

## **Innomp Group Limited**

# **ORDER EXECUTION POLICY**

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## **1. General Principles**

The Company must deal with its client and own account orders fairly and in due turn.

The Company undertakes to:

- act honestly, fairly, and in good faith in executing client orders;
- avoid placing its own interests ahead of its clients’;
- identify and manage conflicts of interest fairly, including by disclosure or declining to act where appropriate;
- not provide portfolio management or discretionary trading services without a written agreement signed by the client;
- not exclude or restrict liability for fraud, willful default, or gross negligence;
- only recommend or facilitate transactions where it reasonably believes sufficient information exists to form a sound basis; and
- refrain from unfair pricing, unreasonable charges, or preferential treatment.

The Company will take reasonable steps to achieve the best available terms for its clients, having regard to market conditions, order size, instrument characteristics, and available liquidity.

## **2. Execution of Client Orders**

When carrying out client orders, the Company will:

- a) ensure orders are promptly and accurately recorded, allocated, and confirmed;
- b) execute comparable client orders sequentially and fairly, unless market conditions make this impractical or client interests require otherwise;
- c) informs a client about any material difficulty relevant to the proper carrying out of orders promptly upon becoming aware of the difficulty; and promptly inform clients of any material difficulty affecting execution; and
- d) provide statements of account reflecting executed transactions.

Where the Company oversees settlement, it will take reasonable steps to ensure that client funds and instruments are correctly delivered to the appropriate client account.

The Company will not misuse information relating to pending client orders and will take reasonable measures to prevent misuse by employees or agents.

## **3. Proprietary Trading**

The Company may trade on its own account. Proprietary trading is conducted separately from client order execution, under the supervision of senior management.

The proprietary trading desk constitutes a client of the Company's dealing department and may execute transactions through the same systems used for client trading.

#### **4. Execution Services**

Execution services are provided by the Company's dealing desk and online trading platform. The Company seeks to obtain the best possible results for clients, taking into account the execution factors listed in Clause 5.

##### **Types of Execution**

- 1. Market Orders** – Immediate execution against a price streamed on the trading platform, subject to sufficient margin and market availability. Orders may be rejected if the market moves or margin is insufficient.
- 2. Pending Orders** – Clients may place Entry Stop, Entry Limit, Stop Loss, Take Profit, or Trailing Stop orders to open or close positions at specified levels. Such orders will be executed when market prices reach the designated trigger, subject to liquidity and platform conditions.

All executed trades are final once confirmed by the platform, and may not be cancelled without the Company's consent.

#### **5. Execution Factors**

In determining how to execute client orders, the Company considers the following factors:

- price;
- speed of execution;
- costs and commissions;
- order size and type;
- market conditions;
- execution capability; and
- any other factors relevant to achieving a fair outcome

The relative importance of these factors depends on:

- client categorization (retail or professional);
- order characteristics;
- instrument characteristics; and
- the available execution venues or liquidity sources.

##### **Order Size**

Large orders may be filled at less favorable prices due to market depth and liquidity conditions.

### **Speed**

Execution depends on technology and client connectivity. Poor internet connections or system instability may result in delayed or failed executions.

### **Likelihood of Execution and Settlement**

Execution and settlement depend on market conditions, system performance, and client account status.

## **6. Monitoring**

The Company monitors its execution arrangements and this Policy on an ongoing basis to identify any deficiencies and make improvements where necessary.

## **7. Client Consent**

By entering into the Client Agreement and placing orders with the Company, clients expressly consent to this Order Execution Policy.

Clients acknowledge that:

- specific instructions (e.g. limit orders) may prevent the Company from following its standard execution process;
- best execution cannot be guaranteed under all circumstances; and
- execution outcomes may differ due to market volatility, technology limitations, or liquidity constraints.

## **8. Review and Disclosures**

This Policy is reviewed periodically by the Company and may be amended at the Company's discretion. Clients will be notified of material changes via the Company's website or other communication channels. Upon request, the Company will demonstrate that client orders have been executed in accordance with this Policy.