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BROKR

Best Execution Policy

1. Purpose

This Best Execution Policy (the "Policy") outlines the process that BROKR Ltd. follows when executing trades or transmitting orders for execution to a third party on behalf of its clients. This Policy integrates the Company's obligations under the Markets in Financial Instruments Directive ("MiFID II") and the conduct of business rules of the Malta Financial Services Authority ("MFSA"). The Policy applies to all financial instruments that can be traded with BROKR Ltd ("BROKR").

2. Scope

Best execution under MiFID II applies to retail and professional clients and to all financial instruments dealt in the course of carrying out investment services in the European Union. It requires investment service providers to take all reasonable steps to consistently aim to obtain the best possible result for clients through the Best Execution Policy. Best execution takes into account multiple factors, requiring BROKR to take all reasonable steps to consistently obtain the best possible result for its clients. The Policy contains both regulatory and industry standards.

3. Factors

When executing trades or transmitting orders for execution, BROKR will take into account various execution factors whilst aiming to obtain the best possible result. Each factor is weighted according to the particular nature of the client, the order and the financial instrument in question:

- Price
- Likelihood of full execution and settlement;
- Speed of execution and settlement;
- Reliability of settlement;
- Size and nature of the order;
- Market situation; and
- Other relevant aspects.

BROKR will aim to achieve the best economic value when executing orders, taking into consideration the price of the financial instrument and the costs incurred by the Client, including execution venue fees, clearing and settlement fees and any other fees paid to the parties involved in the execution of the order.

4. Order execution

BROKR executes or transmits orders for execution on behalf of its clients once per week. BROKR may aggregate its client's orders to buy and/or sell. These buy and sell orders are submitted to the third party executing the orders.

5. Partial execution of orders

In case of large (aggregated) buy or sell orders for a given financial instrument, there may be too few parties who want to sell or buy the instrument in question. To prevent orders from disrupting the market and negatively impacting price, BROKR and the third parties involved in the execution of the order may execute these orders partially. If this happens, each client will receive a portion of the order in proportion to their part that has been executed.

BROKR complies with this order execution policy when executing orders to buy and sell financial instruments. Under special circumstances, including the failure of an order system or heavy traffic on the stock exchange, BROKR is not obliged to execute orders within the usual turnaround time. BROKR is also not liable for any loss the customer incurs as a result, except in the event of intent or gross negligence on the part of BROKR.

6. Review and Revision

This Policy will be reviewed and, if necessary, revised annually or more frequently if there are significant changes to BROKR's business model or market conditions.