

Order Execution Policy





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1. Introduction

Altum Ltd (hereinafter referred to as the “Company”) is incorporated under the laws of the Republic of Seychelles and licensed by the Financial Services Authority (FSA). The Company is committed to the highest standards of Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) compliance in accordance with the Anti-Money Laundering and Countering the Financing of Terrorism Act, 2020 (the “AML & CFT Act 2020”) and related regulations.

This Policy explains how the Company executes client orders and ensures compliance with the Securities Act, 2007 and the Securities (Conduct of Business) Regulations, 2008.

The purpose of this Policy is to ensure that when executing orders, the Company takes all sufficient steps to obtain the best possible result for its clients, taking into account price, costs, speed, likelihood of execution and settlement, size, nature, or any other consideration relevant to the execution of an order.

This Policy forms part of the Company’s internal governance framework and applies to all clients — retail and professional — when they execute transactions in Contracts for Differences (“CFDs”) and other financial instruments offered by the Company.

2. Scope and Services

- 2.1. This Policy applies when the Company executes, or receives and transmits, client orders for financial instruments available on its trading platforms.
- 2.2. The Company acts as principal and sole execution venue for all transactions executed by clients. All trading is conducted on an Over-the-Counter (OTC) basis and not on a regulated exchange or Multilateral Trading Facility (MTF).
- 2.3. The financial instruments offered by the Company include, but are not limited to:

- CFDs on currency pairs (FX)
- CFDs on indices
- CFDs on metals
- CFDs on commodities
- CFDs on cryptocurrencies (where applicable)

3. Execution Factors

When executing client orders, the Company considers the following **Best Execution Factors**:

- **Price:** The primary factor considered when executing orders. The Company sources prices from multiple liquidity providers (LPs) to ensure competitive bid and ask spreads.
- **Costs:** Commissions, swaps, or financing fees may apply depending on the account type and instrument traded.
- **Speed of Execution:** The Company maintains high-speed connections to its servers to minimize latency.
- **Likelihood of Execution:** Dependent on available market liquidity and conditions.
- **Likelihood of Settlement:** All trades are settled immediately upon execution.
- **Order Size and Market Impact:** The Company may reject unusually large orders or partial fills if insufficient liquidity exists.

4. Order Types

The Company supports the following order types on its platforms:

- **Market Orders:** Orders to buy or sell at the current market price.



- Pending Orders: Including Buy Limit, Sell Limit, Buy Stop, and Sell Stop orders.
- Stop Loss and Take Profit Orders: Used to minimize losses or secure profits.
- Good till Cancelled (GTC) and Good till Date (GTD): Orders remain active until executed, cancelled, or expired.

All orders are subject to available market liquidity and may be executed at the next best available price during high volatility or market gaps.

5. Slippage

Slippage occurs when the executed price differs from the requested price. This may happen during:

- Market openings or high volatility periods
- Economic announcements or low liquidity conditions

Slippage may be positive (executed at a better price) or negative (executed at a worse price). The Company will always execute orders at the next best available market price.

6. Margin and Leverage

Margin requirements and leverage limits are determined by the Company's policies and applicable regulatory rules.

The Company reserves the right to modify leverage at any time in response to market volatility, liquidity constraints, or regulatory directives.

Stop-out levels occur at 50% margin level, and margin calls are issued at 80%, unless otherwise stated in the client agreement.

7. Best Execution

- 7.1. The Company will take all sufficient steps to obtain the best possible result for its clients, considering:
- Price and spread competitiveness
 - Speed and likelihood of execution
 - Costs associated with trading
 - Execution consistency under varying market conditions
- 7.2. Where a client provides specific instructions, the Company will execute the order in accordance with those instructions. Such execution will be considered as having met best execution.
- 7.3. Execution venues are continuously assessed to ensure consistent quality of pricing and execution.

8. Monitoring and Review

- 8.1. The Company's Dealing Department, in coordination with the Compliance Department, monitors the execution quality, price competitiveness, and slippage symmetry on an ongoing basis.
- 8.2. Formal reviews are carried out at least annually or whenever a material change occurs that may affect the Company's ability to achieve the best possible result for clients.
- 8.3. Any material updates to this Policy will be communicated through the Company's website or directly to clients.



9. Client Consent

9.1. By opening an account and executing trades with the Company, clients acknowledge that:

- All transactions are executed OTC through the Company's trading platform.
- The Company acts as principal and not as an agent.
- Orders are executed in accordance with this Policy.

10. Contact Information

For any questions regarding this Policy, clients may contact:

ALTUM Ltd

Client Support Department
support@altumbrokers.com
www.altumbrokers.com