

1.11.2025

Best Order Execution Policy

Solantis LLC

Introduction

Solantis LLC (hereinafter “the Company”, “we”, “us”, “our”, “ours” and “ourselves” as appropriate), is authorized and regulated by the Financial Authorities of Saint Lucia with license number 202500785 and, as a regulated entity, it is required to take all sufficient steps to ensure the best possible result when executing your instructions. The Summary Of Order Execution Policy (“the Policy”) is provided to you (our client or prospective client) in compliance with the Markets in Financial Instruments Directive as amended from time to time (the “Law”) and other relevant regulations and guidelines issued by the Market Authority.

Further to this, the Client also agrees and gives consent to the fact that their orders will be executed outside a Regulated Market or Multilateral Trading Facility. This Policy provides an overview of how the Company executes orders on behalf of clients, the factors that can affect the timing of execution and the way in which the market volatility plays a part in handling orders when buying or selling a financial instrument. The disclosure statement forms part of our legal documents that you accept upon registering.

1. Scope and Purpose

This Policy applies to retail clients and professional clients (elective and per se professional clients as defined in the Company’s Client Categorization Policy available on the Company’s website at [Solantis.pro](https://solantis.pro), and it does not apply to business conducted with eligible counterparties. According to the Law, we are required to take all sufficient steps to act to the best interest of our clients when receiving and transmitting Clients Orders and to achieve the best execution results when executing Client orders and to comply, with the principles set out in the Law when providing investment services. This Policy applies when receiving and transmitting Client Orders or executing orders for the Client for all the types of Contracts of Difference (“CFDs”) or Crypto Currencies or Futures offered by the company also referred to as CFDs for better understanding.

2. Best Execution and Execution Factors

Best execution is the requirement to take all sufficient steps to obtain the best possible result when either executing transactions on your behalf or using other affiliates or brokers to execute transactions on your behalf, taking into account price, costs, speed, likelihood of execution and settlement, size, market impact or any other consideration relevant to the execution of the Order (“Best Execution Factors”).

Where the Company executes an order on behalf of a Client, the best possible result shall be determined in terms of the total consideration, representing the price of the financial instrument and the costs relating to execution, which shall include all expenses incurred by the Client which directly relate to the execution of the order. For determining the relative importance of the execution factors, the following criteria are taken into account:

1. The characteristics of the Client including the categorization of the Client.
2. The characteristics of the Client order.
3. The characteristics of Financial Instruments that are the subject of that order.
4. The characteristics of the Execution Venues to which that order can be directed.

The Company determines the relative importance it assigns, in accordance with the abovementioned criteria, to the Best Execution Factors by using its commercial judgment and experience in light of the information available on the market and taking into account the remarks included in paragraph 3. The Company considers price and costs as the most important execution factors, followed by speed, likelihood of execution and settlement, size and nature, and market impact. The relative importance attached to these execution factors does not differ across the asset classes traded by the Company. The Company assigns the following importance level to the Best Execution Factors. For retail clients we give highest emphasis on Price & Cost.

FACTOR	IMPORTANCE LEVEL	REMARKS
Price	Highest	We give strong emphasis on the quality and level of the price data that we receive from external sources in order to provide our Clients with competitive price quotes.
Costs	Highest	We take all sufficient steps to keep the costs of your transactions as low and competitive, to the extent possible.
Speed of Execution	Medium	Execution speed and the opportunity for price improvement are critical to every trader and we repeatedly monitor this factor to ensure we maintain our high execution standards
Likelihood of Execution	Medium	Even though we reserve the right to decline a Client order we aim to execute all Client Orders, to the extent possible.
Market Impact	Medium	
Mature of Order	Medium	
Likelihood of Settlement	Low	
Size of Order	Low	

To ensure Best Order Execution the Company takes into account **total consideration, representing the price of the financial instrument and the costs related to execution**, which includes all expenses incurred by the Client that are directly related to the execution of an Order (including as may be applicable: execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the Order). Where the Company transmits orders for execution to another third-party/execution venue the company shall assess and compare results for the Client that would be achieved by Executing the order on the different execution venues. The Company shall periodically assess different execution venues’ order execution quality (based on the Best Execution Factors) to formulate and/or modify its order routing process. The Company will take all sufficient steps to consistently obtain the best possible result for clients across all financial instruments. In addition to price, costs, speed, and likelihood of execution, the Company will also consider the size of the order, the nature of the order, and the characteristics of the execution venues. Both qualitative and quantitative factors will be assessed, and the decision-making process will be well-documented to demonstrate compliance with best execution obligations.

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2.1. Price Highest

Importance: Bid – Ask Spread:

For any given CFD, we will quote both the higher price (ASK) at which the client can buy (go long) that CFD and the lower price (BID) at which the client can sell (go short) that CFD. Collectively the ASK and BID prices are referred to as the Company's prices. The difference between the lower and the higher price of a given CFD is the spread which may include the Company's mark-up. We will make every effort to ensure that the Client receives the best spread, but we cannot guarantee that our quoted prices will be better than those available elsewhere.

Pending orders:

Orders such as "Buy Limit," "Buy Stop," and "Stop Loss" for opening short positions will be executed at the ASK price, while orders such as "Sell Limit," "Sell Stop," and "Stop Loss," "Take profit for opened long positions" will be executed at the BID price.

Company's Price:

The company calculates its prices by reference to the price of the relevant underlying financial instrument (CFD), which it obtains from third-party external reference sources. More information regarding our costs and charges can be found in our provided CFDs specifications on Solantis LLC website.

The company reviews its third-party external reference sources from time to time, to ensure that the data obtained continues to be competitive. We update our prices as frequently as the limitations of technology and communications links allow. Such checks include but are not limited to, reviewing system settings/parameters, comparing prices with reputable price sources, ensuring symmetry spread, and checking the speed of price updating. The company does not quote prices and Clients cannot place orders outside the company's operating hours (see execution venue below). Certain ex-ante and ex-post quality checks are conducted by the Company to ensure that prices obtained and subsequently passed on to Clients remain competitive. Such checks include, but not limited to, comparing prices with reputable price sources, ensuring symmetry of spread and checking the speed of price updating. When it comes to Market Orders, Stop Market Orders, and Contingent Stop Loss Orders, the price you receive at execution will be the best available at the time of execution. This price may be either better or worse than the price offered at the time that an order was initially placed with us. However, under certain trading conditions it may be impossible to execute Orders (Stop Loss, Take Profit, Buy Limit, Buy Stop, Sell Limit or Sell Stop) at the Client's requested price. In this case, the Company has the right to execute the Order at the first available price. This may occur, for example, at times of rapid price fluctuations, if the price rises or falls in one trading session to such an extent that under the rules of the relevant exchange trading is suspended or restricted, or at the opening of trading sessions.

2.2. Costs- Highest Importance:

Both professional and retail clients need to consider the three primary cost categories, namely, implicit costs, implicit trading costs, and explicit internal costs. The company takes measures to evaluate and reduce these costs by selecting appropriate execution arrangements.

Implicit costs:

Implicit costs, also known as "market impact costs", are indirect costs that result from how a trade is executed. This includes factors such as the impact on the price received, whether the trade is executed immediately or over some time, and the choice of execution venue. Large orders (in comparison to the average depth of the market on the underlying asset) may be subject to higher implicit costs.

Implicit trading costs:

The bid-ask spread, delays, and unfilled orders also contribute to implicit trading costs. Solantis LLC aims to minimize these costs by narrowing bid-ask spreads, reducing delays, and reducing unfilled orders. By agreeing to the Company's Terms and Conditions you acknowledge and agree that Solantis LLC may profit through the bid-ask spread.

Explicit internal costs:

Explicit Internal costs refer to the remuneration received by Solantis LLC, such as fees, commission, or spread mark-up. Solantis LLC does not incorporate commissions or fees into its quoted prices. However, for opening positions in some underlying assets, a commission or financing fee may be applied. Commissions may be charged as a percentage of the trade value or as a fixed amount. Additionally, there may be a mark-up on the spread, and financing fees may be applied throughout the life of the contract. These financing fees are based on prevailing market interest rates and can vary over time. Transparency of dealing costs is a key aspect of Solantis LLC 's execution arrangements. The spread and commission rates are known to the client beforehand, and there are no unknown

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variables that will be revealed after the client has traded. Additionally, Solantis LLC emphasizes the transparency of execution, ensuring that the quoted price is the price at which the trade is executed.

In addition, where the Company transmits orders for execution to another third party¹, the Client may be required to pay additional costs (whether Execution Venue fees or other fees paid to a third party involved in the transaction²). The Company will provide clients with a detailed breakdown of implicit and explicit costs, including fees, commissions, and third-party charges before execution. Clients will receive aggregated cost disclosures as part of pre- and post-trade transparency.

2.3. Speed of execution- High Importance:

Solantis LLC places significant importance on speed of execution when executing the Client's orders and is making all reasonable efforts to offer a high execution speed in the context of technological and telecommunication limitations. The company is not responsible for the poor performance of Client's technology, internet connection or any other resources that might cause delays in the transmission of data between the Client and Solantis LLC. This delay may result in sending to Solantis LLC out-of-date "market orders" which might be declined or executed at better or worse prevailing market price through our platform. As the Client places Orders through Solantis LLC's Electronic Trading Platforms, the Client is exposed to risks which among others are associated with the possibility of the failure of hardware and software (e.g., Internet connectivity issues, server downtimes, etc). This may result in your Order either not being executed per your expectations or not being executed at all. Solantis LLC does not accept any liability in the event of such a failure. Solantis LLC seeks to provide Client orders with the fastest execution reasonably possible although delays may occur. For the STP model, where the Company may transmit orders for execution to a third party (Another Execution Venue), the speed of execution may be impacted by the venue's speed of execution. To improve speed of execution the Company carries out certain quality checks. Such checks include but are not limited to, symmetry of slippage checks, number, or trades to slippage, and comparing our average speed of execution with industry standards. Speed of execution may have different meanings for the different types of execution venues as the measurement of speed varies by both trading systems and trading platforms.

Slippage:

Slippage occurs when at the time that an order is presented for execution, the price requested by the Client is not available³; therefore, the Order will be executed close to or several pips away from the Client's requested price. So, Slippage is the difference between the expected price of an Order and the price the Order is executed at. If the execution price is better than the price requested by the Client that is referred to as 'positive slippage'. In contrast, if the execution price is worse than the price requested by the Client this is referred to as 'negative slippage'. Please be advised that 'slippage' is a normal element when trading in financial instruments and a regular feature of markets under conditions such as liquidity squeezes or elevated volatility due to factors such as news announcements, economic events, and market openings. To summarize, your Orders may not be executed at declared prices. Slippage may appear in all types of accounts Solantis LLC offers. It is noted that Slippage can occur also during Stop Loss, Take Profit, and other types of Orders. Solantis LLC does not guarantee the execution of the client's Pending Orders (see Paragraph 3.7) at the price specified. However, Solantis LLC confirms that the clients' Orders will be executed at the corresponding next best available market price compared to the prices specified under pending Orders. Slippage will be transparently managed, and the Company will always act in the best interests of the client. Slippage monitoring will be part of post-trade analysis to ensure compliance with best execution. Clients will be informed of potential risks in volatile markets.

2.4. Likelihood of execution - Medium Importance:

The likelihood of execution of Client orders depends on the availability of prices of other market makers/financial institutions (acting as price formulators and/or execution venues). In limited instances, it may not be feasible to execute an Order due to various circumstances such as news broadcasts, the beginning of trading sessions, volatile markets, significant price fluctuations, insufficient liquidity at the declared price, where a force majeure has occurred, or other related factors. If the Company is unable to execute an Order due to price or size constraints or any other reason, the Order may either be partially executed or not executed at all. Furthermore, the Company retains the right, without any prior notice or explanation, to decline or refuse to process or execute any Order, Request, or Instructions from the client, as outlined in the Terms and Conditions. For the STP model, where the Company may transmit orders for execution to a third party (Another Execution Venue), the likelihood of execution depends on the pricing and available liquidity of such other parties. Solantis LLC seeks to minimize instances where Client orders are not executed although such a possibility may not be precluded. For these purposes, the company will use the data provided by trading venues on the likelihood of order execution.

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2.5. Market Impact -Medium Importance:

The quoted price of the Company's Financial Instruments may be significantly affected by various market factors, which in turn can impact on some of the factors mentioned earlier. To provide the best outcome for its clients, the Company will take all necessary measures.

It should be noted that the above list of factors is not comprehensive, and any prioritization of these factors should not be inferred. However, if a client provides explicit instructions, the Company will ensure that their orders are executed accordingly.

2.6. The nature of the order – Medium Importance:

The characteristics of an order can affect the execution of the client's order. The Client can place with **Solantis LLC** the following types of orders:

- a) **Market Order:** It is an order to buy or sell at the next available price at the time of placing the order. Execution of this Order results in opening a trade position. Clients buy (go long) CFDs at ASK prices and sell (go short) at BID prices. Solantis LLC will usually fill the order at the price that the Client sees and chooses in the Client Terminal. However, it is possible at certain times for the order not to be executed if the market has moved while the Client was placing the order. Clients may attach "Stop Loss" to limit their losses and/or "Take profit" to realize their profits.
- b) **Pending Order:** A pending order is an order to buy or sell a financial instrument in the future once a certain price specified by the Client is reached. Solantis LLC offers four types of pending orders. Buy Limit, Buy Stop, Sell Limit, and Sell Stop. Stop Loss and/or Take profit limits can be attached to this type of order. The Client is allowed to make changes to an order at any point in time, both before and after it is executed (including after a pending order has been carried out). These Pending Orders are executed once the price reaches the requested level. However, it is noted that under certain trading conditions it may be impossible to execute these Orders at the Client's requested price. In this case, the Company has the right to execute the Order at the first available price (after the pending order has been triggered for execution). This may occur, for example, at times of rapid price fluctuation of the price, rises or falls in one trading session to such an extent that, under the rules of the relevant exchange, trading is suspended or restricted, or there is lack of liquidity, or this may occur at the opening of trading sessions.

2.7. Other types of Pending orders

- a) **Take Profit:** Is a type of pending order intended to close an open position and monetize profits when the price of a CFD reaches a certain level. When a Take-Profit order is triggered, the whole open position is closed. Take-profit orders are always connected to an open market order or to a yet-to-be-executed position-opening pending order. Take profit orders on long positions are executed on Bid prices⁵. Take profit orders on short positions are executed on Ask prices⁶.
- b) **Stop Loss:** Stop Loss Order is used for minimizing losses if the CFD's price has started to move in an unprofitable direction. If the CFD's price reaches this stop loss level, the whole position will be closed automatically. Such Orders are always connected to an open, market or a pending order. Under this type of orders, the Company's trading platform checks long positions with Bid price for meeting of this order provisions (the order is always set below the current Bid price), and it does with Ask price for short positions (the order is always set above the current Ask price).
- c) **Good 'til Cancelled ('GTC') (= Expiry):** this is an execution setting that the client may apply to "pending orders". The order may remain "live" and pending execution until such time as the order is triggered and treated as a market order or cancelled by the client.

2.8. Likelihood of settlement – Low importance:

All transactions are settled upon execution. CFDs offered by the Company do not involve the physical delivery of the underlying assets, so they are not settled physically as there would be, for example if the Client had bought shares. Trading in CFDs is cash settled.

2.9. The size of the order – Low importance:

The Client will be able to place Order(s) as long as he has enough free margin in his trading account.

We have restrictions in place in terms of the minimum and maximum size of position you may hold in a Financial Instrument at any one time. Any opening Order you place with us will be subject to these restrictions. Our minimum and maximum position sizes are set by us for each Financial Instrument and may vary depending on current market conditions. Our minimum and maximum position sizes as they apply from time to time can be found in the *product details* on Solantis LLC's website and on the *contract's specifications* field on the trading platforms. In addition,

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please note that where applicable, our ability to fill your Order is dependent on our ability to fill our Back-to-Back Order. Order size is expressed in lots which correspond to a specific number of contracts depending on the type of the underlying financial instrument (contract size is expressed in units of the underlying instrument being traded). Details of the value of each Lot for a given Financial Instrument can be found on the company's website. Please refer to the website and/or platform for the value of minimum size of an order or minimum Lot for a given CFD type. Solantis LLC reserves the right to decline an order as explained in the Terms and Conditions accepted by the Client. To compare the quality of execution for orders of different size, the data provided by execution venues on transactions within several size ranges will be monitored by the Company.

Solantis LLC will search for execution venues that provide the greatest liquidity and thus potential for execution of large orders. Solantis LLC may also seek opportunities for client orders to benefit from order-size commitments offered by the execution venues.

2.10. Synthetic & Other non-standardized derived instruments

Cash spot index prices do not have a reference price to compare to because each liquidity provider or market maker generates its own prices based on proprietary formulas and inputs. These formulas take into account various factors such as supply and demand, the performance of underlying assets, market conditions, volatility, and the provider's own risk management considerations. As a result, there is no uniform pricing mechanism across the market, leading to discrepancies in spot index prices from one provider to another. For this reason, it is impossible to monitor best execution for trades executed on spot indexes solely on the basis of pricing. Instead, best execution is achieved based on other factors such as execution speed, the frequency of order rejections, liquidity provision, and the overall quality of trade execution, ensuring fairness and efficiency in the trading process beyond just price comparisons.

3. Client's Specific Instruction

If a client provides the Company specific instructions for executing an Order, or if an instruction is given on behalf of the Client, the Company will make every effort to execute the Client's order exactly as specified in the instruction.

WARNING: Note that Clients' specific instructions may prevent the Company from taking the steps outlined in this Policy to obtain the best possible result for the Clients in respect of the elements covered by those instructions. However, it should be considered that the Company satisfies its obligation to take all sufficient steps to obtain the best possible result for the Client. Trading rules for specific Solantis LLC or market conditions may prevent the Company from following certain of the Client's instructions. Specific instructions must be provided in writing or via other durable mediums to ensure proper documentation. Note that providing specific instructions may prevent the Company from achieving the best possible execution result for the client.

4. Execution on Client Orders

When fulfilling Client Orders, the Company will adhere to the following requirements:

- (a) Orders executed on behalf of Clients will be promptly and accurately recorded and allocated.
- (b) Comparable Client orders will be carried out sequentially and promptly unless the order's characteristics or prevailing market conditions make this unfeasible, or the interests of the Client require otherwise.
- (c) Upon becoming aware of any significant difficulty that may affect the proper execution of orders, the Company will promptly inform retail Clients.

5. Execution Venues

Execution Venues are the establishments through which Orders are submitted. The execution of client orders can be carried out by either the Company or a third-party liquidity provider, both of which serve as the Execution Venue. In selecting liquidity providers/execution venues, the Company takes into consideration various criteria, including the liquidity providers' regulatory status, capability to handle large order volumes, execution speed, and the competitiveness of commission rates and spreads.

The Client understands that the transactions carried out with the Company involving Financial Instruments do not take place on a recognized exchange but instead occur over the counter (OTC). Consequently, these transactions may pose higher risks to the Client compared to regulated exchange transactions. The Company may change its execution venues at its own discretion.

Best execution is a process, which considers various factors, not an outcome. This means that, when the Company is executing an order for a Client, the Company must execute it in accordance with its execution policy. The Company does not guarantee that the exact price requested will be obtained in all circumstances and, in any event, the factors may lead to a different result in a particular transaction.

The Company will evaluate and compare execution venues at least annually, based on factors such as price, cost, speed, likelihood of execution, and market conditions. Client categorization and order types will be considered in selecting venues.

6. Reception and transmission of orders and use of brokers

The Company may transmit any order it receives to another entity of a different company or to an approved third-party broker for execution, subject to any specific instructions given by a client. In carrying out this process, the Company will always prioritize the best interests of the client. Moreover, the Company will continuously monitor the quality of the service provided from the point of receiving and transmitting the order to its final execution. The Company does not guarantee that the exact price requested will be obtained in all circumstances and, in any event, the factors may lead to a different result in a particular transaction.

The obligation to provide the best execution applies to all financial instruments under MiFID II, regardless of whether they are listed in the EEA.

7. Liquidity Providers / Price Providers / Brokers

Where the company transmits the for execution to a third-party broker it retains an overarching best execution obligation. The Company satisfies this obligation assessment and validates the adequacy of the third-party broker's execution performance to ensure that the Company's obligations to deliver Best Execution to its clients are met. To decide which Liquidity Providers / Price Providers / Brokers to engage the Company assessed them on several parameters that include (but are not limited to) the following:

- Regulatory status.
- Pricing frequency (ticks per second provided).
- Depth of liquidity – what is the liquidity provided.
- Competitiveness of Commission rates, spreads, and fees.
- Ability to deal with large volumes.
- Quality of Execution (i.e. speed of communication/execution (how fast are the prices received/orders executed), rejections, slippage, etc);
- If dealing back-to-back symmetry of slippage should be evaluated in detail for every order type.

The Company places different relative importance on each of the criteria mentioned above by using its commercial judgment and experience in the light of the information available on the market.

To the extent feasible the Company shall also assess its liquidity providers' capacity to meet their best execution obligations by Smart Routing their hedges among available venues / liquidity providing banks (depending on the type of CFD being traded) and that liquidity providers derive/construct their quoted prices based on sufficiently diverse sources reflecting actual market conditions.

8. Monitoring and Reviewing

The Company will regularly monitor, its Policy, as well as the effectiveness of its order execution arrangement in order to identify and, where appropriate, correct any deficiencies and to ensure that it complies with all regulatory requirements and obligations. If any deficiencies are found, the Company reserves the right to correct them. The Company will review this policy at least once every year. Additionally, a review will be conducted whenever there is a significant change that could affect the company's ability to execute client orders efficiently and consistently using the venues specified in this policy.

As part of the Company's efforts to always deliver the best possible execution for Clients, the Company has implemented a range of initiatives to monitor execution quality. The Company has arrangements and procedures in place that will ensure that the effectiveness of arrangements and execution quality is monitored as well as the transaction and pricing methodology and evidence of monitoring and the test results are kept.

For all financial instruments, pre-trade processes in the form of internal policies have been designed and implemented. In addition, post-trade monitoring of execution quality based on sample testing, price comparison, benchmarking, and review of execution quality statistics related to the frequency of rejections, symmetry, etc. is performed periodically.

The Company will conduct a regular (at least annual) review of its execution policy and execution quality, focusing on internal controls, policies, and the effectiveness of execution arrangements. Any deficiencies identified during the monitoring process will be promptly corrected. The review will also consider the performance of third-party brokers or liquidity providers. The firm will disclose the results of monitoring to clients upon request.

9. Amendment of the Policy and Additional Information

The Company reserves the right to review and/or amend its Policy and arrangements whenever it is deemed appropriate according to the terms of the Client Agreement. It should be noted that the Company will not notify a client separately of changes, other than substantial material changes to the Policy, and Clients should therefore refer from time to time to the website of the Company [Solantis.pro](https://solantis.pro) for the most up to date version of the Policy.

For this Policy, a material change shall be a significant event that could impact parameters of best execution such as, cost, price, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

10. Client's Consent

When the Client agrees to the Client Agreement with the Company for Investment Services, they are giving their consent for this Policy to apply to them.

The Company will obtain explicit prior consent for executing orders outside regulated markets or Multilateral Trading Facilities (MTF). This consent will be collected in a durable medium, and records will be kept for audit and regulatory purposes.

For any additional information or questions, please contact support@solantis.pro