# BEST EXECUTION POLICY

# For Trading CFDs

# 1. Introduction

J.F.CAPITAL CO.,LTD ('J.F.CAPITAL', 'we', 'our 'or 'us') is committed to treating clients honestly, fairly and transacting with clients in a professional and transparent manner when entering into a transaction between two parties. The document summarizes the polices and procedures established by the Company in order to comply with its obligation to act in accordance with the best interest of its clients when transmitting Client orders to other entities for execution.

More specifically, when J.F.CAPITAL enters into a transaction with a client, we will endeavour to provide them with 'best execution'. Best execution means that we will endeavour to take all reasonable steps to obtain the best possible result for you when executing an order with you taking into account various execution criteria.

# 2. Scope

Whether J.F.CAPITAL is acting as an agency or market maker, J.F.CAPITAL always treats clients fairly, transparently and professionally. We have a dedicated team which is always in search for venues of better pricing and executions. J.F.CAPITAL runs on **no dealing desk model** (i.e., we process 100% of our client's trades without manual intervention)**,** so as to provide clients with instant execution and ensuring all clients orders receive best prices possible.

# 3. Execution Factors

J.F.CAPITAL will take into account the following factors to determine the manner in which your order will be executed:

- Price
- Speed
- Likelihood of execution or settlement
- Costs
- Market impact
- Nature of the order
- Any other consideration relevant to the execution of the order

# 4. Executed venues and ECN Connection

J.F.CAPITAL understands that clients trade differently and have different requirements of the trading environment. Hence J.F.CAPITAL actively works with liquidity providers to create different pricing and execution streams. This could be achieved via the liquidity software by aggregating and dispatching the orders among liquidity provided by all liquidity

counterparties of J.F.CAPITAL on a best-executed-price basis (ECN Connection). Executable Streaming Prices (ESP) are sent from J.F.CAPITAL's liquidity providers to our ECN environment where clients can trade with no dealing desk, price manipulation or requotes.

J.F.CAPITAL runs daily monitoring on average spreads, execution speed, and fill rate. This is to ensure that quality trading environment is well maintained at the right level.

J.F.CAPITAL can transact trades on numerous execution venues detailed in **Schedule 2.**

## 5. Order Execution Elements

- Prices

J.F.CAPITAL provides its clients with ECN pricing where an order from a non-institutional client is placed with its institutional counterparty(ies) to achieve a fast, automatic order placement and pricing within a competitive market.

- Specific client instruction

- Slippage

- Partial fills

- Commission

## 6. Best Execution

J.F.CAPITAL only works with the best Prime of Prime liquidity providers, connecting investment banks and non-bank market makers. Each venue has different forte and having them aggregated in one system allows J.F.CAPITAL clients to enjoy top notch execution for all possible instruments.

Below factors are considered to contribute to J.F.CAPITAL' best execution processing:

- All execution factors apply
- All pricings are live pricing from J.F.CAPITAL liquidity providers
- All orders are executed against the market at the next available price once clients send trade requests.
- Limit and stop orders are placed with a minimum distance equal or greater than the spread of the instrument. Once a limit order is triggered, it will be treated just like a market order.
- Limit and stop orders can be
  - o Buy Limit, Sell Limit, Buy Stop and Sell Stop
  - o Due dates (times) can be assigned to each limit order and orders will be cancelled if reached.
- J.F.CAPITAL has no dealing desk ensuring clients to trade as they see.
- Charges allow for overnight positions, in the form of swap and financing.

- Dividends are paid or charged when clients trade indices.

## 7. Monitoring and Reviewing

J.F.CAPITAL monitors the effectiveness of our order execution policy. We will assess on a regular basis whether the price feed and hedging venues in pricing our products allow us to achieve best execution on a consistent basis or whether we need to make changes to our execution arrangements. We will also review our order execution arrangements and order execution policy periodically or whenever a material change occurs that affects our ability to obtain the best result for the execution of client's orders.

## Schedule 1: Financial Instruments within scope of this policy

OTC Instruments

- CFD Commodities

- Rolling Foreign Exchange Spot

- CFD Indices

## Schedule 2: Liquidity Providers List

- IS Prime Limited

- Finalto Group Limited

- CGS-CIMB Securities (Singapore) Pte. Ltd.

- Invast Financial Services Pty Ltd

# Prime of Prime

- London Metal Exchange
- Chicago Mercantile Exchange
- ICE Futures Europe/US
- Chicago Board of Trade
- Hong Kong Exchanges and Clearing
- Chicago Board of Trade
- Hong Kong Futures Exchange
- BNP Paribas
- GS
- XTX
- Commerzbank
- HSBC
- Morgan Stanley
- Citadel
- Citibank
- Australian Securities Exchange
- London Stock Exchange
- Citadel Securities LLC

- COMEX
- New York Mercantile Exchange
- Eurex
- Singapore Exchange
- Tokyo Commodity Exchange
- Australia ASX 24
- Canadian Derivatives Exchange
- UBS
- Credit Suisse
- Citadel
- Deutsche Bank
- Goldman Sachs
- Citigroup
- NYSE American Stock Exchange
- Stock Exchange of Thailand
- Indonesia Stock Exchange
- Jefferies Financial Services