



**ORDER EXECUTION POLICY**  
**STRATEO, Geneva, Branch of Arkéa Direct Bank SA,**  
**Puteaux (Paris)**

**Article 1. Object**

- 1.1 STRATEO, Geneva, Branch of Arkéa Direct Bank SA, Puteaux (Paris), (hereinafter referred to as "the Bank") makes services for the Receipt/Transmission and Execution of Orders on Financial Instruments available to its Clients, under the terms laid down in the General Terms and Conditions.
- 1.2 This document sets out the policy put in place by the Bank to obtain regularly the best possible outcome for its Clients, based on the Factors defined below, for the performance of these services ("the Policy").
- 1.3 The Bank is required to take reasonable measures to obtain regularly the best possible outcome for its Clients. This does not mean that the Bank is obliged, or able to obtain, the best possible outcome for each Financial Instrument Order placed by each of its Clients.
- 1.4 The Bank has a best-efforts obligation. The responsibility of the Bank with regard to this obligation is subject to the provisions of its General Terms and Conditions.

**Article 2. Definitions**

- 2.1 For the purposes of this Policy, the following definitions apply.

Order Execution	The service provided by the Bank when it acts as the last link in the chain of execution between the Client and the Place of Execution where the Client Order is executed.
Factor	All factors specified in Article 4 and taken into account by the Bank as part of its Policy.
Financial Instrument	All instruments referred to in Article 2, 1° of the Financial Sector and Services (Supervision) Act of 2 August 2002 (such as equities, bonds, options, undertakings for collective investment units or shares, etc.).
Specific Instruction	All specific conditions imposed by the Client or instructions given by the Client in relation to his Order.
Execution Venue	Regulated markets, multilateral trading facilities (MTF), systematic internalisers or market makers, or other liquidity providers, or, in general, all entities that undertake tasks of a similar nature in third countries.
Regulated Market	All markets as defined in Articles 2, 5° and 6° of the Financial Sector and Services (Supervision) Act of 2 August 2002.

MTF	A multilateral trading facility governed by the law of a member state of the European Economic Area, which brings together – within its own system and under non-discretionary rules – multiple third-party buying and selling interests for Financial Instruments and applies procedures that result in the conclusion of contracts.
Systematic Internalizer	An investment company or credit institution that in an organised, frequent and systematic way executes for its own account client orders outside a regulated market or a MTF
Order Receipt/Transmission of Orders	The service provided by the Bank in transmitting Client Orders to another entity for execution.

2.2 All words with capital letters that are not defined in this document are to be interpreted as defined in the Bank's General Terms and Conditions.

### Article 3. Field of application of the Policy

- 3.1 The Policy is applicable to Financial Instrument Orders issued by the Bank's Clients.
- 3.2 The Policy is applicable irrespective of the channel of communication through which the Financial Instrument Orders are sent to the Bank.

### Article 4. Factors

- 4.1 In order to determine the policy to be applied in performing its Order Execution and Receipt/Transmission services and obtain regularly the best possible outcome, the Bank takes the following factors into account.
- Execution price;
  - Costs and charges for execution;
  - Speed of execution;
  - Probability of execution;
  - Speed of settlement;
  - Probability of settlement;
  - Order size;
  - Nature of the order;
  - Impact of the order on the market;
  - All other considerations relating to the order.
- 4.2 For Financial Instrument Orders placed by a Retail Client, the best possible result is determined on the basis of the total cost to the Client, in other words, the price of the Financial Instrument and all other charges for execution to be borne by the Client, including charges specific to the Execution Venue, clearing and settlement charges and all other charges that may be payable to third parties involved in the execution of the Order;
- 4.3 Even if, in most cases, the best possible outcome will be determined by the total cost to the Client (see 4.2), there might be cases where other Factors such as the speed of settlement, the probability of execution and settlement, the size and the nature of the Order, the impact on the market comes first against the execution price and the costs and expenses related to the settlement, insofar as they affect decisively on obtaining the best possible outcome in terms of total cost for the Retail Client. The Bank may give priority to these other Factors in certain circumstances, for some Client Orders, Financial Instruments or markets, for example when there is insufficient liquidity in the Execution Venue to perform the whole Order or when the Client makes an Order larger than that normally asked by a Retail Client, or when he places an Order on illiquid Financial Instruments or in case of internal or external system failures. In these cases, the Bank may determine an appropriate way that getting the best price immediately available may not be the best possible outcome for the Client.

## **Article 5. Specific Instruction**

- 5.1 The Bank will comply with any Specific Instruction given by the Client provided this is compatible with the services it offers to its Clients and with its General Terms and Conditions. The Bank is deemed to have complied with its statutory obligation to take all reasonable measures to obtain the best possible outcome if, in executing a Client's Order, it abides by the Specific Instructions given by that Client. Clients are hereby warned that any Specific Instructions they give may prevent the Bank from taking the measures laid down in its Policy.
- 5.2 If the Client's Specific Instruction relates to just one aspect or part of the Order, the Bank must apply its Policy to all the other aspects and/or parts of that Order.

## **Article 6. Execution Venue**

- 6.1 This list of Execution Venues on which an Order placed by a Bank Client may be executed is contained in Appendix 1, broken down by category of Financial Instrument.
- 6.2 This list is not exhaustive and the Bank expressly reserves the right to execute its Client Orders on other Execution Venues that are compatible with its Policy. The Bank also expressly reserves the right to execute a Client Order outside a Regulated Market or MTF by itself acting as its Client's counterparty where it feels this is the appropriate means of execution in the interests of the Client.
- 6.3 This list also contains the executing entity: when this is the Bank itself, please refer to article 7 of this Policy, when the executing entity is a third, please refer to article 8.
- 6.4 Subject to section 7.2, where an Order is placed and there are several potential Execution Venues compatible with the Bank's policy, the Client must specify the Execution Venue when he places his Order. Choosing an Execution Venue constitutes a Specific Instruction by the Client.
- 6.5 Clients Orders relative to Financial Instruments authorized for trading on a Regulated Market or an MTF may be executed outside a Regulated Market or an MTF.

## **Article 7. Order Execution**

- 7.1 If the Bank executes itself Financial Instruments Orders for Clients, it must take every reasonable measure to access the Execution Venues that, based on its own analysis and notably the costs of accessing those Execution Venues, allow to obtain regularly the best possible outcome for the execution of the Orders of its Clients, in accordance with the Factors defined in Article 4.
- 7.2 The Client orders on certain Financial Instruments listed on NYSE Euronext will be executed by default on BOERSE Berlin Equiduct Trading in accordance with Article 4.2. of this Policy and subject to Article 4.3. The Client may decide to make its orders executed on NYSE Euronext on these Financial Instruments by first choosing this option on the Transaction Site under Your Preferences > Site Preferences > Equiduct. His Order on NYSE Euronext will be considered a Specific Instruction in accordance with Article 5 of this Policy.

## **Article 8. Order Reception/Transmission**

- 8.1 With respect to Financial Instruments for which the Bank does not offer an Execution Service but just an Order Receipt/Transmission service whereby it submits Client Orders to other entities for execution, the Bank shall select entities that take reasonable measures and put in

place procedures that make it possible to regularly obtain the best possible outcome in executing the Financial Instrument Orders sent to them by the Bank on behalf of its Clients. Where the entities to which the Bank may send those Orders are not subject to a statutory obligation to take such measures or put such procedures in place, the Bank must, in selecting those entities, give preference, insofar as possible, to those who give a contractual commitment to comply with this obligation or which demonstrate their compliance therewith.

8.2 In addition to the Factors set out in Article 4, the aspects that will be taken into account by the Bank in selecting the entities to which it sends its Client Orders include:

- The role of the entity concerned in the execution chain;
- The quality of the services provided by the entity concerned, based on the overall results it obtains;
- The information available on the market in relation to the entity concerned;
- The country or countries in which the entity concerned operates;
- The policy put in place by the entity concerned to ensure the best possible execution for the Client.

8.3 The entities to which the Bank sends Client Orders expressly reserve the right to execute Client Orders on other Execution Venues that are compatible with their own Order Execution policy.

#### **Article 9. Changes to the Policy**

9.1 The Bank regularly monitors the effectiveness of the Policy and conducts its regular review.

9.2 The Bank reserves the right to change its Policy as and when it deems it to be appropriate.

9.3 All major changes to the Policy shall be Notified to the Client.

#### **Article 10. Client Consent**

By placing a Financial Instrument Order with the Bank, the Client expressly and unreservedly agrees to the Policy of the Bank prevailing at the time when the Order is placed.

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**Appendix 1 Execution Venues on which the Bank executes Financial Instrument Orders for its Clients**

<b>Financial Instruments</b>	<b>EXECUTION VENUES</b>	<b>COUNTRY</b>	<b>EXECUTING ENTITY</b>
<b>Shares (including share certificates, real estate certificates, closed-end funds), Trackers/ETF's</b>	Euronext Brussels, Paris, Amsterdam	Belgium, France, Netherlands	KEYTRADE BANK
	BOERSE BERLIN EQUIDUCT TRADING	Germany	KEYTRADE BANK
	XETRA	Germany	WINTERFLOOD
	London Stock Exchange	United Kingdom	PERSHING
	Bolsa Madrid	Spain	BANCA IMI – SAN PAOLO INTESA
	Borsa Italiana	Italy	BANCA IMI – SAN PAOLO INTESA
	SIX Swiss Exchange	Switzerland	WINTERFLOOD
	Oslo Børse	Norway	WINTERFLOOD
	Nasdaq OMX Copenhagen	Denmark	WINTERFLOOD
	Nasdaq OMX Stockholm	Sweden	WINTERFLOOD
	Nasdaq OMX Helsinki	Finland	WINTERFLOOD
	New York Stock Exchange (AMEX, NYSE, ARCA)	United States	PERSHING
	NASDAQ OMX	United States	PERSHING
	OTC Bulletin Board/Pink Sheets	United States	PERSHING
	Toronto Stock Exchange	Canada	PERSHING
	Canadian Venture Exchange	Canada	PERSHING
<b>Bonds</b>	Euronext Brussels, Paris, Amsterdam	Belgium, France, Netherlands	KEYTRADE BANK
	Bourse de Luxembourg	Luxemburg	KEYTRADE BANK
<b>Listed funds</b>	Euronext Brussels, Paris, Amsterdam	Belgium, France, Netherlands	KEYTRADE BANK
<b>Unlisted funds</b>	Fund Manager		MFEX Mutual Funds Exchange AB
<b>Warrants</b>	Euronext Brussels, Paris, Amsterdam	Belgium, France, Netherlands	KEYTRADE BANK

<b>Turbos , Sprinters, Speeders, Discounters</b>	Euronext Brussels, Paris, Amsterdam	Belgium, France, Netherlands	KEYTRADE BANK
<b>Options</b>	LIFFE	Belgium, France, Netherlands	KEYTRADE BANK
	Eurex Deutschland	Germany	KAS BANK
	American Stock Exchange NYSE ARCA Exchange BATS Exchange Boston Stock Exchange C2 Options Exchange Chicago Board Options Exchange International Securities Exchange (Equities and Options) NASDAQ Exchange Philadelphia Stock Exchange	United States	PERSHING
<b>Structured Products</b>	Euronext Brussels, Paris, Amsterdam	Belgium, Fance, Netherlands	KEYTRADE BANK
<b>Forex spots – Forex Outright</b>	OTC		SAXO BANK
<b>Futures</b>	Chicago Mercantile Exchange, Electronic Chicago Board of Trade, Euronext Equity & Index Derivatives, Euronext Commodities Derivatives, Euronext Equity & Index Derivatives, Euronext Interest Rate Derivatives, Euronext Commodities Derivatives, Euronext Equity & Index Derivatives, EUREX Exchange, Hong Kong Stock Exchange, Intercontinental Exchange, Borsa Italiana SpA/Italian Exchange, Spanish Official Exchange, Bourse de Montreal Inc., New York Board of Trade, Osaka Securities Exchange, Sydney Futures Exchange Corp. Ltd., Singapore Exchange Derivatives Trading Ltd., Tokyo Stock Exchange		SAXO BANK
<b>CFDs</b>	OTC		SAXO BANK