

# **BEST EXECUTION-ORDER EXECUTION POLICY**

**INVEXIA**

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## 1. INTRODUCTION

INVEXIA Ltd. (“INVEXIA” or the “Company”) is a Cypriot Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration No. HE 417464. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under the license No. 000/22.

The CySEC’s Law L.87 (I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets 2017, including all its amendments, the Directives issued by CySEC (the “Regulations”) and the Markets in Financial Instruments Directive II (MiFID II) are the regulatory framework that governs Trading in Financial Instruments.

In accordance with the CySEC’s Law L.87/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets of 2017 ( the “Law”), Cyprus Investment Firms (“CIFs”) must take all sufficient steps to obtain the best possible result for their clients when executing client orders or receiving and transmitting client orders for execution. Under the above legislation, the Company requires to put in place and implement an Order Execution Policy that provides appropriate information to its clients on the execution of their orders. INVEXIA Ltd applies this Policy on acceptance of an order from a client and/or when a client provides no specific instruction for transmission/execution of the order.

Paragraphs 24 and 25 of Directive DI144-2007-02 on the Professional Competence of Investment Firms provide guidance on the duties of CIFs to act in the best interest of the client, and on the contents and scope of the best execution policy, respectively.

## 2. SCOPE

The purpose of this Policy is that in compliance to the Law, the Company has duty to act honestly, fairly, and professionally, considering its clients’ best interest. The Company will take all sufficient steps to obtain the best possible results on behalf of its clients when receiving and transmitting orders for execution taking into consideration the price, costs, speed, likelihood of execution and settlement, size, nature, as well as the clients’ ability, needs and trading policies, where applicable and possible.

Nevertheless, whenever there is a specific instruction from the client the Company shall execute the order following the specific instruction. Clients must note that best execution is a process, which considers various factors, and not the outcome of their transactions.

The Company will act in the capacity of an agent and not as a principal when receiving and transmitting client orders for execution.

This Policy applies to retail and professional clients and does not apply to clients that the Company classifies as Eligible Counterparties

### 3. FINANCIAL INSTRUMENTS

This policy is applicable when executing orders on your behalf on financial instruments offered by the Company. The types and details of the financial instruments available to clients via the Company's trading platforms can be found through the Company's website [www.Invexia.com](http://www.Invexia.com) and on the Company's Terms and Conditions ("Agreement").

### 4. BEST EXECUTION CRITERIA

When the Company executing client's orders, shall take into account the following execution criteria:

- Characteristics of the client, including the categorization of the client as retail or professional
- Characteristics of the client's order
- Characteristics of the financial instrument that are the subject of that order
- Characteristics of execution venues where that order can be directed.

The Company shall take all sufficient steps to obtain the best possible results for its Clients when receiving, transmitting and executing Client Orders, taking into account the following factors when dealing with Clients' Orders: price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order. We do not consider the below list exhaustive and the order in which the below factors ("Best Execution Factors") are presented shall not be taken as priority factor. Nevertheless, where there is a specific instruction from the client the Company shall execute the order following the specific instruction.

The Company assigns the following relative importance to the Best execution factors:

Best Execution Factors	Level of Importance	Company Remarks
Price	High	We give strong emphasis on the quality and level of the price data that we receive from external sources in order to provide our clients with competitive price quotes. We do not however guarantee that our quoted prices will be at a price which is as good, or better, than one might have been available elsewhere.
Cost and commissions	High	We take all reasonable steps as to keep the costs of our transactions low and competitive to the extent possible.
Speed of Execution	High	Speed of execution is critical to every trader and the Company seeks to execute client orders with the fastest execution as reasonably possible within the limitations of technology and communication links.

Likelihood of Execution	High	Even though we reserve the right to decline clients orders, we strive to offer a consistent price quoting and we aim to execute all clients' orders, to the extent possible.
Settlement	Medium	All the transactions shall be settled within the selected liquidity provider(s) as applicable.
Size of an order	Medium	The minimum trading size of an order differs per account type. A lot is a unit measuring the transaction amount and is different for each type of CFD.
Nature of an Order	Medium	The company offers these type of orders as mentioned above such us: Market, Buy/sell Limit, Buy/Sell stop and Take profit and Stop Loss

## 5. BEST EXECUTION FACTORS

### 5.1 Price

The Company's prices for each financial instrument on its trading platform are obtained through its liquidity provider(s). The Company provides clients with continuous price quotations in the form of BID and ASK prices. Where BID is the price referenced for short order (sell order) and ASK is the price referenced for long order (buy order). The ASK price is always higher than the BID price. The difference between BID and ASK price for a given CFD is the SPREAD. To ensure the Company's clients receive best execution, the Company daily monitors and compares its prices and spreads against a range of third-party price providers and data sources as reference to ensure competitive and reliable prices. Depending on the position the client wishes to enter into, the Company will offer a BID or ASK price.

The company's prices can be found on the company's website and/or trading platforms. The Company updates its prices as frequently as the limitations of technology and communications links allow.

Once the client has decided on the position then he will send a request to the Company asking for a confirmation on the requested price. In order to comply with the "best execution policy" the Company will make best effort to execute the requests at the price the client is soliciting.

We strive to provide the best pricing for all clients, however, under certain market conditions the price requested by the client may not be available, and when this situation arises the order will be executed at the next available price without prior confirmation. The client acknowledges that such deviations from the client's declared price may be against the client (negative slippage) or to the client's benefit (positive slippage).

More specific, if the price reaches an order such as: Take Profit, Stop Loss, Buy Limit/stop or Sell limit/stop, these orders are instantly executed. However, under certain trading conditions it may be impossible to execute these orders at the client's requested price. In this case, the company has the right to execute the order at the first available price. This may occur, for example at times of rapid price fluctuations.

## **5.2 COSTS AND COMMISSIONS**

The Company may charge a commission or Swap when the client opens transactions in certain financial instruments.

The details of such costs as well as of the spread for each CFD and the account maintenance fee are available on the Company's website [www.Invexia.com](http://www.Invexia.com).

## **5.3 SPEED OF EXECUTION**

The Company seeks to execute client orders with the fastest execution as reasonably possible. The Company receives and transmits Client Orders for their execution with a third party(ies). However, the Company places a significant importance when executing Client's orders and strives to offer high speed of execution within the limitations of technology and communications links.

For instance, in cases where clients are using a wireless connection, a dial up connection or any other communication link that can cause a poor internet connection then this may cause unstable connectivity with the Company's trading Platforms resulting to scenario of the client placing orders at a delay and hence the orders to be executed at better or worst price offered by the Company.

## **5.4 LIKELIHOOD OF EXECUTION**

The frequency with which the Company offers the best possible speed of execution relies on various market conditions that can affect the prices of different financial instruments; for example, but not limited to, where there is a fast moving market, low liquidity, and/or at the beginning of trading sessions, around fundamental news announcements, it may not be possible to guarantee the execution of any or all market orders / pending orders at the declared price. In general, the likelihood of execution depends on the availability of prices of the liquidity provider and certain risk management limitations (i.e. maximum order size, maximum open positions allowed per instrument/client).

In the event where the company is unable to proceed with an order regarding price or size or other reason, the order will be rejected.

The Company is entitled at any time and at its discretion without giving any notice or explanation to the client to decline/ refuse to transmit or arrange for the execution of any order/ request or instruction of the client in circumstances explained in the client agreement/ terms and conditions.

## **5.5 LIKELIHOOD OF SETTLEMENT**

All transactions are settled upon their execution from the liquidity provider.

## **5.6 SIZE OF AN ORDER**

The Company will endeavor to provide the best possible execution for orders of all sizes; however, in certain circumstances the price given to the client may be different from the declared price due to the effects of market liquidity at the time of the clients' order.

The Company reserves the right not to accept a clients' order in cases where the size of the order is too large and cannot be filled by the company due to certain market conditions at the time of the order or for any other reason as explained in the Client Agreement found on the website. The actual minimum size of an order is different for each type of account. A lot is a unit measuring the transaction amount and is different for each type of CFD.

## 5.7 NATURE OF ORDERS

The client can place with the Company the following type of orders:

- Market order (Instant): this is an order to buy or sell immediately against a price that the Client sees on the Company's trading platform. Market orders are executed on BID/ASK prices offered by the Company. In particular, an order to buy is executed at the current market Ask Price and close later at Bid price and an Order to sell is executed at the current market Bid Price and close later at Ask Price.
- Pending Order: this is an order to buy or sell a financial instrument at a desired and specified price in the future. In this case, if the market price for the relevant financial instrument reaches the specified price in the order, the pending order will become market order and executed at the desired price. However, it is noted that under certain trading conditions it may be impossible to execute these orders at the Client's requested price. Such trading conditions could be: lack of liquidity, at times of rapid price fluctuations of the price, during opening of trading sessions, rises or falls in one trading session to such an extent that under the rules of the relevant exchange the trading session is suspended or restricted etc. In this case, the Company has the right to execute these Orders at the next available price.

The company offers the below pending orders:

- Buy Limit Order: an order to buy at an Ask price that is equal to or less than that specified in the order. The current price level is higher than the value in the order. Usually this order is placed in anticipation of that the security price, having fallen to a certain level, will increase.
- Sell Limit Order: a trade order to sell at the "Bid" price equal to or greater than the one specified in the order. The current price level is lower than the value in the order. Usually this order is placed in anticipation of that the security price, having increased to a certain level, will fall.
- Buy stop: a trade order to buy at the "Ask" price equal to or greater than the one specified in the order. The current price level is lower than the value in the order. Usually this order is placed in anticipation of that the security price, having reached a certain level, will keep on increasing.
- Sell stop: a trade order to sell at the "Bid" price equal to or less than the one specified in the order. The current price level is higher than the value in the order. Usually this order

is placed in anticipation of that the security price, having reached a certain level, will keep on falling.

It is noted that Stop Loss and Take Profit may be attached to a pending order.

- Stop Loss: this order is placed to minimize losses if the price of the financial instrument has started to move in an unprofitable direction to the Clients' order.
- Take Profit: this order is placed to set an intended profit level for when the price of the financial instrument has reached a certain level.

Its noted that in all types of orders slippage may occur depending on market/liquidity conditions.

## **6. CLIENTS' SPECIFIC INSTRUCTIONS**

Specific Order Instructions from clients on how to execute an order received over the phone to the Company, will only be executed once the Company has verified the identity of the caller.

When a client provides specific instructions as to how to execute an order, the Company shall take all sufficient steps to obtain the best possible result when executing that order, by following the client's instructions.

Nevertheless, whenever there is a specific instruction from the Client, the Company shall execute the order following acceptance of such instruction. It is noted that any specific instructions from a Client may prevent the Company from taking the steps that it has designed and implemented in this Policy to obtain the best possible result for the execution of those Orders in respect of the elements covered by those instructions.

In addition, trading rules for specific markets or market conditions in general may prevent the company from following certain of the client's instructions.

## **7. REFUSAL TO TRANSMIT ORDERS**

The client by accepting the Terms and conditions upon registration and as available on our website, agrees and understands that the Company has the right at any time without giving any prior notice and/or explanation, to refuse at its discretion to transmit any order for execution, in the cases presented in the Terms and conditions (available at <https://www.Invexia.com/legal/terms-and-conditions/>).

## **8. EXECUTION VENUES**



Execution venue is the entity or entities with which the orders are placed or to which the Company transmits orders for execution. The company is a so called STP provider (Straight through process). The Company shall act as the agent of the Client (the principal) when receiving and transmitting orders. In circumstances where there is a sole execution venue for client orders, best execution is achieved by execution on that venue.

An **Execution Venue** means a regulated market (e.g. stock exchange), a multilateral trading facility, a systematic internalized, a market maker, another liquidity provider or an entity performing in a third country a function like any of the abovementioned.

The Company does not execute Client Orders in Financial Instruments on an own account basis, as principal to principal against the Client. The Company uses a third-party Financial Institution as Execution Venue. The Company is the agent for all trades and the Company's Liquidity Provider "Sirius Financial Markets PTY Ltd" is the execution venue for CFDs. The Company offers its Clients direct market access (DMA) for trading securities (physical-real stocks), these services are offered through our financial intermediary "Saxo Bank A/S", where trading securities is available only on the Company's MT5 platform. The company acts as an agent for physical stocks trading as well and orders related to physical stocks are executed on venue. Execution venues related to physical stocks are the below :

- **BME** - Bolsa de Madrid
- **FSE** - Frankfurt stock exchange
- **LSE** - London stock exchange
- **NASDAQ** - Nasdaq stock exchange
- **NYSE** - New York Stock exchange
- **XPAR** - Euronext Paris stock exchange

Its noted that the entities listed above are subject to change without notice. More information about real stocks can be found out at the Company's website and Terms and Conditions.

The Company places great significance on the choice of its Liquidity Providers as it strives to offer, on a consistent basis, best execution to its Clients. The Company's liquidity providers Sirius Financial Markets PTY Ltd is regulated by the Australian Securities and Investment Commission (ASIC), and Saxo Bank A/S is regulated by the Danish Financial Supervisory Authority.

Our liquidity providers may be transmitting the orders received by us to other liquidity providers. Broker(s) and Liquidity Provider(s) are not necessarily operating in regulated markets.

## 9. REVIEW AND MONITORING

This policy shall be reviewed at least annually and will be monitored on an on-going basis by the company. In addition, the Company will regularly review whether the execution venues as described in this policy and the chosen entities to whom the Company places or transmits orders for execution, continue to provide the best possible result for the Company customers on a consistent basis and whether need to make changes to these arrangements.

Whether a material change has occurred, the Company shall consider making changes based on the importance of the best execution factors affected in meeting its best execution requirements.

It should be noted that the Company will not notify the Clients separately of changes, other than substantial material changes to the Policy, and Clients should therefore refer from time to time to the website of the Company at Terms and conditions for the most up to date version of the Policy.

On an ongoing basis and to ensure that the Best execution requirements are met on a continuous basis, the company runs the following monitoring checks:

- Review statistics related to order execution (successful /rejected orders)
- Monitor the execution of orders and the symmetry of any observed slippages (positive and/or negative)
- Monitoring of various pricing sources to ensure that the last available price quote is issued to the client
- Comparison of quotes between our liquidity provider and other independent feed providers/sources/ brokers

## 10. CONSENT

Adequate information is provided to the clients through this Policy in relation to the factors that are taken into consideration by INVEXIA when handling clients' orders.

When a client commences trading with the Company, that client has already provided his/her consent to the contents of this **Best** Execution Policy via the client's acceptance of the Company's Terms and Conditions ("Agreement").