

TradeZero Europe B.V -Order Execution Policy Summary

Introduction

This document provides a summary of TradeZero Europe B.V.'s ("TradeZero") Order Execution Policy which sets out the steps TradeZero takes to obtain the best possible result for the execution of client orders. A full version of the Order Execution Policy can be made available upon request.

Execution Brokers

TradeZero provides introducing brokerage services and is responsible for the reception and transmission or execution of client orders. TradeZero relies on the services of external executing brokers, which may include affiliated entities, to execute client orders. The executing broker may route order flow to one or more executing partners including any securities exchange, routing broker dealer, order aggregator, market maker, alternative trading system, or any other party to which executing broker may send or route orders for placement and execution.

Execution brokers are required to seek and to obtain the best execution for client orders, including periodically assessing the execution quality of client trades (including analysis of and comparison to execution they could have obtained elsewhere) and by routing orders to markets that provide the most beneficial terms for clients.

Criteria for Best Execution

When executing client orders, TradeZero and the executing broker will need to take all sufficient steps to establish best execution for clients. The criteria for best execution fall under the obligation to execute orders on terms most favorable to clients, taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other relevant consideration. The primary rule of the Order Execution Policy is that orders are executed at the best price and lowest costs that are available on utilized trading venues used to execute client orders.

Monitoring and Review

TradeZero performs regular reviews of trade execution quality to ensure that TradeZero meets its obligations to provide the best execution for its clients' order. This includes evaluating the performance and execution quality of executing brokers, and comparing filled client orders to the national best bid and offer to update routing rules and venues as needed.

Limitations of Best Execution

In certain situations, there may be limitations with respect to best execution. For instance, when TradeZero is following a specific instruction of a client or when a client wishes to choose the place of execution. There may also be extraordinary circumstances where the obligation of obtaining an optimal result will not apply, for example when the market is very volatile or when TradeZero or an executing broker is facing technical issues.

Policy Review

The Order Execution policy is reviewed annually or upon the occurrence of a material change in the execution arrangements of any executing broker or underlying regulatory obligation.