



Order Execution Policy

Last Updated on **5th September 2025**

This Order Execution Policy applies to the services provided by Gate Technology Ltd. and our website: www.gate.com/en-eu.

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1. Introduction

This Order Execution Policy (this “**Policy**”) outlines the principles and procedures employed by the Company to take all necessary steps to obtain, while executing orders, the best possible results for its clients (the “**Clients**”) in accordance with Regulation (EU) 2023/1114 on Markets in Crypto-Assets and other applicable laws, regulations, rules and guidelines (collectively, “**Applicable Law**”).

This Policy has been approved by the Board of Directors of the Company (the “**Board of Directors**”).

This Policy forms part of the User Agreement of the Company. By accepting the terms of the User Agreement, the Clients are deemed to consent to the terms of this Policy.

2. Order Execution Factors

The Company is required to take all necessary steps to execute orders on the most favourable terms for its Clients by considering certain best execution factors (the “**Execution Factors**”) namely price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

In its dealings with Clients, the Company has a general duty to act honestly, fairly and professionally, taking into account the best interests of Clients. The Company will determine the relative importance of the Execution Factors by using its commercial judgement and experience in the light of the market information available.

A description of the Execution Factors that will be considered is set out below:

- **Price:** Execution at the best possible price for orders, taking into account the prevailing market prices and the specifics of the client order.
- **Costs:** Minimisation of direct and indirect transaction costs to ensure that client outcomes are not adversely affected.
- **Speed:** Prompt execution of orders while maintaining accuracy and minimising the risk of price changes.
- **Likelihood of Execution and Settlement:** Maximisation of the probability of order execution and settlement, taking into account the liquidity of the market.
- **Size and Nature of the Order:** Handling of large orders and specific client instructions with utmost diligence to prevent market impact.
- **Market Conditions:** Monitoring market dynamics that may affect order execution, including volatility and significant news events.
- **Any other consideration relevant to the Execution of the Orders**, which may include but are not limited to low liquidity and/or high volatility.

The Company may, in its absolute discretion and in light of available market information/conditions at the relevant time, decide that one or more of the Execution Factors listed above are more important and act accordingly.

The orders will be executed at the best available terms on the basis of the information available at the time. During times of high demand, delays in processing an order may impact the price and speed at which the order is executed.

In certain instances - whether as a result of system failures, disrupted markets or otherwise - it may be necessary to execute orders of Clients in a different manner to that set out in this Policy. In such circumstances, the Company will seek to achieve the best possible result available for the Client under the prevailing conditions.

3. Specific Instructions

A Client may ask for orders to be executed in accordance with specific instructions, either generally or on a case-by-case basis. The Company will accommodate any such requests, if and to the extent possible. Where any specific instructions result in higher costs, the Company may reflect those higher costs in its fees to the Client. In the latter case, the Company will notify the client of any revised fees prior to accepting the orders. Where the Client's instructions relate to only part of an order, the Company will continue to apply this Policy to those aspects of the order not covered by the specific instructions.

Clients should be aware that specific instructions may prevent the Company from taking the steps set out in this Policy to obtain the best possible result in respect of the elements covered by those instructions. Where there is a specific instruction from a Client, the Company shall be deemed to have satisfied its obligations to take all reasonable steps to obtain the best possible result for the Client - provided that the Company executes the order (or a specific aspect of the order) following the specific instructions.

4. Client Order Handling

The Company ensures the fair treatment of all Clients. Orders are promptly and accurately recorded and executed. Special consideration is given to time-sensitive orders, large transactions, and specific conditions requested by clients.

The Company shall not misuse information relating to pending Clients' orders and shall take all reasonable steps to prevent the misuse of such information by any employees, counterparties or any other relevant persons. This will be achieved via information barriers, access controls and encryption, surveillance and monitoring systems, and employee training.

The Company does not aggregate Clients' orders and executes all orders on an individual basis obtaining the best price available at that time.

5. Execution Venues

The primary venue for the Exchange Services is the Company's trading platform.

For the OTC Services, the Company will select execution venues based on their ability to provide the best possible outcome for the client. Criteria for selection include venue reliability, costs associated with execution, and the likelihood of timely execution. The Company shall not receive any remuneration, discount or non-monetary benefit for routing client orders to a particular trading platform for crypto-assets.

A list of current execution venues for crypto-assets on which the Company will likely rely for the OTC Services is set out in **Schedule 1** to this Policy. The Company reserves the right to

exclude one or more of execution venues and/or include additional execution venues at its discretion.

Summaries of the selection process for external trading venues (if any), execution strategies, the procedures and process used to analyse the quality of the execution obtained and how the Company monitors and verifies that best possible results will be obtained are available to Clients, upon request.

6. Client Consent

Clients are required to agree to this Policy before initiating trading activities, ensuring they understand the manner in which their orders will be handled and executed. By accepting the terms of the User Agreement, the Clients are deemed to consent to the terms of this Policy. If a Client makes any reasonable and proportionate requests for information (including additional information about this Policy), the Company shall answer clearly and within a reasonable time.

For the purposes of the OTC Services, the Client also expressly acknowledges, agrees and consents that orders will be executed outside a trading platform. This may give rise to certain inherent risks, particularly counterparty risk. A description of additional risks is available to the Client, upon request.

7. Conflicts of Interest

The Company has established and maintains a Conflicts of Interest Policy to identify, prevent, manage, and disclose any conflicts of interest. We ensure that the interests of Clients always take precedence in our order execution processes.

8. Monitoring and Review

The Company will monitor the effectiveness of this Policy and its implementation to identify and correct any deficiencies in its execution arrangements. The Company has a robust governance framework in place (which, among other matters, includes first and second line control functions) to ensure that its best execution obligations are complied with in accordance with Applicable Law.

The effectiveness of this Policy will be reviewed regularly, at least annually, or upon significant changes to market conditions or internal processes. This review helps ensure continued compliance with regulatory requirements and the maintenance of high execution standards.

9. Record Retention

The Company will retain all appropriate records in accordance with Applicable Law.

10. Amendments to this Policy

This Policy may be amended from time to time to reflect changes in regulatory requirements, market conditions, or the Company's operational strategies.

The Company will inform its Clients, with whom it has an ongoing relationship, of any material changes to this Policy or its order execution arrangements. Any such changes will come into effect upon notification to the Clients and approval by the Board of Directors.

11. Communication

The Company commits to clear, accurate, and timely communication regarding all aspects of our order execution arrangements in accordance with Applicable Law.

Schedule 1 – List of External Trading Venues for all Crypto-Assets

- Gate Global, Corp (Panama)
- Keyrock NV