



ORDER EXECUTION POLICY



ORDER EXECUTION POLICY

1. Introduction

- 1.1. TPXMGLOBAL Kenya Limited operating under the trading name XM is a non-dealing online foreign exchange broker regulated and authorized by the Capital Markets Authority ("CMA") in Kenya (hereinafter called the "Company").
- 1.2. The Company takes all reasonable steps to find and deal on the terms which are the best available to the client when dealing with or for a client ("best execution"). In this respect, the Company established and provides its clients and potential clients with its Order Execution Policy (the "Policy").
- 1.3. This Policy forms part of our Terms and Conditions of Business and by agreeing with our Terms and Conditions of Business, which is a contractually binding agreement between you and the Company, you are also agreeing to the terms of the Policy set forth in this document.

2. Scope and services

This Policy applies when executing transactions with you for the Securities provided by the Company. It is up to the Company's discretion to decide which types of Securities to make available and to publish the prices at which these can be traded.

The Client is given the option to place with the Company the following orders for execution in the following ways:

- 2.1. The Client places a "Market Order" which is an order instantly executed against a price that the Company has provided. The client may attach to a market order a Stop Loss and/or Take Profit. Stop Loss is an order to limit Client's loss, whereas Take Profit is an order to limit Client's profit.
- 2.2. The Client places a "Pending Order", which is an order to be executed at a later time at the price that the Client specifies. The Company will monitor the pending order and when the price provided by the Company reaches the price specified by the Client, the order will be executed at that price. The following types of pending orders are available: 'Buy Limit' (an order to purchase a Security at or below a specified price), 'Buy Stop' (an order to buy a Security, which is entered at a price above the current offering price; it is triggered when the market price touches or goes through the buy stop price), 'Sell Limit' (an order to sell a Security at a specified price or better), and 'Sell Stop' (an order to sell a Security when it reaches a certain price). You may attach to any 'Pending Order' a 'Stop Loss' and/or 'Take Profit'.
- 2.3. You may hold up to 300 positions simultaneously (considered as summary of "Market" and "Pending Orders" per "client").

The client may modify an order before it is executed. The Client has no right to change or remove Stop Loss, Take Profit and Pending Orders if the price has reached the level of the order execution.

3. Best execution factors

The Company shall take all reasonable steps to obtain the best possible result for its clients taking into account the following factors when executing Clients orders against the Company's quoted prices:

- 3.1. Price
- 3.2. Costs
- 3.3. Speed of Execution
- 3.4. Likelihood of Execution
- 3.5. Likelihood of settlement
- 3.6. Size of order



3.7. Market Impact

The Company does not consider the above list exhaustive and the order in which the above factors are presented shall not be taken as priority factor. Nevertheless, whenever there is a specific instruction from the client the Company shall make sure that the Client's order shall be executed following the specific instruction.

4. Best execution criteria

The Company will determine the relative importance of the above factors by using its commercial judgment and experience in the light of the information available on the market and taking into account the criteria described below:

- 4.1. the characteristics of the client
- 4.2. the characteristics of the order
- 4.3. the characteristics of Securities that are the subject of that order
- 4.4. the characteristics of the execution venues to which that order can be directed

5. Execution venue(s)

For the purposes of orders for the Security provided by the Company the Company will be transmitting the Orders for execution to a third party (known as Straight Through Processing, STP), in which case the Company will not be acting as a counterparty in the transaction and the execution venue will be a third party. The Company may execute orders through various execution venues therefore it will ensure that will achieve the best possible result for the execution of clients' orders.

The Company assesses that price and costs for clients are the most important factors in the choice of venue when we execute transactions, but it will also take into account how each of the other execution factors are affected for example, speed of processing and likelihood of order acceptance in a variety of markets and order types.

It is the Company's policy to maintain such internal procedures and principles in order to act for the best interest of its Clients and provide them the best possible result (or "Best Execution") when dealing with third parties.

The Client acknowledges that the transactions entered in Securities with the Company are not undertaken on a recognized exchange, rather they are transmitted to a third party through which they are executed and, accordingly, they may expose the Client to greater risks than regulated exchange transactions.

6. Monitor and review

The Company will monitor on a regular basis the effectiveness of this Policy and, in particular, the execution quality of the procedures explained in the Policy and, where appropriate, reserves the right to correct any deficiencies.

In addition, the Company will review the Policy at least annually. A review will also be carried out whenever a material change occurs that affects the ability of the Company to continue to the best possible result for the execution of its client orders on a consistent basis using the venues included in this Policy. The Company will notify its affected clients on any changes in its Policy.

7. Client consent

The Company may obtain the above consents in the form of a general agreement where the Client is informed that any orders placed with the Company for the Securities offered will be transmitted for execution to a third party and the Company will not be acting as a counterparty.

The Company reserves the right to review and/or amend its Policy and arrangements, at its sole discretion, whenever it deems fit or appropriate.