

CANTOR FITZGERALD IRELAND LTD

BEST EXECUTION POLICY

CANTOR FITZGERALD IRELAND LTD

BEST EXECUTION POLICY

Contents

1. [Introduction](#)
2. [Client Orders & Specific Instructions](#)
3. [Execution Factors](#)
4. [Execution Venues & Instruments](#)
5. [Methodology](#)
6. [Order Handling](#)
7. [Aggregation of Orders](#)
8. [Conflicts of Interest](#)
9. [Reception and Transmission of Orders](#)
10. [Publishing Limit Orders](#)
11. [Monitoring & Review of the Best Execution Policy](#)
12. [Consent & Communication](#)
13. [Research Procurement Agreement \(RPA\)](#)
14. [Best Ex Committee](#)
15. [Roles and Responsibilities](#)
16. [Appendix I](#)

1. Introduction

This document provides important information and sets out how **Cantor Fitzgerald Ireland Ltd (CFIL)** obtain best execution for their clients as defined in MiFID II. Where a distinction applies to Cantor Fitzgerald Asset Management Europe (**CFAME**) it will be annotated as such.

MiFID II, as transposed into Irish Law by Statutory Instrument No. 375/2017, requires that CFIL have in place and operate an Order Execution Policy such that when executing applicable client orders or receiving and transmitting client orders on behalf of clients in respect of financial instruments covered by MiFID II, all sufficient steps are taken to obtain the best possible result ("BPR") on a consistent basis ("Best Execution").

This policy applies to all trades executed by CFIL for all investment funds and clients under their respective umbrellas. It covers all financial instruments traded under MiFID II (e.g., equities, bonds, derivatives, units in collective investment schemes) and includes activities like executing orders, placing orders with other entities, or transmitting orders.

2. Client Orders & Specific Client Instructions

CFIL consider themselves in receipt of a Client Order when a client provides a trading instruction, that we acknowledge, that requires completion of an investment transaction on the Client's behalf. The price achieved or other aspects of the transaction may be affected by how CFIL or executes the order, for example where:

- An agency obligation exists, or
- Orders are "worked" on a Client's behalf either on a principal or riskless principal basis, or
- Orders are placed with entities for execution that result from decisions to deal in financial instruments on a Client's behalf when providing portfolio management services.

Specific Client Instructions:

If a Retail or Professional Client provides a specific instruction to deal, it may prevent CFIL from following the Best Execution Policy, which is designed to obtain the best possible result for the Client on a consistent basis. Where the Client's instructions relate only to a part of the order, the Order Execution Policy may be followed for those parts not covered by such instructions.

CFIL are not under an obligation to provide Best Execution if:

- The client is defined as an Eligible Counterparty ('ECP'), or
- Terms of a transaction are negotiated acting as principal and the client is not placing reliance on CFIL for best execution.
- Dealing on a Request for Quote ('RFQ') basis (professional clients only)
- Trades for requested for non-standard settlement.

3. Execution Factors

When executing Client Orders and owing a duty of Best Execution, CFIL take all sufficient steps to obtain the best possible result, considering the following Execution Factors:

- Price
- Cost
- Speed of execution
- Likelihood of execution and settlement
- Order size
- Nature of Client Order or any other consideration relevant to the execution of the Client Order.

While the weighting and relevance of these factors may vary, price will ordinarily merit high relative importance. For retail clients, the BPR is determined in terms of the total consideration (price of the financial instrument and the costs related to execution, including venue fees, clearing, settlement fees, and any other fees paid to third parties).

Markets, instruments, and transaction types vary greatly in terms of liquidity, depth, transparency, certainty, ease, and speed of execution. CFIL may therefore consider other Execution Criteria that alter the relative importance of execution elements, such as:

- Prevailing market conditions, including fast markets or business continuity events
- Characteristics, size, and settlement terms of the Client Order
- Characteristics of the financial instruments that are the subject of the Client Order
- Characteristics of the execution venues to which that Client Order can be directed
- Whether the client has provided any specific instruction
- Trading Over the Counter ('OTC') execution as opposed to execution on a trading venue

Asset-Specific Rules

For certain securities CFIL aims where possible to seek multiple quotes.

Equities, ETFs, and Securitized Derivatives:

Price, transaction costs, instrument features, market conditions, quality/speed/probability of execution, market access, and settlement quality.

Fixed Income Securities:

Price, transaction costs, instrument features, market conditions, quality/speed/probability of execution, market access, and settlement quality.

OTC Derivatives and Securities Lending:

Price, transaction costs, instrument features, market conditions, quality/speed/probability of execution, market access, counterparty's long-term ability to service the product, and settlement agreements.

Foreign Exchange Transactions:

Price, transaction costs, quality/speed/probability of execution, market access, and processing quality.

Special Cases:

For illiquid assets like real estate or alternative investments without multiple execution venues, best execution focuses on due diligence and negotiation of terms.

4. Execution Venues & Instruments

MiFID II requires that for each financial instrument in which orders are executed, CFIL utilize those venues (sources of liquidity) that enable them to obtain, on a consistent basis, the BPR for client orders. Orders may be executed via electronic trading platforms or high-touch with various brokers and counterparties, depending on the asset. The knowledge and experience of the trading team are critical components of proper channel selection, often utilizing multiple channels in a single order if needed.

CFIL place significant reliance on the execution venues and brokers/counterparties listed in **Appendix I**. The trading team assimilates a broad scope of data inputs to employ and continually assess their

trading strategy, including indications of interest, trade adverts, volume, price action, volatility, relative market performance, news, and events.

Equities & ETFs:

CFIL execute global equities & ETFs on Exchanges in US, Europe and Asia either directly on order book or off order book. Orders may also be transmitted to third-party brokers or executed via MTFs.

Fixed Income Securities:

CFIL can execute Irish Government Bonds against its own book, acting as a primary dealer and Systematic Internaliser. CFIL also can transmit orders to third-party financial institutions.

Contracts for Difference and Spread bets:

Orders are executed through CFIL or regulated financial institutions acting as CFD and Spread betting providers.

Collective Investment Schemes:

Units are transmitted via Pershing's fund platform or to the secondary market direct with the Transfer Agency for the fund.

Structured Products/Structured Deposits:

Trades are negotiated on a bi-lateral basis and executed off-exchange in line with specific client instructions.

OTC Equities:

OTC equities are no longer offered as an investment by CFIL; only exit trades are permitted, following normal best execution procedures.

Digital Assets:

CFIL will not accept orders for retail clients (other than to reduce an existing holding) in Digital assets or related digital assets, including crypto ETFs or companies whose economic model relies on monetizing crypto-related assets.

Non-Standard Settlement:

For non-standard settlement orders, CFIL will use best endeavours to achieve BPR and may change the priority of execution factors.

Minimum Market Cap

CFIL do not facilitate execution (unless exiting an existing position) in resource related equities with a market cap below €100m, and non-resource related equities below €40m.

5. Methodology

Having assessed the relevant Execution Factors and Execution Criteria, and considering any specific client instructions, CFIL select the most appropriate Execution Venue to achieve consistently the BPR on the Client's behalf. The trading team's qualitative judgment and experience is especially important for less liquid securities.

6. Order Handling

CFIL have order handling procedures and execution arrangement guidelines in place to provide for the prompt, fair, and expeditious execution of client orders.

7. Aggregation of Orders

CFIL may aggregate orders from different funds or clients, provided it is unlikely to disadvantage any individual client or fund. Orders are handled through automated and manual systems with oversight to ensure prompt and fair allocation ahead of execution. Executed block orders are allocated pro-rata. If aggregated orders can be executed only in part, the partial execution is allocated to participants on a pro-rata basis.

8. Conflicts of Interest

CFIL may execute orders against its own book or through an affiliate. The firm maintains a Conflicts of Interest Policy to identify and manage any potential conflicts that may arise. These include, but are not limited to, trading as principal and executing orders with affiliates. The firm takes all appropriate steps to ensure that any actual or potential conflicts of interest do not prevent it from providing BPR to clients.

9. Reception and Transmission of Orders

Subject to any specific client instructions, CFIL may transmit an order to another entity (affiliated or external) for execution if this method is more likely to achieve the BPR. When transmitting such orders, CFIL remain obligated to ensure BPR for the Client and systematically review and monitor the standards of execution received from third-party brokers and affiliates and report to the Best-Ex committee on a periodic basis.

10. Publishing Limit Orders

If a client provides a limit order, it may not always be possible to execute that order under prevailing market conditions. MiFID II requires CFIL to make the Client's order public unless the Client agrees

otherwise. By consenting to this policy, the Client agrees to CFIL exercising discretion as to whether or not to make client orders public.

11. Monitoring & Review of the Best Execution Policy

CFIL monitor the effectiveness of their execution arrangements and the Best Execution Policy at least annually or whenever a material change occurs. The trading team monitors execution quality daily and escalates issues to the Head of Risk. Reviews assess broker performance, execution quality, and compliance with this policy, using tools like transaction cost analysis (TCA). TCA reports are collected quarterly and analysed by the trading team and detailed findings reported to Best Ex committee on a quarterly basis.

Both quantitative (e.g. implementation shortfall, VWAP, order size as a percentage of average daily volume) and qualitative factors (e.g., distribution of activity across trading channels, broker usage, liquidity provision) are considered.

Oversight of Best execution is provided by the Best Execution Committee, with monitoring provided by all lines of defence.

- 1LOD – Business mgmt. and Front office sales and trading
- 2LOD- Risk & Compliance
- 3LOD – Internal Audit

Clients will be notified of material changes to execution arrangements and the Best Execution Policy via updates posted on www.cantorfitzgerald.ie.

12. Consent & Communication

CFIL are required to obtain the client's prior consent to the Best Execution Policy. Prior consent is deemed to have been received when a client places an order with CFIL on or after the date of website upload of this Policy. By completing a client Application Form, the client provides consent to the Best Execution Policy.

13. Research Payment Agreement (RPA)

CFAME use an RPA account to pay for sell-side research.. RPA trading agreements are in place with several trading partners, where basis points are added to trade execution to fund the RPA pot.

14. Best Ex committee

The TOR for the Best Ex committee meeting is reviewed and approved by CFIL EXCO

The Best ex committee meeting sits quarterly, chaired by CFIL Head of Wealth Management and reviews the previous quarters execution standards.

15. Roles and responsibilities

CFIL adopts the Three Lines of Defence Model

The first line (1LOD) is responsible for implementing, executing, and monitoring best execution arrangements on a day-to-day basis. This includes traders, sales teams and operational staff directly involved in order handling, execution, and client interactions.

The second line (2LOD) provides independent oversight, challenge and assurance that the 1LOD activities align with regulatory requirements and CFIL's internal policies#

The third line (3LOD) provides independent assurance to the Board that CFIL's best execution framework is effective, compliant, and aligned with industry best practices.

Appendix I

Schedule of Execution Venues and Executing Brokers where CFIL place significant reliance for the execution of client orders

Counterparty Name	Irish Equity	UK Equity	Pan EU/US Equities	ETF/Funds	Fixed Income	Structured Products	CFD's	Derivatives
Cantor Fitzgerald Ireland LTD					•			
Irish Stock Exchange	•							
London Stock Exchange		•						
Tradeweb Europe					•			
MTS Cash Domestic Ireland					•			
BGC - OTF					•			•
BFC - MTF					•			
Bloomberg MTF				•	•			
AIB Bank					•			
Arden Partners PLC		•						
Bank of America Merrill Lynch (BAML)	•	•	•	•				•
Bank of Ireland Group PLC					•			
Baird			•					
Barclays	•	•	•		•	•		•
BGC Brokers L.P					•			•
BNP Paribas						•		•
Canaccord Genuity Limited		•	•					•
Cantor Fitzgerald + Co			•		•			•
Cantor Fitzgerald Europe	•	•	•					•
Cavendish Securities PLC	•	•						
Cenkos Securities PLC	•	•						
Citibank London					•			•
Commerzbank AG					•			•
Den Danske Bank A/S					•			
Deutsche Bank					•			•
DRW Europe B.V.				•				
EFG Private Bank Limited					•			
Flow Traders B.V.				•				
Goldman Sachs Intl	•	•			•			•
Goodbody Stockbrokers	•	•						
HSBC France					•			
IDAD Limited						•		
IG Markets Limited							•	
Investec Bank PLC				•				
J.P. Morgan SE					•			•

Counterparty Name	Irish Equity	UK Equity	Pan EU/US Equities	ETF/Funds	Fixed Income	Structured Products	CFD's	Derivatives
J+E Davy	•	•						
Jefferies International Ltd	•	•	•					•
Joh. Berenberg, Gossler + Co.	•	•						
JP Morgan Securities Ltd					•			•
Killik + Co LLP		•						
Liberum Capital Ltd		•						
Marex Financial Ltd		•						•
Morgan Stanley and Co. Intl					•			•
NatWest Markets PLC					•			•
Nomura London					•			•
DBNumis	•	•						
Optiver VOF				•				•
Peel Hunt LLP	•	•						
Permanent TSB P.L.C.					•			
Pershing Securities Ltd	•	•	•	•	•			
Redburn	•	•	•					
Shore Capital Stockbrokers Ltd		•						
Singer Capital Markets Secs		•						
Societe Generale				•		•		•
Stifel Nicolaus Europe Limited		•						
Susquehanna International Sec				•				
UBS AG					•			•
Virtu ITG Europe Limited	•	•	•	•				
Winterflood Securities Ltd	•	•						