

## **Client order handling policy**

According to MIFID and Swedish law Neonet Securities AB (Neonet) is required to have an order handling policy in place. Neonets order handling policy gives Neonet's clients guidance to how Neonet will handle their orders to achieve the best possible result.

Neonet will always act in best interest of clients when handling client orders. All clients will be treated in an equal and fair manner. Neonet will always refrain from front-running activities.

Neonet will use this policy whenever Neonet receives, transmits and executes orders on behalf of its clients. Whenever Neonet receives a specific execution instruction from the client Neonet will execute the order according to the specific instruction given by client.

### **General principles**

Neonet will take all reasonable steps to ensure:

- That all orders that are executed on behalf of clients are promptly, accurately and fairly recorded and allocated.
- That all comparable client orders are carried out sequentially and promptly unless the characteristics of the order or prevailing market conditions make this impracticable or the interest of the client require otherwise.
- That all reasonable steps are taken in order to make the settlement process work as smoothly as possible.
- That all reasonable steps are taken so that information relating to client pending orders is not misused by any employee.

### **Aggregation and allocation of orders**

Neonet will only carry out client orders or transactions in aggregation with another clients order if the following conditions are met:

- That it is unlikely that the aggregation of orders and transactions will work overall to the disadvantage of the client whose order is to be aggregated.
- That it is disclosed to each client whose order is to be aggregated that the effect of the aggregation may work to its disadvantage in relation to a particular order.
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### **Marketplaces that Neonet mainly uses for order execution**

Neonet participates on different regulated marketplaces. Neonet regularly evaluates which regulated marketplaces and MTFs are used for order execution in financial instruments (please see <http://www.neonet.com> under Execution Services /Connected Marketplaces for a list of Execution Venues that Neonet is connected to or is a member of).

### **Regular reviews**

In order to keep this **Client order handling policy** in line with client demands and in compliance with applicable rules and regulations Neonet will review the policy on a regular basis.