

POLICY

1. Purpose

This policy sets out The Firm's execution methodology and approach in respect of client order execution when taking all reasonable steps to obtain the best possible results in accordance with the requirements of the appropriate regulatory bodies and best practices for its clients when executing or transmitting client orders.

The Firm is also required to execute orders in a prompt, fair and expeditious manner, relative to other orders or the trading interest of the Firm. This Policy also addresses the Firm's approach in respect of the aggregation and allocation of orders.

2. Scope and Applicability

This policy applies to all orders executed or placed by the Firm on behalf of its clients.

3. Best Execution

We will seek to take reasonable steps to obtain the best possible result for clients under prevailing market conditions and subject to any specific instructions in the client's mandate.

Thus, when executing trades on behalf of clients, the Firm will comply with any applicable legal requirements and exercise due care, skill and consideration for execution criteria detailed below.

3.1. Order Execution criteria

The Firm will take into account the following factors in determining how to execute its clients' orders, make decisions to deal or place orders with a counterparty to achieve the best possible result:

- ✓ Price of the order(s)
 - The direct and indirect costs related to the execution of such order(s) such as
 - all expenses incurred which are directly related to the execution of the order;
 - execution venue fees;
 - clearing and settlement fees; and
 - Any other fees paid to third parties involved in the execution of the order
- ✓ Speed (how quickly the order can be executed)
- ✓ likelihood of execution and settlement
- ✓ Size of the order relative to other trades in the same financial instrument

- ✓ Nature of the order

3.2. Specific Client Instructions

Where a client provides specific instructions as to execution, the order will be executed in accordance with those instructions to obtain the requested results for the execution of those orders as much as is reasonably possible.

Where there is no specific client instruction as to how an order should be executed, this execution steps in this Policy will be applied for each order, taking into account all available market information at the time of execution.

All confirmed client orders buy/sell will be entered into our jobbing book for execution on the Floor of the Nigerian Stock Exchange (“NSE” or “The Exchange”) and we will pursue the execution of the mandate within the standard 10 business day period or as otherwise detailed in the client’s mandate (“Mandate Validity Period”). If after the relevant period, the trade has not been executed, the order will automatically be taken off our jobbing book while we notify the Client of the non-execution of the order within the Mandate Validity Period. Where the Client requests that the order be re-processed, we will seek to re-job the client’s order upon receipt of the Client’s fresh instructions in respect of the same instrument.

4. Order Handling

The Firm will provide for the prompt, fair and expeditious execution of orders. When carrying out orders, we will

- a) ensure all orders, which must detail the following, are received in writing and/or through the client’s registered e-mail address;
 - i. name of the instrument/security to be traded
 - ii. quantity/value of the instrument/security to be traded
 - iii. price i.e. limit/range or best market price
 - iv. order type i.e. buy/sell
- b) ensure that orders are executed as promptly as possible and subject to the client’s instructions. Client orders received within the trading hours will be executed same day subject to availability of the stock; otherwise, it would be jobbed and retained in the order/jobbing book against the next trading day.
- c) Ensure that orders are executed at the best bid/offer price available in the market at the time of executing the trade.

4.1 Cross trades

Where we have two clients with opposite needs in the same security and it is in the interest of both clients to transact with each other instead of both going to the market, we will obtain relevant sell and buy instructions

from the potential seller and buyer of the security respectively and upon receipt of same, shall proceed to cross the trade at the best available market price.

4.2 Online Access

Where a client with online access to his account on our portal chooses to place his/her order by him/herself, the client will select the parameters of the trade i.e. the security(ies), quantity and the bid/offer price. In this case, the order will drop in our jobbing book for execution by us on the Floor of The Exchange, QZS will therefore treat this as the client having given specific instructions in relation to the execution of his or her order.

4.3 Direct Market Access (DMA)

This is an electronic trading facility for clients of QZS who wish to trade directly on the floor of The Exchange. In this instance, the Client places the order directly and it is received into the order book of The Exchange

Where a client chooses to execute an order through the use of our Direct Market Access platform, the client will select the parameters of the trade. In such case, QZS will treat this as the client having given specific instructions in relation to the execution of his/her order as the order goes directly into the market for execution during the trading hours.

5. Monitoring and Record Keeping

The Firm will monitor processes to identify transactions that may not have met order execution requirements as outlined in this policy through surveillance undertaken by our compliance and audit teams.

QZS will maintain records in sufficient detail to show particulars of all transactions undertaken. The following records will be retained for each trade executed by us:

1. Price
2. Time order received
3. Execution time
4. Order Allocation record (Jobbing Book)