StoneX®
StoneX Financial Pte. Ltd.

INFORMATION ON BEST EXECUTION POLICY

IMPORTANT INFORMATION

This Information on Best Execution Policy ("IBEP") is provided by StoneX Financial Pte. Ltd. in accordance with the Guidelines to the Monetary Authority of Singapore ("MAS") issued "Notice SFA 04-N16 on Execution of Customers' Orders" ("Notice"). The IBEP provides a summary of the "SFP Best Execution Policy" which governs how SFP engages individual customers' orders ("Transactions") and comparable customers' Transactions; on the best available terms.

Purpose of Policy

This Information on Best Execution Policy (the "IBEP") is intended to provide you (the Customer) with a summary of the information contained in the Best Execution Policy ("**BEP**") relating to the order execution arrangements that StoneX Financial Pte. Ltd. ("**SFP**") and/or in collaboration with entities of StoneX Group Inc. (collectively referred to as "**StoneX Group**") have in place to comply with SFP's obligations under the "Notice on Execution of Customers' Orders" ("Notice") and the accompanying "Guidelines" issued by the Monetary Authority of Singapore and certain other aspects relating to the way in which SFP handles your orders. All your trading orders submitted to SFP for execution in your Account(hereinafter referred to as "**Transaction**"), will be handled in a manner as detailed in the BEP and summarized in this IBEP. Unless separately defined in the IBEP, words and expressions shall have the meanings given to them under the SFP Customer Agreement ("**SFP-CA**") which governs the terms of business for the operating of your Account (for the execution your Transactions) with SFP.

Scope of SFP's Best Execution Obligations

SFP's Best Execution ("**BE**") obligations to you will depend on the following considerations :

- Only Transactions executed by you which have a contractual nexus and governed by the SFP-CA are in scope for inclusion under SFP's BE obligations to you;
- Only your Transactions pertaining to Capital Market Products ("CMP") as defined under the Securities & Futures Act ("SFA"); are in scope;
- If you are classified as an Institutional Investor ("**II**") as defined under the SFA; SFP is exempted (in line with the Notice) from any BE obligations to you;
- If you are not an II but instead classified as either an "Accredited Investor" or an "Expert Investor", SFP BE obligations to you will not apply when :

  (i) the Transaction has the following attributes :

    (i-1) the Transaction is self-directed; <u>and</u>

    (i-2) the Transaction is executed through an Order Management System ("OMS") offered by an Independent Software Vendor ("ISV"), selected by you; <u>and</u>

    (i-3) the Nature of the Order is facilitated by the OMS and not the Venue; <u>or</u>

  (ii) the Execution Factors have been pre-determined and restricted by the you.

Services Scope - Modes of Execution

SFP's ability to offer you BE will not only depend on the Execution Factors (see next section); but more importantly the mode of engagement of the Transaction with you as detailed below:

- **Self-Directed Dealing**
  In Self-Directed Dealing ("SDD"), you would be the party initiating the Transaction through an Order Management System ("OMS") either managed and offered by SFP ("Proprietary OMS"); or an OMS offered independently by an "Independent Software Vendor ("ISV") that has been appointed by the Venue (the market where the Transactions are being matched between buyers and sellers).

- **Assisted Dealing**
  In Assisted Dealing ("AD"), you would be the customer initiating the Transaction via engagement with the SFP Front Office ("FO") staff through an Approved Channel ("AC") with no direct access to the Venue.
  (The AC refers to communication channels that Customers use to engage FOs for Transactions which are fully recorded and archived by SFP to meet regulatory record keeping obligations).

- **Order Facilitation**
  In Order Facilitation ("OF") activities, there is inducement carried out by either you with the FO or by the FO with you; with the intention to solicit a "**Firm Order**" by you or the FO based on "Indications of Interest" ("IOI") activities.

  (A "Firm Order" is one where the price, quantity and the duration of execution of the order is clearly specified so that it would be acceptable to be executed in any Venue and participate in the order book of the venue).

Applicability of Execution Factors

In fulfilling its BE obligations, SFP will consider the following Execution Factors ("EF") to determine and evaluate that BE had been adequately provided to you. These EF will also be impacted by the Mode of Execution as detailed in the previous paragraph.

The range of factors may include price, cost, speed, likelihood of execution and settlement, size and nature of the order, or any other considerations relevant to the placement and/or execution of the order.

Interaction of Products, Venues, Engagement Modes, Contracting Role and Execution Factors

The overall BE obligations owed by SFP to you will be determined by a combination of considerations as highlighted in the preceding paragraphs. These will include:

(a) The applicability of the Notice to the Transaction and the Customer;
(b) The Mode of Engagement;
(c) The Execution Factors;
(d) The Venue where the proposed Transaction will be executed;
(e) The relevant Capital Market Product being Transacted; and/or
(f) The contractual intermediary role that SFP performs with you as either as an Agent or Principal or if SFP is acting as the sole Venue for your Transaction.

Use of Other Intermediaries

Any Transaction executed by you through our "Modes of Execution" may be relayed through other intermediaries ("Brokers") who are StoneX Group entities or external parties who act as Liquidity Providers, Executing Brokers or Clearing Brokers with the various Venues where your Transaction may be filled. SFP undertakes periodic reviews to determine that they are able to provide the appropriate level of experience and expertise when executing in that market. These include all relevant execution factors and other considerations which are not limited to governance, oversight and transparency of your Transaction, consistency of order handling and front-to-back trade processing; so that SFP may validated that BE is being met on a consistent basis and any potential conflict of interests are managed appropriately. These periodic reviews would also document the basis for the selection of affiliates or external parties as intermediaries for the placement and execution of your Transactions.

Execution of Customers' Comparable Orders

Where SFP receives yours and other customers' multiple Transactions for execution at the Venue(s); the engagement of the Transaction by SFP must ensure that the sequence of the execution is strictly by time of receipt of the Transaction.

- For Transactions received under the AD mode by the FO; the sequence of execution would be based on the priority of the time of receipt and confirmation of the Transaction and not only on the time of receipt. Transactions relayed by the FO to the Venue will only be done after confirmation of the receipt of the Transaction instruction through the various ACs with the Customer.

- For Transactions transmitted by the Customer to the Venue operated by SFP (e.g., for CFDs), the order book of the Venue will be updated based on the time of receipt of the Transaction at the Venue.

Payment for Order Flow (PFOF)

Payment for order flow ("PFOF") refers to commission or other form of payment which a broker receives from another broker or counterparty in return for routing customers' orders to that broker or counterparty. PFOF introduces conflict of interest and is likely to cause harm as the broker may be incentivized to pursue commission or other form of payment from another broker or counterparty in return for routing customers' orders to that broker or counterparty for its own benefit.

PFOF may lead to poorer outcomes for customers as additional costs may be incurred by customers, such as through wider bid-ask spreads from the other broker or counterparty who agrees to pay PFOF in return for obtaining customers' order flow from SFP. This is inconsistent with SFP's obligation to provide BE to its customers. **SFP will not receive PFOF in placing and/or executing customers' transactions in accordance with this BE policy, thereby ensuring that there is no conflict of interest**.

Governance for Best Execution Outcome

SFP has established a governance framework for the ongoing monitoring of its BE capability for all your Transactions executed or facilitated through or with it in accordance with the BEP. These internal benchmarks include the assessment of the latency, slippages, accuracy, rejection rate or fill rate based on the specific benchmarks pre-determined by you in the Transaction

The Senior Management of SFP are responsible for the approval of BEP (and accompanying IBEP) and is subject to ongoing review. This includes :

(i) A re-affirmation of the existing or updated execution factors that need to be considered in delivering best execution;
(ii) applicability of best execution obligation for SFP and carve-outs;
(iii) monitoring and control mechanisms to review execution quality of trades; and/or
(iv) the respective roles of the operational and control functions in ensuring best execution.

SFP remains committed to ensuring that your Transaction continue to attain the highest standards of Best Execution on an ongoing basis through a disciplined and systematic approach that is both fair and efficient and achieves the best available terms.