



# ORDER EXECUTION POLICY

**SAXO CAPITAL MARKETS UK LTD**

Company registered in England & Wales no: 07413871

Registered office at: 40 Bank Street, Canary Wharf, London E14 5DA. United Kingdom

Authorised and regulated by the Financial Services Authority

## 1 INTRODUCTION

This policy is issued pursuant to, and in compliance with, EU Directive 2004/39/EC of 21 April 2004 on Markets in Financial Instruments (as amended) ("MiFID") and the rules of the Financial Services Authority implementing MiFID in the UK (the "FSA Rules") that apply to Saxo Capital Markets UK Ltd. ("SCML").

This policy will apply to you if we have categorised you as a Retail or Professional client. In our dealings with you, we have a general duty to act honestly, fairly and professionally, taking into account your best interest. This document provides information by which SCML will seek to obtain the best possible result for you when executing orders for you or when we receive and transmit orders on your behalf.

Upon acceptance of a client order and when there is no specific client instruction regarding the execution method, SCML will execute an order in accordance with this policy.

## 2 SCOPE

SCML uses automated systems to route and execute client orders, therefore we are dependent on the technology provided by Saxo Bank A/S for routing the orders to the appropriate execution venue. When your order is received by us and if we effect your order as principal for an Over-the-Counter ("OTC") transaction with SCML as the counterparty, SCML act as the sole execution venue of your orders. However, if we effect your order as agent it is automatically routed to an execution venue determined by Saxo Bank A/S to achieve the best execution according to this policy. There is a possibility that your order may be executed outside a regulated market or Multilateral Trading Facility (MTF).

## 3 SCML'S APPROACH TO BEST EXECUTION

In providing you with best execution, we take into account the following criteria for determining the relative importance of the execution factors:

- the characteristics of the client, including whether you are a retail or professional client;
- the characteristic of the client order;
- the characteristics of the financial instruments that are the subject of the order (in particular, where it relates to OTC financial instruments);
- the characteristics of the execution venues to which that order can be directed.

In the process we attach high importance to the following elements:

### Speed and Likelihood of the Execution

Due to the levels of volatility affecting both price and volume, SCML seeks to provide client orders with the fastest execution reasonably possible although delays may occur.

### Price Improvement and Overall Consideration of Costs

If you are a Retail client, the best possible result will be determined in terms of the total consideration, representing the price of the financial instrument and the cost related to execution, which will include all expenses incurred by you which are directly related to the execution of the order. Orders are routed to execution venues where opportunities for price improvement may exist. The criteria used include:

- automatically matching incoming market and limit orders to pending limit orders;
- crossing transactions where price improvement is offered to one or both sides of the trade.

### Size

SCML seeks execution venues that provide the greatest liquidity and thus potential for execution of large orders. SCML also seeks opportunities for client orders to benefit from order-size commitments offered by the execution venues.

### Overall Execution Quality

When determining how and where to route or execute an order, SCML draws on the extensive experience of Saxo Bank A/S on various executing venues, focusing on prompt, sequential and reliable execution.

## **4 LIST OF EXECUTION VENUES CURRENTLY IN USED**

SCML rely on the selection of execution venues by Saxo Bank A/S. A list of execution venues currently used by Saxo Bank A/S is published on our website, [www.saxomarkets.co.uk](http://www.saxomarkets.co.uk) and updated from time to time.

## **5 SPECIFIC INSTRUCTIONS**

Whenever there is a specific instruction from or on behalf of a client, SCML will, to the extent possible, execute the order in accordance with the specific instruction. A specific instruction from a client may prevent SCML from taking the steps that it has described in this policy to obtain the best possible result for the execution of orders. Trading rules for specific markets may prevent SCML from following certain of the client's instructions. To the extent that a client instruction is not complete, SCML will determine any non-specified components of the execution in accordance with this policy.

## **6 AGGREGATION AND SPLIT**

The client's orders may at the discretion of SCML be aggregated with SCML's own orders, orders of any of SCML's associates and/or other clients. Furthermore, SCML may split the client's orders as well as aggregate orders before executing such. Orders will only be aggregated or split where:

- (a) it is unlikely that the aggregating of orders and transactions will work overall to the disadvantage of any client whose order is to be aggregated; and
- (b) it is disclosed to each client whose order is to be aggregated that the effect of aggregation may work to its disadvantage in relation to a particular order.

Aggregation and split may in single occasions result in the client obtaining a less favourable price than if the client's orders had been executed separately or together, as applicable.

## **7 REGULAR REVIEW OF EXECUTION QUALITY AND EXECUTION VENUES**

SCML will review this policy annually and whenever a material change occurs that affects SCML's ability to obtain the best possible result for the execution of client orders. The review will take into account the regular review carried out by Saxo Bank A/S on whom SCML relies to route the order to the execution venues under this policy.

See a [list](#) of order execution venues