Regulated by the Dubai Financial Services Authority (DFSA reference F004173)

TF GLOBAL MARKETS (UK) LIMITED

Summary Order Execution Policy

Document	Summary Order Execution Policy
Version	V 1.2.20
Effective date	27th June 2024
Entity	TF Global Markets (UK) Limited
Regulator	Dubai Financial Services Authority (DFSA)
DFSA reference	F004173
DIFC registration number	7113

Contact

compliance@thinkmarkets.com
Phone: +971 (04) 448 4229
www.thinkmarkets.com/ae
Unit P6-02D Podium Level, Damac Park Towers,
Commercial A, Dubai International Financial Centre, Dubai, United Arab Emirates

Last updated: 8 October 2026

TF Global Markets (UK) Limited is regulated by the Dubai Financial Services Authority (DFSA) under reference #F004173 and registered by DIFC with registration number 7113.

Summary Order Execution Policy

1. Introduction

This is the Order Execution Policy or Best Execution Policy (the "Policy") of TF Global Markets (UK) Limited ("ThinkMarkets"), which is authorised and regulated by the Financial Conduct Authority as an investment firm.

ThinkMarkets operates this Order Execution Policy In accordance with the requirements of the Markets in Financial Instruments Directive 2014/65/EU ("MiFID II") as well as the rules laid down by the Financial Conduct Authority ("FCA Rules").

ThinkMarkets have a general duty to conduct our business with you honestly, fairly and professionally. This document sets out the steps that we follow in order to obtain the best possible result as consistently as possible when executing your orders.

It should be read in conjunction with our Customer Agreement, Conflicts of Interest Policy and Risk Warning Notice.

This policy forms part of our Terms and Conditions, and as such, acceptance of our Customer Agreement infers acceptance of our Order Execution Policy outlined in this document.

2. Scope

Our Execution Policy applies to all orders that are executed by ThinkMarkets on your behalf relating to financial CFDs and Spread Betting transactions, and in relation to financial instruments, (as those terms are defined under MFID II).

All orders will be mark-to-market via counterparties (some of which will be exchange based). In all circumstances, we will be acting as principal (matched principal) and, as such; we are your order execution venue. There will be zero mark up on the counterparty traded execution to you, the client.

The majority of your instructions are executed on an over the counter ('OTC') basis but we may direct some of the trades through a regulated market or multilateral trading facility (MTF).

Where you execute your order through our online MT4 [or other] trading platform, we shall assume that you have provided us with specific instructions and in these circumstances, ThinkMarkets will have

ThinkMarkets is a trading name of TF Global Markets (UK) Ltd. TF Global Markets (UK) Limited is authorised and regulated by the Financial Conduct Authority, FRN 629628. Company number: 09042646

complied with our obligation to take all sufficient steps to obtain the best possible result when executing an order on your behalf.

Any trades with us are synthetically based and as such are non-transferable. If you create an Open Position with us then you must close it with us.

3. Execution Venue

We, ThinkMarkets, are your venue of execution. For clarification, a venue of execution means a regulated market, Multilateral Trading Facility (MTF), systematic internaliser or other liquidity provider (i.e. an off-exchange dealer).

We do NOT act as a Market Maker to your transactions. As such when you execute against us we are your execution venue, however in all circumstances an identical order will be executed on the above-mentioned execution venues by or through the entity selected by ThinkMarkets and to whom ThinkMarkets transmits the order. Venues other than regulated markets and MTFs (e.g. off exchange dealers) may also be used as execution venues in exceptional circumstances.

4. Execution Factors & Criteria

To provide Best Execution we are obliged to take into account certain execution factors for each and every transaction. We have defined these criteria as below for your perusal. In accordance with our regulatory responsibilities, if you have been categorised as a Retail Client, then we must determine whether we have provided you with Best Execution by reference to the total consideration paid (price and cost of execution).

In order to do this we will take into account all relevant factors concerning the underlying market at the time and any specific instructions for your orders.

Our execution Factors & Criteria are an important aspect of the process to ensure that the best possible result is obtained for execution. These Factors & Criteria have been considered in order of the relevant importance we place on them as part of the decision-making process and are as follows:

5. Price & Cost

The relative importance we attached to these factors is HIGH.

The strike price is determined by the price we are able to obtain for the underlying instrument at that time for CFDs, and the ‘Spread Charge’, which is defined as the spread that is added to the underlying

ThinkMarkets is a trading name of TF Global Markets (UK) Ltd. TF Global Markets (UK) Limited is authorised and regulated by the Financial Conduct Authority, FRN 629628. Company number: 09042646

market price, resulting in the spread bet price. We ensure complete transparency by providing you with up-to-date market information sheets on our site. The underlying instrument price is obtained from a Third Party external referenced source.

When trading in the Underlying Instrument, is very active (Fast Market), and the price of the said Underlying Instrument changes quickly, there are no guarantees that every price movement in the underlying instrument will be reflected in Our Price.

We aim to update Our Price as frequently as sufficiently possible; however, our ability to do so may be limited to technological factors including hardware, software and data communications links.

We execute all Trades at Our Price and in accordance with our General Terms. Certain costs may be passed to you arising from charges incurred on the Underlying Instrument. These include (but are not exclusive to) Borrowing charges and certain Stamp Duties).

6. Order Handling

Size of Order and Likelihood of Execution

The relative importance we attached to these factors is HIGH. Trades will be executed as soon as sufficiently possible and in most circumstances almost instantaneously. However, there may be circumstances where Trades cannot be executed almost instantaneously, for example, due to illiquidity in the Underlying Instrument or if there is something unusual about the nature of the Order or in a Fast Market.

When we accept an instruction from you regarding a spread bet or CFD, we will only accept the instruction on the basis that we would be able to fill at least the equivalent hedge as a proprietary trade in the underlying market.

Speed of Execution

The relative importance we attached to these factors is HIGH. In most circumstances, spread bets and CFDs requested by you will be processed immediately. Occasionally however, situations beyond our control may occur that prevent immediate execution. For example, there may be a delay in execution should lack of liquidity in the underlying market prevent instant execution of our hedge, against your spread bet or CFD. TF Global Markets UK Limited will endeavour to fulfil your instructions within a timely manner wherever the market conditions permit.

ThinkMarkets is a trading name of TF Global Markets (UK) Ltd. TF Global Markets (UK) Limited is authorised and regulated by the Financial Conduct Authority, FRN 629628. Company number: 09042646

Other Factors

Client exposure to our products becomes effective as soon as you receive confirmation (Via electronic medium) from us that your CFD or spread bet has been 'filled' and therefore execution has taken place. We do not guarantee the execution price of orders and as such, it is important to note that your fill will be dependent upon the pricing of the underlying instrument at that time. We do, of course, make every effort to execute orders at or very close to the specified order. However, due to potentially rapid movements in the underlying price, it is possible that our price may move quickly or erratically causing market slippage when we execute your orders on your behalf.

7. Dealing with your Orders

We do not operate a Trading desk and as such, we do not offer the ability to talk to traders for the placement or execution of Orders. All instructions will come from yourself via our trading platform and are received by us as matched principal.

In most cases when the conditions or events specified in your Order Instructions occur, your trade will be executed at or very close to the specified Order Price. Our Price may move to a price which is fiscally adverse than your specified Order Price without any quotes at any intermediate levels. This will be due to rapid price changes in the Underlying Instrument (called 'gapping'), and will result in slippage of your specified price to the new executed level. Events such as the unpegging of currencies will be the catalyst for such movements. In such a case, Our Price at the time of execution may be markedly different to the specified Order price.

If you have placed multiple orders, you must ensure you have sufficient funds for them to be executed. If you have placed multiple orders in the same market at the same designated price, there are no guarantees that they will be executed at the same price as they will be treated and executed as separate trades. The Fill price will depend upon the liquidity and other variables effecting the underlying instrument price movement at that time.

8. Our Execution Venue(s)

ThinkMarkets is a subsidiary of TF Global Markets (Aust) Pty Limited, and as such has a liquidity relationship as an intra-group organisation. TF Global Markets (Aust) Pty Ltd is the holder of Australian Financial Services Licence number 424700. TF Global Markets (Aust) Pty Ltd acts pursuant to rules administered by Australian Securities and Investments Commission (ASIC). TF Global Markets (Aust)

ThinkMarkets is a trading name of TF Global Markets (UK) Ltd. TF Global Markets (UK) Limited is authorised and regulated by the Financial Conduct Authority, FRN 629628. Company number: 09042646

Pty Ltd transacts with a number of providers to satisfy its Best Execution requirements, a list of trading venues is available upon request.

9. Our Obligations

We do not owe you a Fiduciary Duty. Our obligations and commitment to provide you with Best Execution does not mean that we owe you any fiduciary responsibilities over and above the specific regulatory obligations placed upon us or as may be otherwise contracted between us.

10. Conflicts Of Interest

ThinkMarkets is a wholly owned subsidiary of TF Global Markets (Aust) Pty Limited. In recognition that potential conflicts of interest could arise where dealing arrangements include reliance on the use of a connected party, ThinkMarkets ensures that these arrangements do not undermine the delivery of best execution for its clients, further, this document has been prepared in accordance with the provisions set out in article 16 (3) and 23 of MiFID II[1].

ThinkMarkets has implemented business practices and management oversight arrangements, supported by controls that monitor these potential conflicts on an ongoing basis and reports to the Compliance Committee and Board on how effectively such potential conflicts are managed.

11. Execution Quality – Data

Where available, we will also provide a link to the most recent execution quality data published in accordance with Article 27(3) of Directive 2014/65/EU (known as 'MiFID II') for each execution broker and venue listed in our Order Execution Policy.

Details of Execution

ThinkMarkets will keep records of all activities and actions relating to an order. On request by a client, we will demonstrate that we have executed the order in accordance with our execution policy.

12. Consent

ThinkMarkets is required by its regulator, the Financial Conduct Authority, to obtain prior client consent to its Order Execution Policy. Clients will be deemed to have provided such consent when accepting ThinkMarkets' terms and policies during the client on-boarding process.

[1] http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32014L0065&from=EN

ThinkMarkets is a trading name of TF Global Markets (UK) Ltd. TF Global Markets (UK) Limited is authorised and regulated by the Financial Conduct Authority, FRN 629628. Company number: 09042646

13. Monitoring and Review of Policy

This policy will be reviewed at least annually and whenever a material change occurs that affects ThinkMarkets' ability to continue to obtain the best possible result for you. We will monitor compliance with the Policy and maintain records of the data that is used to set Our Price.

This policy is also published on our website, you are deemed to have agreed to its terms, and each time you provide us with instructions.

ThinkMarkets is a trading name of TF Global Markets (UK) Ltd. TF Global Markets (UK) Limited is authorised and regulated by the Financial Conduct Authority, FRN 629628. Company number: 09042646