



GO Markets International Ltd

Execution Policy

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Company No. 8425985-1

Securities Dealer License No. SD043



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1. Purpose

This Best Execution Policy (the “Policy”) sets out the policies, procedures and measures adopted by GO Markets International Ltd (Company No. 8425985-1), incorporated in the Republic of Seychelles and licensed by the Financial Services Authority (“FSA”) under the Securities Act 2007 as a Securities Dealer, Licence No. SD043 (the “Company”), to obtain, when executing orders, the best possible result for its Clients.

This Policy applies to both Retail and Professional Clients, and to the execution of Client orders in respect of all Financial Products offered by the Company from time to time.

The Company is required to act honestly, fairly and professionally in accordance with the best interests of its Clients, and to take all sufficient steps to obtain the best possible result when:

- executing Client orders; or
- receiving and transmitting orders for execution.

The Company may amend this Policy from time to time, including where required as a result of changes in applicable law or regulation.

2. Regulatory Framework

This Policy has been prepared based on the following regulatory framework:

- the Securities Act 2007, as amended from time to time; and
- the Securities (Conduct of Business) Regulations 2008, as amended from time to time,

(collectively, the “Best Execution Requirements”).

3. Best Execution Requirements

The objective of the Best Execution Requirements is the execution of orders on terms most favourable to the Client. The Company must comply with the following requirements:

- take all sufficient steps to obtain, when executing Client orders, the best possible result for its Clients, taking into account price, costs, speed, likelihood of execution and settlement, size, nature, or any other consideration relevant to the execution of the order; where a Client gives a specific instruction, the Company shall execute the order in accordance with that instruction;
- where the Company executes an order on behalf of a Client, the best possible result shall be determined in terms of the total consideration, representing the price of the Financial Product and the costs relating to execution, including all expenses incurred by the Client which are directly related to the execution of the order;
- the Company shall not receive any remuneration, discount, or non-monetary benefit for routing Client orders to a particular execution venue that would infringe the requirements on conflicts of interest or inducements;
- the Company maintains conflicts of interest arrangements designed to ensure that remuneration structures, mark-ups, spreads, and execution venue selection do not adversely affect its obligation to obtain the best possible result for Clients; and

- the Company must monitor the effectiveness of its order execution arrangements to identify and, where appropriate, correct any deficiencies, and must be able to demonstrate to Clients, at their request, that it has executed their orders in their best interests and in accordance with this Policy.

4. Best Execution Policy

4.1 General

The Company executes Client orders in relation to the following Financial Products: Margin Foreign Exchange, and CFDs.

4.2 Best Execution Factors

When executing orders, the Company shall take all sufficient steps to obtain the best possible result for its Clients, taking into account the following factors (“Best Execution Factors”): price, costs, speed of execution, likelihood of execution and settlement, size, nature, market impact, and any other consideration relevant to the execution of the order.

Price: The Company quotes two prices for each Financial Product – the higher price (ASK) at which a Client may buy, and the lower price (BID) at which a Client may sell; the difference is the spread. The Company does not guarantee that the price obtained on execution of an order will be more favourable than one which might be available elsewhere.

Costs: Clients may be required to pay commission and/or financing fees in respect of certain Financial Products, the amount of which is disclosed on the Company's website and is not incorporated into the Company's quoted prices.

Speed of Execution: The Company aims to offer a high speed of execution within the limitations of technology and communications links, and does not guarantee that execution speed will be unaffected by prevailing market or connectivity conditions.

Likelihood of Execution: It may not always be possible to execute an order, including during news events, at the start of a trading session, in volatile markets, or where there is insufficient liquidity. In the event that the Company is unable to proceed with an order with regard to price, size, or other reason, the order will not be executed. In addition, the Company may decline or refuse to transmit or arrange for the execution of any order, request, or instruction of the Client in accordance with applicable laws and regulations and the terms of the Client Agreement, and may do so without prior notice or explanation to the Client.

Likelihood of Settlement: The Financial Products offered by the Company do not involve the physical delivery of the underlying asset and are not settled physically.

Market Impact: Certain factors may rapidly affect the price of the underlying instrument from which the Company's quoted price is derived. This list of Best Execution Factors is not exhaustive, and the order in which the factors are presented is not to be taken as an order of priority.

4.3 Types of Orders

Market Order: an order to buy or sell a Financial Product as promptly as possible at the prevailing market price.

Pending Order: an order to buy or sell a Financial Product at a pre-defined price once that price is reached. Under certain trading conditions it may be impossible to execute a Pending Order at the Client's requested price, in which case the Company may execute the order at the first available price.

Take Profit: an order to close an open position once the price has reached a specified, more favourable level.

Stop Loss: an order to close an open position once the price has reached a specified, less favourable level, with a view to limiting losses.

4.4 Slippage

Slippage occurs where, at the time an order is presented for execution, the price requested by the Client is not available, and the order is executed at the next best available price. Slippage may be positive (where the execution price is better than the price requested) or negative (where it is worse), and occurs more frequently during periods of illiquidity or high volatility.

4.5 Best Execution Criteria

When executing Client orders, the Company takes into account the following criteria for determining the relative importance of the Best Execution Factors:

- the characteristics of the Client, including the categorisation of the Client as retail or professional;
- the characteristics of the Client order;
- the characteristics of the Financial Product that is the subject of the order; and
- the characteristics of the execution venue to which the order is directed.

The Company determines the relative importance of the Best Execution Factors using its commercial judgement and experience in light of available market information.

The Best Execution Requirements apply also to the Company's arrangements for providing brokerage services on CFDs on Cryptocurrencies.

Where a Client gives a specific instruction relating to an order, or a specific aspect of an order, the Company shall arrange, to the extent possible, for the execution of the order strictly in accordance with that instruction.

5. Execution of Client Orders

When carrying out Client orders, the Company shall:

- take all reasonable steps to find and deal on the terms that are the best available to the Client (best execution);
- deal with Clients and its own account orders fairly and in due turn (fair execution);
- effect or arrange the execution of an order as soon as practicable after agreeing or deciding to do so (timely execution);

- ensure that orders executed on behalf of Clients are promptly and accurately recorded and allocated (fair allocation);
- where orders are aggregated with the Company's own account or another Client's order, not give unfair preference to itself or any Client, and give priority to satisfying Client orders where not all orders can be satisfied;
- disclose, in every transaction, whether it is dealing with a Client in its capacity as agent or on its own account;
- carry out otherwise comparable Client orders sequentially and promptly, unless the characteristics of the order or prevailing market conditions make this impracticable or the Client's interests require otherwise; and
- inform a Retail Client of any material difficulty relevant to the proper carrying out of an order promptly upon becoming aware of it.

6. Execution Venues

The Company is able to transact trades on a Client's behalf via its Liquidity Providers.

The Company shall disclose in every transaction whether it is dealing with a Client in its capacity as an agent or on its own account.

Where there is only one possible execution venue, best execution is achieved by execution on that venue. Best execution is a process, not an outcome: the Company does not guarantee that the exact price requested will be obtained in all circumstances, and the Best Execution Factors may lead to a different result in a particular transaction.

7. Ongoing Monitoring

The effectiveness of the Company's execution arrangements and monitoring processes shall be reviewed periodically, and any material findings or deficiencies identified shall be addressed through appropriate corrective measures.