

Order Execution Policy for CFD Grow Markets

1. Introduction

CFD Grow Markets (hereinafter referred to as "the Company"), owned by **Freedom Finance Europe Ltd**, is committed to providing its clients with the best possible outcomes when executing orders. This document outlines the Company's **Order Execution Policy**, which is designed to ensure that all reasonable steps are taken to achieve the best execution of client orders, in compliance with applicable regulations and industry standards.

This policy applies to all retail and professional clients and is reviewed periodically to ensure its continued effectiveness.

2. Purpose

The purpose of this policy is to:

- Provide transparency regarding the Company's order execution arrangements.
 - Ensure that client orders are executed fairly and promptly.
 - Outline the factors that influence the execution process to achieve the best possible result for clients.
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3. Scope

This policy applies to:

- All financial instruments offered by the Company, including Contracts for Difference (CFDs) on forex, commodities, indices, stocks, and other underlying assets.
 - All orders executed on behalf of clients by the Company.
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4. Execution Factors

The Company considers several factors to determine the best execution of client orders. These factors include:

- 1.

Price:

The price at which a financial instrument is executed, as quoted by the Company. Prices are derived from reputable liquidity providers and market data sources.

2.

3.

Costs:

This includes all fees and charges associated with the execution of an order, such as spreads, commissions, and funding costs.

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5.

Speed of Execution:

The time it takes to execute an order. The Company prioritizes prompt execution under normal market conditions.

6.

7.

Likelihood of Execution and Settlement:

The probability that the order will be executed and settled successfully.

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9.

Order Size:

The size of the order and its potential impact on the market or execution conditions.

10.

11.

Nature of the Order:

Specific characteristics of the order, such as market orders, limit orders, or stop orders, and how these may affect execution.

12.

13.

Market Conditions:

The current state of the market, including volatility, liquidity, and the availability of prices.

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5. Execution Venues

CFD Grow Markets uses multiple execution venues to ensure competitive pricing and liquidity. These venues may include:

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Liquidity Providers and Brokers:

The Company sources prices from leading liquidity providers to ensure fair and competitive rates.

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OTC (Over-the-Counter) Transactions:

All orders are executed over the counter, as CFDs are not traded on a regulated exchange.

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The Company is solely responsible for determining the execution venue for all orders. Clients do not have the ability to select the execution venue.

6. Order Types

CFD Grow Markets supports the following types of orders:

- 1.

Market Orders:

Executed at the best available price at the time the order is placed.

- 2.

- 3.

Limit Orders:

Executed at a specified price or better. If the market does not reach the specified price, the order remains pending.

- 4.

- 5.

Stop Orders:

Executed when the market reaches a specified trigger price, converting the stop order into a market order.

- 6.

7.

Pending Orders:

Orders set to be executed at a future price level, including buy limit, sell limit, buy stop, and sell stop orders.

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7. Price Slippage and Re-quotes

7.1 Slippage

Slippage may occur due to market volatility or rapid price movements. While the Company aims to execute orders at the requested price, the final execution price may differ from the requested price. Slippage is more common during high-impact news events or periods of low liquidity.

7.2 Re-quotes

Re-quotes occur when the requested price is no longer available, and the system provides an updated price for the client to accept or reject. The Company strives to minimize re-quotes under normal market conditions.

8. No Guaranteed Execution

The Company does not guarantee that orders will always be executed at the specified price, particularly under the following conditions:

- High market volatility.
 - Market gaps during news releases.
 - Limited market liquidity.
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9. Client Responsibilities

Clients are responsible for:

- Understanding the risks associated with trading CFDs, including market volatility and slippage.
 - Familiarizing themselves with the Company's trading platform and the order types supported.
 - Monitoring their trades and account activity regularly.
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10. Conflicts of Interest

The Company acts as the sole counter-party to all client transactions (acting as a principal). As such, the Company benefits when clients incur trading losses. To mitigate potential conflicts of interest, CFD Grow Markets ensures that:

- Pricing is derived from reliable external sources.
 - Execution quality is monitored regularly.
 - Client orders are handled transparently and fairly.
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11. Monitoring and Review

The Company monitors its order execution arrangements on an ongoing basis to ensure compliance with this policy. Key aspects of monitoring include:

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Regular Assessments:

Reviewing the quality of execution against the factors outlined in this policy.

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System Audits:

Ensuring the trading platform is functioning optimally and adhering to execution protocols.

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Policy Updates:

This policy is reviewed at least annually and whenever significant changes occur in the regulatory or trading environment.

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12. Client Acknowledgment

By trading with CFD Grow Markets, clients acknowledge and agree to the terms of this **Order Execution Policy**. Clients are encouraged to review this document periodically and contact the Company with any questions or concerns.

13. Contact Information

For questions or clarifications regarding this policy, please contact CFD Grow Markets at:

Email: compliance@cfdgrowmarkets.com

Address: 26, Pentadaktylou Street, 4001 Mesa Geitonia Limassol

This document is confidential and intended for internal use within CFD Grow Markets. It should not be disclosed to third parties without appropriate authorization.