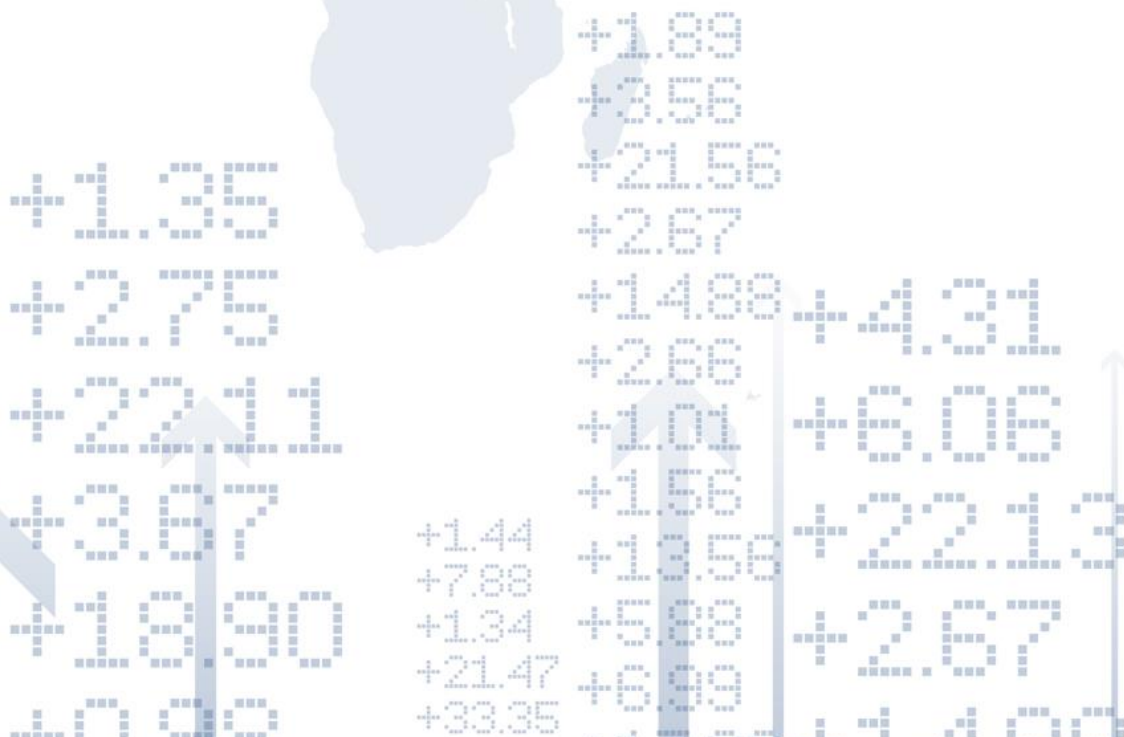




Plus500

World's Trading Machine



Summary Order Execution Policy





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1. Introduction

- 1.1 In accordance with MiFID guidelines and the Financial Conduct Authority (FCA) rules concerning its implementation in the UK, Plus500UK Ltd is required to inform you as to the policies for execution of your Trades and Orders.
- 1.2 This policy should be read in conjunction with the User Agreement (the contractual agreement that a client enters into when opening an account with Plus500UK Ltd) and if there is anything you do not understand please contact our Customer Support department.
- 1.3 In the event of a disagreement between this policy and the User Agreement, then the User Agreement shall prevail.

2. Plus500 UK Ltd (“Plus500”, “we”, “our”, “it”)

- 2.1 Plus500 offers retail clients only, contracts for differences (CFDs) across a range of asset classes: FX, Equity, Commodity, Indices, ETFs (Exchange Traded Funds) and Options on Indices.
- 2.2 Trades are directly booked with Plus500 via an online trading platform only (there is no facility for telephone or face-to-face trading), and Plus500 is the counterparty to clients’ trades. In other words, Plus500 transacts with clients as principal on the basis of a quote. This means that you must open and close every trade with Plus500 and cannot close an open trade with a third party. Plus500 is therefore the sole execution venue for trades executed by it for you.
- 2.3 Plus500 decides which markets to quote, and the times at which those markets are quoted.
- 2.4 All prices offered by Plus500 are provided by its parent company, Plus500 Ltd.
- 2.5 All trades are executed by Plus500 using the Plus500 Ltd trading platform and for each trade an identical hedge trade takes place between Plus500 and Plus500 Ltd.
- 2.6 Plus500 acts as principal in all your trades which are bilateral transactions between it and you. Accordingly, there is no aggregation, allocation or re-allocation of your and/or Plus500’s own account Orders or transactions.



- (iv) The price is then said to have ‘slipped’ from one level to another, as the market has ‘gapped’ from one level to another.
- (v) In most cases an Order, when triggered by market price action, will be filled at the same, or very close to the same price as requested.
- (vi) If the market ‘gaps’ overnight, it will open at the start of the trading day at a price sharply different to the closing price of the previous trading session.
- (vii) Any Order whose activation price is between Plus500’s closing quote of the previous day’s trading and their opening quote of the next day’s trading session, will be filled at the first price Plus500 can reasonably obtain with reference to the ‘underlying market’.

If any market gaps from one quoted price to another due to any market sensitive piece of information (such as a profit warning or an economic data release), then any Order in place between these prices will be activated.

- 6.4 The execution price of any Order affected by price sensitive information will be subject to general exchange rules.
- 6.5 Where a client gives instructions via the use of a Guaranteed Stop Order, specifying the price at which a position is to be closed if the market moves against them, those instructions take precedence over other aspects of Plus500’s Order Execution Policy.
- 6.6 A trade which has a Guaranteed Stop Order set against it will be closed at the specified level if it is reached.
- 6.7 Plus500 does not accept any Orders outside the market hours of the relevant underlying financial instrument, and futures are traded in accordance with the trading hours of the exchange on which the underlying financial instrument is traded.
- 6.8 When executing your Limit Order, the order will be executed taking into account the conditions offered at the time the Order is eventually executed. This includes but is not limited to the Leverage ratio, which may be different from the Leverage ratio at the time the Order was placed.

7. Trade size and nature: the relative importance attached is LOW as not applicable to Plus500’s business model

- 7.1 All trade execution is subject to size considerations.
- 7.2 Plus500 neither executes any trades above normal market size, nor offers greater liquidity than the ‘underlying market’.
- 7.3 Plus500 will not make a ‘partial fill’ of any trade.



(i) Price:

- a) Ensuring due regard to its bid/ offer prices being reflective of the market price and movement for the underlying reference product to which the CFD relates.
- b) To aid clients to seek reassurance primarily for futures contracts, there is a link on the trading screen to prices on the relevant exchange on which the underlying financial instrument is traded. This facilitates the easy comparison of Plus500's prices and the exchange's prices, although as these prices are provided via newswires there is often a slight time delay. Where the underlying instrument is not traded on a specific exchange, there is a link to Yahoo Finance/ Google Finance for illustrative purposes only.
- c) The price for a given contract is calculated by reference to the price of the relevant underlying financial instrument. This price is obtained through Plus500 Ltd from a range of independent third party reference sources, various nominated independent financial market data providers, who source their price feeds from relevant exchanges. Each provider's price feed is subjected to numerous defined checks and verifications, which are carried out by Plus500 Ltd at individual financial instrument level, before being presented to Plus500, and onto their clients.
- d) In the event that the price is outside acceptable defined parameters when compared to the previous price received from the same provider, an alert is triggered for the gap to be investigated by Plus500 Ltd prior to a price being presented to Plus500 and onto their clients. Where the price is verified, as the gap is as a result of, for example, market volatility, the price is presented to Plus500 and is available for clients to trade.
- e) Price feeds that do not comply to spread limitations are not provided by Plus500 Ltd to Plus500 and therefore are not presented to clients, until they are within a prescribed variance of the prevailing market spread. Instruments with continual low trading volumes and poor market value that result in a wide bid-ask spread will not generally be available to trade.
- f) As the price is obtained through Plus500 Ltd from a range of independent third party reference sources, various nominated independent financial market data providers, who source their price feeds from relevant exchanges, there are various contingency arrangements that preserve the existence of a price feed from Plus500 Ltd to Plus500, and onto clients.

(ii) Costs and Spreads:

- a) As there is only one execution venue, cost is deemed the most important aspect to the client, assuming price movements track the underlying market fairly.



b) Spreads and costs are monitored via numerous internal protocols, processes and examination of records.

(iii) Speed:

a) In the event of price slippage between the time that a client requests a trade and its execution, Plus500 operates symmetric price slippage, and closely monitors this aspect to ensure absolute adherence to this philosophy.

10.3 These checks and verifications are separately monitored by Plus500, as ownership of best execution monitoring resides with Plus500.

10.4 Additional monitoring reviews and investigation of any anomalies is undertaken by a senior independent person at Plus500, from the person(s) carrying out the more frequent reviews.

10.5 The best execution obligation requires Plus500 to take all reasonable steps to deliver the best possible result for clients. There may be instances where it will be apparent that best execution was not provided. There may be legitimate reasons for this, or it may be that Plus500 could have improved the service provided to the client. Plus500 will learn from all incidents, take remedial action to rectify any client detriment and correct any deficiencies identified as a result of its best execution monitoring to ensure that best execution is maintained on an on-going basis.



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Plus500UK Ltd. ■ 78 Cornhill ■ London, EC3V 3QQ