

BEST EXECUTION POLICY

(Version 1.0)

1. INTRODUCTION

CMC Markets Singapore Invest Pte. Ltd. (“CMSI”, the “Company”, “we”, “our”) is a holder of a capital markets services licence issued by the Monetary Authority of Singapore (“MAS”), and has undertaken to ensure that the company and its employees and licenced representatives comply with the requirements under the SFA, subsidiary legislation and MAS Notices and Guidelines (the “Regulations”) at all times.

2. PURPOSE & SCOPE

In accordance with the MAS Notice (SFA 04-N16) and Guidelines on Execution of Customer’s Orders, CMSI is required to establish policies and procedures that are commensurate with the nature, scale, and complexity of the business:

- a) to place and / or execute customers’ orders on the best available terms.
- b) to place and / or execute comparable customers’ orders in accordance with the time of receipt of such orders.

When handling and executing orders for customers, CMSI has the obligation to take reasonable steps to obtain the “best outcome” for the customer. For retail clients, obtaining the best outcome means obtaining the best total consideration. The obligation to take reasonable steps to achieve the best total consideration for the customer is known as “best execution”.

Total Consideration

Obtaining the best outcome means obtaining the best total consideration.

Total consideration means:

- for a buy order, the purchase price paid in respect of the order plus transaction costs (inclusive of GST); and
- for a sell order, the sale price received in respect of the order less transaction costs (inclusive of GST).

This Policy sets out the consideration and approach taken by CMSI to provide best execution for its customers. It is applicable to all customer orders accepted by the Company for the purchase or sale of capital markets products offered on the CMC Invest platform (listed securities, shares in collective investment schemes, and exchange-traded derivatives contracts).

3. EXECUTION BROKER AND VENUE

CMSI’s execution broker is Morgan Stanley (“MS”). MS has Best Execution obligations to CMSI and will determine the appropriate venue where the Company’s customer orders are to be executed.

The Company will review the execution broker and venue on an annual basis to determine that MS fulfils its Best Execution obligations to CMSI. The counterparty due diligence and suitability criteria may include

financial standing, reputation, creditworthiness, governance framework, cost of execution, quality of execution, trade confirmation, and execution speed.

4. EXECUTION FACTORS AND CRITERIA

When executing orders on behalf of CMSI's customers, MS will consider a range of execution factors and take reasonable steps to achieve the best execution terms for customers.

The general factors considered may include: price, costs, liquidity, speed, likelihood of execution and settlement, size and nature/type of the customer's orders, or any other considerations relevant to the execution and / or placement.

While some execution factors may merit a higher importance, there are circumstances where the relative importance of these factors may change in accordance with general prevailing market conditions or customer's instructions.

5. ORDER EXECUTION

CMSI primarily accepts orders to buy and sell securities through the Order Processing Systems ("Online Service"). In limited circumstances, orders can also be received by telephone or in writing. The way in which the Company deals with all instructions and orders is contained in the CMC Markets Invest Terms and Conditions.

The Company places customer orders with MS in time priority i.e., "first come first served basis", which means the first valid order that is received at a given price for a particular security will be the first order that is submitted to MS.

Where the customer has provided specific instructions, CMSI endeavour to take reasonable steps to liaise with MS and execute such orders in accordance with those instructions, even though, as a result, this may not achieve best execution. CMSI will only do so in circumstances where the customer's instruction does not conflict with other obligations under the Company's Terms and Conditions, the SFA's Market Conduct Rules and any other relevant laws. Per the Guidelines to MAS Notice SFA 04-N16, when such an order is placed / executed following the specific instruction from the customer, CMSI would be regarded as having satisfied its Best Execution obligations.

6. EVIDENCE OF COMPLIANCE WITH THE POLICY

Where the Company receives a reasonable request from a client, the Company will liaise with MS and provide evidence that the order has been executed in line with this Policy and the Terms and Conditions. On receipt of a request, the Company will advise the estimated time to provide this information.

7. MONITORING AND REVIEW

The Company will monitor and review the compliance with, and effectiveness, of this Best Execution Policy. CMSI will perform post execution review on the trade executions on a regular basis to check that MS fulfils its Best Execution obligations to CMSI to deliver the best outcome to customers.

8. CHANGES TO THIS BEST EXECUTION POLICY

CMSI will review this Policy and vary it as required, from time to time. Customers will be notified of changes via updates to this Policy on CMSI's website. Customers who require further information on this Policy may call our hotline at 6-559-6000 for guidance.

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