



GCI FINANCIAL LIMITED

Best Execution Policy



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## 1. Introduction

This Best Execution Policy (the "Policy") outlines the procedures and practices that GCI Financial Limited ("GCI") will follow when executing orders on behalf of its clients to ensure that the best possible result is obtained for clients on a consistent basis. The policy is based on the principles of fair and equitable treatment of clients, transparency, and the delivery of best execution. Accordingly, this policy is in adequacy with international best practices and standards.

## 2. Best Execution Principles

The first section of the policy outlines the principles that the investment dealer will follow when facilitating execution of orders on behalf of clients. These principles include obtaining the best possible result for clients, taking into account various factors such as price, speed, likelihood of execution, costs, and the size and nature of the order.

GCI shall take all reasonable steps to obtain the best possible result for its clients when executing orders. In particular, the Firm shall consider the following factors in order of priority:

### 1. Price

GCI shall seek to obtain the most favorable price available when executing client orders, taking into account the prevailing market conditions, the characteristics of the financial instrument, and any other relevant factors.

### 2. Speed

GCI shall execute client orders promptly, taking into account market liquidity and any other relevant factors.

### 3. Likelihood of Execution

GCI shall take into account the likelihood of execution when determining the best possible result for the client, and shall seek to execute orders in a way that maximizes the chances of execution.

### 4. Costs

GCI shall take into account any relevant costs, including execution costs, clearing and settlement costs, and any other related costs, when determining the best possible result for the client. GCI shall ensure that all costs associated to the proposed transactions that have been communicated will not jeopardize the end result.

### 5. Size and Nature of Order

GCI shall take into account the size and nature of the client order, including any instructions or restrictions provided by the client, when determining the best possible result for the client.



## 6. Characteristics of the client

GCI shall consider any characteristics and/or instructions provided by the client where applicable.

## 3. Execution Venues

The second section of the policy outlines how the investment dealer will assess and compare execution venues in order to obtain the best possible result for clients. This involves taking into account various factors such as the nature of the financial instrument, the liquidity of the market, execution speed, cost of execution, and the likelihood of execution. The investment dealer will then select execution venues that are likely to provide the best possible result for the client.

GCI shall assess and compare execution venues to obtain the best possible result for its clients. The assessment shall take into account the following factors:

1. The nature of the financial instrument.
2. The liquidity of the market.
3. The execution speed.
4. The cost of execution.
5. The likelihood of execution.

GCI shall select execution venues that are likely to provide the best possible result for the client, taking into account the above factors.

## 4. Exceptions

This policy shall apply to all clients of GCI, with the exception of the below:

### a. Execution-Only

This applies when customers use the trading platform of GCI solely to execute their trades on their own initiative and without intervention, advice or otherwise subscribing to any other services of GCI. Execution-only transactions shall also include instances where the client submits instructions for execution only by GCI.

## 5. Monitoring and Review

The third section of the policy outlines how GCI will monitor and review the effectiveness of the policy on an ongoing basis. GCI will review the policy at least annually to ensure that it remains effective and appropriate.



GCI shall monitor the effectiveness of this Policy on an ongoing basis and shall review it at least annually to ensure that it remains effective and appropriate.

## 6. Conclusion

Overall, this Best Execution Policy is designed to ensure that GCI acts in the best interests of its clients when executing orders on their behalf. It outlines the principles that GCI will follow, how it will select execution venues, and how it will monitor and review the effectiveness of the policy. By communicating the policy to clients, GCI ensures that clients are aware of how their orders will be executed and can have confidence in GCI's commitment to obtaining the best possible result for them.