



BEST ORDER EXECUTION POLICY FOR TRADING IN CONTRACTS FOR DIFFERENCE (CFDs)

1. Introduction

Oqtima Int. Ltd ('the Company', or 'we', or 'our' or 'us'), is a Securities Dealer authorized and regulated by the Financial Services Authority of Seychelles (FSA) with License Number SD109 and is operating under the trading name "Oqtima". We are committed to treating clients honestly, fairly and transacting with clients in a professional and transparent manner when entering into a transaction between two parties. This Best Order Execution Policy (the "Policy") summarizes the policies and procedures established by the Company in order to comply with its obligation to act in accordance with the best interest of its clients when transmitting Client orders to other entities for execution. This Policy forms part of the Client Agreement, as defined in the Client Agreement.

More specifically, when we enter into a transaction with a client, we will take all sufficient steps to ensure the best possible result when executing your instructions in order to achieve the best possible outcome for you by executing those orders according to this Policy and subject to any specific instructions received from you. Best execution means that we will take all reasonable steps to obtain the best possible result for you when executing an order for you taking into account various execution criteria.

2. Scope

Whether the Company is acting as an agency or market maker, the company always treats clients fairly, transparently and professionally. We have a dedicated team which is always in search for venues of better pricing and executions. The company runs on **no dealing desk model** (i.e., we process 100% of our client's trades without manual intervention), so as to provide clients with instant execution and ensuring all clients orders receive best prices possible.

3. Execution Factors

The Company will take into account the following factors to determine the manner in which your order will be executed:

- Price
- Speed
- Likelihood of execution or settlement
- Costs

- Market impact
- Nature of the order

Any other consideration relevant to the execution of the order.

4. Executed venues and ECN Connection

The Company understands that clients trade differently and have different requirements of the trading environment. Hence the Company actively works with liquidity providers to create different pricing and execution streams. This could be achieved via the liquidity software by aggregating and dispatching the orders among liquidity provided by all liquidity counterparties of the Company on a best-executed-price basis (ECN Connection). Executable Streaming Prices (ESP) are sent from the Company's liquidity providers to our ECN environment where clients can trade with no dealing desk.

The Company runs daily monitoring on average spreads, execution speed, and fill rate. This is to ensure that quality trading environment is well maintained at the right level.

5. Order Execution Elements

- Prices

The Company provides its clients with ECN pricing where an order from a non-institutional client is placed with its institutional counterparty(ies) to achieve a fast, automatic order placement and pricing within a competitive market.

- Specific client instruction

When a client provides us with specific instructions as to how to execute an order, we shall take all sufficient steps to obtain the best possible result when executing that order, by following the client's instructions.

Specific instructions provided by clients as to how to execute an order may prevent us from taking the steps described in our Best Order Execution Policy to obtain the best result for the client.

- Slippage
- In the event of price slippage between the time that a client requests a trade and its execution, we operate symmetric price slippage.

6. Best Execution

The Company only works with the best Prime of Prime liquidity providers, connecting investment banks and non-bank market makers. Each venue has different forte and having them aggregated in one system allows the Company clients to enjoy top notch execution for all possible instruments.

Below factors are considered to contribute to the Company's best execution processing:

- All execution factors apply

- All pricings are live pricing from the Company liquidity providers
- All orders are executed against the market at the next available price once clients send trade requests.
- Limit and stop orders are placed with a minimum distance equal or greater than the spread of the instrument. Once a limit order is triggered, it will be treated just like a market order.
- Limit and stop orders can be
 - Buy Limit, Sell Limit, Buy Stop and Sell Stop
 - Due dates (times) can be assigned to each limit order and orders will be cancelled if reached.
- The Company has no dealing desk ensuring clients to trade as they see.
- Charges allow for overnight positions, in the form of swap and financing.
- Dividends are paid or charged when clients trade indices.

7. Monitoring and Reviewing

The Company monitors the effectiveness of their Policy and reviews this Policy and its order execution arrangements, at least annually. We will assess on a regular basis whether the price feed and hedging venues in pricing our products allow us to achieve best execution on a consistent basis or whether we need to make changes to our execution arrangements. We will also review our order execution arrangements and order execution policy periodically or whenever a material change occurs that affects our ability to obtain the best result for the execution of client's orders. The monitoring is conducted at various frequencies and covers trading on the trading platform of all asset classes, and focuses on three key execution factors: price, costs and speed.

A review will be carried out whenever a material change occurs that affects the firm's ability to continue to obtain the best possible result for its client orders on a consistent basis using the methods described in this Policy. Any material changes/updates to this Policy and to the Company's order execution arrangements will be notified to you accordingly, as necessary.