

Best Execution Policy

Gasamamo Financial Services Ltd.

1 Order Execution Policy for Financial Instruments

1.1 Description and Purpose of the Policy

This policy establishes the processes and procedures for the carrying out the arrangements for order execution of GasanMamo Financial Services (GMFS or the company). The purpose is to ensure that GMFS obtains the best possible result for its clients on the execution of the orders.

1.2 Basis of the document

This Policy is based on the requirements of the MiFID II (Markets in Financial Instruments Directive (2004/39/EC)) with regards to the Execution of Clients' orders, namely Article 27 of the directive and the supporting document, RTS 28 and the transposition of the documents contained within the MFSA's Conduct of Business Rulebook.

1.3 Scope

The following topics are addressed by the Policy:

- Best execution practices
- Execution Venue
- Execution Monitoring
- Specific instructions
- Policy review
- Client consent

2 Best Execution requirements

2.1 Introduction

GasamMamo Financial Services Ltd is licensed by the MFSA under Category 1a license and able:

- To receive and transmit orders in relation to one or more instruments;
- To place instruments without a firm commitment basis (without hold or control of clients' money or customers' assets)

In accordance with its license, GMFS does not execute orders directly but rather receives and transmits orders to brokers for the execution on behalf of the client.

Notwithstanding the above, GMFS is subjected to the Best Execution policy rules as it provides the service of reception and transmission of order and consequently acts on behalf of a client.

2.2 Criteria determining Best execution practices

GMFS ensures that when executing Client orders, it shall take into account the following criteria to determine the best possible result for its clients:

- the characteristics of the client (such as their client categorisation);
- the characteristics of the order;
- the characteristics of the financial instrument; and
- the characteristics of the execution venue.

2.3 Execution Venue

GMFS relies on the broker's execution arrangements, including their execution arrangements, to help meet its obligations to obtain the best possible result for the client order.

GMFS ensures that the entity and selected venue will enable to obtain results for its clients that are at least as good as the results that it reasonably could expect from using alternative entities.

GMFS' brokers may use any of the following type of platforms:

- Primary market on the Malta Stock Exchange;
- Secondary Market of the Malta Stock Exchange.

2.4 Monitoring

GMFS monitors and reviews, on a regular basis, its receipt and transmission of orders. In addition, it reviews the execution quality of the brokers with which the orders are placed.

2.5 Specific instructions

Where the clients wish to provide specific instructions in relation to an order, the client can communicate the instruction in writing. GMFS shall then forward the instruction to the corresponding broker which shall be executing the order.

2.6 Review

A review of the Policy is completed on an annual basis or ad hoc whenever a material change occurs which could affect GMFS' ability to obtain the best possible result for its clients on the transmission of the orders. Any material changes to the order execution policy shall be notified to GMFS clients.

2.7 Consent

By reading this policy and placing an order with GMFS, it shall be deemed that the client has given consent to this policy.