



## **Best Execution Policy**

We are authorised by the Financial Conduct Authority (FCA) to deal in Investments for our clients who are classed as either retail or professional clients.

Because we have this permission, we are required to produce a Best Execution Policy.

We are required to provide you with information outlining what steps we take to consistently obtain the best possible result when we trade in investments for and on behalf of our clients.

### **Venue**

We transmit all of our client's orders to one venue, Platform Securities LLP, who are also authorised by the Financial Conduct Authority under firm reference number 214206. Platform Securities have demonstrated that they enable us to provide the best possible results for the execution of our client's orders on a consistent basis.

Platform Securities LLP provide us with dealing and safe custody services for our clients.

Platform Securities LLP produces its own best execution policy which we monitor.

Their best execution policy follows on from our policy

### **Execution Factors**

When we receive an instruction to trade from you or when we make a decision to trade for our discretionary clients, we submit that order, usually electronically, to Platform Securities LLP.

All orders received by us will be submitted to Platform Securities in an orderly, prompt and timely manner.

Once Platform Securities LLP receive the order from us, they execute the order taking into account the following execution factors:

Share Price, Costs of Execution, Speed of Execution, Number of Shares and liquidity in the market, Likelihood of Execution and Settlement, the Credit Worthiness and Performance of the Institution whom they could trade with and any other consideration relevant to the execution of the order.

If you provide us with specific instructions for execution of a transaction, we may not be able to arrange for your trade to be executed in line with our best execution policy and achieve the best possible result.

If you place an order with a specified limit in terms of price and, or size, we may not always be able to arrange for that order to be executed immediately under prevailing market conditions. Platform Securities LLP are required to make that order public (i.e., show the order to the market) unless you expressly instruct us otherwise.

## **Aggregation**

When we make a decision to trade for our discretionary clients, we may combine the instruction with other clients who we have made the same decision for, to execute as one single order. Aggregation under this arrangement on rare occasions may result in you obtaining a less favourable price.

## **Monitoring**

We will monitor compliance with our order execution arrangement and policy at least annually. We will also assess whether the execution venue in our policy provide the best possible result for our clients. Any review may result in an update to our execution venues and we will notify clients of any material changes to our order execution policy.

## **Consent**

The Financial Conduct Authority require that we must obtain your consent to our execution policy. Unless you have provided a written objection to us adopting this policy, we will deem you to have provided such consent for us to continue to trade on your behalf.

This policy came into force on January 3<sup>rd</sup> 2018 and was updated 11th November 2024, with no material changes.



# **ORDER EXECUTION POLICY**

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**Platform Securities LLP**

January 2025

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## Version Control

Description	Version	Author	Date
Annual Reviews	6.0	Mike Anderson	01.12.2019
Policy Review	7.0	Mike Anderson	01.12.2020
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Policy Review	11.0	Mike Anderson	17.01.2025

Policy Owner	Valid from		Review
Mike Anderson	01.01.2025		01.01.2026

## 1.0 Introduction

Platform Securities is authorised and regulated by the FCA to execute and transmit, on an agency basis, both retail and professional customers' orders on behalf of our clients.

Platform Securities will act to deliver good outcomes for consumers by acting in good faith, avoid causing foreseeable harm and support customers to pursue their financial objectives.

When offering this service, Platform Securities has an obligation to take all sufficient steps to obtain, when executing those client orders, the best possible results taking into account certain execution factors including price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of an order.

Platform Securities is required to establish and implement an order execution policy that details how those orders will be executed and the arrangements that are in place to monitor and ensure that the best possible results are achieved taking into account the various execution factors.

## 2.0 What is Best Execution?

Best Execution is taking all sufficient steps to obtain the best possible results when executing client orders and this applies to all types of financial instruments. As each type of financial instrument has different characteristics these need to be considered when looking at the importance of the execution factors.

- The execution factors we consider are:
- the price of the financial instrument;
- the costs related to execution;
- the speed of execution;
- the likelihood of execution and settlement;
- the size of the order and associated liquidity in the market for the instrument;
- the credit worthiness and performance of the institution with whom we ultimately place your order;
- the nature of the order; and
- any other consideration relevant to the execution of an order.

When executing client orders the FCA state we must take into account the following criteria for determining the relative importance of the above factors:

- the characteristics of the client including the categorisation of the client as retail or professional;
- the characteristics of the client order;
- the characteristics of financial instruments that are the subject of that order; and
- the characteristics of the execution venues to which that order can be directed.

Due to the nature of the orders we receive we consider the overall cost of execution to be the most important factor with the other factors given equal importance after price.

For retail and professional clients the overall cost of execution will take into account the price of the financial instrument and the costs relating to execution including expenses directly related to the execution of the order such as execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order.

The execution venues which we may use include a Regulated Market (RM), a Multilateral Trading Facility (MTF), an Organised Trading Facility (OTF), a Systematic Internaliser (SI), 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.

In certain circumstances Platform Securities, where it feels it is in your best interests, may execute client orders outside of a Regulated Market (RM), Multilateral Trading Facility (MTF) or an Organised Trading Facility (OTF), and by agreeing to this policy you are providing prior express consent.

It is our policy to have processes to ensure that every client's order is treated in a way that aims to maximise the chance of ensuring good customer outcomes by getting the best possible result when being executed.

Platform Securities treats each of our clients separately and does not aggregate one client customers' orders with another client customers' orders.

Platform Securities execute the majority of our clients' UK orders ourselves but in certain circumstance, where we feel it would be appropriate to achieve the best possible result for the customer, we may transmit the order to one of our partners. Our partners may use several differing tools such as algorithms and smart order routers to execute the orders and we monitor their performance by benchmarking the price achieved against prevailing exchange prices.

For UK orders these will typically be the very large trades where our partners will have access to specific tools and liquidity that we do not. The circumstances when we may use our partners for these types of trades has been discussed with our corporate clients.

### **3.0 How do we treat specific instruction and Limit orders?**

Whenever there is a specific instruction from our clients or their underlying customers, we will carry out the order in accordance with that specific instruction and we will be deemed to have complied with the best execution requirement to the extent of that instruction.

However, please note that by acting on your specific instructions, we may be prevented from executing your order in accordance with our execution policy and achieving the best possible result.

If you place an order with a specified limit in terms of price and, or size, we may not always be able to execute that order immediately under the prevailing market conditions. We are required to make your order public (i.e. show the order to the market) in such a case unless you expressly instruct us otherwise. By consenting to this policy, you agree to our not making your orders public.

## **4.0 Types of Financial Instrument**

### **4.1 UK Equities**

The London Stock Exchange (LSE) remains the dominant UK exchange for retail order flow and our Order Management System (OMS) routes UK order flow to the Retail Service Providers (RSP) network for onward electronic trading. Platform Securities connect to a number of RSP providers to ensure that any concentration risk is mitigated by having a number of firms and liquidity providers contributing to the execution process.

Our OMS will request quotes from those RSPs that we have chosen to connect to based on competitive pricing and financial stability. Based on the quotes returned our OMS will trade at the best available price.

If the order cannot be executed this way, then it will be routed to our dealers and they will place the order with the market. Our dealers will use their experience and reference any available electronic pricing information to determine the most appropriate route to market based on the size and nature of the order.

Our dealers have access to the RSP network, the Stock Exchange Trading System (SETS) order book and a number of approved market counterparties to achieve the best possible result based on the above execution criteria.

The counterparties we execute with via the RSP and directly in the market all go through an approval process to ensure that they are able to fulfil and complete the order, the process looks at their financial position, regulatory status including news and a further negative media search. The counterparties are regularly monitored to ensure that they continue to meet our requirements.

The counterparty approval process does not guarantee that a counterparty will fulfil their obligations, but it ensures we only trade with those who we feel are most likely to meet the execution criteria.

## 4.2 Venues

The UK order flow will be executed across multiple venues to ensure best results for our clients.

A full list of venues is available upon request.

Regular governance meetings take place with the top five counterparties we execute the majority of our business with to assess the quality of the execution we receive by considering the various execution factors and this includes both quantitative and qualitative assessments.

## 4.3 Exchange Traded Products

Exchange traded funds, notes and commodities are included in the process for UK equities and will either be executed via the RSP network or with an approved market counterparty.

## 4.4 Foreign Equities

We route international orders to Counterparties who we consider to be established market leaders in the markets in which they operate. They will either trade directly on the primary exchange(s) or MTF(s) that offer the best price and liquidity for your order.

Where we transmit orders to other entities for execution, we will monitor the execution quality of such entities.

We transmit our overseas orders to UBS or Stifel Europe as it is our reasonable expectation (having regard to our experience) that they will enable us to obtain at least as good results as may reasonably be expected from using alternative entities for execution. Clients should be aware that UBS are our global custodian and while this simplifies and aids the settlement process it does not exclude them from the other execution factors assessed under the Best Execution requirements.

As part of the governance and review process regular meetings take place to ensure that their execution process and the tools they use allow us to meet our requirements to clients and their customers. When we transmit orders for execution our partners may use several differing tools such as algorithms and smart order routers to execute the orders and we monitor their performance by benchmarking the price achieved against prevailing exchange prices.

Our chosen executing counterparties use smart order routing technology across multiple venues to find best prices and liquidity.

A full list of venues is available upon request.

#### 4.5 Fixed Income / Government Securities

Fixed income and Government securities have differing criteria to equities and are executed using different counterparties and strategies depending on the asset class involved.

These securities can be executed in several differing ways depending on the instrument itself, the size of the order and the liquidity available at the time. For more liquid fixed income instruments (e.g. UK Gilts and UK retail bonds listed on the London Stock Exchange Order Book for Retail Bonds) orders will be routed to the RSP Network for onward execution.

For less liquid fixed income instruments our dealers will request a price from a minimum of two approved counterparties to establish a competing quote for execution with a view to providing the best possible outcome for our client.

A full list of venues is available upon request.

#### 4.6 Collective Investments

When placing instructions in these types of instruments we will either utilise a platform where multiple manufacturers make their products available, or we will transact with the provider themselves depending on the specific requirements of the product itself. These types of products do not have competing quotes, so the role of price is less important and other factors will take precedence.

### 5.0 Monitoring and Review

The Order Execution Policy is owned and maintained by the Dealing Department who monitor its effectiveness on an on-going basis. The results of this monitoring are reported on a monthly basis to Senior Management and appropriate internal governance committees who review their findings and escalate accordingly.

The Compliance function undertake independent monitoring to ensure adherence to the policy as part of their monitoring program, exceptions are included in their reports to Senior Management within the business.

The order execution policy is formally reviewed by the Business and the Board on an annual basis and we continually monitor our counterparties financial position and performance to ensure we are obtaining the best possible results for our clients.

The formal review looks at whether there have been any material changes in the types of orders and markets our clients are accessing, internal or external events and we consider any potential changes that have taken place in the industry that may alter the relative importance of the execution factors in allowing us to continue to meet the overarching best execution requirements. We will update the list of execution venues and counterparties when necessary.

As part of the on-going monitoring we consider including or removing counterparties, venues and any other modifications to our dealing process by reviewing the nuances of the different types of financial instruments we are executing on behalf of our clients. We look at the performance of our counterparties against the differing products and assess whether we should continue to use them for that product or if there are venues or counterparties that we should add that will enhance our dealing process.

If a material change occurs, we will notify our clients of that change and how it will impact our ability to meet the best execution requirements. We define a material change to be a significant event that could impact the execution factors of best execution and do not consider the addition or removal of counterparties as a material change.

Platform Securities do not receive any remuneration or payment for order flow and will execute where we feel the best execution result will be returned.

The quality of execution is monitored on a daily and monthly basis with any orders identified as not achieving best execution being repaired to ensure that our clients and their underlying customers receive the best possible outcome from each transaction.

Platform Securities do not undertake portfolio management or advisory services themselves and have no involvement in either providing or receiving research and any payments that maybe linked to these services on the financial instruments we trade.

## Appendix A

### Definitions

**Regulated Market (RM)** is 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 the provisions of Title III of MiFID.

**Multilateral Trading Facility (MTF)** is 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.

**Organised Trading Facility (OTF)** is a multilateral system that is not a Regulated Market (RM) or MTF. Within an OTF, multiple third-party buying and selling interests in bonds, structured finance products, emission allowances or derivatives are able to interact in a way that results in a contract. Equities are not permitted to be traded through an OTF.

**Systematic Internaliser** is an investment firm which, on an organised, frequent and systematic basis, deals on its own account executing client orders outside of an RM or MTF.

**SETS** is the London Stock Exchange's electronic order book where market participants are able to place buy and sell orders for a specific security that are organised and displayed by price and size.

**Smart Order Routing (SOR)** is an automated process of handling orders, aimed at taking the best available opportunity throughout a range of different trading venues.

**Client**, refers to our Corporate Clients

**Customer**, refers to the underlying customer of our corporate clients

**Quantitative and qualitative research methods** are ways businesses understand various information.

- **Quantitative research** is the method used when you want to know how many times or how often something happens.
- **Qualitative research** is the method used when you want to understand why something happens.