BEST INTEREST AND ORDER EXECUTION POLICY

Last Updated on: 12 May 2023

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1. Introduction

This Best Interest and Order Execution Policy ("Policy") is provided by Zero Markets LLC ("Zero Markets", "the Company", "we", "us", or "our") to you, our Client or prospective Client, in accordance with applicable law as amended from time to time.

Pursuant to its regulatory obligations, the Company is required to take all sufficient steps to obtain the best possible result ("best execution") on behalf of its Clients, whether executing Client orders directly or receiving and transmitting orders to an Execution Venue.

This Policy applies primarily under the laws of St. Vincent & the Grenadines. To the extent that services are provided to Clients located in the Socialist Republic of Vietnam, this Policy is also informed by the Law on Securities 2019 (No. 54/2019/QH14), Decree No. 155/2020/ND-CP detailing the implementation of the Law on Securities, and Circular No. 96/2020/TT-BTC on guidelines for transactions on the securities market, as each may be amended from time to time.

By opening a Trading Account, you consent to your Orders being executed outside a Regulated Market or a Multilateral Trading Facility. All CFD transactions with the Company are undertaken over-the-counter (OTC) and are not listed on any recognised exchange.

2. Scope

2.1. This Policy applies when the Company executes Client Orders for the Client for all types of Contracts for Difference ("CFDs") offered by the Company.

2.2. This policy also applies when providing the service of Portfolio Management.

2.3. For Clients located in Vietnam, this Policy should be read alongside the Company's Client Agreement, Risk Disclosure Statement, and any product-specific disclosures provided at the time of account opening. The Company will provide information in a clear and comprehensible manner, ensuring Vietnamese Clients are informed of all material terms governing order execution.

3. Best Execution Factors

3.1. When executing Orders, the company takes all sufficient steps to obtain the best possible result ("Best Execution") for our Clients. The best possible result is determined by reference to the total consideration, representing the price of the financial instrument and the costs relating to execution - including all expenses incurred by the Client which directly relate to the execution of the order.

The following Best Execution Factors are considered:

- Price
- Costs
- Speed of execution

- Likelihood of execution and settlement
- Size and nature of the Order
- Market impact
- Any other consideration relevant to the execution of the Order

In determining the relative importance of these factors, the Company takes into account:

- The characteristics of the Client (including whether the Client is a retail or professional client)
- The characteristics of the Client order;
- The characteristics of Financial Instruments that are the subject of that order;
- The characteristics of the Execution Venues to which that order can be directed.

The Company considers price and costs as the most important execution factors, followed by speed, likelihood of execution and settlement, size and nature, and market impact. The relative importance attached to these factors does not differ across the asset classes traded by the Company.

a) Price–Highest Importance:

For any given CFD, the Company will quote two prices: the higher price (ASK) at which the Client may buy (go long), and the lower price (BID) at which the Client can sell (go short). The difference between these prices of is the spread.

The Company quotes prices provided by the its Execution Venue. The Execution Venue calculates tradable by reference to the prices of the relevant underlying asset obtained from third party external price sources. Company prices are available on the Company's trading platforms and are updated as frequently as technology and communications links allow.

To ensure best price, the company compares the bid / ask spread against a range of underlying price providers and data sources. The Company reviews its Execution Venue at least annually to ensure competitive pricing is maintained.

Despite taking all sufficient steps, the company does not guarantee that its price will always be more favourable than price available elsewhere.

Pending Orders (Buy Limit, Buy Stop, Stop Loss and Take Profit on short positions) are executed at the ASK price. Orders such as Sell Limit, Sell Stop, Stop Loss and Take profit on long position are executed at the BID price.

Certain ex-ante and ex-post quality checks are conducted to ensure that prices remain competitive, including: reviewing system settings and parameters; comparing prices with reputable price sources; ensuring symmetry of spread; and checking the speed of price updating.

If the price reaches an Order set by you (Stop Loss, Take Profit, Buy Limit, Buy Stop, Sell Limit or Sell Stop), the order is automatically executed. Under certain conditions - including rapid price fluctuations, market suspensions, or session openings - it may be impossible to execute at the requested price, and the Company may execute at the first available price.

b) Costs-Highest Importance:

For certain CFDs, the Client may be required to pay commission or financing fees, These are disclosed on the Company's website and are not incorporated into quoted prices – they are charged explicitly to the Client's account.

- Commissions: charged as a percentage of total trade value or as fixed amounts.; details available on the Company's website.
- Financing Fee (Swap Rates): positions held overnight may incur a daily financing fee based on prevailing market rates; details available on the Company's website.

Where the Company transmits orders to a third party Execution Venue, additional costs (including Execution Venue fees) may apply; those are disclosed on the Company's website.

The Company may receive a commission or inducement from its Liquidity Provider in consideration for the transmission of Clients Orders. Clients may contact the Company for further information regarding such arrangements.

Any decision by the Company not to charge certain costs at a given time shall not constitute a waiver of its rights to apply those costs in the future, subject to prior notice to the Client.

c) Speed of Execution-Highest Importance:

The Company places a significant importance on the speed of execution and strives to offer high-speed execution within the limitations of technology and communications links. Poor internet connectivity (e.g., wireless, dial-up) on the Clients' side may result in delayed Order placement and execution at prices that may differ from those at the time of instruction.

d) Likelihood of Execution-Medium Importance:

The Company arranges for the execution of Client Orders with third party Execution Venue. Execution Venue may difficult in certain circumstances, including during periods of high volatility, news releases, trading session openings, rapid price movement, insufficient liquidity, or force majeure events. Where an order cannot be executed. It will not be filled.

The Company is entitled, at its discretion and without explanation to the Client, to decline or refuse to transmit any order in circumstances set out in the Client Agreement.

To improve speed and likelihood of execution, the Company conducts ex-ante and ex-post quality checks, including symmetric slippage analysis, trade volume subject to slippage, and benchmarking of execution speed against industry standards.

e) Likelihood of settlement–Low Importance:

The Company settles all transactions upon execution. All CFDs offered by the Company are cash settled – there is no physical delivery of the underlying asset.

f) Size of Order–Low Importance:

Minimum order size very by account type and CFD instrument. A lot is a standardised unit measuring transaction amount; lot sizes differ by CFD type. Refer to Company's website for minimum order size details. Large order may result in less favourable pricing; the Company reserves the right to decline an Orders that cannot be filled.

g) Market Impact–Medium Importance:

Certain market factors may rapidly affect the price of the underlying instruments from which the Company's quoted prices are derived. The Company takes all sufficient steps to obtain the best possible result notwithstanding market impact. The list of execution factors is not exhaustive; their presentation order does not constitute a strict priority ranking. Specific Clients instructions will always be followed where possible.

3.2. Types of Order(s) in Trading in CFDs:

Clients may place the following order types:

Market Orders

A Market Order instructs the Company to buy or sell a CFD as promptly as possible at the prevailing market price resulting in the opening a trade position. CFDs are bought at ASK price and sold at BID price. Stop Loss and Take Profit Orders may be attached to a Market Order. Market Orders are available for all account types.

Pending Orders

A Pending order instructs the Company to buy or sell a CFD at a pre-defined price in the future once the market reaches a specified level. Types available include: Buy Limit, Buy Stop, Sell Limit, and Sell Stop. Pending orders are good till cancelled. Stop Loss and Take Profit may be attached to a Pending Order. Under certain trading conditions, execution at the requested price may not be possible, in which case the Company will execute at the first available price.

Take Profit Orders

A Take Profit Order closes a position automatically when the CFD price reaches a specified profit level. For long positions, the platform checks the Bid price; for short positions, the Ask price.

Stop Loss Orders

A Stop Loss Order automatically closes a position when the price moves to a specified loss level to limit further losses. For long positions, the platform checks the Bid price; for short positions the Ask price.

3.3. Execution Practices in CFDs

Slippage is the difference between the expected price of an Order, and the price at which it is actually executed. Slippage may occur when the specific price shown to the Client at the time of order placement is unavailable. If the execution price is better than the requested price, this is positive slippage. If worse, this is negative slippage.

Slippage is a normal element of CFD trading. It occurs more frequently during periods of illiquidity or higher volatility - for example, during news announcements, economic events and market openings. Slippage may affect all order types, including Stop Loss, Take Profit, and other pending orders.

WARNING: The Company does not guarantee the execution of orders at the price specified. However, the Company confirms that orders will be executed at the next best available price from the price specified. Clients should be aware that slippage may result in losses greater than anticipated.

3.4. Different Types of Trading Accounts in CFDs

The Company offers different types of Trading Account. Minimum initial deposit requirements, spreads, commissions, and other costs may vary by account type. Further information is available on the Company's website.

4. Best Execution Criteria

4.1. When executing Client orders, the Company determines the relative importance of each Best Execution Factor using its commercial judgement and experience in light of available market information taking into account the criteria set out in section 3. The importance levels assigned to each factor are summarised in the table below:

FACTOR	IMPORTANCE	REMARKS
Price	High	We place strong emphasis on the quality and level of price data received from external sources, ensuring competitive quotes for all Clients.
Costs	High	We take all sufficient steps to keep transaction costs as low and competitive as possible, including spreads, commissions, and financing fees.
Speed of Execution	High	Execution speed and price improvement opportunity are critical. We continuously monitor this factor to maintain high execution standards.
Likelihood of Execution	Medium	While we reserve the right to decline an order, we aim to execute all Client orders to the extent possible.
Likelihood of Settlement	Low	All CFDs offered by the Company are cash settled. No physical delivery of the underlying asset occurs.
Size of Order	Low	Minimum order sizes vary by account type and CFD instrument. Large orders may result in less favourable pricing. See the Company's website for details.
Market Impact	Medium	Factors that rapidly affect underlying instrument prices are monitored. We take all sufficient steps to obtain the best possible result notwithstanding market impact.

4.2 Where there is more than one competing Execution Venue capable of executing an order, the Company assesses and compares the results achievable on each venue — including the Company's own commissions and costs - to determine the optimal venue for execution. The Company does not structure or charge commissions in a manner that discriminates unfairly between Execution Venues.

5. Client's Specific Instruction

5.1. Where a Client provides a specific instruction relating to an Order or any aspect of an order, the Company will arrange–to the extent possible–for the order to be executed strictly in accordance with that instruction.

WARNING: Specific instructions from a Client may prevent the Company from applying certain elements of this Policy designed to obtain the best possible result for that order. covered by those instructions. However, it shall be considered that the Company satisfies its obligation to take all sufficient steps to obtain the best possible result for the Client.

5.2. Trading rules for applicable to specific markets or market conditions may prevent the Company from following certain Client instructions.

6. Execution on Client Orders

6.1. When carrying out Client Orders, the Company ensures that:

(a) Orders executed on behalf of Clients are promptly and accurately recorded and allocated;

(b) Comparable Client Orders are carried out sequentially and promptly, unless the characteristics of the Order or prevailing market conditions make this impracticable, or the interests of the Client require otherwise;

6.2 For Vietnamese Clients, the Company maintains records of all order executions in accordance with applicable record-keeping requirements. Clients may request information about the status or outcome of their orders at any time by contacting the support team.

7. Execution Venues

7.1. Execution Venues are the entities with which the orders are placed and executed.

The list of Execution Venues may be updated at the Company's discretion upon at least one business day prior notice to the Clients.

The Company evaluates and selects the Execution Venues based on a number of criteria including such as (but not limited to) the following:

(a) Regulatory status and authorisation of the institution

(b) Ability to deal with large volumes of Orders

(c) Speed of execution

(d) Competitiveness of commission rates and spreads

(e) Reputation financial standing of the institution

(f) Ease of doing business and legal terms of the business relationship

(g) Qualitative criteria including clearing schemes, circuit breakers and scheduled corporate actions.

The Company assigns different relative importance on each of the criterion using its commercial judgment and market experience. It selects Execution Venues that enable it to consistently obtain the best possible result for Client orders. Where there is only one possible Execution Venue, best execution is achieved by executing on that venue. Best execution is a process - not a guaranteed outcome. The Company does not guarantee that the exact price requested will be obtained in all circumstances.

7.2. The Client acknowledges that all transactions entered in Financial Instruments with the

Company are undertaken over the counter (OTC) and are not executed on a recognised exchange or regulated market. OTC transactions may expose the Client to greater risks than regulated exchange transactions.

7.3. Before selecting an Execution Venues, the Company conducts due diligence on Liquidity Providers, evaluating following parameters:

- Pricing frequency – number of ticks provided per second.
- Speed of prices delivery and orders executed.
- Occurrence and frequency of price freezes.
- Depth of liquidity provided.
- Competitiveness for overall clients in back-to-back dealing agreements.
- Symmetry of slippage across all order types in back-to-back dealing agreements.

7.4. The Company randomly selects a statistically sufficiently sample of trades across different periods, instruments and CFD types - including trades during irregular market events - to verify that it is consistently obtaining the best possible results for Clients.

8. Client's Consent

8.1. By entering into a Client Agreement with the Company for the provision of Investment Services, the Client consents to the application of this Policy on the business relationship between the Company and the Client. This Policy forms part of the Client Agreement available on the Company's website.

8.2 For Clients located in Vietnam, consent to this Policy is given in accordance with the requirements of the Law on Securities 2019 and related implementing regulations. The Client acknowledges that they have read and understood this Policy prior to opening a Trading Account.

9. Amendment of the Policy and Additional Information

9.1. The Company reserves the right to review and amend this Policy at any time in accordance with the terms of the Client Agreement. Clients will be notified of substantial material changes. For non-material updates Clients are encouraged to refer from time to time to the website of the Company for the most up to date version of this Policy.

9.2 For Clients in Vietnam, any material amendments to this Policy that affect the terms of order execution will be communicated in writing (including by email or website notice) at least Ten (10) business days before the changes take effect, in accordance with applicable Vietnamese securities regulations.

9.3. Should you require any further information and/or have any questions about this policy please direct your request and/or questions to our support team.

Should you have any questions or enquiries, please don't hesitate to

contact Zero Markets LLC

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www.zeromarkets.com