly trading, as well as efficient dissemination of price information for any securities trading on that exchange. Exchanges give companies, governments and other groups a platform to sell securities to the investing public. An exchange may be a physical

	location where traders meet to conduct business but more often are an electronic platform.
Exchange Traded Fund (ETF):	see Exchange Traded Products.
Exchange Traded Products (ETP):	investment products traded on stock exchanges that are usually benchmarked to the performance of indices, or to the price movements of other instruments such as commodities such as oil, gold or currencies. ETPs include Exchange Traded Funds, Exchange Traded Commodities and Exchange Traded Notes.
Execution Venue:	a Regulated Market, a MTF, an OTF, 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.
FCA:	means the Financial Conduct Authority or any succeeding authority.
Financial Instrument:	a generic term used to refer to any type of tradable financial asset, such as an equity or debt security, derivative or unit in a collective investment scheme.
Fixed Income:	securities that pay a rate of interest and involve varying degrees of Counterparty Risk. The most common type of fixed-income securities are Eurobonds and Government Bonds.
Limit Order:	an Order to buy or sell an investment at a specified price limit or better and for a specified size.
MiFID:	the EU Markets in Financial Instruments Directive (Directive 2014/65/EU) and the EU Markets in Financial Instruments Directive Regulation (Regulation 2014/600).
Multilateral Trading Facility (MTF):	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 Title II of MiFID.
NEX Exchange:	a secondary trading market for listed or quoted securities admitted to trading on other EU markets or early-stage companies.

Ongoing Charges Figure (OCF):	the OCF represents the ongoing costs attributable to Collective Investment Schemes. This includes the annual management charge (AMC) and other charges for administrative services performed by parties involved in the fund, such as the custodian.
Order:	an instruction from a client to buy or sell a Financial Instrument that is accepted by us for execution or transmission to a third party.
Order Book:	electronic board, usually operated by Regulated Markets, displaying buyers and sellers of financial instruments. Orders can be entered to satisfy, or partially satisfy Orders already advertised at particular price levels or added to the board at a price that is not necessarily immediately achievable. Opening and closing prices are normally established by an auction process; thereafter price is driven by Orders entered on the board.
Organised Trading Facility (OTF):	is a multilateral system, which is not a Regulated Market or MTF and in which multiple third-party buying and selling interests in bonds, structured finance product, emissions allowances or derivatives are able to interact in the system in a way which results in a contract.
Over the Counter (OTC):	where buying and selling is not conducted over an exchange but via a direct link between the firms acting as counterparties to the transaction.
Platform:	firms that provide investment dealing and custody services to intermediary firms.
Principal:	a firm which is trading on its own account.
Regulated Market:	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 Title III of MiFID.
Retail Service Provider (RSP):	also known as a market maker. A market maker is a regulated firm that is always ready to both buy and sell a stock at all times.
Riskless Principal:	back-to-back transactions where the agent, acting on behalf of the client, stands between the market trade, or trades (that might

have been executed on one or more venues) and the client. The agent does not take a position and the trades are on the same terms (for example, price, or average price).

- Rules:** means the rules and financial regulations of the FCA, the London Stock Exchange, any other Execution Venue, Clearing House or regulatory authority having jurisdiction in relation to business which we transact for you, and of Euroclear UK & Ireland Limited together with any requirements arising from or regulations made by the FCA (or ESMA) or in accordance with the Financial Services and Markets Act 2000 (or any succeeding legislation).
- Smart Order Router (SOR):** an electronic system that routes Orders to a number of Execution Venues where a security is traded with the aim of obtaining best price and liquidity.
- Systematic Internaliser:** an investment firm that, on an organised, frequent, systematic and substantial basis, deals on its own account when executing client Orders outside a Regulated Market or a MTF or OTF without operating a multilateral system.
- Trading Venue:** a Regulated Market, a Multilateral Trading Facility (MTF) or Organised Trading Facility (OTF).
- Turquoise:** a pan-European Stock Exchange.