



May 2025

UK

Order Handling Policy

MARKETAXESS EUROPE LIMITED

ORDER HANDLING POLICY

Effective Date: May 12th, 2025

1. INTRODUCTION

In accordance with its regulatory requirements,¹ MarketAxess Europe Limited ('MAEL', 'we', 'our' or 'us') is required to establish and implement a policy for the handling of client orders in financial instruments pursuant to MAEL's permission to conduct the regulated activity of arranging deals in investment for the purposes of the reception and transmission of orders ('Order Transmission Service').

This order handling and execution policy ('Policy') does not apply to the operation of the MAEL multilateral trading facility ('MTF').

To the extent MAEL provides you with Order Transmission Services, the provision of such services is subject to the terms of business set out in the relevant addendum to your agreement with MAEL, as such agreement may be amended from time to time. This Policy, as amended from time to time, forms part of the agreement entered into between you and MAEL, as such agreement may be amended from time to time. MAEL will act in the best interests of its clients when providing the service of reception and transmission of orders.

2. INSTRUMENTS

This Policy is in relation to the following financial instruments only:

(a) Equities:

(i) Exchange-Traded Funds, Exchange-Traded Notes, Exchange-Traded Commodities/Currencies; and

(ii) Shares;

(b) Options and futures admitted to trading on a trading venue:

(iii) Single stock options, index options, exotic options; and

(iv) Single stock futures, index futures;

(c) Other derivatives:

(i) Single stock forwards, index forwards;

(ii) Single stock swaps, index swaps, and variance swaps; and

- (iii) Fixed income interest rate, swaptions, and index excess return swaps;
- (d) Bonds and money-market instruments:
 - (i) European high-grade bonds;
 - (ii) European high-yield bonds;
 - (iii) Sovereign, supranational and agency bonds;
 - (iv) Emerging Market bonds;
 - (v) US high-grade bonds;
 - (vi) US (taxable) municipal bonds; and
 - (vii) US high-yield bonds,

(each an '**Eligible Instrument**', and together the '**Eligible Instruments**').

Information about the nature, functioning, performance and risks of these instruments is accessible or publicly available so that professional clients and eligible counterparties requesting these instruments are able to take investment decisions on an informed basis.

MAEL shall be able to amend the list of Eligible Instruments from time to time.

3. TARGET MARKET

MAEL provides Order Transmission Services only to professional clients and eligible counterparties as each is defined for the purposes of COBS ('**professional clients**' and '**eligible counterparties**' respectively). MAEL does not provide services to retail clients. Professional clients and eligible counterparties are presumed to possess an appropriate level of knowledge, experience and competence in relation to the Eligible Instruments and the Order Transmission Service offered by MAEL.

The Order Transmission Service offered by MAEL is to enable professional clients and eligible counterparties to access liquidity and the electronification of workflow.

4. DISTRIBUTION

MAEL will never recommend any product or service, nor will it buy or sell financial instruments in its own name or on its own account for the benefit of its clients. MAEL will only receive and transmit orders following explicit written instructions from its clients.

5. APPLICATION

This Policy will only apply to you if we have classified you as a professional client and we handle an order in Eligible Instruments for you pursuant to our Order Transmission Services permissions.

This Policy applies to all professional clients of MAEL, without making a distinction as to whether the professional client is resident inside or outside of the UK, and irrespective of where the transaction is executed.

This Policy does not apply to business conducted with, or on behalf of, clients who have been categorised as eligible counterparties.

6. CLIENT ORDER HANDLING

We will be obliged to take all sufficient steps to obtain the best possible result for you in accordance with your instructions. This obligation is referred to in this document as our '**order handling obligation**' or '**order handling**'.

The circumstances in which the order handling obligation is expected to apply in connection with our Order Transmission Service include any of the following:

- (a) the transmission of orders to execute an Eligible Instrument to the relevant exchange where it is listed and any transaction involving such Eligible Instrument is required to be executed; and
- (b) the transmission of an order to a third party for execution or onward transmission.

When handling client orders, we will ensure that orders are promptly and accurately recorded. MAEL does not deal on own account and does not aggregate client orders in any way.

We will not misuse information relating to pending client orders and we take reasonable steps to prevent the misuse of such information by any of our employees.

7. BEST EXECUTION IS DEEMED SATISFIED OR DOES NOT APPLY

In relation to our Order Transmission Service, cases where best execution is deemed to be satisfied due to the following factors::

a. Specific client instructions

MAEL follows specific instructions from its client when placing an order with, or transmitting an order to, another entity for execution.

We shall only handle your orders when accompanied by specific instructions in writing or electronically through the MarketAxess system, relating to an order or a particular aspect of an order. The correctness of the specific instructions will be the responsibility of each client. Where we accept those instructions and receive and transmit an order, or enable you to transmit an order to another entity for execution as far as reasonably practicable or possible in accordance with those instructions, we will have satisfied our best execution obligation. This covers situations such as the selection of an algorithm or individual parameters of an algorithm.

b. Electronic trading systems

Where we have provided you with access to prices displayed on third party crossing networks or other third party electronic systems and you decide to deal at the prices displayed, you are responsible for achieving your own best execution.

If you want to discuss the application of best execution to your activities with MAEL please feel free to contact us at complianceEU@marketaxess.com

8. EXECUTION VENUE AND STRATEGY

Any client may request the addition of an execution venue provided they provide assurance that they are able to clear and settle transactions executed thereon. We will only receive and transmit orders to execution venues that have been pre-notified to you or appear on a list of MarketAxess-approved execution venues that we may provide you from time to time. MAEL requires every execution venue to provide it with proof of regulation.

As noted in Section 7 above, we will only receive and transmit orders to third parties as specified by you as a client in writing or electronically through the MarketAxess system. Such instructions must pertain to all aspects of the order.

MAEL does not assess execution quality of any third party.

9. INFORMATION FOLLOWING EXECUTION

On your request, we will demonstrate that we have handled your orders in accordance with this Policy. On the request of our competent authority, we will demonstrate that we have complied with this obligation to you and our other clients.

10. INDUCEMENTS

MAEL does not receive any remuneration, discount or non-monetary benefit for routing client orders to a particular trading venue or execution venue that would infringe the requirements on applicable conflicts of interest or inducements requirements.

11. CONSENT

You will be deemed to have read, understood and consented to this Policy and given prior consent to the application of this Policy to our dealings with you as soon as you accept our terms of business, or place an order with or through us, whichever occurs first. You will also be deemed to have read, understood and consented to any amendments to this Policy if you continue to place an order with or through us or continue to receive services from us.

13. POLICY MONITORING, REVIEW AND UPDATE

Monitoring of the Policy

We will monitor this Policy on a regular basis, and where a material change has occurred update the Policy as necessary.

Policy Updates

We will notify clients with whom we have an on-going client relationship of any material change to our arrangements or this Policy.

Version Control

Version	Date	Changes/comments	Review conducted by
1	July 2024	New policy	Compliance
2	May 2025	Refined the positioning of our best execution obligation which is deemed to be satisfied. Amended the instrument list into clearer buckets. Focused the policy in referring more to our obligations around client order handling	Compliance