

**Best Execution Policy Statement****General**

Skybound Wealth Europe Ltd (previously Fenix Capital Markets Trading Ltd) (the "Company") is a Financial Advisory Firm which provides purely advisory and wealth management services to its clients. Therefore, it is not an execution venue.

The Company is licensed and regulated by the Cyprus Securities and Exchange Commission (the "CySEC"), under licence number 308/16, which allows the Company to operate as a Cyprus investment fund for the provision of investment services.

We rely on reputable Providers including banks, platform providers and other executing entities to ensure best execution.

It is our policy to deal only with execution venues which provide best execution for all orders, taking into account price, volume, costs, speed, likelihood of execution and settlement, size, nature and any other factors which may be relevant to the execution.

When determining these factors we will take into account the following:-

- personal characteristics including client categorisation eg retail;
- the nature of the order;
- nature of the instruments or products which are the subject of the order;
- characteristics of the execution venues on which the order can be executed;
- price of the order – which, although being of high importance, will be considered in context of the above and any specific instructions we receive. Price will also be considered in accordance with market conditions, volumes and timing as these can also influence price considerations; and
- any other circumstance that the Company may deem to be relevant for the execution of a specific instruction.

**Order Transmission**

Orders should be executed promptly and in successive fashion according to receipt of order, but without prejudice to the factors above. They should be processed in a manner which is fair to all clients, and which does not give rise to a conflict of interest.

Our advice is predominantly limited to collective investment schemes but may also extend on occasion to other instruments such as equities, bonds and exchange traded funds.

Any order transmitted will be presented to our clients prior to any orders being placed.

**Monitoring**

Our Best Execution policy is reviewed, as a minimum, on an annual basis or when material changes occur which may require a revision to ensure that we remain able to continue to obtain the best results for our clients.

For the purpose of this policy, a material change will include, but are not limited to the following:

- the addition or removal of execution venues or brokers;
- changes in products (financial instruments) or services offered by the Company; and
- material market impact.

A copy of the latest version of our best execution policy shall be available on the Company's website and/or on receipt of a written request.

**Execution Venues**

The Company considers the following when selecting execution venues for clients:-

- Quality of service
- Access to markets

- Perceived creditworthiness, reputation and financial stability
- Ability to provide transaction cost analysis
- Continuity of trading
- Promptness of execution
- Past history in executing orders
- Clearance and settlement capabilities

### **Specific Client Instructions**

Where a client wishes to execute an order and provides specific instruction to this extent the Company will (subject to the appropriate tests in relation to suitability and/or appropriateness) transmit the order as per the instruction.

However, it should be noted that, in facilitating client specific instructions, the Company will have complied with its obligations to achieve/obtain the best possible results for the execution of the orders.

### **Execution Venues**

Execution Venues are the locations (with or without a physical presence) such as Regulated Markets, Multilateral Trading Facilities, Systematic Internalisers, Market Makers, liquidity providers or any other entity that facilitates trading of financial instruments.

With respect to Equities, Bonds and ETFs, the primary execution venue will be a Regulated Market or a Multilateral Trading Facility via the third-party financial institutions to which the company passes instructions or through another broker with which they have an agreement for handling client orders.

Where this is not possible or appropriate due to best execution integrity, orders may be executed outside of a Regulated Market or Multilateral Trading Facility.

Examples of venues that the Company utilise are: Ardan, Novia Global, Capital Platforms, Quilter International, RL360 and iPensions.

With respect to collective investment schemes, orders will usually be placed directly with the manager/administrator of the scheme or through a settlement system. The Company will seek the best terms available and where possible, place deals with little or no initial charge.

### **Prior consent**

We are required to obtain prior consent from our clients in relation to our Execution Policy when establishing a relationship. We are also required to obtain our clients consent where an order will be executed outside of a Regulated market or Multilateral Trading Facility.

Obtaining consent will be facilitated through our Client Agreement which will be available and agreed prior to the execution of any orders.

The Company will treat clients who have agreed to the terms of the Best Execution Policy as Clients who have given consent to the Policy as well as given consent to the Company to receive and transmit an order for execution outside a Regulated market or Multilateral Trading Facility.

This policy forms part of our client agreement with our clients and on entering into any agreement with the Company our clients agree to the terms of this policy as set out.

### **Additional Information**

The Company reserves the right to amend this policy at any time.