

Client Order and Execution Policy

I. Introduction

This policy is issued pursuant to, and in compliance with, paragraph 3.2 of the Code of Conduct for Persons Licensed by or Registered with the Securities and Futures Commission (Code of Conduct) that applies to XHK Limited ("XHK").

This document is designed to inform our Clients of the principles and methods governing the execution of Orders on the best possible terms, and to serve as a basis for our Clients' consent to our Order Execution Principles when buying or selling a financial instrument.

This policy applies to XHK's execution of Orders for Clients.

All Orders are promptly and accurately recorded and allocated on the platforms used by XHK and details of executed trades are maintained on the platforms indefinitely.

2. Financial instruments to which this policy applies

This policy applies to financial products as defined by the Securities and Futures Ordinance (Cap. 571), including Stocks, Bonds, Exchange Traded Funds ("ETFs"), Futures, Options (OTC and exchange

客户的交易指示和执 行政策

I. 引言

本政策是根据及遵照适用于XHK Limited (简称“XHK”)的《证券及期货事务监察委员会持牌人或注册人操守准则》(操守准则)第3.2段而发布。

本文件旨在告知客户有关以尽可能最佳条款执行交易指示的原则和方法,并作为客户在购买或出售金融工具时同意我们的[交易指示执行原则]的基础。

本政策适用于XHK对客户交易指示的执行。

所有交易指示均在XHK使用的平台上被迅速准确地记录和分配,而已执行交易的详细信息将无限期地在平台上保留。

2. 本政策适用的金融工具

本政策适用于《证券及期货条例》(第571章)所界定的金融产品,包括股票、债券、交易所买卖基金("ETF")、期货、期权(场外交易及交易所买卖)、差价合约("CFD")、凭证、认股权证和共同基金。其中一些产品因其性质而在场外交易。

traded), Contracts For Difference ("CFDs"), Certificates, Warrants and Mutual Funds. Some of these products are due to their nature traded OTC.

上述产品的交易条件和费用可在网上的客户保护专区获取。

The trading conditions and fees for the above products are available online in the client protected area.

3. XHK's approach to best execution

3.1. When executing Orders on Clients' behalf in relation to financial instruments, XHK will take all reasonable steps to obtain the best possible execution result (the "Best Execution"). In absence of specific Client instructions, XHK will take into account a combination of the following execution factors for the purpose of delivery to Client the Best Execution:

- Price;
- Cost of execution;
- Speed;
- Speed of execution and settlement;
- Likelihood of execution and settlement;
- Size, nature and type of the Order;
- Any other consideration relevant to the execution of the Order.

3. XHK的最佳执行方法

3.1. 当代表客户执行与金融工具有关的交易指示时, XHK将采取一切合理步骤以尽可能获得最佳执行结果("最佳执行")。在没有具体的客户指示情况下, XHK将综合考虑以下执行因素, 以便向客户交付最佳执行:

- 价格
- 执行的费用
- 执行和交收的速度
- 执行和交收的可能性
- 交易指示的数额、性质和类型
- 与执行交易指示相关的任何其他考虑因素

3.2. 在考虑最佳执行因素时, XHK会考虑以下标准:

- 交易指示的特征
- 受制于交易指示的金融工具的特征(特别是与场外金融工具相关者)

3.2. When considering the best execution factors, XHK takes into account the following criteria:

- Characteristics of the Order;
- Characteristics of the financial instruments that are subject to the Order (in particular in relation to OTC financial instruments);
- Characteristics of the execution venues to which the order can be directed.

3.3. Whenever there is a specific instruction from or on behalf of a Client, XHK will, to the extent possible, execute the Order in accordance with the specific instruction. A specific instruction from a Client may prevent XHK from taking the steps that it has described in this policy to obtain the Best Execution. Trading rules for specific markets may prevent XHK from following certain of the Client's instructions. To the extent that a Client's instruction is not complete, XHK will determine any non-specified components of the execution in accordance with this policy.

3.4. Due to system failures or other unavoidable reasons, XHK may execute Orders in a method that differs from the method selected pursuant to this policy. Even in such a case, however, XHK endeavours to execute Orders on the best terms available at that point.

- 接受交易指示的执行场所的特征

3.3. 每当收到客户或其代表的特别指示时, XHK将尽可能根据该特别指示执行交易指示。来自客户的特别指示可能会妨碍XHK采取其在本政策中所描述的步骤以实现最佳执行。特定市场的交易规则可能会妨碍XHK遵从客户的某些指示。如果客户的指示不完整, XHK将根据本政策确定该指示执行当中的任何非指定组成部分。

3.4. 由于系统故障或其他不可避免的原因, XHK可能会采用与按照本政策选择的方法不同的方法来执行交易指示。但是, 即使在这种情况下, XHK也会尽力按照当时可用的最佳条款执行交易指示。

4. Best execution criteria

4.1. The procedure for routing determinations is mainly based on 4 criteria and is regularly reviewed by XHK. Hence to determine the best way to execute an Order, XHK takes into consideration:

4.1.1. Price Improvement and Overall Consideration of Costs: Orders are routed to market makers and/or market centres where opportunities for price improvement exist. The criteria to be used by other market makers and/or market centres include:

- Automatically matching incoming market and limit Orders to pending limit Orders;
- Cross transactions where price improvement can be offered to one or both sides of the trade.

4.1.2. Speed and Likelihood of the Execution: Due to the levels of volatility affecting both price and volume, XHK seeks to provide Orders with the fastest execution reasonably possible although delays may occur.

4.1.3. Size Improvement: In routing Orders, XHK seeks markets that provide the greatest liquidity

4. 最佳执行标准

4.1. 确定路径的流程主要基于4个标准，并由XHK定期审查。因此，为了确定执行交易指示的最佳方式，XHK考虑以下因素：

4.1.1. 价格改善和总体费用考虑：交易指示发送给有机会改善价格的做市商和/或市场中心。其他做市商和/或市场中心使用的标准包括：

- 自动将进入的市价交易指示和限价交易指示匹配等待执行的限价交易指示；
- 可以向交易的一方或双方提供可以改善价格的交叉交易。

4.1.2. 执行的速度和可能性：由于波动水平影响价格和交易量，虽然XHK设法尽可能合理提供最快速执行的交易指示，但仍可能会出现延迟。

4.1.3. 规模改善：在转发交易指示时，XHK寻求可提供最大的流动性并因此有可能执行大额交易指示的市场。XHK还寻求机会，使交易指示受益于第三方提供的交易指示规模承诺。

4.1.4. 总体执行质量：在确定如何发送交易指示及发送至哪里时，XHK专注于快速且可靠的执行，并不断对其进行评估（本政策的第9节）。

and thus potential for execution of large Orders. XHK also seeks opportunities for Orders to benefit from order-size commitments offered by third parties.

- 4.1.4. Overall Execution Quality:
When determining how and where to route an Order, XHK focuses on prompt and reliable execution which is being continuously evaluated (section 9 of this Policy).

5. Execution of client orders

- 5.1. XHK uses automated systems to route Orders for execution. When an Order is received by XHK, it is routed to the execution venue that XHK considers to generally provide the Best Execution. XHK may execute Orders outside regulated markets and multilateral trading facilities. In this respect, by accepting this policy and any agreement attached herewith, the Client signals his/her consent for XHK to execute Orders outside regulated markets and multilateral trading facilities.
- 5.2. For instruments admitted to trading and official listing on a regulated market or stock exchange (i.e. Bonds, Stocks, Futures and ETFs), XHK routes Orders to the multilateral trading facility or third parties that can execute trade on stock exchanges by the prices of stock exchange.

5. 客户交易指示的执行

- 5.1. XHK使用自动化系统来发送交易指示以进行执行。当XHK收到交易指示时，交易指示将发送到XHK认为通常提供最佳执行的执行场所。XHK可以在受监管市场和多边交易设施之外执行交易指示。就此而言，一经接受本政策及其附带的任何协议，客户即表示他/她同意XHK在受监管市场和多边交易设施之外执行交易指示。
- 5.2. 对于获准在受监管市场或证券交易所交易和正式上市的工具（即债券、股票、期货和ETF），XHK将发送交易指示至多边交易设施或可以按证券交易所的价格在证券交易所执行交易的第三方。
- 5.3. 对于场外交易产品（差价合约），XHK将发送交易指示至相应的做市商公司，以按照他们在交易平台上提供的价格执行。对于单一股票的场外交易差价合约，执行以主要监管市场或相关股票的

- 5.3. For OTC products (CFDs), XHK will route Orders to the appropriate market maker firms for the execution by prices provided by them on trading platform. For OTC-traded CFDs on single stocks, execution is benchmarked to the pricing and liquidity on the primary regulated market or exchange of the relevant stock.
- 5.4. Prices of non-listed units in Mutual Funds (e.g. unit trusts or open-ended investment companies) are set at a future "valuation point" and the exact price of such units is therefore not known in advance. Execution price for such Order will be provided by liquidity provider of XHK according to the fund manager's rounding rules.
- 5.5. There may be delays in execution of Orders, including Orders placed through online trading systems. Some Orders placed through online trading systems may be handled manually. When high traffic in electronic Orders causes a backlog, XHK, as well as counterparts to which Orders are sent for execution, will have to discontinue normal automatic execution procedures and turn to manual execution, leading to possible delay in execution. In order to minimize such a risk, XHK has in place procedures and arrangements which to the furthest extent possible provide for the prompt, fair and expeditious execution of Orders.
- 交易所的定价和流动性为基准。
- 5.4. 共同基金非上市单位（例如单位信托或开放式投资公司）的价格在未来的“估值点”设定，因此预先不知道此类单位的确切价格。此类交易指示的执行价格将由XHK的流动性提供商根据基金经理的舍入规则提供。
- 5.5. 交易指示执行可能会延迟，包括通过在线交易系统下达的交易指示。某些通过在线交易系统下达的交易指示可能会手动处理。当出现大量电子交易指示导致积压时，XHK以及接受交易指示以执行的对手方将不得不停止正常的自动执行程序，并转为手动执行，从而可能导致执行延迟。为了尽量降低这种风险，XHK已制定一些程序和安排，以尽可能及时、公平和迅速地执行交易指示。
- 5.6. 交易指示的执行受到7天24小时监控，并可在以下情况下手动更改（切断）执行场所：
- a) XHK发现客户资金安全有潜在风险的证据——信用风险事件；
 - b) 如有技术问题，当交易平台的技术支持发现对手方完全没有响应的证据时，可以将其切断，直到技术问题得到解决；
 - c) 任何其他可能对XHK的诚信和客户资金构成威胁的事件；
 - d) 对执行场所/对手方的定期评估显示服务级别升级、费用下降和条件改善，这基本上意味着对手方获得更高

- 5.6. Execution of Orders is monitored 24/7 and the execution venue can be changed (switched off) manually in the following cases:
- XHK finds evidence for potential risks to the safety of client's funds — credit risk events;
 - In case of technical problems, when the technical support of the trading platform sees evidence that counterpart is not responsive at all, it can be switched off, until technical problems are solved;
 - Any other events which potentially poses threats to the integrity of XHK and the clients' funds;
 - Periodic evaluation of the execution venue/counterpart shows upgrade of the service level, reduction of costs and better conditions, which basically means that counterpart gets rated higher and moves up in the execution line.
- 5.7. Standard execution venue failure — applicable only to CFDs, transferable securities and other exchange traded instruments. OTC instruments like Eurobonds or OTC Futures and Options are handled on a case-by-case basis, and the best price is determined by the price range of extensive trading.

评级，且在执行线中的位置上移。

- 5.7. 标准执行场所失效——仅适用于差价合约、可转让证券和其他交易所买卖工具。欧洲债券或场外交易期货和期权等场外交易工具根据具体情况处理，而最佳价格由广泛交易的价格区间确定。为了提供连续性和容错性，XHK在可能由以下原因引起的执行场所失效的情况下使用智能交易指示传递：
- 执行场所的技术断开；
 - 在对手方的账户上缺乏提供给执行场所的自由资金；
 - 交易指示不合适的特征。

在上述情况下，智能交易指示传递将在下一个执行场所发出交易指示。如果交易指示无法下达，则会被完全拒绝。如果交易指示规模对于市场来说太大或市场深度太浅，则适用相同的策略。在上述(b)的情况下，智能交易指示传递只是在提供给特定执行场所的资金到达该对手方的账户之前的临时措施。XHK保留有关此类拒绝的记录，并根据评分系统评估对手方的容错性，以进一步确定是否更改评级。

To provide continuity and fault-tolerance, XHK uses smart order routing in case of execution venue failure which may be caused by the following reasons:

- a) Technical disconnection of the execution venue;
- b) Lack of free funds on the account with the counterpart providing the execution venue;
- c) Unsuitable characteristics of the Order.

In the above cases, smart order routing will place Order with the next execution venue in line. If an Order cannot be placed, it is rejected completely. If an Order size is too large for the market or the market depth is too thin, the same strategy applies. In the case of (b) above, smart order routing is the temporary measure only until funds arrive to the account with this counterpart providing specific execution venue. XHK keeps records on such rejects and evaluates fault-tolerance of the counterpart for further possible changes of rating according to the scoring system.

6. Execution venues

- 6.1. XHK uses several external financial institutions and brokers to execute Orders for different financial instruments.
- 6.2. Before including the counterpart in the list of execution venues, 4 steps must be

6. 执行场所

- 6.1. XHK使用多家外部金融机构和经纪商为不同的金融工具执行交易指示。
- 6.2. 在将对手方列入执行场所列表之前，必须完成4个步骤：

completed:

A — Initial pre-screening of conditions — at this stage XHK evaluates if the counterparty could offer better service, additional markets, better financing rates or faster execution. This phase is mostly undocumented.

B — Due Diligence check — is performed by the relevant compliance employee or director. Written result should be approved by the director.

C — Risk Assessment — financial and other risks are evaluated by XHK or a manager

of XHK. Recommendations and conclusions should be provided to the director responsible for due diligence check.

D — Technical compatibility — technical specialists of the trading platform provider are checking general integration possibilities of the counterparty systems with the trading platform.

A – 初步的条件预先筛选——在此阶段, XHK评估交易对手是否可以提供更好的服务、额外市场、更好的融资利率或更快的执行。这个阶段通常没有文档记录。

B – 尽职调查——由相关合规员工或董事执行。书面结果应经董事批准。

C – 风险评估——财务及其他风险由XHK或XHK的经理评估。应向负责尽职调查的董事提供建议和结论。

D – 技术兼容性——交易平台提供商的技术专家将检查对手方系统与交易平台的一般集成可能性。

一旦对手方被列入执行场所列表中, 就会根据评分系统开始连续评估。

Name 名称	Country of registration 注册国家	Regulatory authority 监管机构	Financial instruments 金融工具
R.J. O'Brien Limited	USA 美国	Financial Industry Regulatory Authority ("FINRA") 金融业监管局(FINRA)	Worldwide Derivative Contracts Fixed Income Securities 全球衍生工具合约、固定收益证券
Cowen International Limited	United Kingdom 英国	Financial Conduct Authority (FCA) 金融市场行为监管局	Worldwide Transferable Securities, Derivative Contracts, Fixed Income Securities 全球可转让证券及衍生工具合约 和固定收益证券

Name 名称	Country of registration 注册国家	Regulatory authority 监管机构	Financial instruments 金融工具
Lek Securities UK Limited	United Kingdom 英国	Financial Conduct Authority (FCA) 金融市场行为监管局	Worldwide Transferable Securities, Derivative Contracts, Fixed Income Securities 全球可转让证券及衍生工具合约和固定收益证券
Oyak Yatirim Menkul Degerler A.S.	Turkey 土耳其	Capital Markets Board of Turkey (CMBT) 土耳其资本市场委员会	Worldwide Transferable Securities, Derivative Contracts, Fixed Income Securities 全球可转让证券、衍生工具合约和固定收益证券
Advantage futures LLC	USA 美国	Financial Industry Regulatory Authority (FINRA) 金融业监管局(FINRA)	Derivative contracts 衍生工具合约
Sparkasse Bank	Malta 马耳他	Malta Financial Services Authority 马耳他金融服务局	Malta Government Bonds 马耳他政府债券
Nissan Securities Co., Ltd	Japan 日本	Financial Services Agency 日本金融厅	Derivative Contracts 衍生工具合约
EXT LTD	Cyprus 塞浦路斯	Cyprus Securities and Exchange commission (CYSEC) 塞浦路斯证券交易委员会(CYSEC)	Worldwide Transferable Securities and Derivative Contracts and Fixed Income Securities, Contracts for Difference (CFD) 全球可转让证券及衍生工具合约和固定收益证券、差价合约(CFD)

Once the counterpart is being included in the list of execution venues, continuous

6.3. 金融工具的执行场所/执行场所提供商(对手方)列表:

evaluation begins according to the scoring system.

6.3. List of execution venues/execution venues providers (counterparts) for the financial instruments:

6.4. The standard and alternate execution venues (execution line) for different trading instruments are specified in the Annex I of this Policy.

6.4. 不同交易工具的标准和备用执行场所(执行线)于本政策的附件1中规定。

7. Effects on order execution

7.1. Clients should be aware of the following risks associated with volatile markets, especially at or near the opening or closing of the standard trading session:

- Execution at a substantially different price from the quoted bid or offer, or the last reported sale price at the time of order entry, as well as partial executions or execution of large Orders in several transactions at different prices.
- Delays in executing Orders for financial instruments that XHK must send to external market maker and manually routed or manually executed Orders.
- Opening prices that may differ substantially from the closing price on the previous day.
- Locked (the bid equals the offer)

7. 对交易指示执行的影响

7.1. 客户应知悉与波动市场相关的以下风险,特别是在标准交易时段开盘或收盘时或附近:

- 以与所报的买价或卖价明显不同的价格,或在交易指示输入时的最后报告的销售价格执行,以及通过若干交易以不同价格部分执行或执行大额交易指示。
- 延迟执行XHK必须发送给外部做市商的金融工具交易指示及手动传递或手动执行的交易指示。
- 开盘价可能与前一天的收盘价明显不同。
- 锁定(卖价等于买价)并交叉(卖价高于买价)市场,这妨碍了客户交易的执行。
- 价格波动是可能影响交易指示执行的一个因素。当客户向经纪商下达大

and crossed (the bid is higher than the offer) markets, which prevent the execution of Client trades.

- Price volatility is one factor that can affect Order execution. When Clients place a high volume of Orders with brokers, Order imbalances and backlogs can occur. This implies that more time is needed to execute the pending Orders. Such delays are usually caused by the occurrence of different factors: (a) the number and size of Orders to be processed, (b) the speed at which current quotations (or last-sale information) are provided to XHK and other brokerage firms; and (c) the system capacity constraints applicable to the given exchange, as well as to XHK and other firms.

量交易指示时,可能会发生交易指示不平衡和积压。这意味着执行等待执行的交易指示需要更多的时间。这种延迟通常是由不同因素引起的:(a) 待处理交易指示的数量及规模,(b) 向XHK及其他经纪公司提供现时报价(或最后卖出信息)的速度;(c) 适用于给定交易所,以及XHK和其他公司的系统处理量限制。

8. Types of orders

- 8.1. Given the risks that may arise when trading in volatile markets, the Client may wish to consider using different types of Orders to limit the risk and manage investment strategies. (It should be noted that the following descriptions of Order types may apply only to some and not all types of financial instruments).
- 8.2. Market order: With a market order, the Client instructs a financial institution or trading counterpart to execute a trade

8. 交易指示类型

- 8.1. 鉴于在波动市场交易时可能会出现风险,客户可能希望考虑使用不同类型的交易指示来限制风险和管理投资策略。(应当注意,以下交易指示类型描述可能仅适用于某些而非所有类型的金融工具)。
- 8.2. 市价交易指示:通过市价交易指示,客户指示金融机构或对手方以现行市场价格尽快执行一定规模的交易。不论价格如何变化,金融机构均须执行市价交易指示。因此,如果市场价格在交易指示成交所需的时间内发生大幅变动,则交



of a certain size as promptly as possible at the prevailing market price. Financial institutions are required to execute market orders without regard to price changes. Therefore, if the market price moves significantly during the time it takes to fill an Order, the Order will most likely be exposed to the risk of execution at a price substantially different from the price when the Order was entered.

- 8.3. Limit order: With a limit order, the Client sets a maximum purchase price, or a minimum sale price, at which the trade is to be executed. As a limit order may be entered away from the current market price, it may not be executed immediately. A Client that puts a limit order must be aware that he/she is giving up the certainty of immediate execution in exchange for the expectation of getting an improved price in the future. Limit orders may be routed to an exchange without human intervention.
- 8.4. Stop order: Different from a limit order, a stop order allows for selling below the current market price or buying above the current market price if the stop price is reached or breached. A stop order is therefore a "sleeping" order until the stop price is reached or breached.
- 8.5. Stop limit order: A stop limit order is a variation of a stop order as described in Section 8.1.3 with a lower (higher) limit price to suspend trading if the price falls
- 易指示很可能会面临以与交易指示输入时价格明显不同的价格执行的风险。
- 8.3. 限价交易指示:通过限价交易指示,客户设定要执行交易的最高购买价格或最低卖出价格。由于限价交易指示可以按有别于当前市场价格的价格输入,因此可能不会立即执行。下达限价交易指示的客户必须知悉,他/她是在放弃立即执行的确定性,以换取将来获得改善价格的预期。限价交易指示可以在没有人为干预的情况下传递到交易所。
- 8.4. 止损交易指示:与限价交易指示不同,当达到或突破止损价格时,止损交易指示允许在低于当前市场价格的位置卖出或在高于当前市场价格的位置买入。因此,在达到或突破止损价格之前,止损交易指示是“休眠”交易指示。
- 8.5. 止损限价交易指示:止损限价交易指示是止损交易指示的变种,如第8.1.3条所述,如果价格在交易指示成交之前下跌(上涨)太多,其较低(较高)的限价会使交易暂停,将交易限制在预定价格区间内。

(rises) too far before the order is filled, restricting trading to a predefined price range.

9. Regular review of execution quality and execution venue

- 9.1. XHK will review this policy when necessary but at least annually and whenever a material change occurs that affects XHK's ability to obtain the Best Execution.
- 9.2. XHK regularly reviews the overall quality of its order. Continuous evaluation of execution and its venue is made via a scoring system. All scores are relative on a scale from 1 (worst) to 10 (best). The highest Total Score determines the rank of the execution venue.

$$\text{Total Score} = 0.5 \times \text{SpreadAndPriceScore} + 0.5 \times \text{ReliabilityScore} + 0.5 \times \text{CostScore} + 0.3 \times \text{ServiceScore}$$

where:

Spread and Price Score — relative score of the average bid/ask spread in the instrument, sampled on random times. These scores also include types of Orders that venue can execute, number of Orders filled, possible last look, handling of mass Orders etc.;

Reliability Score — score of total technical integration, speed of execution and technical stability;

9. 定期审查执行质量和执行场所

- 9.1. XHK将在必要时,但至少每年一次,以及每当发生影响XHK获得最佳执行的能力的重大变化时审查本政策。XHK定期审查其交易指示的整体质量。通过评分系统对执行及其场所进行持续评估。所有分数都是从1(最差)到10(最好)之间的相对数值。最高总分决定了执行场所的排名。

$$\text{总分} = 0.5 \times \text{点差与价格分数} + 0.5 \times \text{可靠性分数} + 0.5 \times \text{费用分数} + 0.3 \times \text{服务分数}$$

其中:

点差与价格分数 - 工具的平均买/卖点差的相对分数,随机抽样。这些分数还包括该场所可以执行的交易指示类型、成交交易指示的数量、可能的最后确认、批量交易指示处理等;

可靠性分数 - 总技术整合、执行速度和技术稳定性的分数;

费用分数 - 在该场所执行交易指示所涉及的费用总费用的相对分数;

服务分数 - 对手方融入后台对账,提供额外服务,对技术和融资方面提供快速和良好支持的能力的相对分数。



Cost Score — relative score of total cost associated with executing an Order on the venue;

Service Score — relative score of the ability of the counterpart to integrate into back office reconciliation, provide additional services, have fast and good support on technical as well as on the finance side.

Evaluation is done sporadically at random times, and at least quarterly. XHK will amend this policy on the basis of such reviews as it considers necessary. Any new policy will be made available on XHK's websites and will be in force as from publication.

Please see Annex 2.

评估偶尔随机进行, 并至少每季度进行一次。XHK将根据此类审查的结果在认为必要的情况下修改本政策。任何新政策都将在XHK的网站上公布, 并将在发布时生效。

请参阅本政策的附件2。

10. XHK's terms of business

10.1. This policy is subject to XHK's Terms of Business and other Rules from time to time governing the relationship between the Client and XHK. Further information on Order execution can be found in XHK's Terms of Business.

10. XHK的商业条款

10.1. 本政策受XHK的商业条款和其他不时规管客户与XHK之间的关系的规则的约束。有关交易指示执行的更多信息, 请查看XHK的商业条款。

Annex I

附件1

Standard and Alternate Execution Venues

标准和备用执行场所

Instrument	Standard Execution Venue*	Alternate execution venue**			
		2nd	3rd	4th	5th
	标准执行场所*	第二场所	第三场所	第四场所	第五场所
Contracts for Difference (CFD) 差价合约(CFD)	EXT LTD	Cowen international Limited			
Transferable Securities 可转让证券	Lek Securities UK Limited	Cowen International Limited	EXT LTD		
Russian MOEX Fixed Income Securities 俄罗斯MOEX固定收益证券	EXT LTD				

Alternate execution venue
备用执行场所****

Russian MOEX Transferable EXT LTD
Securities
俄罗斯MOEX可转
让证券

Russian MOEX Fixed Income EXT LTD
Securities
俄罗斯MOEX固定
收益证券

Execution is regularly evaluated by the certain criteria:

- Reliability of the [CP], fault-tolerance, spreads, commissions, leverage what may result change in the sequence of execution venues.

Standard execution venue* — for all Orders, main criteria is fault tolerant execution.

Alternative execution venue** — automated switch in case of standard execution venue failure.

Contracts for Difference (CFD):

- EXT LTD — set as standard because of the absence of slippage.
- Cowen International Limited — set as last option in case all previous venues have failed.

执行按以下特定标准定期进行评估：

- [CP]的可靠性、容错性、点差、佣金、利用可能导致执行场所顺序发生变化的内容。

标准执行场所* - 对于所有交易指示，主要标准是容错性执行

备用执行场所** - 在标准执行场所失效的情况下自动切换

差价合约(CFD):

- EXT Ltd - 因没有滑移价差而设定为标准场所
- Cowen International Limited – 设定为在之前的所有场所都失效的情况下的最后选项

Annex 2

Best Execution in Daily Operations and Its Control Tools

XHK performs best execution control tests on a yearly basis by analysing random transactions. The overall system of monitoring and control takes place a constant 24/7 basis.

When defining the best execution, the following factors are taken into consideration:

- Types of securities traded;
- Broker/dealers (counterparties) used;
- Trading venues utilized;
- Costs and clients' benefits;
- Possible conflict of interest.

XHK uses technical solution - Symbol DB system ("DBS"), aimed to provide automatic assessment of the Order and allocate to the most appropriate counterpart. The settings are managed by the outsourced technical support of the trading platform provider and XHK. Major changes such as counterpart inclusion/exclusion should be approved by a director; regular daily changes such as switching of counterpart or any other auto-routing

附件2

日常操作中的执行及其控制工具

XHK通过分析随机交易，每年实施最佳执行控制测试。整个监测和控制系统以不间断的7天24小时运行。

- 在界定最佳执行时，会考虑以下因素：
- 交易的证券类型
- 使用的经纪商/交易商（对手方）
- 使用的交易场所
- 费用和客户优惠
- 可能发生的利益冲突

最佳执行分为3个阶段：执行前，此时XHK选择适当的对手方；执行，此时评估交易平台的功能以及现有的内部控制；及执行后，此时审查和分析有关XHK如何检测和解决交易错误的信息。

XHK使用技术解决方案——交易品种数据库系统("DBS")，旨在提供交易指示的自动评估并分配给最合适的对手方。这些设置由交易平台提供商的外包技术支持和XHK进行管理。对手方的列入/排除等重大变更应由董事批准；常规日常变更（例如切换对手方或与在线制度相关的任何其

issues related to the online regime are resolved by the outsourced technical support of the trading platform provider according to this policy and other instructions of XHK.

At the pre-execution stage, XHK will analyse the current list of available counterparts for different financial instruments, their rates, XHK's balances on the counterparts' accounts and rank them in DBS.

XHK will immediately re-evaluate the counterparts and make changes within DBS in the following cases:

- When the system starts to provide declines (except when the Clients do not have enough balance on their accounts for the Orders provided).
- When XHK's balances on the counterparts' accounts have reached low/zero balances.
- When notifications from the counterparts regarding changes/limits implemented have been received.
- When any other new circumstances arise.

XHK's policy is to execute trades individually and in the order they are received on a "first come, first served" basis, even in the case of partial execution. Therefore, in principle, XHK does not aggregate Orders.

Due to system failures or other unavoidable reasons, XHK may execute Orders in a method that differs from that stated in this policy. Even in such a case, XHK endeavours to execute

他自动转发问题) 由交易平台提供商的外包技术支持根据本政策和XHK的其他指示来解决。

在执行前阶段, XHK将分析不同金融工具的可用对手方的当前列表、其费率、XHK在对手方账户的余额, 并将他们在DBS中排名。

在下列情况下, XHK将立即重新评估对手方并在DBS内进行更改:

- 当系统开始发出拒绝时(除非是客户的账户中没有足够的余额来执行所提供的交易指示)。
- 当XHK在对手方的账户中的余额达到低水平/零时。
- 当收到对手方发出的关于实施变更/限制的通知时。
- 当出现任何其他新情况时。

XHK的政策是, 即使在部分执行的情况下, 也按照“先到先得”顺序单独执行交易。因此, 原则上XHK不会合并交易指示。

由于系统故障或其他不可避免的原因, XHK可能会采用与本政策中所述方法不同的方法执行交易指示。即使在这种情况下, XHK也会尽力按照当时可用的最佳条款执行交易指示。

在执行阶段, 系统会自动处理所有交易指示。外包技术支持会按照交易指示执行的统计数据监控系统提供的所有通知。

Orders on the best terms available at that point.

At the execution stage, all the Orders are processed automatically by the system. The outsourced technical support is monitoring all the notifications provided by the system, following the Order executions' statistics.

The automatic system's notifications are divided into 3 main groups:

1. Infrastructure problems within XHK: might arise in case of technical problems with the network (locally or globally), hardware/software problems and/or hosting company.
2. Counterpart problems: usually occur if the counterpart changes its settings, such as limits, financial instruments identifications, etc., without prior notification to XHK; in case of connection loss at the counterpart's side or between the counterpart and stock exchange.
3. Client problems: usually happen when clients provide incorrect Orders, such as out of trading time, out of the minimum/maximum limits defined by the stock exchange, incorrect size of a lot; clients have insufficient funds on the account for the initiated operation or do not have enough rights/proper access.

At the post-execution stage, all systems' notifications are analysed within the overall performance and the necessary amendments to the settings are made.

自动系统的通知分为3大组：

1. XHK内部的基础设施问题，可能在以下情况出现：网络（本地或全球）、硬件/软件问题和/或托管公司出现技术问题。
2. 对手方问题，通常在以下情况发生：对手方在未事先通知XHK的情况下更改其设置（如限额、金融工具标识符等）；对手方的连接或对手方与证券交易所之间的连接丢失。
3. 客户问题，通常在以下情况发生：客户提供不正确的交易指示，例如不在交易时间，超出证券交易所规定的最低/最高限额，手数不正确；客户的账户中没有足够的资金用于发起的操作，或者没有足够的权限/适当的访问权限。
4. 在执行后阶段，会在整体表现范围内对所有系统通知进行分析，并对设置进行必要的修改。

The English language is the official communication language at XHK. In case of any disputes, discrepancies, ambiguity or differences in translations of documents/information in any other languages, the version in English prevails. Documents/Information provided in any other languages is for information purposes only and cannot be treated as an official text of the particular document.

英语是XHK的官方沟通语言。如任何其他语言的文件/信息在翻译方面有任何争议、差异、歧义或差别，则以英文版本为准。以任何其他语言提供的文件/信息只作参考用途，不能视为该文件的正式文本。