



BEST EXECUTION POLICY-ACMEL

ACM EUROPE LIMITED

ACMEL Address
NU BIS CENTRE,
Triq il- Mosta
LIJA
LJA 9012
Malta

Overview

This document sets out the ACM EUROPE LIMITED ("ACMEL", hereby referenced as the "Firm") order execution policy ("Policy") in respect of its retail and professional clients ("you" or "Client") for transactions in financial instruments. This document summarises the arrangements that ACMEL has put in place to provide its clients with best execution when ACMEL transmits an order on their behalf.

Execution venues and third parties

ACMEL has entered into an agreement with Interactive Brokers Ireland Limited for the provision of investment platform services which include transmission and reception of orders as well as execution of orders. All transactions will be transmitted to Interactive Brokers Ireland Limited on an execution only basis.

The Best Execution Policy of Interactive Brokers Ireland Limited can be accessed here: <https://www.interactivebrokers.ie/en/accounts/legalDocuments/mifidExecPolicy.php>

Client Instructions

All transactions need to be submitted by the clients or their Financial Adviser/Trading Executive for execution to Interactive Brokers Ireland Limited. The instructions will be submitted via the online portal which can be accessed on www.wealthvault.io.

Execution factors

When transmitting orders to Interactive Brokers Ireland Limited, ACMEL will make every effort to ensure the best possible result for our clients taking into account the following factors:

- Price
- Cost of execution of the transaction to the client;
- Speed of execution of the transaction;
- Likelihood of execution and settlement of achieving execution and settlement;
- Size and nature of the order;
- Any other considerations relevant to the execution of the specific order (the "Execution Factors")

When executing orders, the Firm will take all sufficient steps to achieve Best Execution, subject to and taking into account, any specific instructions from the client, the nature of such orders, the priorities its clients' place upon it in filling those orders and the nature of the markets and products in question. In order to deliver Best Execution, the Firm and any associated Third Party(ies) will use its/their knowledge, experience and judgement to execute trades on behalf of its clients taking into consideration a number of execution factors including those listed above

For retail clients, the price and cost of execution of the order will normally be the most important aspect in obtaining the best possible result. We'll therefore assume that this is the most important outcome for your transaction unless you tell us otherwise.

To the extent that the Firm any associated Third Party(ies) follows specific instructions from a client when placing an order and with, or transmitting an order to, another entity for execution, such instructions supersede this Policy and the Firm will be deemed to have complied with its Best Execution obligations by following the clients' specific instructions. Specific client instructions may prevent the Firm from taking the steps it has implemented in this Policy to obtain Best Execution.

Monitoring and review of our execution policy

The Firm has an obligation to monitor the effectiveness of its best execution arrangements and this Policy and to demonstrate compliance with this Policy. This obligation has been incorporated into the Firm's general compliance monitoring process. The Firm's processes are designed to ensure that monitoring assists the Firm in delivering Best Execution for its clients on a consistent basis and that, where necessary, it identifies Best Execution failures or poor client outcomes. This policy is reviewed annually or amended when criteria changes so that the policy is current and in line with guidelines set by regulatory bodies. The Firm's Compliance Officer is responsible for the maintenance and annual review of this Policy and the Firm's execution procedures.

Staff understanding

All relevant staff are made aware of this policy to highlight and emphasise the importance of best execution.

The Firm's senior management is responsible for ensuring that business practices are operating in all its trading activities to deliver Best Execution on a consistent basis and for promoting a culture that proactively identifies and manages conflicts of interest.

How to reach us

ACMEL Address
NU BIS CENTRE,
Triq il- Mosta
LIJA
LJA 9012
Malta

ACM EUROPE LIMITED. ACM EUROPE LIMITED is authorised and regulated by the Malta Financial Services Authority (www.mfsa.mt) and registered with the Central Bank of Ireland for conduct of business rules. Malta company number: C 26673. Registered office: NU BIS CENTRE, Triq il- Mosta, LIJA, LJA 9012, Malta

Tel: +356 2755 5069

Email: admin@ariacm.com

Website: www.ariacm.com