



# Order Execution Policy

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## **Our Duty of Best Execution**

BL Global Markets Limited (“the Company or BL Global”) has the obligation to take all reasonable steps to obtain the best possible result for the execution of its client orders on a consistent basis, taking into account our Execution Policy and any specific instructions received from our customers.

Our policy cannot provide a guarantee, however, when entering into Margin FX Contracts with a client or executing transactions on a client’s behalf, the price will always be better than one which is or might have been available elsewhere.

## **Best Execution Factors and Criteria**

The Company will enter into transactions with the client as principal (counterparty) and not as an agent; even though the Company may transmit the client’s order to the liquidity providers for execution, due to execution factors (noted below). The Company will still be the contractual counterparty to the client. Therefore, the Company will act as the sole Execution Venue for clients’ orders.

To achieve the best possible result, we will take a number of factors into account, including price, costs, speed of execution, likelihood of execution and settlement, size, nature of the order or any other factors relevant to the execution of that order. We have rated price as the most important, and we pay due consideration to the market price for the underlying reference product to which client’s Contract relates.

BL Global prices on Margin FX Contracts are sourced from independent price providers who supply liquidity to the OTC FX Market. To achieve the most competitive price spreads for clients BL Global quotes prices in 1/1000th of a cent (1/10th of a pip).

BL Global may transmit orders to the liquidity providers or brokers. As well as having regard to an entity’s access to markets and execution venues, when choosing entities for inclusion in this Policy, BL Global assesses each entity’s ability to obtain the best possible result on a consistent basis, having regard to the above execution factors.

## **Order Execution Risk**

### **Slippage**

Slippage is the difference between a quoted price and the price at which the order was executed or filled. BL Global takes reasonable steps so that execution of our quoted prices will obtain the best possible result for clients at the time the quote is provided however fast moving markets may result in execution of a transaction at a price which has ceased to be the best market price.

## **Gap**

A gap in the markets is a break between prices on a chart that occurs when the price of a product makes a sharp move up or down with no trading occurring in between or when the market closes at a different rate to when it opens again.

There are 2 common types of slippage:

- (a) When a market gaps, either over the weekend or after a news event (like payroll figures or interest rate decisions); and
- (b) When a price is clicked on and has substantially changed in the time it took to get back to the executing bank or broker.

## **Trading System or Internet Connectivity Execution Delays**

Delays in execution beyond our control may occur as a result of technical failures or malfunctions in connection with use of the BL Global Online Facility or internet connectivity or processing speed for which BL Global does not accept responsibility.

## **Specific Client Instructions**

Where clients provide us with specific instructions as to how to execute their orders, we will have complied with our obligation to take all reasonable steps to obtain the best possible result when executing that order by following their instructions. In those circumstances, our execution in accordance with your instructions will be deemed best execution.

## **Aggregation**

Depending upon circumstances, market conditions and order size, we may combine orders of several customers for execution as a single order. This will be where we reasonably believe that this is in the overall best interests of our clients and is unlikely to work to your disadvantage. Such aggregation is not considered to compromise the customers' interests, although some disadvantage in relation to a particular order, may occur.

## **Monitoring and Review**

There are two areas that a firm may need to monitor to establish the effectiveness of its execution policy and arrangements.

## **Testing**

The Company in order to test whether the best execution is provided to its' clients, can be established by comparing similar transactions:

- on the same venue, in order to test whether a firm's judgment about how orders are executed is correct, and
- The company maintains its own price blender, which collects prices from various sources and provides the best available price to the client. In case any price is offset from the best available price is rejected immediately, and
- at the same time, the price offered to the clients is also being compared with other price providers, in order to ensure that the Company's clients receive the best available price, and
- the company ensures that the currency swaps available to clients are always up to date with the current market interest rates
- Speed of orders where the company ensures that the trades are executed without any delay by having the relevant proxy servers in key geographical locations.

## **Sampling**

From BL Global's point of view, it is not necessary for these purposes that the Company review every transaction and that other approaches, such as sampling, could suffice. Sampling must however reflect the size and nature of the transactions performed and the Company must appropriately assess and compare the relevant available data.

Using the above methodology, BL Global will review this Policy at least annually or when a material change occurs. Material changes to this Policy will be notified through the BL Global website and be available to actual and potential clients.