



# Order Execution Policy

Date: 03-05-2024

Version 3.9

EPE B.V. is a private limited liability company (besloten vennootschap met beperkte aansprakelijkheid) with its statutory seat in Amsterdam, the Netherlands, registered with the Trade Register of the Dutch Chamber of Commerce in Amsterdam under number 58403949. EPE B.V. is authorised as an investment firm and supervised as such by the Dutch Authority for the Financial Markets (AFM).

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## 1 Introduction

EPE B.V. (“**EPE**”) provides a brokerage service for shares and ETF’s to retail clients (“**You**”). This EPE Order Execution Policy (“**This Policy**”) sets out the steps EPE takes to obtain the best possible result for the execution of Your orders, also known as ‘best execution’.

The services of EPE are provided through the EPE mobile application. This Policy therefore applies to all retail and opt up professionals which will place orders through the EPE mobile application. By placing an order through the EPE mobile application, You acknowledge and accept that Your orders will be carried out in accordance with This Policy.

EPE provides brokerage services. EPE and only receives and transmits or executes or executes Your orders, part of This Policy is the procedure to establish the right partnerships for the execution of Your orders.

## 2 Approach

### 2.1 Executing broker and Trading Participant

EPE provides an introducing brokerage service for shares and ETFs and is responsible for the reception and transmission or execution of Your orders. In carrying out Your orders we may rely on the services of an Execution Venue and or an external executing broker. EPE is a Trading Participant of Equiduct and EPE has a partnership with an executing broker which executes the orders.

Both EPE and the executing broker shall have execution arrangements in place that enable both parties to comply with all obligations and regulations when receiving, transmitting or executing Your orders. EPE will make sure the order execution policy of the appointed executing broker matches with This Policy.

### 2.2 Best execution

When executing Your orders, EPE and the executing broker will need to take all sufficient steps to establish best execution for You. The characteristics for best execution fall under the obligation to execute orders on terms most favourable to You, taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other relevant consideration.

Next to this, there are a number of aspects that EPE takes into account when looking at the execution of Your orders:

- No opening or closing orders are rejected, provided You have sufficient cash in Your account, and provided that Your order falls within certain requirements set when the order is submitted by You. In situations where the EPE mobile application is unavailable (due to an unscheduled mobile application outage) or You are not able to access the EPE mobile application (e.g. due to loss or malfunction of Your mobile

phone) and as such You are not able to close a position, a telephone service will be available for closing orders;

- Pricing should always reflect the underlying market to which the order will ultimately relate;
- You will receive a live pricing feed from the market and can decide yourself if You want to act upon that given price by sending in a Market Order, or a Limit Order. Limit Orders will be executed if the market price at the venue trades through the proposed Limit Order price. In a situation where the available market volume at Your proposed Limit Order price is not fully traded You will receive full execution, partial execution or no execution depending on the position of Your Limit Order in the order book queue.

### **3 Execution partner & Execution Venue**

EPE may decide to route and execute orders through their own membership of an Execution Venue or send the order to an executing broker. EPE has entered into arrangements with an executing broker. Before entering into such an arrangement, a proper due diligence needs to take place to ensure the partnership will be in the best interest of the client and makes sense from a business perspective. It is important that EPE exercises due skill, care and diligence when entering into, managing or terminating any arrangement with an executing broker and when selecting an Execution Venue

When performing an assessment of a potential executing broker partner, EPE investigates the following components: (1) an assessment of the executing broker as a company and (2) assessing the order execution policy of the executing broker and the order execution results on the basis of the annual publication by the execution broker on the identity of execution venues and the quality of execution.

When performing an assessment of a potential Execution Venue, EPE investigates the following: (1) costs for connecting to the Execution Venue and (2) an assessment of the order execution results of Execution Venue on the basis annual publication by the Execution Venue on the quality of execution of transactions.

#### **3.1 Partnership company assessment**

For the assessment of the executing broker as a company, the following aspects are to be considered:

- Vision, direction and strategy: the vision, direction and strategy of the company should fit with the vision, direction and strategy of EPE;
- Due diligence of Management Team (MT): it is important that the MT members are considered to be capable and knowledgeable to not only bring the company to a higher level, but also to make sure that they have the client's interest in mind while doing so;
- Solvability and liquidity: the solvability and liquidity of the partner should be healthy;
- Regulatory framework in which the company operates: EPE requires the partner to be fully licensed in a jurisdiction within the European Economic Area;

- IT infrastructure: the IT infrastructure should be solid and capable of handling a large amount of orders within a short period of time. Also, it is important to have a full suite of APIs available for the technical integration;
- IT security: the security of the executing broker should be high level. Whitelisting of IP addresses and two-factor authentication are important to make sure the trading platform is safe and secure.

### **3.2 Partnership order execution assessment**

For the assessment of the order execution of the executing broker, the following factors are taken into account:

- Pricing: the pricing structure and the level of pricing that the partners uses;
- Likelihood of execution/liquidity: the difference between the bid and the ask price should be consistent. The smaller the spread, the more liquid a product often is. EPE aims to only offer liquid products (i.e. blue chip shares) and the spread is an indicator of the extent to which a product is actually liquid. Therefore, the spread should be considered small and consistent. The market the executing broker covers needs to fulfill the obligation to execute the order in a liquid market and increase the likelihood of execution;
- Speed of execution/latency: the time it takes from the moment You decide to send in an order to the moment it is received by the market, is called latency. The speed of execution for a Market Order should be instant. With limit orders, the order should be executed immediately when the set price is reached. Situations may occur that prevent immediate execution, but these need to be reported as such and are only per incidental exception. With blue chip shares, the execution of the order needs to happen immediately. The assessment should therefore take into account the extent to which orders can be processed immediately;
- Transaction costs and involved post trading costs: the transaction costs and involved post trading costs determine the viability of the business model. These costs need to be assessed in order to determine the commercial value of the partnership;
- Product offering: a larger geographical reach is considered better;
- Additional costs for implementing another executing broker: both one-off costs as well as ongoing costs. This is important, especially when using the services of a single dedicated executing broker.
- Best Execution Reports

The order execution policy of the executing broker lies at the foundation of the assessment of the order execution. EPE will perform periodic checks on the order execution policy of the execution broker to establish if there have been any changes.

### **3.3 Execution Venue Selection**

EPE will select execution venues which enables to deliver best execution on a continuous basis. EPE will also consider qualitative factors like the costs and the connectivity to the

venue and clearing schemes, circuit breakers like a kill switch, liquidity analysis and any other relevant considerations like the best execution reports per transaction to monitor the quality of execution. Market data of the venue is particularly important concerning the quality of quotes and the related costs.

As a basis for the selection of a venue and in order to evaluate and compare execution venues, we review the execution quality reports published by the venues. In addition, we review our own transaction data at least semi-annually.

## **4 Order processing**

### **4.1 Execution of orders**

To make sure Your orders are executed fairly and expeditious, EPE ensures the following conditions are met when carrying out Your orders:

- Orders are accurately recorded and allocated;
- Comparable client orders will be carried out sequentially and promptly;
- You are properly informed upfront about any material difficulty relevant to the proper carrying out of orders;
- The quality of the executions of orders and the taken action when the criteria for best execution are not met.

Your orders are always sent to the market based on the timestamp of creation by You.

EPE executes Your orders by one of the following methods or a combination of methods:

- Directly on a regulated market (RM), a multilateral trading facility (MTF) of organised trading facility (OTF) of which EPE is a member or a participant;
- Indirectly via an execution broker. Your orders can be executed by the executing broker:
  - Via a Smart Order Routing (SOR) method: the executing broker allocates the received order to a venue or SI based on a discretionary algorithm with price as a priority in any decision;
  - By sending the order directly to the venue of preference;
  - Via a bilateral method, like an SI or another 'Over The Counter' method(see chapter 4.4);

EPE will execute client orders investing in European shares and ETFs tradeable at Equiduct via its own Trading Participation membership at Equiduct. Equiduct makes use of Volume Weighted Best Bid and Offer (VBBO). Meaning the VBBO is the best volume weighted bid/offer price clients could obtain if their order was optimally routed to multiple venues to interact with the best priced liquidity available at the time the order was submitted. Equiduct has access to Pan European venues and their orderbook, like for example, Euronext, Deutsche Boerse, CBOE Europe BATS and CBOE Europe Chix.

EPE will route all European and US shares and ETFs which are not offered by Equiduct to an executing broker. The external executing broker has access to multiple Trading Venues and Systematic Internalizers and will make use of their smart order router to route between these Trading Venues and Systematic Internalizers.

When Your order will be executed outside a Trading Venue (e.g. via a bilateral method), You will face counterparty risk. This risk means that when Your counterparty (any third-party, such as a broker) becomes insolvent it may not be able to meet its contractual obligations to you. When trading on-exchange Your counterparty risks might be reduced because your trade will usually be cleared against a central counterparty (CCP). CCPs are subject to financial supervision and various risk mitigation rules, such as high capital buffers and collateralization rules which enhances your protection against counterparty risks

In annex I to this Policy we have listed the execution venues directly or indirectly used by us. Not all available execution venues are selected, because of the high costs of some venues or high costs for post trading. This means that sometimes a better price is available at a venue EPE (directly or via the executing broker) has no access to, but taking into account the total consideration of the price and costs, execution on that venue would lead to a negative result for You and therefore that venue is not selected.

Execution venues or execution brokers are selected based on the following execution factors:

- Price: this is the price at which your order can be executed;
- Costs: these are the costs related to the execution of the order;
- Speed: this is the time it takes from the moment You decide to send in an order to the moment it is executed;
- Likelihood of execution and settlement: EPE expects that it is able to execute and settle Your order in a timely manner;
- Nature of the client orders: this is the type of order given by You for example a Market Order or a Limit order.
- Size of Your order: this refers to the size of the order in relation to the average turnover of the specific financial instrument;

For orders of retail clients the cost and the price are normally the most important execution factor.

Annually EPE will publish a report on its website with the top 5 executing brokers and top 5 execution venues used in the preceding year, based on trading volumes.

## **4.2 Order types**

EPE offers the following order types in the EPE mobile application:

### **Market Order**

Market Orders are executed at the best available market price.

Market Buy orders are adjusted to Limit Orders collared up to 5% as a safeguard for unexpected market movements. Market Buy order collars may vary depending on prices of instruments, market conditions and other factors. Market Sell orders are not collared.

The price You see when You create the order may differ from the execution price for both Market Buy orders and Market Sell orders due to price fluctuations. You should be conscious to accept the risk associated with this type of instruction. EPE will not be liable for losses incurred due to the selection of this order type.

### **Limit Order**

Limit Orders specify the maximum price You are willing to pay for a share or the minimum price You want to receive for a share You are selling.

With a limit buy order You will never have to pay more for a share than the given limit. With a limit sell order You will never receive less than the limit You gave.

### **Zero Order**

Zero Orders will be executed every day during an execution window, shortly after the Cutoff Time. The Cutoff Time is the time of day when we will not take new Orders for that day. The price at which a Zero Order will be executed will depend on the prevailing market price at the time the transaction is executed. This may work to Your advantage or disadvantage due to the inherent nature of a moving market. For more information about the operation, definition of the Zero Order and the terms and conditions, please refer to the Product Information Sheets.

Please be aware that EPE is not liable for your choice for this order type and the associated risks such as - but not limited to - losses incurred.

## **4.3 Extraordinary circumstances**

In some situations the obligation of obtaining an optimal result for the execution of Your orders will not apply, for example when the market is very volatile or when EPE or one of its partners is facing technical issues. The focus will then shift to executing Your order in a timely manner.

In situations where the EPE mobile application is unavailable (due to an unscheduled mobile application outage), a telephone service will be available, but only for closing orders.

If an execution venue or execution broker is facing technical issues, new orders will be sent to another execution venue for execution if feasible.

As EPE is not affiliated with any OTC (Over The Counter) markets, EPE cannot facilitate any trades of financial instruments that are traded on OTC markets. In the situation that a financial instrument that is being offered on EPE is being delisted and moved to OTC markets, EPE principally can not offer any further trades on that financial instrument.



Depending on the specific OTC market, EPE may facilitate a single one time sell of the financial instrument on the OTC market, but cannot guarantee this.

#### **4.4 OTC markets**

As EPE is not affiliated with any OTC (Over The Counter) markets, EPE cannot facilitate any trades of financial instruments that are traded on OTC markets. In the situation that a financial instrument that is being offered on EPE is being delisted and moved to OTC markets, EPE principally can not offer any further trades on that financial instrument. Depending on the specific OTC market, EPE may facilitate a single one time sell of the financial instrument on the OTC market, but cannot guarantee this.

#### **4.5 List of executing brokers**

The executing broker EPE partnered with for the execution of orders placed through the EPE mobile application is ABN AMRO Clearing Bank N.V. Execution venues used are CBOE Europe BATS and CBOE Europe Chix and Tower Research Capital as SI.

This partner is also responsible for the clearing, settlement and custody of the shares offered through the EPE mobile application.

#### **4.6 List of membership of Execution Venue**

EPE is a Trading Participant of Equiduct and EPE may decide to execute orders through the EPE mobile application directly on this Regulated market. ABN AMRO Clearing Bank N.V. will take care of the clearing, settlement and custody of the shares offered through the EPE mobile application.

#### **4.7 Fractional Trading**

Fractional shares is a term used to describe the purchase of a proportion of a share or exchange-traded fund (ETF). It allows You to purchase securities in monetary amounts rather than share quantities. One of the benefits of fractional shares is that it provides diversification for relatively small investments, but You should be aware of the unique features, risks and limitations prior to investing. This is noted in our Risk Disclosure document.

Fractions of shares are not tradable at an execution venue. Orders in these small sizes will therefore be executed outside of a Regulated Market or MTF. The execution of fractional shares is performed by a Systematic Internalizer. EPE will only allow fractional trading in shares and ETFs with sufficient liquidity.

You can place real-time fractional share orders in Euro amounts or share amounts. All orders will be rounded to the nearest cent. When You create an order an indication will be displayed

how many fractional shares you can purchase. When the order is executed the actual number of fractions will be displayed and the total Euro amount.

You can use the market order type for fractional trading. This order type is described in this document.

All fractional orders are transmitted by EPE to an executing broker which will execute the order. When an order contains multiple shares and a fractional part. The rounded number of shares will smart order routed between multiple venues. The fractional part of the order is transmitted by the executing broker to a Systematic Internaliser which will execute the order. In this case, the fractional execution price will be the same as the execution price for the multiple shares in the market. On the occasion that the order has only a fractional number of shares, the order will be transmitted by the executing broker to the Systematic Internalizer and will execute the order immediately at the market price of that moment provided by their data vendor.

## **5 Cash handling partner**

EPE is not entitled to hold any client money. EPE has therefore entered into arrangements with a partner responsible for the handling of Your money.

For this partnership a proper due diligence needs to take place to ensure the partnership will be in the best interest of the client and makes sense from a business perspective. It is important that EPE exercises due skill, care and diligence when entering into, managing or terminating any arrangement with a partner for the handling of Your money.

To make sure Your money is handled fairly and correctly, EPE ensures the following conditions are met:

- a) Client money is handled by an institution that provides the required safety guarantees (e.g. Deposits Guarantee System (DGS) or Investments Compensation Scheme (BCS)<sup>1</sup>
- b) Client money is fully segregated from the capital of the partner;
- c) Client money is administered individually.

The aspects mentioned in chapter 3.1 in relation to the assessment of a potential executing broker also apply when assessing a potential partner for the handling of Your money.

The partner responsible for the handling of Your money in relation to the EPE mobile application is ABN AMRO Clearing Bank N.V.

## **6 Monitoring and review**

EPE undertakes to monitor execution performance and execution quality of the executing broker and Execution Venues on an ongoing basis.

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<sup>1</sup> DGS = Deposito Garantie Stelsel and BCS = Beleggers Compensatie Stelsel. Both guarantee systems are applicable under Dutch law.

This Policy is reviewed on an annual basis or on the occurrence of a material change in the execution arrangements of the executing broker or in underlying regulatory obligations. The purpose of the review is to assess whether This Policy and the order execution of the executing broker and Execution Venues are reasonably designed to enable EPE to obtain the best possible result for the execution of Your orders. More specific EPE will monitor the execution quality of the execution brokers and Execution Venues. On your request we will also demonstrate that we have executed your order in accordance with this Execution Policy.

You will be notified of any material changes to This Policy.

## **ANNEX I**

Execution venues and brokers used by EPE.

The below list is not an exhaustive list but contains the execution venues on which EPE places significant reliance. EPE is allowed to use other execution venues if needed in accordance with this best execution policy.

<b>Investment product</b>	<b>Execution Venue</b>	<b>Direct/Broker</b>
ETFs	CBOE Europe	Broker
ETFs	Equiduct	Broker/Direct
ETFs	Tower (SI)	Broker
ETFs (fractions)	AACB (SI)	Broker
Shares	CBOE Europe BATS	Broker
Shares	CBOE Europe Chix	Broker
Shares	Equiduct	Broker/Direct
Shares	Tower (SI)	Broker
Shares (fractions)	AACB (SI)	Broker