

## BEST EXECUTION POLICY

### 1. Introduction

- 1.1. FATHOM WEALTH MANAGEMENT ADVISORS LTD is a Cyprus Investment Firm registered with the Registrar of Companies in Nicosia under the number HE 348759 and authorized and regulated by the Cyprus Securities and Exchange Commission under the license number 306/16 (hereinafter called the "**Company**").
- 1.2. In our dealings with you, we have a general duty to act honestly, fairly and professionally, taking into account your best interest.
- 1.3. The policy applies to all of the Company's clients.
- 1.4. We only route orders to the specific banking or financial institution(s) which you specifically instructed us to do. Such institutions have been selected by you in order to safeguard your assets and execute all orders, thus, we consider that we are always acting upon your specific instructions when placing an order or transmitting an order to your selected banking or financial institution(s) for execution.
- 1.5. By acting upon your specific instructions to always use your selected banking or financial institution(s) for placing an order or transmitting an order for execution, we consider that our best execution obligation has been satisfied.
- 1.6. Notwithstanding the provisions of Point 1.5 hereinabove, it should be noted that, by acting upon your specific instructions to always use your selected banking or financial institution(s) we may not be in a position to obtain the best possible result for the execution of your orders.

### 2. Execution Venues

- 2.1. We understand that you have opened a trading account with one or more banking/financial institution(s) and you have obtained and accepted their best execution policy.
- 2.2. As we will only be working with your selected banking/financial institutions when transmitting your orders for execution and/or placing

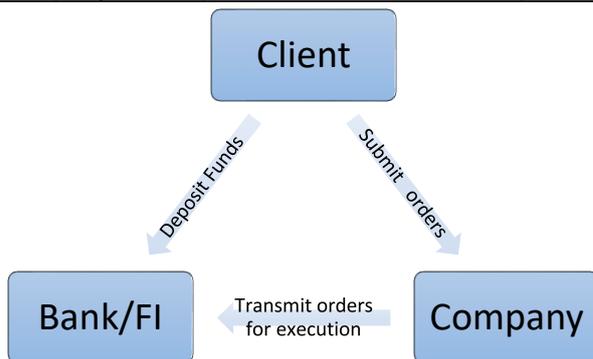
2.3. orders for execution when offering our portfolio management services, whichever applicable, the execution venues used by your selected banking/financial institutions are the ones listed in their best execution policy.

**3. Trilateral Execution Arrangement/Model**

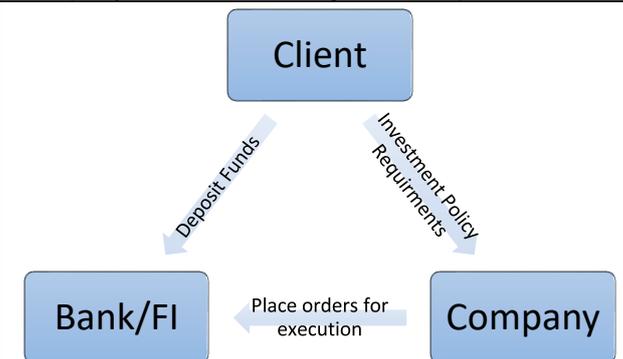
3.1. Your selected banking/financial institutions are ultimately responsible for the execution of all orders submitted by our Company’s Reception and Transmission Department (See Figure 1 below) or placed by our Company’s Portfolio Management Department (See Figure 2 below).

3.2. We understand that you have entered into a business relationship with the aforesaid banking/financial institutions for the safeguarding of your assets and for offering execution services.

**Figure 1:** Execution of orders submitted to our Company’s Reception and Transmission Department



**Figure 2:** Execution of orders placed by Company’s Portfolio Management Department



**4. Duties of the Banking/Financial Institution(s)**

4.1. In our efforts to act in your best interest and assist you to be able to review the quality of execution offered to you by your selected banking/financial institution(s), we present below some of the most important duties that your selected banking/financial institution(s) has(have) in relation to their obligation to deliver best execution to you:

4.1.1. The banking/financial institution(s), when executing your orders, must take all sufficient steps to obtain the best possible result for you by taking into account price, costs, speed, likelihood of execution and settlement,

- 4.1.2. size, nature or any other consideration relevant to the execution of the order.
- 4.1.3. The best possible result shall be determined in terms of the total consideration, representing the price of the financial instrument and the costs relating to execution, which shall include all expenses incurred by you which are directly relating to the execution of the order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order.
- 4.1.4. For the purposes of delivering best possible result when executing your orders, where there is more than one competing venue to execute an order for a financial instrument, in order to assess and compare the results that would be achieved by executing the order on each of the execution venues listed in the banking/financial institution's order execution policy which are capable of executing that order, the banking/financial institution's own commissions and the costs for executing the order on each of the eligible execution venues, shall be taken into account in that assessment.
- 4.1.5. The banking/financial institution(s) shall not receive any remuneration, discount or nonmonetary benefit for routing your orders to a particular trading venue or execution venue which would infringe the requirements on conflicts of interest or inducements as per the relevant legislative requirements.
- 4.1.6. The banking/financial institution(s), in case it acted as the execution venue, must make available to the public, without any charges, on at least an annual basis, data relating to the quality of execution of transactions. The said periodic reports shall include details about price, costs, speed and likelihood of execution for individual financial instruments.
- 4.1.7. The banking/financial institution(s) must provide you with their order execution policy which shall include, in respect of each class of financial instruments, information on the different venues where the banking/financial institution(s) executes orders and the factors affecting the choice of execution venue and must at least include those venues that enable the banking/financial institution(s) to obtain on a consistent basis the best possible result for the execution of client orders.

- 4.1.8. The banking/financial institution(s) must summarise and make public on an annual basis, for each class of financial instruments, the top five execution venues in terms of trading volumes where it executed client orders in the preceding year and information on the quality of execution obtained.
- 4.1.9. The banking/financial institution(s) must monitor the effectiveness of its order execution arrangements and execution policy in order to identify and, where appropriate, correct any deficiencies. In particular, the banking/financial institution(s) must assess, on a regular basis, whether the execution venues included in its(their) policy for order execution, provide for the best possible result for the client or whether the banking/financial institution(s) needs to make changes to its execution arrangements. The banking/financial institution(s) must notify clients with whom it has(have) an ongoing client relationship of any material changes to its(their) order execution arrangements or execution policy.
- 4.1.10. The banking/financial institution(s) must be able to demonstrate to you, at your request, that it(they) has(have) executed your orders in accordance with its(their) execution policy.

## **5. Remuneration from Banking/Financial Institution(s)**

- 5.1. We do not receive any fees, commission, or non-monetary benefit (hereinafter called the “remuneration”) from your selected banking/financial institution(s) for placing or transmitting orders to them for execution.
- 5.2. In case we shall receive remuneration by your selected banking/financial institution(s) when offering to you the services of independent investment advice or portfolio management, after receipt of such remuneration we shall transfer any remuneration received to you as soon as reasonably possible after receipt.
- 5.3. Notwithstanding the provisions of Point 5.2 hereinabove, we shall not be required to transfer to you any remuneration received which is in line with the inducements regime and conflicts of interest regime as per the applicable provisions of the Law L.87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the

operation of regulated markets. We shall fully disclose such remuneration to you in advance or as soon as practically possible.

## **6. Aggregation of Orders**

6.1. The Company is neither aggregating nor splitting any clients' orders. All orders are individually transmitted or placed for execution.

## **7. Consent**

7.1. The Company is required to obtain your prior consent to this policy.

7.2. Where an instrument is not admitted to trading on a regulated market or a multilateral trading facility, the Company is required to obtain the client's' prior express consent in order to be able to deal outside of a regulated market or a multilateral trading facility (i.e. off-exchange transactions) as such transactions may expose the client to greater risks than regulated exchange transactions.

7.3. Further to point 7.2 above, the client consents that the Company may deal outside a regulated market or a multilateral trading facility.

## **8. Monitoring and Review**

8.1. The Board of Directors of the Company shall review this policy at least annually and whenever a significant change occurs.

8.2. The effectiveness of this policy shall be monitored regularly by the Company's compliance officer.

8.3. We shall notify our clients of any significant changes to this policy or our execution arrangements.

## **9. Contact**

If you have any questions or comments about this policy, please contact our Compliance Department at [compliance@fathomwma.com](mailto:compliance@fathomwma.com).