VELSTEIN MARKETS

COMPLIANCE • POLICY 07

Order Execution Policy

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SECTION 01

Introduction

1.1 Velstein Markets (hereinafter referred to as "the Company") has established this Order Execution Policy (the "Policy") to set out the principles and procedures the Company follows when executing client orders in Contracts for Difference ("CFDs") and other financial instruments offered by the Company.

1.2 The Company is duly registered and incorporated in Saint Lucia under Company Registration Number 2026-00749. This Policy is issued in compliance with applicable regulatory requirements governing best execution obligations.

1.3 The Company is committed to taking all sufficient steps to obtain the best possible result for its clients when executing orders, taking into account the execution factors described in this Policy. However, the Company does not guarantee that every individual order will be executed at the best available price.

1.4 By opening a trading account with the Company and placing orders, you acknowledge that you have read, understood, and agreed to the terms of this Order Execution Policy.

SECTION 02

Scope

2.1 This Policy applies to the execution of all client orders in CFDs and other leveraged financial instruments available on the Company's trading platform(s), including but not limited to CFDs on forex currency pairs, precious metals, commodities, indices, shares, and cryptocurrencies.

2.2 The Policy applies to all retail and professional clients of the Company. Eligible counterparties may be subject to different execution arrangements as agreed separately.

2.3 All trading is conducted through the Company's electronic trading platform(s) (MetaTrader 5, Web Terminal). The Company does not accept orders via telephone, email, or any other manual channel unless expressly agreed in writing.

SECTION 03

Execution Venues

3.1 Velstein Markets acts as the sole execution venue for all client orders. The Company acts as principal (counterparty) to all client trades. Client orders are not transmitted to an external exchange or third-party venue for execution.

3.2 As the Company acts as the counterparty to all client transactions, it is responsible for providing bid and ask prices derived from one or more third-party liquidity providers. The Company aggregates and processes price feeds to generate executable quotes displayed on the trading platform.

3.3 The Company may, at its discretion, hedge some or all of its net exposure arising from client positions with external liquidity providers. Such hedging arrangements are internal risk management decisions and do not alter the Company's role as counterparty to the client.

3.4 The Company regularly assesses its liquidity providers and execution arrangements to ensure that they continue to provide competitive pricing and reliable execution quality for the benefit of its clients.

SECTION 04

Best Execution Factors

4.1 When executing client orders, the Company takes into account the following execution factors to obtain the best possible result for the client:

- Price: The bid and ask prices offered to the client for the relevant instrument.
- Costs: All costs related to execution, including spreads, commissions, swap charges, and any applicable conversion fees.
- Speed: The speed at which the order is executed from the moment it is received by the Company's trading server.
- Likelihood of execution: The probability that the order can be filled at the requested price and size.
- Likelihood of settlement: The probability that the transaction will be settled correctly and in a timely manner.
- Size: The volume of the order and its potential impact on the available market price.
- Nature of the order: The specific characteristics of the order type and any particular instructions provided by the client.

4.2 For retail clients, the best possible result is determined primarily in terms of "total consideration" — the price of the financial instrument plus all costs relating to execution. The Company places the highest relative importance on price and costs when executing retail client orders.

4.3 For professional clients, the Company may place different relative importance on the execution factors depending on the specific characteristics of the order, the financial instruments involved, and the execution venues available.

SECTION 05

Order Types

5.1 TheCompany offers the following order types through its trading platform(s):

Market Order
An instruction to buy or sell an instrument at the best available current price. Market orders are executed immediately at the prevailing market price, which may differ from the price displayed at the time of order submission.

Limit Order
An instruction to buy or sell an instrument at a specified price or better. A buy limit order is executed at the limit price or lower; a sell limit order is executed at the limit price or higher. Limit orders are not guaranteed to be filled.

Stop Order
An instruction that becomes a market order once a specified trigger price is reached. Stop orders are commonly used as stop-loss or stop-entry orders. Once triggered, the order is executed at the next available price, which may differ from the trigger price.

Stop Limit Order
A combination of a stop order and a limit order. Once the stop price is reached, the order becomes a limit order rather than a market order.

Trailing Stop
A stop order that automatically adjusts the trigger price as the market moves in the client's favor, maintaining a fixed distance from the current market price.

5.2 Pending orders (limit and stop orders) are stored on the Company's trading server and are executed automatically when the specified trigger conditions are met, subject to available liquidity and market conditions.

5.3 The Company reserves the right to reject or cancel any order if it reasonably determines that the order was placed based on an erroneous price, results from a platform malfunction, or is otherwise manifestly incorrect.

SECTION 06

Slippage

6.1 Slippage occurs when the execution price of an order differs from the price requested by the client or the trigger price specified in a pending order. Slippage is an inherent feature of trading in financial markets and may occur during periods of high volatility, low liquidity, or when large orders are placed.

6.2 Slippage may be positive (the order is executed at a price more favorable than requested) or negative (the order is executed at a price less favorable than requested). The Company applies a symmetric slippage policy, meaning that both positive and negative slippage are passed on to the client.

6.3 Stop-loss orders are particularly susceptible to slippage during price gaps, which may occur over weekends, public holidays, or following the release of high-impact economic data. In such cases, the stop-loss order will be executed at the first available price after the gap, which may be significantly different from the trigger price.

6.4 The Company monitors slippage statistics on an ongoing basis and takes reasonable steps to minimize excessive negative slippage while ensuring that clients benefit from positive slippage on a fair and consistent basis.

SECTION 07

Requotes

7.1 A requote occurs when the price at which a client submits a market order is no longer available at the time the order reaches the Company's trading server. In such circumstances, the Company may offer the client a new price (a "requote") at which the order can be executed.

7.2 Requotes are more likely to occur during periods of extreme market volatility, around major economic announcements, or when market liquidity is thin. The frequency of requotes may vary depending on the instrument traded and prevailing market conditions.

7.3 When a requote is offered, the client may choose to accept the new price or reject it. If the client rejects the requote, the order will not be executed. The Company aims to minimize the occurrence of requotes by maintaining robust technology infrastructure and competitive liquidity arrangements.

SECTION 08

Market Conditions

IMPORTANT
Abnormal market conditions may significantly impact order execution quality. Clients should be aware that during such periods, execution may be delayed, spreads may widen substantially, and slippage may increase.

8.1 Under normal market conditions, the Company endeavors to execute client orders promptly and at competitive prices. Normal market conditions are characterized by reasonable liquidity, orderly price movements, and the absence of significant market-moving events.

8.2 Abnormal market conditions may arise due to, but are not limited to, the following events:

- Major geopolitical events, natural disasters, or acts of terrorism.
- Central bank interest rate decisions or unexpected policy announcements.
- Release of major economic data that deviates significantly from market expectations.
- Flash crashes, circuit breaker events, or trading halts on underlying exchanges.
- Periods of extreme illiquidity, such as market openings, market closings, or holiday-related reduced trading hours.
- Force majeure events that disrupt normal market operations.

8.3 During abnormal market conditions, the Company may take one or more of the following actions:

- . Widening of spreads beyond normal levels.
- Adjustment of leverage and margin requirements.
- Restriction or suspension of trading in certain instruments.
- Temporary suspension of the trading platform.
- Execution of pending orders at the first available price (which may differ significantly from the trigger price).

8.4 The Company shall not be liable for any losses incurred by the client as a result of abnormal market conditions, provided the Company has acted in good faith and in accordance with its regulatory obligations.

SECTION 09

Monitoring and Review

9.1 The Company monitors the effectiveness of its order execution arrangements and this Policy on a regular basis. The Company reviews the quality of execution obtained from its liquidity providers and the overall execution experience delivered to clients.

9.2 The Company conducts periodic reviews of this Policy at least annually, or more frequently where a material change occurs that affects the Company's ability to continue to obtain the best possible result for its clients. Such material changes may include changes to the Company's liquidity provider arrangements, significant market structure changes, or regulatory developments.

9.3 Clients will be notified of any material changes to this Policy through the Company's website (https://velsteinmarkets.com) or by direct communication. Continued use of the Company's trading services after notification of changes constitutes acceptance of the revised Policy.

9.4 If you have any questions regarding this Policy or the Company's order execution practices, please contact us at compliance@velsteinmarkets.com.

Document	Order Execution Policy
Company	Velstein Markets LTD

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Website	www.velsteinmarkets.com
Support	support@velsteinmarkets.com

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