



Type:	Policy
Name:	Best Execution Policy
Level:	Stanbic IBTC Stockbrokers Limited
Classification:	Internal Use
Owner:	Head, Compliance
Governance committee	Board Risk Management Committee
Approved by:	Board of Directors
Approval date:	February 2024
Effective date:	February 2024
Next review date	February 2025
Contact:	sislcompliance@stanbicibtc.com

This document has been classified as: Internal Use Only and has been issued strictly for internal business purposes of Stanbic IBTC Stockbrokers Limited (a subsidiary of Stanbic IBTC Holdings PLC). Dissemination by any means thereof outside the organization is prohibited unless prior written approval is obtained from the Policy owner.

## 1 Policy Statement

**1.1** The business of Stanbic IBTC Stockbrokers Limited is built on trust and integrity as perceived by our stakeholders, especially our clients, shareholders, and regulators.

**1.2** An important element of trust and integrity is ensuring that Stanbic IBTC Stockbrokers Limited conducts its business in accordance with the values and Code of Conduct and Ethics that Stanbic IBTC Stockbrokers Limited has adopted, and in compliance with applicable laws, rules, and standards.

**1.3** Stanbic IBTC Stockbrokers Limited Best Execution Policy (the “Policy”) is designed to comply with the Nigerian Exchange Group (NGX) Rules on Order Handling and Best Execution as well as other applicable statutory and regulatory obligations, ensuring that:

**1.3.1** Best execution is sought at all times when purchasing or selling securities on behalf of Stanbic IBTC Stockbrokers Limited clients.

**1.3.2** Reasonable steps are taken to obtain the best available result for Stanbic IBTC Stockbrokers Limited clients within the shortest time frame, provided that Stanbic IBTC Stockbrokers Limited does not deviate from the client’s mandate

## 2 Applicability

**2.1** This Policy applies to all employees of Stanbic IBTC Stockbrokers Limited.

## 3 Policy

### 3.1 When does this Policy apply?

This Policy applies to all clients’ mandates on all types of securities.

### 3.2 Best Execution

**3.2.1** Stanbic IBTC Stockbrokers Limited shall at all times when acting on behalf of clients on the purchase or sale of securities, adhere to this Policy by taking reasonable steps to obtain the best available results for the client within the shortest time frame in accordance with the terms and conditions of the mandate from the client.

**3.2.2** Stanbic IBTC Stockbrokers Limited is obligated to deliver the best possible result when executing client mandates on all types of securities.

3.2.3 Stanbic IBTC Stockbrokers Limited shall apply this Policy in a manner that takes into account the different circumstances associated with the execution of mandates related to particular types of securities.

3.2.4 When executing an order, Stanbic IBTC Stockbrokers Limited shall take reasonable steps to obtain the best possible results under the circumstances whilst taking into consideration the following execution factors. These include: price, costs, speed, likelihood of execution and settlement, size, nature, fill rate, price improvement, market impact or any other consideration relevant to the execution of a client's mandate.

3.2.5 Stanbic IBTC Stockbrokers Limited shall establish and implement this Policy to each client's mandate

### **3.3 Client Order Handling**

3.3.1 Stanbic IBTC Stockbrokers Limited shall implement process and procedures which provide for the prompt, fair and expeditious execution of clients' mandates.

3.3.2 Stanbic IBTC Stockbrokers Limited shall whilst carrying out clients' mandates, ensure that mandates executed on behalf of clients are promptly and accurately recorded and allocated.

3.3.3 Stanbic IBTC Stockbrokers Limited shall not execute a client's mandate in aggregation with another client's mandate.

3.3.4 Stanbic IBTC Stockbrokers Limited shall not aggregate a client's mandate with a transaction for its proprietary account.

3.3.5 Stanbic IBTC Stockbrokers Limited shall not misuse information relating to pending client orders and shall take all reasonable steps to prevent the misuse of such information.

### **3.4 Direct Market Access (DMA)**

Where a client chooses to execute an order through the use of Stanbic IBTC Stockbrokers Limited's DMA, the client will select the parameters of the trade. In such situations, Stanbic IBTC Stockbrokers Limited will treat this as the client having given specific instructions in relation to the execution of his or her order as the order goes immediately into the market. Stanbic IBTC Stockbrokers Limited will therefore be deemed to have satisfied its best execution obligations. All trading activities executed by the client shall comply with all

applicable laws and regulations, including but not limited to the NGX's Rules and Regulations.

### **3.5 Notification**

3.5.1 Stanbic IBTC Stockbrokers Limited shall display the Policy on its website at all times.

3.5.2 Stanbic IBTC Stockbrokers Limited shall notify its clients of the regulatory provisions of this Policy, any changes therein and its effect to their transactions.

3.5.3 Stanbic IBTC Stockbrokers Limited shall promptly inform its clients of any material difficulty relevant to the proper execution of mandates upon becoming aware of the difficulty.

### **3.6 Audit Trail**

3.6.1 Stanbic IBTC Stockbrokers Limited shall ensure that a system for tracking and monitoring orders is established and maintained.

3.6.2 Evidence of audit trail shall be maintained.

### **3.7 Monitoring**

3.7.1 Stanbic IBTC Stockbrokers Limited shall monitor the effectiveness of its order execution arrangements and this Policy on a regular basis in order to identify and, where appropriate, correct any deficiencies.

## **4 Roles and Responsibilities**

### **4.1 Board of Directors**

4.1.1 Adopts and approves this Policy.

### **4.2 Board Risk Management Committee**

4.2.1 Recommends the Policy to the board for approval.

### **4.3 Compliance must:**

4.3.1 Develop, review and maintain this Policy.

4.3.2 Monitor adherence to this Policy.

4.3.3 Raise awareness in terms of this Policy.

4.3.4 Provide advice and guidance in terms of this Policy.

4.3.5 Report relevant details of breaches or non-adherence to this Policy to the appropriate governance committees.

#### **4.4 Employees must:**

4.4.1 Familiarize themselves with and adhere to this Policy.

## **5 Disciplinary Action**

5.1 Failure to adhere to this Policy may lead to disciplinary action and possible dismissal.

## **6 Definitions**

### **6.1 Client Mandate/Order:**

This is an authorization from a client to a firm to trade securities in its registered trading account. The client is the beneficial owner of the securities traded.

### **6.2 Best Execution**

“Best execution” refers to the obligation on the firm, when executing or arranging the execution of a client order, to take all reasonable steps to obtain the best possible result for its client.

### **6.3 Direct Market Access**

An electronic trading facility for investors, who are clients of Stanbic IBTC Stockbrokers Limited and wishes to trade in financial instruments, to interact directly with the order book of the exchange.

## **7 Policy Administration**

### **Contact Person:**

Title	Head Compliance
Department	Compliance
Email	sislcompliance@stanbicibtc.com

## 8 Revision History

Version No	Purpose of revision: [Regulatory development / Annual review]	Review Date	Effective Date	Summary of Key Revision Points
V3	Regulatory development/Review	Feb 2020	Feb 2020	
V4	Annual Review	Feb 2021	Feb 2021	
V5	Annual Review	Feb 2022	Feb 2022	Update NSE to NGX
V6	Annual Review	Feb 2023	Feb 2023	
V7	Annual Review	Feb 2024	Feb 2024	