



SYFE PTE. LTD.

**BEST EXECUTION AND
ORDER PLACEMENT POLICY**

1 Introduction

Syfe Pte. Ltd. ("**Syfe**", "**us**", or "**we**") is committed to treating our clients ("**you**", "**your**", "**yours**") honestly, transacting for you in a professional and transparent manner, and to act in your best interests whether opening or closing transactions entered into for you. Our trading service and definition of related terms used in this document are detailed in the Client Agreement.

Under the MAS Notice on Execution of Customers' Orders ("**SFA 04-N16**"), Syfe is required to establish and implement best execution policies and procedures which cover all capital markets products and all capacities in which it is acting in, agent or principal, when executing or placing trades. Based on such policies and procedures, Syfe will take all sufficient steps to obtain consistently over time (and not in relation to every single order) the best possible result when executing clients' orders. This document ("**Policy**") is to explain Syfe's execution and order placement policy.

The Policy came into force on 3rd March 2022, and it applies to Syfe's transmission or placement of orders in shares, exchange traded funds and/or other capital markets products ("**Financial Instruments**") available on our platform to our Brokers which execute them.

This Policy forms part of our terms of business. Therefore, by agreeing to the terms of the applicable Client Agreement, you are also confirming your understanding to the terms of our Policy, as summarised in this document.

2 Best Execution

Best execution is the process by which organizations seek to obtain the best possible result when executing and/or placing client orders with another party for execution.

The definition of best possible result will vary as there are a range of factors and the determination of their relative importance based on the characteristics of the clients, the orders that it receives and the markets in which it operates. These factors are further described in this Policy for your information.

For the avoidance of doubt, Syfe does not execute any client orders directly in any execution venue for any of the Financial Instruments available on our platform. Consequently, we do not assess the execution factors nor execution criteria stated in this section as they are not within our control. These considerations are assessed by each of the Brokers that we appoint for execution services in the Financial Instruments available on our platform.

Additionally, Syfe does not act in a principal capacity to any of your orders. Syfe acts as your agent in all orders and places them with the Brokers for their execution.

Syfe undertakes to take all steps necessary to resolve any service issues by negotiation with the Brokers and to consider the operational issues involved in any such decision. The executing Brokers will recognise Syfe's right to decide to execute trades on an alternative venue in circumstances where there is a continued and serious deterioration in the quality of its service to Syfe.

2.1 Execution Factors

In order execution, organizations will give due consideration to a range of execution factors when determining how to obtain the best possible result for the clients. Some of the below factors are considered to be more important than others; however, there are situations where the relative importance of these factors may change in accordance with instructions that clients provide or broader market conditions.

- a) Price – the price at which the order is executed;
- b) Costs – any additional charges that may be incurred in executing the order in a particular way over and above the organization's normal charges, e.g. exchange or clearing fees;

- c) Size – the size and nature of the order may affect the price of execution;
- d) Speed – the time it takes to execute the order;
- e) Likelihood of execution and settlement – the likelihood that the order can be completed; and
- f) Any other consideration relevant to the execution of the order – e.g. the particular characteristics of the order which can affect how the best execution is received.

The Brokers that we appoint, in their discretion, will consider these execution factors when determining how to obtain the best possible result for you when they receive the orders we transmit to them, for their execution.

2.2 Execution Criteria

The relative importance that organizations attach to the execution factors in any particular case may be affected by the circumstances of the order which include, but are not limited to:

- a) Client characteristics – professional clients may have different needs to retail clients;
- b) Order characteristics – such as the potential for it to have an impact on the market;
- c) Financial Instrument characteristics – such as liquidity and whether there is a recognized
- d) centralized market;
- e) Venue characteristics – particular features of the liquidity sources available to the executing organizations; and
- f) Other relevant circumstances – as applicable.

Ordinarily, price and costs will merit high relative importance in obtaining the best possible result. However, there may be circumstances where the primary execution factors may vary and price is no longer the dominant execution factor; for example, for transactions in illiquid securities, the likelihood of execution and settlement become more important.

During the process when applying consideration to each execution factor, organizations will use their experience and expertise to achieve the best balance across the full range of factors. This may mean that organizations do not always achieve the best price for every transaction, but the best result that can be reasonably expected given the information available during the execution process. It should, however, be noted that when undertaking a transaction, any specific instruction specified by you will always be paramount in ensuring best execution is provided.

The Brokers that we appoint, in their discretion, will consider these execution criteria when determining how to obtain the best possible result for you when they receive the orders we transmit to them, for their execution.

2.3 Execution Venues

Execution venues can include:

- Regulated markets
- Other exchanges
- Multilateral Trading Facilities
- Organized Trading Facilities
- Market makers
- Other liquidity providers

The Brokers that we appoint, in their discretion, determine where to execute orders that will result in the best execution of your orders.



2.4 Specific Instructions

When you give us a specific instruction in relation to an order, we will transmit the instructions as they are received, to our Brokers for their execution. By following your specific instruction, we will have satisfied the obligation to provide you with best execution in relation to that transaction. Examples of such instructions may include, but are not limited to, requests to execute an order over a particular timeframe or price range. For Syfe Brokerage, such instructions may include the type of order you request – “market order by shares”, “market order by value”, “limit order” and “stop order” as well as instructions from you with respect to time frame including “good till cancelled” or “good till day”.

We draw your attention to the fact that any specific instructions from you may prevent us or our Brokers from taking the steps that we have designed and implemented in this document to obtain the best possible result for the execution of those orders in respect of the elements covered by those instructions.

3 Syfe’s Approach to Best Execution

Syfe shall aim to provide best execution where we have a contractual obligation to do so, regardless of whether Syfe is acting in a principal or agency capacity to you and/or where you are placing a legitimate reliance on us to protect your interest in relation to the execution of a transaction.

The following sections 3.1 and 3.2 illustrate how Syfe aims to provide best execution to you where it is within our control to do so.

3.1 Appointment of Brokers

In appointing Brokers to execute transactions for our clients, we consider the respective merits of each Broker through qualitative and quantitative factors.

Syfe’s appointed Brokers are assessed on a regular basis. These Brokers have been appointed and preferred as the time and costs incurred by us in considering other alternatives have been assessed to outweigh any improvement in the quality of the execution of your order. In that regard, Syfe regularly applies checks on the Brokers to ensure that they are consistently able to deliver best execution for our clients.

3.2 Order Handling

3.2.1 Syfe Brokerage

Generally, the orders we receive from you on our brokerage platform (“**Syfe Brokerage**”) are automatically transmitted, as they are, in the sequence in which they are received and recorded, to the appointed Broker(s). Hence, we endeavor to ensure that we convey your orders to the Broker(s) for execution in a timely manner. This transmission takes place real time unless otherwise stated.

The Broker(s), in their own discretion, determine where to route the orders they receive that will result in the best execution of the orders. The Broker(s) are bound by their regulatory obligations and/or order execution policies to produce the best possible result for you. Orders transmitted to our Broker(s) for execution to various exchanges or market centres are based on a number of factors. These include the size of order, trading characteristics of the security, favorable execution prices (including the opportunity for price improvement), access to reliable market data, availability of efficient automated transaction processing and reduced execution costs through price concessions from market centres. Certain of the market centres may execute orders at prices superior to the publicly quoted market in accordance with their rules or practices.

Market volatility may result in the price of a Financial Instrument moving significantly from the time of receipt of your order to the time of order execution. You should be aware that there are risks

associated with volatile markets, especially at or near the open or close of the standard trading session and these risks include, but are not limited to:

- Execution at a substantially different price from the last reported price at the time of order entry, as well as partial executions or execution of large orders in several transactions at different prices;
- Delays in executing orders for Financial Instruments that the Broker(s) must send to external market makers and manually routed or manually executed orders;
- Opening prices that may differ substantially from the previous day's closing prices;
- Locked (where the bid equals the offer) and crossed (where the bid is higher than the offer) markets, halted markets, limit up (buys halted) / limit down (sales halted) which may prevent the execution of client orders;
- Price volatility is one factor that can affect order execution. When there is a high volume of orders in the market, order imbalances and backlogs can occur, which may imply that more time is needed to execute the pending orders. Such delays are usually caused by the occurrence of different factors which may include:
 - i. the number and size of orders to be processed;
 - ii. the speed at which current quotations (or last-sale information) are provided to the Broker(s) and other firms; and
 - iii. the system capacity constraints applicable to the given exchange, as well as to the Broker(s).

The market data available on the Syfe Brokerage platform is supplied by third party service providers and are displayed "as is" and on an "as available" basis, without warranties of any kind, express or implied. We subscribe to premium services which source market data across the multiple exchanges in the markets in which Syfe Brokerage has access to, which provide consolidated trade by trade information. Conversely, prices displayed in publicly available sources may not always fully reflect actual market conditions as they may not be sourced from all the exchanges available.

3.2.2 Syfe Cash Management and Managed Portfolios

Orders received on the portfolios available on our platform are aggregated for execution once a day after the necessary verification checks. The execution of the underlying Financial Instruments are undertaken by our appointed Broker(s). Syfe places orders for each of the portfolios through the Broker(s)' trading platform(s) and the orders are transmitted to the Broker for execution.

The Broker(s) have their own order execution policy to produce the best possible results for the underlying Financial Instruments in each portfolio. Instructions that we give to our Broker, may, at its discretion, be aggregated with instructions of its other clients or the Broker(s) themselves. Furthermore, our Broker(s) may split the instructions we give it before executing such instructions. Instructions will only be aggregated or split where the Broker(s) reasonably believe it to be unlikely that the aggregation or split generally will be detrimental to you.

For the avoidance of doubt, financial instruments which are non-exchange traded collective investment schemes (CIS) in certain portfolio(s) are not in scope of this Policy as they are subscribed or redeemed at one price (the net asset value (NAV)).

3.2.2.1 Order netting

Where possible, Syfe nets the buy and sell orders generated by the portfolios before routing to our Broker for execution. This provides a number of benefits, including reduced market impact and trading costs. This means a better execution price is achieved for your portfolio whilst also allowing Syfe to continue offering you low management fees.

We will first trade any residual amount (e.g. if we are buying more shares than selling), before using that execution price for our internal netting, ensuring all customers receive the same price.



4 Payment for order flow

Payment for order flow ("PFOF") refers to commission or other form of payment which a broker receives from another broker or counterparty in return for routing customers' orders to that broker or counterparty.

Syfe does not engage in PFOF.

5 Monitoring and Review

We will monitor the effectiveness and adequacy of this Policy and internal procedures on a regular basis.

Syfe reserves the right to amend this Policy at any time and the revised Policy will be available on our website at <https://www.syfe.com/legal>.