

ARGON FINANCIAL LIMITED

ORDER HANDLING AND EXECUTION POLICY

Under the Markets in Financial Instruments Directive 2014/65/EU ("MiFID II"), The Financial Services (Markets in Financial Instruments) Act 2018 ("the Act") and the Financial Services Act 2019, Argon Financial Limited ("Argon") is required to put in place an Order Handling and Execution Policy. The aim of this Policy is to set out in sufficient detail and in an easy-to-understand way, how Argon will handle the execution of orders on behalf of its clients. This Policy should be read in conjunction with our Terms & Conditions, Conflicts of Interest Policy and Risk Warning Notice, which are all available on request from our Compliance Department by email (compliance@argonfinancial.com).

Introduction

This document is prepared in accordance with Article 27 of MiFID II and reflects Argon's standard practice when dealing with its clients and the steps Argon will take in order to obtain the best possible result when executing orders.

It is Argon's intention to exercise consistent standards and operate appropriate processes across all markets in which Argon operates and it is Argon's policy to;

- Establish and maintain Argon's Order Handling and Execution Policy;
- Provide Argon's Order Handling and Execution Policy to its clients;
- Monitor the effectiveness of Argon's Order Handling and Execution Policy;
- Review the Order Handling and Execution Policy at least annually; and
- Demonstrate that Argon executes orders in accordance with our Policy

Scope

Argon's Order Handling and Execution Policy applies to all client orders executed by Argon acting on your behalf in relation to financial instruments covered under MiFID II. The term "client" should be interpreted with reference to Retail Clients and Professional Clients in the context of the Order Execution Policy.

Where you execute an order through one of our online trading platforms, (a "Direct Instruction") Argon shall be entitled to assume that you have provided Argon with direct instructions. In such circumstances Argon will have complied with its obligation to take all sufficient steps to obtain the best possible result when executing an order on your behalf.

Where you execute your order through the Argon trading desk and provide specific instructions, (a "Specific Instruction") including specifying the characteristics of a bespoke product, either relating to an order or a particular aspect of an order, Argon will execute the order in accordance with those instructions. Where an order arises from your Specific Instruction, Argon is not obliged to follow our Order Handling and Execution Policy.

Where you execute your order through Argon's trading desk, and in the absence of a specific instruction, we will seek to follow Argon's Order Handling and Best Execution Policy for those relevant parts of the order not covered by your instruction. Argon's Order Handling and Best Execution Policy has been determined taking into consideration various execution factors and criteria relevant to your order with the intention of obtaining the best possible result on a consistent basis.

You agree that we shall not owe you a duty of Best Execution in respect for placing orders for instruments which are regulated investments, but fall outside the scope of MiFID II, however Argon will, to its best efforts continue to follow our Best Execution Procedure with all orders regardless.

Best Execution Procedure

With the implementation of MiFID II, the responsibilities on Investment Firms, such as Argon, in respect of executing orders on behalf of clients have been significantly extended. The factors and criteria have been widened to ensure that the best possible result has been achieved for the client, that execution of orders has been fair and ensure that clients remain sufficiently protected. Best Execution obligations do not apply to Eligible Counterparties, however Argon's duty to identify and manage any conflicts of interest remain.

Argon's fundamental principles under its Best Execution Procedure is to ensure that Argon when executing orders takes **all sufficient steps** to obtain the best possible result for our clients, considering;

1. Price;
2. Costs;
3. Speed;
4. Likelihood of execution and settlement;
5. Size; and
6. Nature or any other considerations relevant to the execution of the order

Argon will also consider (i) commissions, (ii) fees, (iii) taxes, (iv) exchanges fees, and (v) clearing and settlement costs when executing orders and choosing execution venues to evaluate the explicit external cost of a transaction.

Argon is also required to consider additional execution factors, and their relative importance to our Best Execution Procedure, ranking them based on the following criteria;

- Client characteristics
- Characteristics and nature of the order
- Characteristics of the underlying financial instrument and the proposed trade
- Characteristics of the execution venue

Execution venue

Argon may use one or more of the following venues or third parties when processing an order on a client's behalf:

- a Broker, on or off a regulated market;
- Multilateral Trading Facilities ("MTF");
- Organised Trading Facility ("OTF");
- Systematic Internaliser ("SI");
- third party Investment Firms and/or affiliates acting as Market Makers and other liquidity providers; and/or
- non-EU entities performing similar functions.

Argon will assess which venue is likely to provide the best possible result for you.

In addition, by consenting to Argon's Order Handling and Execution Policy, you acknowledge that we may frequently be constrained as to the venues upon which Argon can successfully place your trade.

There may be circumstances where your trades can only be successfully placed in one execution venue or in a limited number of execution venues. By consenting to Argon's Order Handling and Execution Policy, you acknowledge that in such circumstances, you acknowledge that our Best Execution Procedure, when taken together, will constitute the most important factors in determining the manner in which your order will be executed.

Where Argon places an order on your behalf for onward execution by a third party, Argon will require that third party to confirm that it will provide best execution in carrying out that transaction.

Compliance

Argon engages and accepts orders from clients in durable means, either electronically, by email or voice based, using dedicated telephone lines. Argon will only accept orders from account holders and/or authorised individuals able to trade on the client account.

Additionally, Argon will also disclose, for each of our venues;

- Venue name
- Class of underlying financial instrument
- Number and volume of client orders executed on that venue, measured against total executed orders
- Percentage of passive/aggressive orders

Argon will review and analysis the quality of execution obtained and review the brokers and dealers to whom Argon transmits orders for execution to ensure they provide for the best execution results on a consistent basis and whether Argon needs to make changes to its execution arrangements.

Should Argon decide to change this policy; we will provide you with sufficient notice.