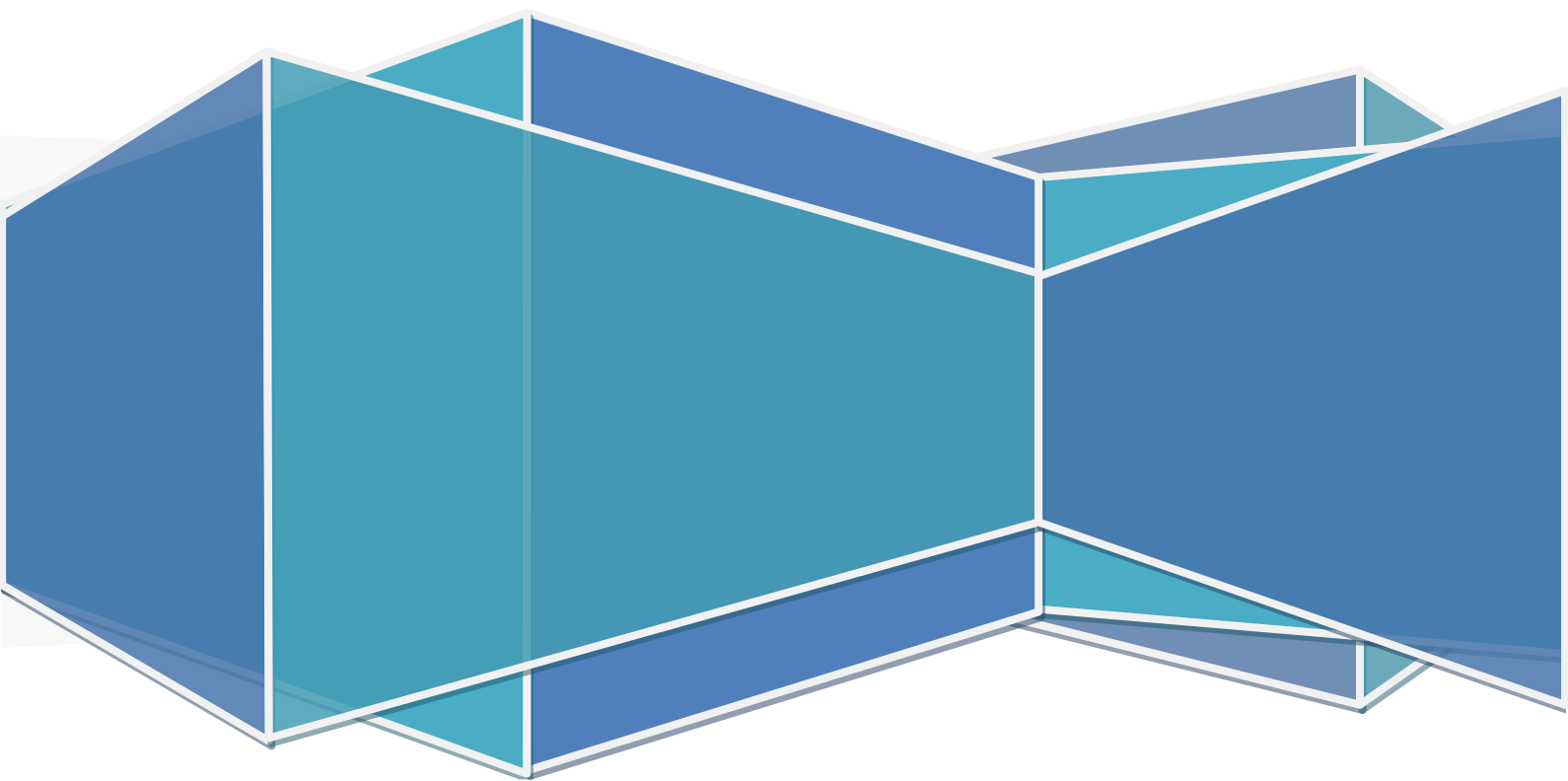




## BEST ORDER EXECUTION POLICY FOR CLIENTS



## **INTRODUCTION AND SCOPE**

Blue Suisse Limited (hereinafter, “BlueSuisse” or “Company”), shall carry out its activities with utmost good faith and integrity and in accordance with the best interests of its clients when placing orders with other entities for execution on behalf of its clients, as a straight-through-processor.

This Best Order Execution Policy or “BOEP” sets forth the basis which BlueSuisse will follow in executing and transmitting orders on behalf of its clients, as required under MiFID Regulations and in line with the Malta Financial Services Authority (“MFSA”) Investment Service Rules and the MFSA Conduct of Business Rulebook, as updated from time to time.

The scope of this BOEP relates to BlueSuisse commitment towards its clients for the best possible result in:

- Executing orders on behalf of Retail Clients, Professional Clients (including collective investment schemes) and Eligible Counterparties and/or
- Reception and Transmission of Orders for Professional Clients (including collective investment schemes) and Eligible Counterparties.

The Company has in place the requisite procedures and arrangements which are designed to consistently provide for the prompt, fair and expeditious execution of orders for its clients, subject to and considering the nature of the trade, the priorities of the trading strategy and the market in question.

## **BEST ORDER EXECUTION CRITERIA**

The BOEP obligation is about the requirement to execute clients’ orders on the best available terms for clients. BlueSuisse will execute a client order taking into consideration the following:

- **Price** - This refers to the resulting price of the transaction excluding any applicable Company’s charges. Price would include execution venue fees, clearing and settlement prices and any other fees to the extent applicable.
- **Speed and Likelihood of Execution** – The Company applies the criterion of speed and likelihood of execution as the rate at which it can progress the order and the likelihood that it is able to fill the order or at least a substantial part of it, in its entirety. Where client instructions require or imply a rate at which the Company must proceed with the order, it will follow such instructions unless it assesses an immediate and substantial conflict with the price criterion. Where the instructions do not refer to speed, the Company will progress the order at a rate which it believes represents a balance between creating market impact and executing the order in a timely fashion to reduce execution risk.
- **Costs** - This refers to the expenses incurred from entering the transactions and any associated hedging activity.
- **Likelihood of settlement** – The Company envisages transactions to be executed to settle on a timely basis. If a client’s particular execution strategy compromises the likelihood of settlement, the Company may not necessarily pursue that strategy even if it were to result in a better price.
- **Order size** - Size of any request for quote may affect the quote price.

- Characteristics of the order - Characteristics of a request for quote or resultant order might affect the performance.
- Any other relevant consideration - These criteria may include the nature of the relevant market, local regulatory requirements, prevailing market conditions, potential market impact, timing of receipt of orders and other issues which might have been agreed with the client.

When the Company transmits an order, the selection of the liquidity provider is based on the aforementioned factors and the available market information at the time of the order considering the following best execution criteria:

- The characteristics of the mandate constraints
- The characteristics of the order, including the size of the order with respect to other transactions in the relevant instrument, the need to minimize the potential impact of the order on the market
- The characteristics of the financial instruments to which the order relates
- The characteristics of execution venue where the execution of the client order can be accommodated
- The liquidity provider's commission.

The obligation to deliver the best possible result when executing client orders applies in relation to all types of financial instruments. Given the differences in market structures or the structure of financial instruments, it may be however difficult to identify and apply a uniform standard of any procedure for best execution that would be valid and effective for all classes of instruments.

For standardized derivatives contracts the principal criteria are price and speed of execution. Likelihood of execution is also important. For non-standardized derivative contracts, the guiding criteria is price.

### **BROKER SELECTION**

The Company works together with selected liquidity providers, the latter of which can demonstrate meeting specific criteria. The following section describes the selection of liquidity providers and the criteria used to assess them regularly:

- financial stability
- organizational structure and resources for the provision of the services
- regulatory authorization and registration
- ability to provide liquidity
- access to required markets
- availability of pricing and flow
- service, consistency and quality regarding settlements, confirmations, cooperation in case of problems identified
- Cost of execution.

### **CLIENTS' ORDER HANDLING**

When handling clients' orders the Company ensures that orders are promptly and accurately recorded and allocated. Otherwise, the Company handles comparable clients' 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.

Where possible, order allocation is determined pre-trade before the order is placed and in the best interest of the customer.

Aggregation is used to prevent differences in execution amongst mandates resulting in different quality of execution. As such, orders are aggregated unless aggregation works to the disadvantage of those mandates whose orders are aggregated.

Trades are allocated in accordance with the pre-allocation. Trades resulting from partially filled orders are allocated pro rate, i.e. proportionally to the pre-allocation.

### **TRANSPARENCY TOWARDS CLIENTS**

BlueSuisse has an obligation to provide its clients with appropriate information on this Policy. In order to comply with this obligation, the Company will make available this Policy to its clients. Should the Company make any material changes to this Policy (whether pursuant to the review process or otherwise), it will update its policy on the website accordingly.