SKYBOUND

BEST EXECUTiON POLICY

SKYBOUND WEALTH EUROPE LTD

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SKYBOUND

BEST EXECUTION POLICY

1. DEFINITiONS

Best Execution	The obligation to take all reasonable steps to achieve the best possible result for clients when transmitting orders, considering factors such as price, cost, speed, likelihood of execution, size, nature, or other relevant considerations.
Clearance and Setlement	The post-trade process by which financial instruments and monetary payments are transferred between parties to complete a trade.
Client Order	An instruction from a client to buy, sell, or otherwise deal in a specific financial instrument transmited by the Company to an Execution Venue.
Cost	The total financial impact of executing an order, including commissions, fees, and other transaction related expenses.
Execution Venue	Any location or entity (with or without a physical presence) facilitating the execution of financial instruments, including Regulated Markets, Multilateral Trading Facilities, Systematic Internalisers, Market Makers, liquidity providers, or other third-party financial institutions.
Financial Instrument:	Any instrument as defined under MiFID II, including equities, bonds, exchange-traded funds (ETFs), derivatives, and collective investment schemes.
Likelihood of Execution	The probability of successfully executing a client's order under the prevailing market conditions.
MiFID II	The European Union's Markets in Financial Instruments Directive II governs the provision of investment services and activities to ensure market transparency and investor protection.
Multilateral Trading Facility (MTF)	A multilateral system operated by an investment firm or market operator that facilitates trading in financial instruments but is not classified as a Regulated Market.
Price	The amount at which a financial instrument is bought or sold at a given Execution Venue.
Reception and Transmission of Orders (RTO)	The investment service provided by the Company involving the receipt of client orders and their transmission to an Execution Venue for processing.
Regulated Market	A multilateral system operated and/or managed by a market operator that brings together multiple third-party buying and selling interests in financial instruments, as authorised under MiFID II.
Specific Instructions	Explicit instructions provided by a client regarding the execution of their order which may override the Company's ability to apply this Best Execution Policy.
Systematic Internaliser	An investment firm that, on an organised and systematic basis, deals on its own account when executing client orders outside a Regulated Market or MTF.

2. POLICY STATEMENT

Skybound Wealth Europe Ltd (the "Company", "we", "SWE" or "us") a Cyprus Investment Firm (CIF), authorised and supervised by the Cyprus Securities and Exchange Comission (CySEC) under license No. 308/16. We provide financial advice and investment services to help individuals, companies, and professional advisers meet their financial objectives. As part of its obligations under MiFID II and the Provision of Investment Services Law of 2017 (Law 87(I)/2017, as amended), the Company is commited to achieving the best possible outcomes for its clients when receiving and transmitting orders.

Although the Company does not execute orders directly, it transmits orders to carefully selected Execution Venues that adhere to high standards of execution integrity and regulatory compliance. This Best Execution Policy establishes the principles, processes, and standards the Company applies to ensure optimal execution outcomes, considering factors such as price, cost, speed, likelihood of execution, and other relevant considerations.

By implementing this Policy, the Company ensures transparency and accountability in its order transmission processes. It fosters client trust and confidence while complying with applicable laws and regulations. The Policy is regularly monitored, reviewed, and updated to reflect evolving market conditions and regulatory requirements.

3. APPLICABILITY

This Best Execution Policy applies to all client orders received and transmited by Skybound Wealth Europe under its Reception and Transmission of Orders license. The Policy covers the transmission of orders relating to all financial instruments, including equities, bonds, exchange-traded funds (ETFs), derivatives, and collective investment schemes.

The Policy applies to:

- **Clients:** Both professional and retail clients entrusted the Company to transmit their orders.
- **Execution Venues:** Third-party institutions, such as banks, platform providers, trustees, and insurance companies, with which the Company has established agreements for order execution.
- **Skybound Wealth Europe Staff:** All employees involved in receiving, transmiting, and monitoring client orders.

This Policy does not apply to transactions where clients provide specific instructions overriding the Company's obligation to ensure Best Execution. In such cases, the Company will act on the instructions provided but may not be able to fully implement the principles outlined in this Policy.

By adhering to this Policy, the Company ensures compliance with MiFID II and CySEC regulations, thereby protecting client interests and maintaining the integrity of the order transmission process.

4. POLICY

4.1. EXECUTiON VENUES

The Company does not execute orders directly but transmits them to third-party institutions, such as banks, pla orm providers, trustees, or insurance companies (collectively called "Execution Venues"). These venues are selected based on their adherence to high standards of Best Execution policy and practice.

Execution Venues are the locations (with or without a physical presence) where trading of financial instruments takes place. These include Regulated Markets, Multilateral Trading Facilities, Systematic Internalisers, Market Makers, liquidity providers, or other entities facilitating trading.

For Equities, Bonds, and ETFs, the primary execution venue will generally be a Regulated Market or a Multilateral Trading Facility. Orders are transmited through third-party financial institutions or brokers with which the Company has established agreements. Where such options are unavailable or unsuitable for ensuring the best execution integrity, orders may be executed outside a Regulated Market or Multilateral Trading Facility.

Examples of Execution Venues utilised by the Company include:

- **Novia Global**
- **Ardan International**
- **Morningstar**

For collective investment schemes, orders are typically placed directly with the scheme's manager/administrator or via a setlement system. The Company aims to secure the best available terms while minimising costs such as initial charges.

4.2. EXECUTiON FACTORS

Our Policy is to deal with execution venues which provide the best execution for all orders, taking into account price, volume, costs, speed, likelihood of execution and setlement, size, nature and any other consideration relevant to the execution of the order in question. Execution factors are prioritised based on the nature of the order, financial instruments, and client instructions. These factors include:

- Price – Ensuring the best available price for the client.
- Cost – Minimizing the total cost, including commissions and fees.
- Speed – Prompt execution of orders.
- Likelihood of Execution – Ensuring a high probability of successful execution.
- Size and Nature of Order – Suitability of execution venue based on order specifics.
- Other Considerations – Any other factor deemed relevant for optimal client outcomes.

Although price is generally expected to be highly important relative to other specified factors, its precise importance in any given order will depend on the abovementioned criteria. It may also be affected by specific instructions provided by clients. Subject to such instructions, the timing of execution and the market impact of an order will be major considerations, particularly for orders that are large relative to market volumes.6.

4.3. SELECTiON OF EXECUTiON VENUES

When selecting Execution Venues, the Company evaluates their ability to consistently deliver high-quality execution outcomes for its clients. The following criteria are considered:

- **Regulatory compliance:** The venue must operate under a recognised regulatory framework.
- **Reputation and stability:** Assessment of the venue's financial stability, creditworthiness, and industry reputa**ti**on.
- **Promptness of execution:** Ensuring timely and efficient processing of orders.
- **Past execution performance:** A proven history of successfully executing client orders.
- **Clearance and setlement capabilities:** Robust systems for post-trade processing and setlement.
- **Quality of service:** Ensuring the venue delivers excellent client support and order management services.
- **Access to markets:** Executing trades across relevant financial instruments and markets.

The Company continually monitors these criteria to ensure that selected Execution Venues align with its Best Execution standards.

4.4. PRICING AND COST

The Company relies on pricing derived from Execution Venues. Clients may incur commissions or financing fees imposed by these venues. Such costs are transparently communicated to clients before execution.

4.5. SPECIAL INSTRUCTiONS

Where clients provide specific instructions regarding order execution, the Company will route the order to the designated financial institution. However, adherence to specific instructions may limit the Company's ability to achieve the best possible result under this Policy.

4.6. PLACING ORDERS

The Company accepts orders through the following channels:

- Telephone
- Email
- Fax

Upon account opening, clients are provided with an order instruction form. All received orders are reviewed, recorded, and securely stored.

4.7. REJECTiON OF ORDERS

The Company reserves the right to reject an order under the following condi**ti**ons:

- Insufficient client financial capacity.
- Ambiguity or incompleteness in order instructions.
- The selected Execution Venue's inability to accept the order
- Incomplete client KYC documentation.

4.8. MONITORING AND REVIEW

The Company continuously monitors execution arrangements and policies to maintain effectiveness and compliance with regulatory requirements.

4.8.1. Monitoring Activities

- Regular assessment of Execution Venues for performance and adherence to Best Execution standards.
- Continuous evaluation of execution factors such as price, cost, and speed.

4.8.2. Review and Updates

- Annual review of this Policy is conducted more frequently in response to significant regulatory or market changes.
- Updates are promptly reflected and accessible to clients on the Company's website.

4.8.3. Client Disclosure

- Clients are provided with adequate information about this Policy upon request, and any material updates to the Policy are disclosed to clients promptly.

5. ROLES AND RESPONSIBILITiES

5.1. BOARD OF DIRECTORS:

- Ensure the establishment of a robust Best Execution framework.
- Oversee the Policy's effectiveness and ensure alignment with regulatory requirements.

- Approve periodic reviews and updates to the Policy.

5.2. COMPLIANCE:

The Compliance function plays a key role in the governance and oversight of this Policy. Its responsibilities include:

- Monitor adherence to the Best Execution Policy.
- Conduct periodic audits and reviews to ensure compliance with regulatory standards.
- Provide training and guidance to employees on their responsibilities under the Policy.
- If required, report any breaches or deficiencies to the Board and regulatory authorities.

5.3. ORDER HANDLING AND TRANSMISSION TEAM:

- Implement the Best Execution Policy in daily operations.
- Ensure orders are transmited only to approved Execution Venues.
- Maintain detailed records of order handling and transmission decisions.
- Monitor the performance of Execution Venues and report any issues to Compliance.

5.4. EMPLOYEES AND ASSOCIATED PERSONS:

- Adhere to the procedures outlined in the Policy.
- Report any potential issues or non-compliance related to order execution to the Compliance Team.
- Maintain a high standard of client care and ensure transparency in communication about order handling.

6. DISCIPLINARY ACTiON

Skybound Wealth Europe is commited to maintaining the highest compliance standards and client care in implementing its Best Order Execution Policy. Any breach of this Policy, whether intentional or due to negligence, is considered a serious mater that may result in disciplinary action.

The Company ensures that all disciplinary actions are conducted fairly, consistently, and in line with applicable employment laws and internal policies. Employees, advisors, and staff are encouraged to seek clarification from their Manager, Compliance Team, or designated supervisor if they are uncertain about their responsibilities under this Policy.

7. POLICY REVIEW

The Best Execution Policy is subject to review every two years to ensure its continued effectiveness, relevance, and alignment with applicable laws, regulations, and best practices. The Regional Head of Compliance: Europe will lead the formal review in collaboration with the Group Head of Compliance to evaluate the Policy's effectiveness in achieving the best execution outcomes and its adherence to evolving regulatory and market conditions.

The Regional Head of Compliance: Europe owns, maintains, and ensures the Policy remains effective and compliant with local and international regulatory requirements, including MiFID II and CySEC directives. The Board of Directors must review and approve any interim changes to the Policy upon the recommendation of the Head of Compliance Europe.

8. OWNERSHIP

The Regional Head of Compliance: Europe owns this Policy and will coordinate its drafting and review as mandated by the Board of Directors.

9. APPROVAL

The Regional Head of Compliance: Europe recommends the Policy, and the Board of Directors approve it.

10. REVISION HISTORY

Version #	Revision Purpose	Effective Date	Next Review Date	Summary of Critical Revisions
V.1	New Policy	March 2025	March 2027	N/A. New Policy