

## **Interactive Brokers (U.K.) Limited MIFID Retail Client Notification and Order Execution Policy Consent**

The European Union legislative act known as the Markets in Financial Instruments Directive, or MiFID, requires Interactive Brokers (U.K.) Ltd to classify each client according to their knowledge, experience and expertise: "Retail", "Professional" or "Eligible Counterparty". Based upon the provisions of MiFID we have determined your client classification to be Retail, which entitles you to the highest level of regulatory protection and execution service, and we intend to continue operating under that standard as specified under MiFID's best execution requirements. Clients are requested to read and consent to our order execution policy, a copy of which is found below.

### **IB UK ORDER EXECUTION POLICY**

#### Approach:

IB UK's order execution policy is premised upon the principle that, for the combination of clients served and products offered, a client order is most likely to be executed at the optimal price, at the greatest speed and with the highest levels of accuracy and certainty of completion (i.e. "best execution") if that order is submitted via direct access to a fully automated market venue. Moreover, to the extent that an order is associated with a product listed on multiple market venues, "best execution" is achieved by reviewing the bids and offers at each of those venues in an automated manner and directly routing the order to the venue having either the most favorable price or the most favorable price net of execution costs. While automatically executed orders may not have an opportunity to be executed at a price better than the execution venue's posted bid or offer, they are not subject to being held by a market maker or specialist and executed at an inferior price or declined execution if the market moves in the client's favor while the order is pending.

Given this background, IB offers clients two primary methods of routing orders to the market for execution. First, IB UK clients may provide specific instructions to directly route their orders through the IB trading platform to the order book of a particular venue of their choice. When this method has been selected, IB UK will be deemed as having satisfied its best execution obligation.

Second, for products that are multiply listed, IB UK offers SmartRouting<sup>SM</sup> a proprietary computerized routing algorithm that is designed to optimize both speed and price of execution by continuously scanning competing execution venues and automatically seeking to route the order to the best venue. Clients may select SmartRouting<sup>SM</sup> based upon two criteria, the first being the most favorable price, and the second the most favorable price after taking into consideration execution costs. A general description of SmartRouting<sup>SM</sup> including details as to how this execution method considers factors such as quote prices, speed and likelihood of execution, quote size, and nature of order along with the execution venues covered may be found at: [www.interactivebrokers.co.uk](http://www.interactivebrokers.co.uk)

#### Execution Venues:

IB UK provides clients with direct access to a number of execution venues that have been selected based upon the level of relevance they maintain within their particular region in addition to factors such as product breadth, liquidity, electronic access, costs and speed and likelihood of settlement. These considerations, in the aggregate, are intended to provide a range of execution venues most likely to provide clients with best executions. While these venues will typically fall into the classification of Regulated Markets, they may also include other exchanges, Multilateral Trading Facilities, Systemic Internalisers, and third-party investment firms,

brokers and/or affiliates acting as market makers or liquidity providers. A list of execution venues accessible to clients may be found at: [www.interactivebrokers.co.uk](http://www.interactivebrokers.co.uk)

**Monitoring and Review:**

IB UK will monitor the effectiveness of this order execution policy to identify and, when applicable, correct any deficiencies. A review of the policy will be conducted at least annually or whenever a material change takes place to ensure that client orders continue to obtain the best possible results. We will notify clients of any material changes to this order execution policy.

**Important Notice Regarding Best Execution:**

It should be noted that IB UK cannot and does not warrant or guarantee that every client order will be executed at the best posted price. Among other things: (a) IB UK may not have access to every market at which a particular product may trade; (b) other orders may trade ahead of a client's order and exhaust available volume at a posted price; (c) execution venues or market makers may fail to honor their posted prices; (d) execution venues may re-route client orders out of automated execution systems for manual handling (in which case, execution or representation of a client's order may be substantially delayed); (e) execution venue rules or decisions or systems delays or failures may prevent a client's order from being executed, may cause a delay in the execution of a client's order, or may cause a client's order not to be executed at the best posted price; or (f) a client may have provided instructions to direct an order to a specific venue of their choice.

**ACKNOWLEDGEMENT & CONSENT:**

1. I acknowledge receipt of this Notification of my classification as a "retail" client and consent to the IBUK Order Execution Policy.
2. I consent to IB UK executing my orders outside a regulated market or multilateral trading facility.
3. In the event I place with IB UK a limit order which is submitted to trading on a Regulated Market and that order is not immediately executed under prevailing market conditions, I hereby instruct IB UK not to make the order public where IB UK considers it appropriate not to do so.