

Best Execution Policy

Order Execution Policy for Novum Securities Limited

Overview of Best Execution requirement

MiFID IIs best execution regime requires Novum to take all sufficient steps to obtain the best possible result for clients, taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of an order. The firm at all times strives to act in accordance with the best interests of their clients when transmitting client orders to other entities for execution.

In order to comply with the overarching best execution requirement (above), Novum Securities will ensure that appropriate (execution) policies and/or arrangements are effectively implemented for the carrying out of all orders.

Novum Securities however are not under an obligation to obtain the best possible result for each individual order; rather we will apply our (execution) policies to each order with a view to obtaining the best possible result in accordance with the (execution) policy.

The detailed policy for order execution contained below will be reviewed regularly and clients will be informed of any material changes to the policy.

Best Execution Policy

This policy is intended, in as clear a way as possible to demonstrate how Novum Securities operates and provides best execution as often as is possible.

Execution Venues

An 'execution venue' includes a regulated market, an MTF, an OTF, a systematic internaliser, or a market maker or other liquidity provider or an entity that performs a similar function in a third country to the function performed by any of the foregoing.

The below table shows what instruments Novum Securities is involved with and what execution clearers are used for each instrument. All orders will be executed on a regulated market or MTF/Orders may be executed outside of a regulated market.

Instruments	Execution Venues/Clearer
Share	GPP
Warrant	GPP
Certificate representing certain security	GPP
Contracts for differences (CFD)	ETX
Spread Bet	ETX

Novum Securities believes that the execution clearers above are appropriate to providing best execution to you as these clearers enable the firm to obtain on a consistent basis the best possible result for the execution of client orders. The charges passed down to the client are consistent with the

cost to the firm of dealing with each execution clearer so as not to unfairly discriminate against any one clearer.

We will regularly assess the execution clearers available in respect to any product that we trade in order to ensure they continue to be the most appropriate for our clients.

Execution Factors

The decision of which Execution venue/clearer is used for any one trade will be reached based on price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of an order. This decision may be influenced by the firm's own fees and commissions.

When executing an order the firm will generally treat price as the highest priority for ensuring best execution. Only under exceptional circumstances would this not be the case.

In order to calculate the price the firm will pay due attention to the 'total consideration'. This is represented by the price of the financial instrument and the costs related to execution, which must include all expenses incurred by the client which are directly related to the execution of the order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order.

Execution Criteria

When executing a client order, we will take into account the following criteria for determining the relative importance of the execution factors above:

1. the characteristics of the client including the categorisation of the client as retail or professional;
2. the characteristics of the client order; including where the order involves a securities financing transaction (SFT);
3. the characteristics of financial instruments that are the subject of that order;
4. the characteristics of the execution venues to which that order can be directed

Regardless, due to the differences in market structures and the structure of financial instruments, it may be difficult to identify and apply a uniform standard of, and procedure for, best execution that would be valid and effective for all classes of instrument. As such we will take into account the different circumstances surrounding the execution of orders for particular types of financial instruments.

As best execution obligations apply to all financial instruments, irrespective of whether they are traded on trading venues or OTC, the firm will gather relevant market data in order to check whether the OTC price offered for a client is fair and delivers on the best execution obligation.

Selecting an Execution Venue

The following methodology will be used when selecting an execution venue for an Order.

Subject to proper consideration of the execution criteria and execution factors referred to above, we will choose where we believe we can trade to the best advantage (or at no disadvantage to) for you.

When dealing on a regulated market or a Multilateral Trading Facility (MTF) we will select the execution venue that we consider the most appropriate.

Conflict of Interests/Inducements

The firm will not receive any remuneration, discount or non-monetary benefit for routing client orders to a particular trading venue or execution venue which would infringe the requirements on conflicts of interests.

Providing information to clients on order execution

Following the execution of a transaction on behalf of a client the firm will inform the client of where the order was executed.

Specific Client Instructions

The firm can take specific instructions from a client which may override this policy however the firm may not induce any client to do so. If a client chooses to give specific instructions to the firm then the firm will attempt to provide best execution as far as is possible. However this may prevent the firm from taking the steps that it has designed and implemented in its execution policy to obtain the best possible result for the execution of those orders in respect of the elements covered by those instructions.

Please note that we are required to obtain your prior consent to this policy.

We are also required to obtain your prior express consent before we execute an order outside of a Regulated Market or Multilateral Trading Facility (MTF) in an instrument admitted to trading on a Regulated Market or MTF. This consent must be in writing or by email.