
WWF SUMMARY ORDER ALLOCATION AND BEST EXECUTION POLICY

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1. Introduction Best Execution Overview

This Best Execution Summary is provided by WISE WOLVES FINANCE LTD (hereinafter referred to as the “Company”) in accordance with the Markets in Financial Instruments Directive II (hereinafter referred to as “MiFID II”), as in force and/or as this may be amended from time to time and the Cyprus Investment Services and Activities and Regulated Markets Law, Law 87(I)/2017 (hereinafter referred to as the “Law”), as in force and/or as this may be amended from time to time.

The Company has established internal arrangements designed to ensure that, when executing or transmitting client orders in financial instruments, it takes all sufficient steps to obtain the best possible result for its clients, in line with applicable regulatory requirements.

This summary applies to Retail and Professional Clients. It does not apply to clients classified as Eligible Counterparties, for whom MiFID II best execution obligations do not apply in the same manner.

Best execution refers to the obligation of investment firms to execute client orders on terms that are most favourable to the client, taking into account a range of relevant execution factors. MiFID II enhances this obligation by requiring firms to achieve best execution on a consistent basis, rather than on a trade-by-trade basis alone.

For the purposes of best execution, a client order includes any instruction to buy or sell a financial instrument, whether the order is:

- a) Executed directly on a trading venue; or
- b) Transmitted to a third party for execution on the Company’s behalf.

Where the Company executes orders in over-the-counter (OTC) instruments, including bespoke or less liquid products, it takes additional steps to assess the fairness of the price offered to the client. This may include the use of available market data and comparisons with similar or comparable instruments, where appropriate.

The Law also requires that investment firms do not structure or charge commissions in a way that unfairly discriminates between execution venues. The Company complies with this requirement.

2. Regulatory Framework

This summary is prepared in accordance with, among others, and *inter alia*:

- a) Law 87(I)/2017 (Cyprus)
- b) Directive 2014/65/EU (MiFID II)
- c) Commission Delegated Regulation (EU) 2017/565
- d) ESMA and CESR guidance on best execution
- e) CySEC Circular C343 on best execution obligations

3. Scope and Application

This Best Execution Summary explains how the Company approaches order execution and order transmission for the financial instruments it offers.

The Company acts honestly, fairly and professionally, and always in the best interests of its clients, when:

- a) Executing orders on behalf of clients; or
- b) Receiving and transmitting orders to third parties for execution.

Best execution applies whenever the Company provides investment services relating to one or more MiFID II financial instruments to Retail or Professional Clients, as defined in the Company’s Client Classification arrangements.

Clients are encouraged to read this summary together with the Company’s General Terms and Conditions, which govern the contractual relationship between the client and the Company.

4. Method of Disclosure

Information on best execution may be provided:

- a) In a durable medium; or
- b) Via the Company’s website, where legally permitted.

Where information is made available electronically, the Company ensures that:

- a) The method of disclosure is appropriate to the client relationship;
- b) Clients have consented to receiving information in this form;
- c) Information is kept up to date;
- d) It remains accessible for a reasonable period of time.

5. No Guarantee of Outcome

While the Company takes all sufficient steps to achieve the best possible result for clients, best execution does not constitute a guarantee that the best possible outcome will be achieved in every individual transaction. Market conditions, liquidity, volatility and client-specific instructions may affect execution outcomes.

6. Key Definitions

Financial Instruments

Financial instruments include those defined under MiFID II and Cyprus Law 87(I)/2017, such as shares, bonds, derivatives and other regulated investment products offered by the Company.

Market Orders

A Market Order is an instruction to buy or sell a financial instrument immediately at the best available price. Market orders prioritise speed and likelihood of execution over price certainty and are subject to prevailing market conditions and available liquidity.

Limit Orders

A Limit Order is an instruction to buy or sell a financial instrument at a specified price or better. Execution occurs only if the market reaches the specified price. Limit orders prioritise price certainty and may remain partially or fully unexecuted.

Stop Loss Orders

A Stop Loss Order is designed to limit losses by automatically closing a position when a specified price level is reached.

Take Profit Orders

A Take Profit Order automatically closes a position when a specified profit level is reached.

Execution Venues

Execution venues are the places where orders are executed or to which they are transmitted, such as regulated markets, trading facilities, market makers or liquidity providers.

OTC (Over-the-Counter) Transactions

OTC transactions are trades executed outside a regulated trading venue. These may involve greater flexibility but can also involve different risks compared to on-venue execution.

Material Changes

A material change refers to a significant event that could affect the Company's ability to consistently achieve best execution, such as pricing disruptions or connectivity issues with liquidity providers.

7. Financial Instruments

This Policy applies when receiving and transmitting Client Orders or executing orders for the Client in relation to the following financial instruments:

- (1) Transferable securities;
- (2) Money-market instruments;
- (3) Units in collective investment undertakings;
- (4) Options, futures, swaps, forward rate agreements and any other derivative contracts relating to securities, currencies, interest rates or yields, emission allowances or other derivatives instruments, financial indices or financial measures which may be settled physically or in cash;
- (5) Options, futures, swaps, forwards and any other derivative contracts relating to commodities that must be settled in cash or may be settled in cash at the option of one of the parties other than by reason of default or other termination event;
- (6) Options, futures, swaps, and any other derivative contract relating to commodities that can be physically settled provided that they are traded on a regulated market, a MTF, or an OTF, except for wholesale energy products traded on an OTF that must be physically settled;
- (7) Options, futures, swaps, forwards and any other derivative contracts relating to commodities, that can be physically settled not otherwise mentioned in point 6) of this Part and not being for commercial purposes, which have the characteristics of other derivative financial instruments;
- (8) Derivative instruments for the transfer of credit risk;
- (9) Financial contracts for differences;
- (10) Options, futures, swaps, forward-rate agreements and any other derivative contracts relating to climatic variables, freight rates or inflation rates or other official economic statistics that must be settled in cash or may be settled in cash at the option of one of the parties other than by reason of default or other termination event, as well as any other

derivative contracts relating to assets, rights, obligations, indices and measures not otherwise mentioned in this Part, which have the characteristics of other derivative financial instruments, having regard to whether, inter alia, they are traded on a regulated market, OTF, or an MTF.

This policy only applies with respect to Financial Instruments within the scope of MiFID and also describes execution principles in relation to the securities financing transactions (“SFTs”).

8. Selection of Execution Venues

Execution venues are the entities through which client orders are placed or executed. These may include regulated markets, Multilateral Trading Facilities (MTFs), Organised Trading Facilities (OTFs), systematic internalisers, market makers, liquidity providers, or equivalent entities in third countries.

The Company maintains access to a range of execution venues across different products and geographical markets (including the EU and non-EU markets), with the objective of achieving the best possible result for client orders on a consistent basis.

Approach to Venue Selection

The Company selects execution venues and counterparties using a structured assessment process designed to ensure high execution quality and reliability. The Company aims to maintain a choice of venues where possible and does not rely on a single venue unless market characteristics make this unavoidable.

When selecting execution venues, the Company ensures that:

- It does not structure or charge commissions in a way that unfairly discriminates between venues;
- It does not receive any remuneration, discount or non-monetary benefit for routing orders to a particular venue that would conflict with regulatory requirements on conflicts of interest or inducements;
- It does not receive payment for order flow (PFOF) when acting for Retail Clients or opted-in Professional Clients, in accordance with applicable regulation.

Information on applicable fees, costs and charges is made available to clients through the Company’s official website and client portals.

Venue Selection in the Absence of Client Instructions

Where a client does not provide specific instructions, the Company applies the following approach:

- Orders are routed to the execution venue or counterparty that is reasonably expected to provide the best possible result for the client;
- The Company may execute orders over-the-counter (OTC), including acting as execution venue, where this does not disadvantage the client and where fair pricing can be achieved;
- For exchange-traded products, orders are typically executed on the relevant exchange through third-party brokers that are members of that exchange;
- For certain products or markets, available execution venues may be limited due to the nature of the instrument.

Factors Considered When Selecting Execution Venues

When selecting and assessing execution venues, the Company considers a range of qualitative and quantitative factors, including:

- Price and total costs (including spreads and implicit costs);
- Liquidity and market depth;
- Speed and reliability of access;
- Credit and settlement risk;
- Financial standing and solvency of the venue or counterparty;
- Regulatory status and reputation;
- Counterparty performance and operational reliability.

For bespoke or structured instruments, such as structured notes or primary market offerings, execution is typically carried out through the issuer or its agent. In such cases, the Company ensures price fairness based on available market information and treats these transactions as instruction-driven or fixed-price arrangements where applicable.

Execution venues are assessed when a relationship is established and are reviewed periodically, at least annually.

9. Order Execution and Allocation

The Company has arrangements in place to ensure that client orders are executed and allocated fairly, promptly and accurately.

Order Handling Principles

When executing or transmitting client orders, the Company:

- Records and allocates executed orders promptly and accurately;
- Executes otherwise comparable client orders sequentially, unless market conditions make this impracticable;
- Informs Retail Clients of any material difficulty affecting the proper execution of their orders as soon as practicable.

10. Aggregation of Client Orders

The Company may aggregate client orders with other client orders only where this is unlikely to disadvantage any client and where aggregation may achieve efficiencies, such as improved pricing.

Client orders are never aggregated with the Company's own account.

Where aggregated orders are:

- Fully executed, allocations are based on execution price or a volume-weighted average price;
- Partially executed, allocations are made on a fair and proportional (pro-rata) basis.

If a reduced allocation becomes uneconomic or not in a client's best interests, the Company may exclude that client from the allocation and reallocate the remaining volume proportionately among other clients.

The Company retains records of aggregated orders and their allocation for the required regulatory period.

11. Fair Treatment and Conflict Prevention

The Company ensures that:

- ✓ No client account is favored over another;
- ✓ No unfair precedence is given to the Company's own interests;
- ✓ Transactions for the Company's own account are not reallocated in a manner that disadvantages clients.

12. OTC Execution and Risk Disclosure

Some financial instruments may be executed outside regulated trading venues, on an over-the-counter (OTC) basis. In such cases, the Company:

- Obtains the client's express consent for OTC execution;
- Assesses the fairness of the price using available market data and comparable instruments, where possible.

Clients should be aware that OTC transactions may involve higher counterparty and settlement risk, as they are not subject to the clearing and settlement protections of organised trading venues.

To mitigate these risks, the Company generally uses Delivery Versus Payment (DVP) settlement arrangements, including through central clearing systems such as Euroclear and Clearstream, where applicable.

13. Execution Factors and Order Execution Criteria

When executing or transmitting client orders, WISE WOLVES FINANCE LTD (the "Company") takes all sufficient steps to obtain the best possible result for its clients on a consistent basis, in accordance with MiFID II requirements.

The Company determines how best to execute an order by exercising professional judgement and experience, taking into account available market information and the specific circumstances of each transaction. Execution factors are assessed collectively and not in isolation.

Criteria Used to Determine Best Execution

The relative importance of execution factors depends on the following criteria:

- ❖ The classification of the client as a Retail or Professional Client;
- ❖ The characteristics of the client order, including any specific instructions provided;
- ❖ The characteristics of the financial instrument being traded;
- ❖ The characteristics, availability and liquidity of the execution venues.

Retail Clients – Total Consideration

For Retail Clients, the best possible result is primarily determined by total consideration, which includes:

- The price of the financial instrument; and
- All costs directly related to execution, including execution venue fees, clearing and settlement fees, and any third-party charges.

In certain circumstances, other factors such as speed of execution, likelihood of execution and settlement, order size, nature of the order or market impact may be prioritised, only where these support achieving the best overall outcome in terms of total consideration.

Professional Clients

For Professional Clients, total consideration may not always be the most relevant factor. Depending on the nature of the instrument and market conditions, greater importance may be given to:

- Speed of execution;
- Likelihood of execution and settlement;
- Market liquidity and depth.

This is particularly relevant in volatile markets or when trading less liquid financial instruments.

14. Execution Factors Considered

When applying best execution principles, the Company considers the following factors:

- ✓ Price of the financial instrument;
- ✓ Costs associated with execution;
- ✓ Size of the transaction and potential market impact;
- ✓ Nature of the order;
- ✓ Speed of execution and settlement, including latency;
- ✓ Market liquidity;
- ✓ Likelihood of execution and settlement.

These factors are assessed together, taking into account prevailing market conditions at the time of execution.

15. Market Conditions and Order Acceptance

Under certain market conditions, including high volatility, reduced liquidity, trading halts, pricing gaps or during significant news announcements, the Company may:

- ✚ Decline an order; or
- ✚ Offer a revised price for market orders.

Such measures are intended to protect clients and ensure orderly execution.

16. Means of Order Execution and Order Handling

The Company may execute orders on behalf of clients or receive and transmit orders to third-party execution venues. Orders may be executed directly or via carefully selected execution brokers and liquidity providers to ensure efficient and competitive execution.

Direct Market Access (DMA)

Where available, the Company facilitates Direct Market Access (DMA), allowing clients to place orders directly on trading venues such as Multilateral Trading Facilities (MTFs) or Organised Trading Facilities (OTFs) using the Company's infrastructure. DMA enables real-time market interaction, enhanced transparency and potentially improved execution quality. In certain cases, the Company may act on a matched-principal (back-to-back) basis, which is treated as principal trading and remains subject to best execution requirements.

Limit Orders on Regulated Markets

Where a client submits a limit order for a financial instrument admitted to trading on a regulated market or MTF and the order is not immediately executed, the Company will, unless expressly instructed otherwise, take reasonable steps to facilitate execution as soon as possible. This obligation is deemed satisfied where the order is transmitted to a regulated market or MTF and made visible to market participants.

Monitoring of Execution Quality

The Company monitors the quality of execution services on an ongoing basis, from receipt of the order through to final execution, to ensure continued compliance with best execution obligations.

17. Transactions and OTC Execution

The Company may act:

- ✓ As an agent transmitting client orders;
- ✓ As a matched principal; and/or
- ✓ As principal, where it acts as the execution venue.

Client orders may be executed on regulated trading venues or over-the-counter (OTC). OTC transactions are executed directly between parties outside regulated markets and may be used for bespoke or less liquid instruments. Where orders

are executed OTC, the Company takes steps to ensure price fairness, including comparing prices against available market data and similar or comparable instruments where possible.

18. Client Specific Instructions

Where a client provides specific instructions in relation to an order or any aspect of an order (including price, timing or execution venue), the Company will execute the order strictly in accordance with that instruction. In such cases, the Company is deemed to have satisfied with its best execution obligation only in respect of the elements of the order covered by the client's instruction. Specific instructions may prevent the Company from taking steps it would otherwise take to achieve the best possible result for those aspects of the order. By providing specific instructions, clients acknowledge and consent to the potential impact such instructions may have on execution outcomes.

19. Monitoring Best Execution

The Company monitors the effectiveness of its best execution arrangements on an ongoing basis to ensure they continue to deliver appropriate outcomes for clients. Execution quality is assessed using post-execution analysis and benchmarking, applying a risk-based approach. A summary of execution quality and venue selection is disclosed in the Company's annual RTS 28 Report, which is published on the Company's website.

20. Client Consent, Policy Review and Monitoring

Client Consent

By entering into an Accession Agreement with the Company, clients agree to be bound by the Company's Terms and Conditions for the provision of investment services and acknowledge their consent to the Company's best execution arrangements. Where required under applicable regulation, the Company will obtain the client's prior express consent before transmitting orders for execution outside a regulated market, Multilateral Trading Facility (MTF) or Organised Trading Facility (OTF). Such consent may be provided through a general agreement or in relation to individual transactions. Clients acknowledge that, by consenting to execution on trading venues and/or over-the-counter (OTC), their orders may be executed outside organised markets where different risks may apply.

Notification of Material Changes

The Company will inform clients of any material changes to its execution arrangements or best execution approach. A change is considered material where its disclosure is necessary to enable clients to make an informed decision about whether to continue using the Company's services. Material changes may include, among others:

- Changes to the relative importance of execution factors; and/or
- Changes to the execution venues on which the Company places significant reliance to achieve best execution.

Policy Review

In accordance with applicable laws and regulations, the Company reviews its execution arrangements and best execution approach at least annually. Additional reviews are conducted whenever a material change occurs that could affect the Company's ability to consistently obtain the best possible result for client orders. As part of this review, the Company assesses whether it is necessary to:

- Include or exclude execution venues;
- Adjust the relative importance of execution factors; or
- Modify other aspects of its execution arrangements.

Relevant data sources may be taken into account as part of this assessment, including publicly available execution quality information where applicable.

Amendments and Additional Information

The Company reserves the right to review and amend its best execution arrangements whenever necessary, including reflecting regulatory developments, market changes or internal governance decisions. Policies shall be reviewed and/or amended annually and/or as and when it is deemed necessary by the Company, Regulatory Authorities and/or the Compliance Officer and further approved by the Board of Directors of the Company. The client consents and agrees that the latest versions of any of the Documentation and/or Policies published on the Company's official website shall prevail. Clients will be notified of material amendments where required and, where applicable, their consent will be obtained. Clients may request further information or raise questions regarding best execution arrangements or executed orders by contacting their relationship manager or by email at wwf@wise-wolves.com.