

# Lim & Tan Securities Pte Ltd

## Best Execution Policy

Monetary Authority of Singapore [“MAS”] Notice SFA 04-N16 -  
Execution of Customers’ Orders

## 1. Introduction

This document outlines the Best Execution policy of Lim & Tan Securities Pte Ltd (LTS) when executing clients' orders within the scope of requirements under the Monetary Authority of Singapore (MAS) Notice SFA 04-N16 on Execution of Customers' Order.

## 2. Scope of Policy

This document sets out LTS' approach in respect of best execution policy for clients, subject to any specific instructions, the nature of the orders and the nature of the markets and products concerned.

Best execution would apply when executing clients' orders directly on an execution venue or acting as Principal or placing clients' orders with another capital markets intermediary or our counter parties when dealing in capital markets products in a foreign jurisdiction.

LTS' obligations to achieve the best possible outcome is applicable to both clients' orders executed on-exchange or off exchange.

LTS' commitment to obtain the best possible results for clients' orders do not mean that LTS owes clients any fiduciary responsibilities beyond the specific regulatory requirements placed on LTS.

## 3. Execution Factors and Criteria

LTS will consider the following factors to achieve the best possible outcome for clients' orders (not in order of priority):

- i. Price – This is the price at which order is executed excluding ancillary costs/fee.
- ii. Costs – Include both direct costs and indirect costs if any.
- iii. Speed – Time taken to execute the order.
- iv. Likelihood of execution and settlement – The likelihood that LTS will be able to complete the order or substantial part of the order.
- v. Size of order and liquidity of the share counter – Size of order and the liquidity of the share counter in the market may affect the price of execution

- vi Comparable Client Orders – For orders received from various clients, LTS will place/execute in accordance with the time of receipt of the order.
- vii. Other market considerations which may affect the placement and/or execution of order

Generally price will merit a higher importance. However there may be situations in which the relative importance of the above mentioned factors may be affected by clients' specific instructions.

In determining the relative importance and/or the applicability of the factors, LTS will also take into account the following considerations:

- (a) the types of customers it serves, whether retail customers or otherwise;
- (b) the types of capital markets products for which it accepts, places or executes orders;
- (c) the characteristics of the execution venues or brokers to which the order can be directed; and
- (d) the characteristics of the customer's orders.

#### 4. Clients' Specific Instructions

Where the client provides LTS with specific instruction for the order, LTS will follow the specific instructions given by clients. In accordance with MAS Notice SFA 04-N16 on Execution of Customers' Orders, LTS is deemed to have satisfied its best execution obligations when it places the order in accordance with those instructions. However, where clients' instructions relate to only part of an order, LTS will continue to apply its best execution policy to those aspects of the order not covered by specific instructions.

Clients are required to give specific instructions (eg price/ quantity) when placing a broker assisted order and LTS would be deemed to have fulfilled its best execution requirements.

#### 5. Online Trading System

Where client keys in orders directly into the online trading system linked to the respective exchanges or via LTS' counter parties' online trading systems, LTS is deemed to have satisfied its best execution obligations. LTS shall ensure that the infrastructure works as intended and does not result in unnecessary delays in the transmission of orders to the respective exchanges.

## 6. Venues of Trades Execution

LTS shall execute clients' orders for foreign market trades with appointed 3<sup>rd</sup> party counterparts. In selecting the appointed counterparties, LTS shall take reasonable care that the appointed counterparties are approved and licensed operators in the respective market where the securities are listed. Clients' orders are routed directly to 3<sup>rd</sup> party's online trading

system in the primary market where the securities are listed. It is considered that such arrangement is most likely to achieve consistently the best possible result for customers.

LTS will conduct periodic review of all appointed counterparties to ensure the best possible execution venues for clients.

## 7. Monitoring and review

LTS shall review its best execution policy periodically or whenever a material change occurs that LTS considers may impact the existing policy.

Clients may refer to the latest version of the policy on LTS' website

LTS has put in place appropriate governance processes to monitor periodically (i) compliance with its Best Execution policies and procedures (ii) effectiveness of its Best Execution policies and procedures to deliver the best available terms to clients on a consistent basis.

## 8. Contact details for queries

Clients who require more information may contact their respective Trading Representatives or submit feedback via LTS' website