

AS Redgate Capital Best execution policy

Approved on:
01.06.2021

Effective as of:
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15.06.2021

1. General provision

- 1.1 This Best Execution Policy ("Policy") shall stipulate the terms, conditions and principles, based on which AS Redgate Capital ("Redgate Capital") shall execute the transaction orders ("Order") in financial instruments of retail and professional clients ("Clients") of Redgate Capital.
- 1.2 Redgate Capital is committed to treat Clients fairly transacting with them in a professional and transparent manner. Redgate Capital has the obligation to provide its Clients with best execution of Orders which means Redgate Capital must take all reasonable steps to obtain the best possible result for Client when executing an order with the Client or on Client's behalf, taking into account various important factors of best execution as referred in subsection 3 of this Policy and subject to any specific instructions received from the Client.
- 1.3 This Policy shall be followed with every Order given by the Client, except when the Client issues specific instructions, and should be read in conjunction with Redgate Capital Terms and Conditions for Wealth Management and other terms regulating provision of services.
- 1.4 For all retail clients the best possible execution will be determined in terms of the total consideration, representing the price of the financial instrument and the costs related to execution. Whenever there is a specific instruction from a Client, Redgate Capital shall execute the Order following the specific instruction, and compliance with that specific instruction will be treated as satisfaction of the best execution obligation of Redgate Capital to Client.
- 1.5 Redgate Capital recognizes that the professional clients also rely on Redgate Capital to provide best execution therefore Redgate Capital will execute Orders from professional clients in line with this Policy to the extent possible. In certain circumstances Redgate Capital determination of the relative importance of the execution factors regarding Orders of professional clients may differ from retail clients including for example where the likelihood of execution may take precedence over price.
- 1.6 By agreeing to the Redgate Capital Terms and Conditions for Wealth Management, the Client also agrees to the terms of this Policy, as summarized in this document. All clients of Redgate Capital are required to familiarize themselves with the given Policy. When giving Orders, Redgate Capital interprets the Client's consent and acceptance with the Policy. Redgate Capital will monitor the effectiveness of the given Policy's order execution arrangements and execution policy to identify and, where appropriate, correct any deficiencies. The Policy shall be reviewed at least once a year. Any amendments to the Policy shall be published on the website of Redgate Capital at <https://redgatecapital.eu/en/about-us/regulations/> Amendments shall come into force from the date of publication on the website.

1.7 In case the Client will not be satisfied with the execution of the Order, Redgate Capital is obligated to provide, at the written request from the Client, any necessary and relevant information enabling the Client to verify whether Redgate Capital executed the Order in question in full compliance with this Policy and other applicable terms of business of Redgate Capital.

2. Executing orders

2.1 Redgate Capital acts on behalf of clients (not as principal) in relation to all submitted Orders. This means that any client of Redgate Capital will be dealing within the underlying market and not with Redgate Capital.

2.2 Redgate Capital takes reasonable steps to ensure that execution of Orders obtain the best possible result for Clients, however fast-moving markets may result in execution of a transaction at a price which has ceased to be the best market price. Depending on the circumstances the slippage may have either favorable or adverse material impact on the execution of Client's Order.

2.3 Redgate Capital shall inform the clients if any material difficulty relevant for executing the Orders properly should emerge.

3. Important factors of best execution of orders

3.1 Redgate Capital executes all given clients' Orders according to the Redgate Capital imposed General Terms and Conditions for Wealth Management.

3.2 When executing clients' Orders, Redgate Capital shall consider the following information:

- the characteristics of the Client, including the categorization of the client as retail or professional;
- the characteristics of the Client Order;
- the characteristics of securities that are the subject of that Order.

3.3 Redgate Capital shall consider the following factors when executing and transmitting Orders:

- total consideration (the sum of the price of the financial instrument and the costs related to execution, including all expenses incurred by the client, which are directly related to the execution of the Order);
- speed of execution and settlement;
- likelihood of execution and settlement, that is available liquidity;
- the nature and size of the Order and transaction and its market impact;
- other factors that Redgate Capital believes to have significance for the execution of the Order.

3.4 The importance of the factors described in clauses 3.2. and 3.3. will be assessed in line with Redgate Capital experience and considering market conditions, including the need for timely execution, availability of price improvement, the liquidity of the market and size of the Order and the potential impact on total consideration. For the time being we consider the price as the most important factor as its impact on the total consideration is the greatest.

3.5 If the client Order obliges Redgate Capital to execute this Order contrary to any or some considerations in Clauses 3.2. and 3.3. Redgate Capital shall execute the order pursuant to the respective Order (Specific Instructions). Redgate Capital shall make best endeavors to inform the Client of such circumstance (see Clause 5 for more detail).

3.6 In relation to some financial instruments, at the time at which the Client gives Redgate Capital an order, there may be no functioning or no open market or exchange on which the reference product is traded. In such cases Redgate Capital sets out to determine a fair underlying price based on several factors.

4. Effect of other factors on the execution order

4.1 Redgate Capital reserves the right to modify the Redgate Capital spread whereas the clients may experience widened spreads and slippage under certain market conditions (for example, but not limited to, when the trading desk is closed, around fundamental news announcements, where there is a rapidly moving market or low liquidity).

4.2 Delays in execution beyond Redgate Capital control may occur as a result of technical failures or malfunctions in connection with use of third-party service providers, trading platforms, internet connectivity or processing speed for which Redgate Capital does not accept responsibility but takes reasonable efforts and exercises due care to avoid such situations.

4.3 In extreme volume and volatility situations, automated dealing system constraints may require automated execution of Orders to be switched off and / or electronic execution to be suspended in favor of manual execution. Such events lead to further execution delays and increased market volatility.

5. Specific instructions from clients

5.1 If a client provides specific instructions on full or partial execution of the Client's Order, the Order shall be executed according to such instructions. Provision of specific instructions of the client to Redgate Capital may prevent Redgate Capital from taking the steps that it has designed and implemented in this Policy for best execution of client Orders to obtain the best possible result for the execution of those orders in respect of the elements covered by those instructions.

5.2 Redgate Capital shall be considered to have offered the best execution of an Order as long as it has acted in accordance with the relevant specific instructions of Client.