



## EXECUTION POLICY

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### 1) Introduction

The Execution Policy should be read in conjunction with our Account Agreement or General Terms, as applicable, and, as relevant to your account, our Terms covering Spot Forex ("Spot FX"), Off-Exchange Options, CFD and Spread Bet trading. This document applies to the execution of all products and services offered by GFT. Depending on the region, some products are not available due to regulatory restrictions. Please contact GFT for more information regarding these restrictions.

GFT refers to Global Futures & Forex, Ltd. and all of its divisions, branches and subsidiaries, including Global Forex Trading, FX 360, GFT Global Markets Asia Pte. Ltd., GFT Global Markets UK Limited and GFT DMCC. Global Futures & Forex, Ltd., doing business as Global Forex Trading and as GFT Futures, is registered with the U.S. Commodity Futures Trading Commission as a futures commission merchant, and is a member of the National Futures Association. In Japan, Global Futures & Forex, Ltd. is registered with the Financial Services Agency as a financial instruments firm and is a member of the Financial Futures Association of Japan. In Australia, GFT refers to Global Futures & Forex, Ltd., and is registered with the Australian Securities and Investment Commission. In the United Kingdom, GFT is the business name of GFT Global Markets UK Limited, which is registered in England and Wales, and is authorized and regulated by the Financial Services Authority. All contracts for difference (CFD) transactions are handled by GFT Global Markets UK Limited or the GFT affiliate in Australia. In Singapore, this information is made available to you by or for GFT Global Markets Asia Pte. Ltd. In Dubai, GFT is the business name of GFT DMCC, where GFT is Registered & Licensed as a FREEZONE Company under the Rules and Regulations of DMCCA.

All clients are advised that trading foreign exchange contracts, off-exchange options, CFDs, Spread Bets, derivatives and other investment products which are leveraged, can carry a high level of risk and may not be suitable for all investors. It is possible to lose more than the initial investment. The risks must be understood prior to trading.

### 2) Trading Hours

- a) A Client may execute a trade twenty-four (24) hours a day beginning at 17:00 hours (5:00 p.m.) on Sunday, (17:30 hours for off-exchange options) and ending at 17:00 hours (5:00 p.m.) on Friday for all investment products. Times referenced in this Execution Policy are Eastern Time in the United States (ET).
- b) At 17:00 hours (5:00 p.m.) each Friday, trading will be disabled until Sunday 17:00 hours (5:00 p.m.).
- c) Clients will be informed in advance by GFT on a best efforts basis of changes in operating hours due to daylight savings/summertime changes, holidays and special system maintenance requirements.

Please note: All markets do not trade 24 hours a day and some markets may not open right at 5:00 pm ET.

Please reference the market information sheets found on our websites [www.gftforex.com](http://www.gftforex.com), [www.gftuk.com](http://www.gftuk.com), <http://www.gft.com.au>, [www.gftasia.com](http://www.gftasia.com), or [www.gftarabic.com](http://www.gftarabic.com) for exact market hours.

### 3) Execution Services

GFT and its subsidiaries provide execution services in Spot FX, Off-Exchange Options, Contracts for Difference ("CFD") and Spread Betting. These services are offered utilizing the following methods:

- a) via one of our trading platforms or
- b) by telephone directly to our dealing desk

GFT or its subsidiaries is the principal to all trades and acts as the execution venue for all orders.

### 4) Order Execution

The following order types are available for foreign currency (forex), off exchange option transactions, CFDs and Spread Bets.

Please note the following factors are taken into consideration when executing customer orders:

*Instrument*

*Price*

*Size*

*Costs*

*Speed and Likelihood of Execution*

*Type of trade*

- a) **Stop Orders:** Stop Orders are activated at the price designated by the client. The next price that is available is where the stop order will be executed. Buy Stop orders are executed at the next available offer price and Sell Stop orders are executed at the next available bid price.
- b) **Limit Orders:** Limit Orders are executed at the customer requested price or better if the price is available.
- c) **Market Orders:** Market Orders are executed at the best available price. The price that appears in the client's ticket prior to submission is the last price only and does not constitute the actual execution price. Once the submitted order is received it will be executed at the next best available price.
- d) **Direct Deals:** Direct deal orders are typically price specific. Orders are filled at requested price or the customer is quoted to the current market price. A slippage tolerance can be set on direct deal orders. This functionality is discussed in later sections of this policy. Direct deal orders may not be available for all instruments offered by GFT.

- e) Attached Stop Orders and Attached Limit Orders: Attached stop and limit orders are only available on binary CFDs and binary Spread Bets. The user may specify the attached order level by indicating either
  - i. the price at which the attached order should be booked or
  - ii. the number of points from the parent order level at which the attached order should be booked. In the latter case, if the parent order is a Market Order, Stop Order or Limit Order, the attached order will be booked the specified number of points away from the price at which the parent order was submitted and not from the price at which the parent order was filled.

#### Placing an Order

Orders are accepted through the Internet, by mobile technology or by telephoning the GFT Dealing Desk. Off-exchange Options are not available through mobile technology or our web based platform. Each customer is responsible for all orders placed by that customer, and should fully understand the mechanics and method of execution of each order before placing it. GFT's descriptions of the various types of orders are summaries and do not describe all aspects of each order. If you have any questions as to how any of the types of orders will be executed, please call a GFT representative for an explanation.

#### Disputed Orders

All orders placed through the dealing desk are confirmed by the system and appear on the system's trading reports. An order will be deemed fair, accurate, and undisputed unless a Client disputes an order within 4 days of the trade being executed.

#### Confirmed Orders

Once an order has been confirmed electronically through the dealing desk, its terms are final and the obligation of the Client is established unless within the appropriate time a dispute is registered and per the sole discretion of GFT, a correction is to be made by GFT.

#### Non-Executable Orders

Any order placed by a Client whose account lacks sufficient equity will be deemed to be a non-executable order, and thus may not be executed by the System. Similarly, Stop and Limit orders executed outside of the Available Margin may not be executed. Orders on binary CFDs and binary Spread Bets may not be executable if the order is received after the Last Dealing Time. Such non-executable orders will be rejected immediately. Orders that are deemed to be non-executable orders may not be recorded into the System. Nevertheless, if, notwithstanding this rule, GFT executes such a trade, the Client will be responsible for the resulting position and the account's performance. Furthermore, if any such trade is made, GFT, at its sole discretion, may immediately close out any such position.

#### Working Orders while GFT is closed

When GFT is closed, such as holidays and weekends, working orders (Stops, Limits and OCO orders) are not active and will not be filled until GFT reopens for business. Orders will then only be filled based on real-time prices and not previous prices that might have occurred while GFT was closed. Orders working in products which are not traded 24 hours a day will be handled the same way when the market reopens.

### 5) Pricing

GFT and its subsidiaries view the importance of the price in the execution of a trade for a client as being high.

The spreads for each instrument can be viewed in GFT's market information sheets for Spot FX, Off-Exchange Options, CFDs and Spread Betting on our website [www.gftforex.com](http://www.gftforex.com), [www.gftuk.com](http://www.gftuk.com), <http://www.gft.com.au>, [www.gftasia.com](http://www.gftasia.com), or [www.gftarabic.com](http://www.gftarabic.com).

#### a) Spot FX, CFD FX and Spread Bet FX

Spot FX, CFD FX, SpreadBet FX price discovery is obtained from liquidity providers in the wholesale market. GFT uses this liquidity as guidance in determining bid/ask prices but is not bound to use this liquidity in any particular manner. GFT's bid/ask spread may be tighter or wider than these wholesale prices, and is dictated by overall liquidity and demand. The bid/ask price of a particular price feed is universal for all customers who subscribe to that feed. Some price feeds display a discounted spread and subscribers to some of these discounted feeds may be charged a commission, which is disclosed to our customers. GFT is the counterparty to all transactions.

#### b) Off-Exchange Options

GFT's prices for off-exchange options are derived internally using market observable inputs obtained from our liquidity providers or third party vendors. A fair value price is generated by GFT's option pricing engine and then a spread is added to create a bid and offer price. Where GFT continues to quote option prices outside of traditional option trading hours, spreads may be increased and maximum trade size may be restricted.

#### c) CFD and Spread Bet Indices

GFT's prices for cash and futures based indices are derived from the underlying futures exchange of the instrument. In the case of cash markets an adjustment called a fair value adjustment is made to take account of financing costs and anticipated dividends that will occur during the period between the maturity date of the cash index and the maturity date of the underlying future.

Where GFT continues to quote prices outside of the market hours of the underlying future, it creates its prices by taking into account such factors as the current prices of other worldwide indices and may be subject to restrictions in maximum size and increased spreads.

A mid price is derived from these prices and then a GFT spread is added to the mid price to create a bid and offer price.

- d) CFD and Spread Bet Commodities  
GFT derives its prices for commodities instruments from the underlying futures prices to which they relate except for spot markets where a fair value adjustment is made to take into account financing costs that will occur during the period between the maturity date of the spot commodity and the maturity date its underlying future.  
A mid price is derived from these prices and then a GFT spread is added to the mid price to create a bid and offer price.
- e) CFD and Spread Bet Bonds  
GFT derives its prices for Bonds instruments from the underlying futures prices to which they relate.  
A mid price is derived from these prices and then a GFT spread is added to the mid price to create a bid and offer price.
- f) CFD and Spread Bet Interest Rates  
GFT derives its prices for Interest Rate instruments from the underlying futures prices to which they relate  
A mid price is derived from these prices and then a GFT spread is added to the mid price to create a bid and offer price.
- g) CFD and Spread Bet Equities  
GFT derives its prices from one or more data sources that reflect the underlying exchanges' prices. Where this data is unavailable, GFT will base its prices on the last traded price of the underlying instrument. In the case of Spread Betting GFTs spread will be added the derived bid and offer prices.
- h) Binary CFDs and Binary Spread Bets  
GFT's prices for binary CFDs and binary Spread Bets are derived internally using market observable inputs. A fair price is generated by GFT's binary CFD and binary Spread Bet pricing engine and then a spread is added to create a bid and offer price. Binary CFD and binary Spread Bet prices on indices are derived from the GFT CFD and Spread Bet index prices to which they relate. Binary CFD and binary Spread Bet prices on commodities are derived from the GFT CFD and Spread Bet commodity prices to which they relate. Binary CFD and binary Spread Bet prices on FX are derived from the GFT CFD and Spread Bet FX prices to which they relate.

## 6) **Slippage and Re-quoting Policy**

Slippage is a term referring to a market situation in which an Order for a particular Currency Pair is filled at a price which is different from the requested price of the Order because the price requested is no longer available. GFT applies slippage settings uniformly regardless of the direction in which the market has moved. If GFT decides to re-quote prices when the market has moved against it, GFT will also re-quote prices when the market has moved in its favour. GFT does not apply different slippage settings or re-quoting practices based on the customer. If GFT decides to do so, GFT will disclose this fact to the client and indicate the guidelines used to determine appropriate settings and practices for that client.

Slippage is possible on all Order types. Stop Orders are activated at the price designated by the client. The Stop Order will be executed at the next price that is available. Buy Stop orders are executed at the next available offer price and Sell Stop orders are executed at the next available bid price. The possibility of slippage increases during fundamental announcements, at illiquid times, and at times of extreme market volatility. The release of fundamental data and extreme world events many times causes increased volatility in the market. When economic data or world events are announced, the market may "gap" in a particular direction. This means that there are no tradable prices between the actual price at which the market was trading prior to a fundamental announcement or world event and the price available after the market has adjusted, following the announcement or event. Prices move very quickly and orders are filled in some cases at prices very far away from the stop price.

- a) GFT is closed from Friday at 17:00 hours (5 p.m.) until Sunday at 17:00 hours (5 p.m.). During this time markets may move. All stops which are due for execution will be filled at the opening rate which GFT is quoting at 17:00 hours (5 p.m.) on Sunday.
- b) When a submitted Market Order is received by GFT it will be executed at the next best available price, which may not be the price reflected in GFT's platform at the time the order was submitted.
- c) The client has the ability to control slippage on direct deal orders. When the client submits an order, they can select the amount of slippage that they will accept. The client enters a range in pips, either better or worse, than the direct rate entered. If the market is within this range, they will be filled at the new price. The fill may, however, be different than the direct deal price that they submitted. Direct deal orders which are outside of slippage amount will not be filled and may be re-quoted.

If a client does not set an amount of acceptable slippage the direct deal order will be filled at the client's price or it will be re-quoted. If a client places a direct deal order and the order is received by GFT and the market is within a half (.5) and one (1) pip on all major currency pairs or between two (2) and one-hundred (100) pips on all exotic currency pairs, from the customer requested price, the order will be filled at the requested price.

Note: the direct deal order type may not be available for all instruments.

- d) When a Stop Order is activated using GFT's G3BO, it will be executed at the market price, which may not be the price designated by the client.

## 7) **Invalid Prices**

No working orders (stops or limits) will be filled if an invalid price occurs. Invalid prices occur when incorrect price information is entered into DealBook. Invalid prices are removed from the price charts to alleviate confusion.

## 8) Size

GFT and its subsidiaries view the relative importance of size as high. GFT sets a minimum and maximum size for instruments that it trades. These can be viewed in market information sheets for Spot FX, Off-Exchange Options, CFD's, and Spread bets, on our website [www.gftforex.com](http://www.gftforex.com), [www.GFT\\_UK.com](http://www.GFT_UK.com), [www.gft.com.au](http://www.gft.com.au), [www.gftasia.com](http://www.gftasia.com), or [www.gftarabic.com](http://www.gftarabic.com). For CFD and Spread Betting of Equities, maximum trade or bet sizes will vary from equity to equity, according to underlying liquidity and, in the case of UK shares, "Normal Market Size".

## 9) Costs

GFT and its subsidiaries may charge the following types of costs:

### a) GFT Spreads

These are detailed in the market information sheets available on the applicable website.

### b) Commissions

These may be charged on the opening and closing of a position.

### c) Conversion Charges

If you must deposit or withdrawal funds in a currency other than the base currency of your GFT account, GFT will convert the funds to your base currency with a conversion fee charge. The conversion rate will be the current GFT Ask (Buy) rate plus a conversion premium.

The premium covers the cost of purchasing small and uneven amounts of physical currency from other parties.

### d) Financing Charges

These will be generally be charged on rolling spot positions and long Equity CFD positions and represent the interest cost of holding the position. If the position is a short position a credit will normally be applied to your account.

### e) Automatic Roll Over of Foreign Currency (Forex) Trades Not Noticed for Delivery – Net Based

All contracts for foreign currency are executed for actual delivery, but where trades are not noticed for settlement by delivery by the client, the foreign currency transaction will be rolled via swap transaction into the next applicable spot value date. GFT will continue to roll customer positions until client notices GFT of intent to take delivery or closes out the currency position.

At approximately 17:00 hours (5:00 p.m.) daily, client positions will be rolled into the next applicable value date; GFT uses the Tom/Next swap rate as the bench mark for these currency rollovers. All transactions done after 17:00 hours (5:00 p.m.) will be for the new value date.

### f) Financing of Foreign Currency (Forex) Trades – Position Based, CFD and Spread Betting

Each business day at 17:00 hours (5:00 p.m.), a debit or credit will be applied to the customer account to account for the interest payment or receipt due as a result of the positions held in the customer's account. This procedure will occur daily until the client closes out the currency position.

### g) Guaranteed Stop Loss premiums

A charge will be applied by adjusting the trade price whenever a guaranteed stop loss is utilized. The amount of the charge can be viewed in GFT's market information sheets for Spot FX, CFDs and Spread Betting on our various websites. Guaranteed stops may not be available on all instruments offered by GFT.

### h) Inactivity Fees.

Customer accounts will be subject to a monthly inactivity fee if no trading activity has occurred for a period of 60 days or more. Trading activity is defined as the opening and/or closing of a position or maintaining an open position during that period. These fees can be viewed in the fee schedule found on our website [www.gftforex.com](http://www.gftforex.com), [www.gftuk.com](http://www.gftuk.com), [www.gft.com.au](http://www.gft.com.au), [www.gftasia.com](http://www.gftasia.com), or [www.gftarabic.com](http://www.gftarabic.com).

### i) Processing Fees.

Customer accounts may be subject to additional fees associated with maintaining the account and facilitating certain transactions. These fees can be viewed in the fee schedule found on our website [www.gftforex.com](http://www.gftforex.com), [www.gftuk.com](http://www.gftuk.com), <http://www.gft.com.au>, [www.gftasia.com](http://www.gftasia.com), or [www.gftarabic.com](http://www.gftarabic.com).

## 10) Speed and Likelihood of Execution

GFT and its subsidiaries consider this to be of high importance and provide multiple methods of execution to automate execution. However, there may be circumstances such as unusual or volatile market conditions, delay in the timeliness of an order being received by GFT, risk management decision, discrepancies between rate on an order and market rate, or size of your order which may result in your order being manually priced by our dealing desk. This may cause a delay in processing your order which may affect the price at which your order may be executed. Please be reminded that customers whose orders often fall into such condition may meet delay in execution even for normal orders.

**11) Type of trade**

The type of trade, including whether it is a stop loss, limit or opening order, can be an important factor of execution where it might determine whether it is priced and executed manually rather than automatically.

**12) Specific Instructions**

If GFT and its subsidiaries have agreed specific trade instructions from a client, those instructions will take priority over other determinants as set out in this Execution Policy. Where such instructions are not comprehensive, then for those parts not covered the firm will follow the Policy as required for executing the trade. In general, however, the firm will still exercise its judgement in balancing the various execution factors in order to obtain the most advantageous outcome for the client on a consistent basis.

Where execution under special instructions from a client results in the firm having to use a different process than that specified in this policy, the firm may pass on to the client any direct costs incurred, but only where such charges are first discussed and agreed with the client.

In following special instructions as a priority over the usual approach to execution as defined by this Execution Policy, the firm will take into account the respective client's experience and knowledge of the relevant markets when discussing those instructions with the client.

**13) Recording of Orders**

All telephone calls placed through the Dealing Desk, are recorded by telephone recording devices and are kept on file in accordance with regulatory requirements. All conversations concerning price quote requests, order placement and execution, confirmations and any other trading related issues, are also generally recorded to ensure fairness and accuracy for all parties involved in the delivery and execution of a trading order and are also kept in accordance with regulatory requirements.

**14) Instructions for Placing a Telephone Order with the Dealing Desk**

a) The Dealing Desk can be contacted using the following telephone numbers based on your location

- (1) US Dealing Desk - 1-877-465-0787 or (616) 974-3670
- (2) UK Dealing Desk - 44 207 170 0750
- (3) Singapore (FX) 65 6227 6409, (CFD) 65 6593 9930

For Singapore office, instructions to place a telephone order is only available Monday–Friday 8:30am – 5:30pm SGT

b) Once the telephone is answered, have ready the following information for the dealer who has answered your call:

- (1) Your Account Number
- (2) Answer to account security question
- (3) Whether You are Buying or Selling
- (4) The Volume of Your Order
- (5) The Currency Pair or Instrument You Wish to Trade
- (6) The price at which you would like your order placed
- (7) The type of order (limit, stop, and/or OCO)

**15) Review of this Policy**

This policy will be regularly reviewed by senior management to identify any inadequacies and to ensure that GFT and its subsidiaries achieve execution on a consistent basis in relation to this policy