

VIEWS

Order Execution Policy June 2024

Introduction

The Financial Conduct Authority (**FCA**) rules place a high-level obligation on investment firms to ensure that client orders are executed on terms that are most favorable to the client, which is referred to as the best execution obligation.

As an investment firm Visions Integrated Exchange Ltd (VIEXS) has an obligation to take all sufficient steps to obtain the best possible results for its clients when executing client orders or passing them to other firms for execution, taking into account certain execution factors including price; costs; speed of execution; probability of execution and settlement and size of order. If a client has provided specific instructions, we will meet our obligation to obtain the best possible result by following those instructions.

The applicable requirements differ depending on the nature of the activity undertaken by the firm in question: firms that execute orders on behalf of clients are subject to a more onerous regime than firms that transmit to or place orders with other entities for execution.

‘Execution’ is where we execute an order as principal or directly against an execution venue, a market maker or other liquidity provider. For example, a regulated market, MTF, OTF, SI, or principal trading firm. Execution of orders on behalf of clients’ means acting to conclude agreements to buy or sell one or more financial instruments on behalf of clients. We may not receive a duty of best execution from the venue and therefore, we must take ‘all sufficient steps’ to obtain the best possible result for our clients.

Purpose

To comply with our obligations and the relevant requirements, VIEXS has established this Order Execution Policy (**OEP**).

This document sets out how we meet our obligations in respect of Best Execution and should be read in the context of our terms and conditions, summary order execution policy and information about the quality of our execution on our website.

This OEP, the results of the monitoring performed over internal arrangements, as well as the annual qualitative and quantitative reports form the evidence necessary for VIEXS to demonstrate that we have taken all sufficient steps to provide best execution to our clients and that this has been delivered on a consistent basis.

Policy review

The Head of Compliance and Head of Risk will review this policy, and our best execution arrangements, at least annually to consider whether it has satisfied our obligation to take all

sufficient steps to obtain the best possible result for clients. The review will include whether to:

- Exclude or to include additional or different execution venues.
- Assign different relative importance to the execution factors.
- Modify any other aspects of this policy and/or the best execution arrangements; and
- Review and approve the contents of our annual publication on our execution venues (types of transactions and volumes) and a summary analysis on our execution quality for the previous year.

The Head of Compliance and Head of Risk will also carry out a review if a material change occurs that could affect our ability to obtain the best possible results for the execution of our client orders, on a consistent basis, using our chosen execution venues. We will also assess if we need to make changes to the relative importance of the best execution factors so we can continue to meet our overall best execution obligation.

VIEXS's approach

VIEXS provides an automated trading service and is the ultimate provider of all prices to our clients and it is VIEXS with whom the client is dealing and contracting with. It provides margin trading services in Foreign Exchange (**FX**) and Contracts for Difference (**CFDs**). VIEXS trades as principal with each client.

VIEXS needs to verify on an ongoing basis that its execution arrangements work well throughout the different stages of the execution process. This approach is linked to a general regulatory obligation to treat customers fairly as well as the need to appropriately address any potential conflict of interest inherent in the execution arrangements and business model.

Our Order Execution Arrangements also have an impact on Consumer Duty outcomes and operating this policy effectively will contribute to VIEXS being able to demonstrate that good outcomes for clients are being achieved.

VIEXS endeavors to deliver the best result to its clients when executing transactions by:

- Taking all sufficient steps to obtain, when executing orders, the best possible result for its clients based on the factors below
- Establishing and maintaining execution arrangements and an Order Execution policy (as previously defined)
- Providing clients with information on where orders were executed.
- Monitoring the effectiveness of the execution arrangements.
- Conducting periodic reviews of the execution arrangements and of this Policy.

- Demonstrating to clients that VIEXS has executed orders in accordance with this Policy; and
- Publishing information annually detailing our execution venues in the preceding year.
- Disclosing a summary of this Policy to its clients and prospective clients.

VIEXS does not accept any benefit for routing client orders to a particular trading or execution venue (commonly called 'Payment for Order Flow') as this would be an infringement of the requirements in relation to inducements and conflicts of interest. Nor does VIEXS charge commissions to clients in a way that discriminates unfairly between different execution venues, as the firm is committed to ensuring it trades on venues that offer the best possible outcome in terms of all the execution factors.

Delivering best execution

VIEXS will consider the following execution factors when evaluating how to secure the best possible result for its client's orders:

- Price and cost
- Speed
- The size and nature of the order
- Likelihood of execution
- The characteristics of the client

Usually, the primary objective is to ensure the client receives the best available price and to minimise the total cost of the transaction, taking precedence over all other factors.

VIEXS's trading platform has been designed on the basis of this order execution policy, to take into account these and any other relevant factors, such as the nature of the underlying markets and any specific instructions clients may have given us, so that we can consistently deliver what we consider to be the best possible results.

The Head of Risk has responsibility for implementing this policy, and will therefore:

- Ensure that all relevant staff are aware of this policy and operate in accordance with it;
- Monitor transactions for best execution and compliance with this policy; and
- Evaluate our best execution arrangements on an ongoing basis to identify and implement any appropriate enhancements to our policy.

Price

Typically, the most important execution factor that impacts clients is the price they receive when trading with us. Therefore, when considering best execution factors we monitor the price of execution most closely. We obtain our prices via liquidity arrangements in order to try and get the best available quotes to our platform. These sources are regularly reviewed for competitiveness and stability in order to improve the integrity of our price and reduce the cost of dealing for our clients.

Given the fast nature of the way markets can move, sometimes the price clients see on the platform may have changed by the time the order reaches us some milliseconds later. Depending on the order type sent by the client this could mean an order is rejected.

If the client sends us an 'Instant' order our trading platform will apply a symmetrical tolerance level either side of the requested price – if the market stays within this range by the time we receive the order, the order will be executed at the level requested (subject to available liquidity in the underlying market at the time).

If the current price has moved outside this range, we will do one of two things:

- If the market moves to a better level for the client, our trading platform will pass on the price-improvement.
- If the price moves beyond our tolerance in the opposite direction, we'll reject the order and the client will have to resubmit the request.

Market orders will be filled at the live price available in the requested size upon receipt of the order.

Costs

Getting the best price for our clients is normally the primary best-execution consideration, and therefore reducing the cost of dealing, through our spreads or commissions, is also a high priority for us.

All of our spreads and commissions for all asset classes, can be found in our product information tables, including information on the minimum, average and out of hours spreads where applicable.

We pride ourselves on providing some of the lowest spreads within the industry globally and continually endeavour to reduce spreads where possible.

For spread based transactions (e.g. indices or commodities) VIEXS takes into account factors such as interest, expected dividends and variations in the underlying contract for the reference date of the expiry of the product. A spread is added to this, and as a result, the prices displayed on the firm's trading platform may vary from the cash price of the underlying.

In relation to some financial instruments, if no market or exchange on which a product is traded is open at the time at a client's order is received, a fair underlying price based on several factors is determined. These factors could include, for example, price movements on

associated markets and other market influences, including information about the client's order.

In relation to FX, the main way in which VIEWS ensures clients receive best execution is by ensuring that the calculation of its bid/offer spreads is made with reference to a wide range of underlying price providers and data sources.

Speed & likelihood of execution

Regardless of whether VIEWS hedges its principal exposure with other counterparties the speed with which the trade is executed, whilst also being mindful of price, is of high importance.

Where clients request to trade using a 'market order', specifying direction and size only, then VIEWS may prioritise speed above that of price. This will be assessed with reference to market conditions, taking consideration of the liquidity of the market, size of the order, availability of price improvement and the potential impact on total consideration.

In almost all circumstances, client transaction requests will be executed automatically at the requested or live market price, in case of a 'market' order request, subject to the size requested being equal to or under the size permissible in the 'underlying market' at that time.

Rejection rates

At VIEWS we aim to keep our client's likelihood of execution as high as possible, therefore we regularly review the number of rejections that our clients face.

Typically, the main reason for rejection is if the price a client requests has moved since reaching our platform, or if there is insufficient liquidity to provide an execution in the size requested. One way to avoid this is for clients to use 'Market' orders, however, there is the added risk of slippage, both positive and negative but clients will always be filled at the latest price available.

Slippage is the difference between the executed price and the price seen at time of request. With market orders, slippage can be both positive (in the client's favour), or negative (at a worse price) from the price seen at time of request.

Professional clients

Getting the best price for our retail clients and minimising the total cost of the transaction takes precedence over all other factors. For professional clients, in certain circumstances we may prioritise other factors, such as the speed and probability of execution, if we determine that these have equal or greater importance compared to overall price.

Client information and consent

We will make appropriate information on our order execution policy available to our clients. The information will clearly explain how we will execute their orders and will include:

- how the execution factors of price costs, speed, likelihood of execution and any other relevant factors are considered as part of all sufficient steps to obtain the best possible result for the client;
- where a firm executes orders outside a trading venue, the consequences, e.g. counterparty risk, and upon client request, additional information about the consequences of this means of execution.
- a clear and prominent warning that any specific instructions from a client may prevent us from obtaining the best possible result in respect of the order elements covered by those instructions
- a summary of the selection process for execution venues, execution strategies employed, the procedures and process used to analyse the quality of execution obtained and how we monitor and verify that the best possible results were obtained for our clients;
- where we apply different fees depending on the execution venue, we must explain these differences in sufficient detail in order to allow the client to understand the advantages and the disadvantages of the choice of a single execution venue.
- where we invite clients to choose an execution venue, we must provide fair, clear and not misleading information to prevent the client from choosing an execution venue on the sole basis of the price policy applied by the firm.

We must obtain client consent to our order execution policy before we execute orders for them. We provide new clients with information on our order execution policy at the onboarding stage and provide updates when there are material changes to existing clients by e-mail.

Monitoring and reporting

We monitor a variety of execution performance metrics through a monthly report. In the report, we focus on monitoring the execution factors that are deemed the most important for achieving the best possible outcome for our clients. These execution factors can be found in our [summary order execution policy](#) which is available on our website.

COBS 11.2A.31 R requires VIEWS to monitor the effectiveness of its execution arrangements and its execution policy to identify, and where appropriate, correct any deficiencies.

VIEWS periodically reviews the internal arrangements, the quality and appropriateness of the execution provided.

The Compliance Officer, supported by the Board of Directors, ensures that best execution arrangements are part of the Compliance Monitoring Programme, and that related monitoring is periodically completed. In doing so, the following methods are applied:

- **Ex-ante monitoring**, which ensures that the design and review process is appropriate, and takes into account new services or products offered by the firm; and
- **Ex-post monitoring**, which includes checking whether this Policy has been correctly applied.

Monitoring involves a combination of front office and compliance monitoring, using methods that rely on random sampling and exception reporting.

Results of the ongoing monitoring on order execution arrangements are included in the periodic Management Information (**MI**) given to the Board, to enable the Board to make informed decisions and take appropriate actions when required.

Roles and Responsibilities

The Board is ultimately responsible for the firm's adherence to this Policy, and for ensuring that the underlying trading arrangements are in place to provide best execution to its clients. In fulfilling this responsibility, it is supported by the Best Execution Committee, Risk & Compliance Committee and the Compliance Department.

The Head of Risk is the first line of defense and is responsible for ensuring that the execution services in place are adequate and appropriate to comply with regulatory requirements.

The Compliance Department is the second line of defense and will perform on-going monitoring of this policy and the Compliance & Risk Committee is the third line.

Record Keeping

In accordance with COBS 11.SA of the FCA Handbook - '*Record keeping: client orders and transactions*', VIEXS maintains records and documentation to evidence the firm's ongoing monitoring and periodic reviews of best execution.

Maintaining relevant records enables the firm to demonstrate to the FCA that its order execution arrangements are designed with the clients' best interests in mind and not biased by conflicts of interest.