

## Best Selection Policy

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### Preamble

This document has for objective to specify the scope and conditions of application of ProRealTime's best selection policy and order execution policy (hereafter the "Policy").

This policy is in conformity with the European directive 2014/65/UE on financial markets "MIFID 2" which requires that investment service providers act in an honest, fair and professional manner which serves their clients' best interests.

This policy describes how ProRealTime meets its "best selection" requirements, which consist of taking sufficient steps when orders are transmitted for execution to obtain the best possible result (depending on price, cost, speed, probability of execution, size, nature of the order or other considerations relative to the execution of the order) for their clients.

[This policy is available on ProRealTime's website.](#)

This policy can be updated without previous notice. The last version of this document is available on the ProRealTime's website.

## 1. Application

### 1.1 General Points

When ProRealTime acts in the name of clients, has opted for the status of a professional client with regards to intermediaires / counterparties. In this manner, ProRealTime requires a higher level of protection for its "clients" when acting in their name and on their account.

### 1.2 Client scope

This Policy applies to professional clients and non-professional clients (with the MIFID 2 meaning), depending on the category given to them by ProRealTime.

This policy does not apply to eligible counterparties.

### 1.3 Service scope

ProRealTime's activities which are within the scope of this document are comprised of:

- the reception and transmission of orders for third parties for all financial instruments as defined in the article L.211-1 of the French *Monetary and Financial Code*.

### 1.4 Product scope

The financial instruments concerned by this policy are financial contracts and securities such as:

- securities or financial contracts negotiated in regulated markets;
- financial contracts traded over-the-counter

### 1.5 Concerned regulated markets

When the "Intermediary selected by ProRealTime" executes an order on your account, this intermediary uses one or more execution venues to obtain the best possible result.

A selection of the execution venues which the “Intermediary selected by ProRealTime” trusts the most to honor its obligation to take sufficient steps to obtain, in most cases, the best possible results for the orders of its clients is indicated on [ProRealTime's website](#).

This list specifies the execution venues used for :

- each category of financial instruments
- and for securities financing transactions

This list may change and the “intermediary selected by ProRealTime” updates their website regularly. This list is not limiting. The financial instruments affected may be negotiated on exchanges such as the following:

- for financial securities: Euronext, LSE, Deutsche Boerse, Borsa Italiana, Bolsa Madrid, NASDAQ, NYSE, NYSE American;
- for "Futures" contracts: Euronext, EUREX, MEFF, IDEM, CME, CBOT, NYMEX, COMEX.

## 2. Authorization of Brokers and Intermediaries

The brokers and intermediaries to which orders are transmitted must have concluded agreements concerning execution allowing ProRealTime to meet their commitments.

Any such broker or intermediary must first have been added to the list of brokers or intermediaries authorized by ProRealTime.

This limited list is subject to a regular examination by the company directors and compliance officer.

The intermediaries will be chosen in accordance with the principle of the best interests of the client. The client must be assured that the intermediary is being chosen in light of the best market conditions.

An analysis based on qualitative and quantitative criteria will then allow the stipulation of the conditions that must be met for authorization as an authorized broker or intermediary.

ProRealTime shall in particular examine their order execution mechanisms.

The “intermediaries selected by ProRealTime” to which orders are transmitted for execution are:

- Interactive Brokers Ireland
- Saxo Bank

The offer "IG account sponsored by ProRealTime":

Clients also have the option of opening a IG account sponsored by ProRealTime. This offer is provided by IG in agreement with ProRealTime and allows trading of CFDs and spreads. ProRealTime does not offer the Order Reception & Transmission service.

Spread bets and CFDs are complex instruments and come with a high risk of losing money rapidly due to leverage.

### 3. Implementation of the Best Selection Policy: Choice of Intermediaries

In the list of authorized brokers and intermediaries, ProRealTime has selected one or more intermediaries that will be able to provide the best execution possible in the interest of clients.

#### 3.1 Selection criteria

ProRealTime applies its best selection policy which enables it to select the “chosen intermediary” based on the following main criteria:

- quality of order execution
- connectivity
- total cost (including clearing/delivery if applicable)
- financial solidity
- quality of middle and back office support
- feedback based on customer experience
- documentation provided concerning best execution and best selection
- quality of the relationship and the service provided.

The intermediary chosen by ProRealTime has **a best execution obligation with regards to ProRealTime.**

#### 3.2 Best execution principle

In practice, except when ProRealTime indicates otherwise to its clients, ProRealTime works with service providers with whom the client accounts will be opened and who will also execute the orders.

These service providers are all entities with excellent reputations in the online brokerage market. These suppliers will be chosen based on the attractive prices they can offer in view of the number of financial instruments that can be traded with a single account and the quality of services related to brokerage services that they can provide.

In principle, and in accordance with the applicable regulations:

- for non-professional clients, the main criteria shall be the total cost paid by the Client, representing the price of the instrument or the financial contract, plus all costs related to execution; The “total cost” is comprised of the price of the instrument plus costs related to execution (including all expenses billed to the client directly linked to the execution of the order, including costs specific to the execution venue, the clearing and regulatory costs and any other fees paid to third parties who may have participated in the execution). Qualitative factors can also be taken into account (the transparency of the price formation process, the simplicity of the mechanisms, the possibility of providing customers with complete and intelligible information on the execution mechanisms, etc.). However, the criterion of total cost takes precedence.
- for professional clients, several criteria shall be taken into account, in particular the price, cost, quickness, probability of execution, size and nature of the order or any other consideration related to the execution of the order (see the non-exhaustive list of qualitative criteria above). The relative importance of the different criteria shall be determined based on criteria relative to the characteristics of the order, the instruments concerned by the order and the places of execution to which the order might be sent.

The intermediaries selected by ProRealTime have the obligation to take sufficient steps to obtain the best possible results for their clients, based on these factors (the “execution factors”) :

- price
- cost
- speed

- probability of execution and payment
- size and nature of the order
- any other consideration related to the execution of the order

To determine the relative importance of the factors of execution, the selected intermediaries take into account the following criteria when they execute client orders:

- characteristics of the order
- characteristics of the financial instruments the order is placed on
- characteristics of the places of execution the order can be sent to
- characteristics of the client, including professional or non-professional status:

In addition, a link to the best execution policy of the “intermediary selected by ProRealTime” is available on ProRealTime's website. This policy contains the relative importance of each execution factor to determine the sufficient steps taken to obtain the best possible result for the client.

## **4. Method of Supplying the Services Related to Financial Instruments (traded on regulated or over-the-counter markets)**

### **4.1 General Points**

#### 4.1.1 Method of Transmitting Orders

Clients' orders may be transmitted via several channels:

- via our electronic platform;
- via a platform made available by the “intermediary selected by ProRealTime”
- exceptionally, only when the electronic platform is unavailable, by phone directly with the customer service representative of the broker or intermediary authorized by ProRealTime.

In general, once the orders sent via our trading platform have been entered and validated, they will be sent by ProRealTime to “the intermediary selected by ProRealTime”.

The time of reception in the order book of the place of execution chosen by the broker and the exact time of execution are recorded.

The orders are sent, depending on the case, by electronic means to the place of execution selected by the broker in accordance with their best selection policy.

The circumstances which justify that the orders be rejected or taken into account manually include but are not limited to the following:

- in the best interests of the client, in case of filtering orders greater than a fixed amount;
- in case of insufficient margin to open a position
- to respect protective rules of market integrity, notably those required by regulators

This is not an exhaustive list. An order may be rejected by an exchange or intermediary for reasons ProRealTime cannot control.

#### 4.1.2 Case of Orders Transmitted Via Our Electronic Platform

Orders that are directly entered and validated by the client on the ProRealTime electronic platform are transmitted according to the current procedure.

The price and quantity to orders, be they in real-time or delayed, and displayed in the workstation at the time the order is placed are given on an indicative basis and may not be used as a reference relative to best execution.

#### **4.2 Financial Instruments Traded on Regulated Markets**

In principal, subject to the provisions of 4.3 below, to preserve the interest of its clients and as a result of the size of orders, certain transactions may not be transmitted directly to markets but will be taken into account by a professional whose mandate involves executing ProRealTime's orders in the best conditions possible.

#### **4.3 Specific Instructions**

The Client is hereby informed that they can provide certain instructions concerning the mode of execution.

However, the Client is also warned that, in case of specific instructions, ProRealTime may be prevented from taking into account the measures provided for and in its best selection policy, in order to take into account these instructions.

In particular, Clients should note that when they open a security or cash account with a broker or intermediary selected by ProRealTime (example: Interactive Brokers), all of their orders will be transmitted by ProRealTime to that broker for execution.

All of the orders transmitted in this way shall be considered to be specific instructions, and as a result, ProRealTime shall be deemed to have fulfilled its "best selection" obligation.

### **5. Consent of the Client**

#### **5.1 Principle**

The consent given by the Client is a general agreement covering the provisions of the execution policy and is valid for all transactions performed via ProRealTime.

#### **5.2 Warning**

ProRealTime warns you that execution of orders outside of a negotiation platform (regulated markets, MTFs, or OTFs) involves counterparty risk. For this reason, ProRealTime needs to obtain your consent before transmitting orders outside of a negotiation platform of these kinds. This consent is obtained in the form of a general agreement. If you ask, ProRealTime can provide additional information on the consequences of this type of execution.

#### **5.3 Form of Consent**

Following the receipt of this policy, the placement of an order by the client is shall constitute consent to dealing in accordance with to the provisions of articles 1 to 5 of this Best Selection Policy.

## 6. Modification of this policy

This policy is reviewed at least once per year and also if an important modification occurs affecting the capability of ProRealTime to obtain the best possible results in the execution of the orders transmitted to the selected intermediary.

ProRealTime reserves the right to update this execution policy whenever a significant event, based on its own opinion, has an impact on this policy. The updated policy will be published on ProRealTime's website.

## 7. Conservation and archiving

ProRealTime saves data relative to its best selection policy.

The archived documents are saved for 5 years and can be sent to you at your request. These archives can also be sent to competent authorities at their request.

## 8. Regulatory references

- Article L 533-18 to L533-20 of the Financial Code
- Level 1 European texts - Directive 2014/65/UE of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU
- COMMISSION DELEGATED REGULATION (EU) 2017/565 of 8 June 2016
- COMMISSION DELEGATED REGULATION (EU) 2017/576 of 8 June 2016
- Position - Recommendation DOC-2014-07 - Guide concerning best execution
- Position - Recommendation DOC-2007-25
- Q&A CESR/07-320
- Q&A ESMA 35-43-349