

The logo for Oval Money, featuring the word "Oval" in a white, rounded, sans-serif font. The logo is positioned on a large green circular shape that occupies the top-left portion of the page.

Oval

OVAL MONEY (EUROPE) LTD

Order Execution Policy

OCTOBER 2022

A yellow decorative shape in the bottom-right corner of the page, consisting of a curved, triangular-like form.

Order Execution Policy



Contents

- 1. INTRODUCTION..... 2
- 2. PURPOSE 2
- 3. DEFINITIONS 2
- 4. TYPE OF FINANCIAL INSTRUMENTS..... 2
- 5. WHAT IS THE BEST EXECUTION 2
- 6. BEST EXECUTION FACTORS 3
- 7. BEST EXECUTION CRITERIA..... 5
- 8. SPECIFIC INSTRUCTIONS..... 6
- 9. EXECUTION OF CLIENT’S ORDERS 7
- 10. CLIENT’S CONSENT 7
- 11. RECORD KEEPING 7
- 12. REVIEW OF THE POLICY 7

Order Execution Policy



1. INTRODUCTION

Oval Money (Europe) Ltd (the “Company, “we”, or “us”), operating through the trading names Oval and OvalX, has adopted the following Order Execution Policy (the “Policy”).

The Company is authorised and licensed under the Cyprus Securities and Exchange Commission (‘CySEC’) with license number 096/08 in accordance with MiFID II. Moreover, Oval Money (Europe) Ltd is an Electronic Money Distributor (“EMD”) Agent of UAB PayrNet, an Electronic Money Institution authorised by the Bank of Lithuania under the Law on Electronic Money and Electronic Money Institutions (license reference 72, issued on 2020-08-28) for the issuing of electronic money and the provision of the related payment services.

The Policy is issued pursuant to the Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments (“MiFID II”) as amended. This Policy provides the procedures and methods established and implemented by the Company to ensure that the best possible, and most favourable outcome is obtained for its clients on a consistent basis, when executing client orders and/or transmitting orders to third parties (i.e. other brokers) for execution.

2. PURPOSE

This Policy applies to both retail and professional clients. However, as per the Article 30(1) of the Directive 2014/65/EU the Policy does not apply to Eligible Counterparties.

In addition to that, where the Company receives a specific instruction from the Client, it shall execute the order following this specific instruction.

Also, the Policy applies to all instruments which the Clients trade with the Company.

3. DEFINITIONS

Eligible Counterparty has the meaning given in the Investment Services Law.

Oval App is the Company's App, where the client can find 'Save', where he can set and find his saving goals, 'Invest' where he can manage his investments and 'Pay' the centre of app availability.

4. TYPE OF FINANCIAL INSTRUMENTS

The Company offers access to Transferable Securities to its clients through the Oval App.

5. WHAT IS THE BEST EXECUTION

The Company is committed to ensure that clients are treated fairly and receive the best possible price when executing a trade, whatever the product.

Order Execution Policy



Best execution refers to our responsibility to take all sufficient steps to achieve the best possible result on a consistent basis when executing orders on our clients' behalf. In practice there are a variety of factors that could be considered in order to achieve best execution.

6. BEST EXECUTION FACTORS

When receiving and executing and/or transmitting clients' orders to third party, the Company shall consider the following sufficient factors to obtain the best possible result for its clients:

- a) **Price:** The Company will quote two prices: the higher price (ASK) at which the client can buy (go long) and the lower price (BID) at which the Client cannot sell (go short). The difference between the lower and the higher price of a given Financial Instrument is the spread. Such orders as Buy, Buy Limit, Buy Stop, Buy Stop Limit and Stop Loss, Take Profit for opened short position are executed at ASK price. Such orders as Sell, Sell Limit, Sell Stop, Sell Stop Limit and Stop Loss, Take Profit for opened long position are executed at BID price. The Company's prices will be available at all times in the Oval App. The Company updates its prices as frequently as the limitations of technology and communications links allow. The Company reviews its third-party external reference sources in frequent periods to ensure that the data obtained continues to remain competitive.
- b) **Costs:** The Company incorporates commissions or fees into its quoted price. The Company may be charging the account holder a commission fee every time they are opening and/or closing a position. Commission fees are automatically calculated based on the volume traded. Further information about the costs can be found in the Company's Oval App. Also, the Company may be charging management fees on a daily basis. More information regarding management fees can be found in the Company's KIDs.
- c) **Slippage:** At the time that an order is presented for execution, the specific price requested by the client may not be available; therefore, the order will be executed close to or a number of pips away from the client's requested price. If the execution price is better than the price requested by the client this is referred to as 'positive slippage'. In contrast, if the execution price is worse than the price requested by the client this is referred to as 'negative slippage'. Please note that 'slippage' is a normal market practice and a regular feature of the foreign exchange and stock markets under conditions such as illiquidity and volatility due to news announcements, economic events and market openings. The Company's automated execution software does not operate based on any individual parameters related to the execution of orders through any specific client accounts.
- d) **Speed of execution:** Because of the levels of volatility affecting both price and volume, the Company seeks to provide client's orders with the highest speed of execution, as much as possible.
- e) **Likelihood of execution:** The Company's Liquidity Provider is acting as the sole execution venue for the execution of the Client's orders for the financial instruments provided by the Company, therefore all orders opened with the Company will be closed with the Liquidity Provider. The Company seeks to provide Client orders with the fastest execution reasonably possible, and at the requested price. However, in certain cases the Company might not be

Order Execution Policy



able to arrange an order. These certain cases are so-called as “market conditions” and includes the:

- during volatile markets;
- during times of market news and events;
- during market opening times;
- where there is a rapid price movement of a particular instrument
- where the underline instrument has been suspended or due to the Company’s internal risk;
- if there is insufficient liquidity for the execution of the specific volume at the requested price.

In these cases, the Company has the right to decline the order of any type or to offer the Client a new price for “market order”. Upon execution of the transactions the Company shall proceed to a settlement of such transactions.

- f) **Likelihood of settlement:** Settlement of financial instruments such as Transferrable Securities will depend to the market practice and the capability of the Company’s liquidity providers to settle within that market.
- g) **Size of order:** The value of minimum sizes of orders regarding all the products are available on the Company’s Oval App. The size of the order may affect the price of execution. This is because the prices displayed are the top of the order book thus larger orders may not receive the price displayed on the Oval App). We reserve the right to decline any order or transaction, as explained in the Terms and Conditions.
- h) **Nature of order:**
- **Market Order:** this is an order to buy or sell at the current market price that is available. The system automatically aggregates the volume received from third party liquidity providers and executes the ‘market order’ at VWAP (‘Volume-Weighted Average Price’) that is the best available price at the time of the execution.
 - **Pending Order:** Under certain trading conditions (including but not limited to situations of high market volatility or illiquidity and market gaps) it may not be possible for the Company to execute pending orders at the price specified by the Client. In this case, the Company reserves the right to execute the order or modify the opening and/or closing price to provide the next best price.
- i) **Market Conditions:** The Company seeks to provide Client orders with the fastest execution reasonably possible, and at the requested price. However, in certain cases the Company might not be able to arrange an order. These certain cases are so-called as “market conditions” and includes the:
- **during volatile markets;**
 - **during times of market news and events;**
 - **during market opening times;**
 - **where there is a rapid price movement of a particular instrument**
 - **where the underline instrument has been suspended or due to the Company’s internal risk;**

Order Execution Policy



- if there is insufficient liquidity for the execution of the specific volume at the requested price.

In these cases, the Company has the right to decline the order of any type or to offer the Client a new price for “market order”. Upon execution of the transactions the Company shall proceed to a settlement of such transactions.

j) **Any other relevant factors**

The Company considers as relevant factors that might affect the execution of Clients Orders, fundamental announcements, and unusual market conditions such as low liquidity or/and high volatility. At that time the Company may execute the orders manually as they might have an impact on the price and speed the orders are executed.

The Company will take all necessary steps to obtain the best possible result for its Clients. However, during times of high demand manual pricing and/or execution may cause delays in processing an order which they can have an impact on the price and speed at which the order is executed. Additionally, in the case of any communication or technical failure, as well as any incorrect reflection on the quotes feed, the Company reserves the right not to execute an order or change the opening and/or closing price of a particular order.

It is important to note that, in certain cases and as a result of a system failure or otherwise, the Company may have no alternative but to execute an order using a method other than the method it has selected based on this Policy. In this kind of cases, the Company will endeavour to execute the order with the best possible terms.

7. BEST EXECUTION CRITERIA

In order to determine the relative importance of these factors, the Company will take into account:

- the characteristics of the client (that is, whether the order was made by a retail or professional client);
- the characteristics of the client order;
- characteristics of the financial instruments involved;
- characteristics of the execution venues being considered;

When executing an order, the best possible result is determined by the total consideration of all the stated factors.

The Company assigns the following importance to the Best Execution Factors:

Factors	Importance Level	Remarks
---------	------------------	---------

Order Execution Policy



Price	High	The Company emphasises on the quality and level of the price data that receives from third parties in order to provide the clients with competitive price quotes. However, the Company do not guarantee that its quoted prices will be at a price which is as good, or better, than one that may have been available elsewhere.
Costs	High	The Company takes all reasonable steps and measures to keep the costs of the client's transactions as low and competitive, to the extent possible. Commissions and management fees may be charged either in the form of a percentage of the overall value of the trade or as fixed amount.
Speed of Execution	High	Execution speed and the opportunity for price improvement are critical to every trader and we continuously monitor these factors to secure that we maintain our high execution standards. However, the use of any form of unstable connection at the Client's end, whether wireless or dial-up, may result in poor or interrupted connectivity, which may cause delays in the transmission of data between the Client and the Company.
Likelihood of Execution	Medium	The Company's Liquidity Provider is the Execution Venue for the execution of the Client's Orders for all the financial instruments provided by the Company. Even though the Company reserves the right to decline or not to accept a Client order, the Company's scope is to execute all Clients' orders, to the extent possible.
Likelihood of Settlement	Low	See relevant description in Paragraph 6(f).
Size of Order	Low	Please refer to the Company's Oval App for the value of minimum size of an order.
Market Conditions	Low	See relevant description in Paragraph 6(i).

8. SPECIFIC INSTRUCTIONS

In cases where the Client gives to the Company a specific instruction through Oval App in relation to the execution of an order and the Company has accepted this instruction, the Company will execute the order in accordance with that specific instruction.

Order Execution Policy



Nevertheless, if the client provides a specific instruction to carry out an order, then by executing that order the Company will be complying with the Company's duty to provide the client with best execution. This may result in being unable to follow the Company's order execution policy for that particular order.

The Client understands and acknowledges that these specific instructions may contradict the Company's Policy and may not necessarily lead to best execution of his orders. Subject to this, the Client consents that the Company will not be held liable for any direct or indirect loss or damage that may result from the execution of his orders. Risks and consequences are to be borne entirely by the Client.

9. EXECUTION OF CLIENT'S ORDERS

At all times the Company's Liquidity Provider acts as a principal for all the orders of the financial instruments that the Company provides. The Company's Liquidity provider is **Cirdan Capital Management Ltd.** Therefore, the Company act as an agent for all the Client's orders regarding the offered financial instruments.

All the information of the trading conditions for particular instruments are available through Oval App. Holidays are announced through the internal mail or the Oval App.

The Client acknowledges that the transactions entered with the Company for the financial instruments provided by the Company are not undertaken through the Company's Oval App, and accordingly, this may expose the Client to greater risks.

10. CLIENT'S CONSENT

By entering into an Agreement with the Company for the provision of Investment Services, the Client is also consenting to an application for this Order Execution Policy.

11. RECORD KEEPING

For the purpose of this Policy and pursuant to the Best Execution Rules, the Company will maintain records of transactions made by the Client, including details about the costs, speed and likelihood of execution, for a minimum period of five (5) years, unless an additional period is requested by any regulator or relevant laws.

12. REVIEW OF THE POLICY

The Company reserves the right to review the Policy on an annual basis and update it whenever deems necessary, to be in compliance with the laws and regulations.