SUMMARY OF ORDER HANDLING AND BEST EXECUTION POLICY

This document sets out a summary of the Plum Money CY Limited's Order Handling & Best Execution Policy ('the Policy"). The Summary addresses the main provisions of the Policy and will help Retail clients to understand how their orders will be executed. This document shall be read in conjunction with our Order Handling & Best Execution Policy, which is available on the Company's website at <link to the Order Handling & Best Execution Policy uploaded on the website>.

1. Introduction

Plum Money CY Limited ("Plum", the "Company", "our" or "we") authorised by the Cyprus Securities and Exchange Commission (CySEC) (Licence Number: 407/21) to carry on investment services activities as a Cyprus Investment Firm (CIF), under the Law 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets (the "Investment Services Law", as amended), is required to have in place an Order Execution Policy and take all sufficient steps to obtain the best possible results for its Clients when executing their Orders.

In this respect, the Company has established an Order Handling & Best Execution Policy (the "Policy") as well as implemented a robust framework comprising, amongst others, procedures, monitoring processes, and reporting channels to achieve the best possible result for its Clients on a consistent basis.

This Policy forms an integral part of our Agreement with the Client ("you") and sets out the means by which we meet our best execution obligations when executing orders for our Clients.

2. Purpose

The purpose of this Policy is to set out Plum's approach to meeting our Clients best interests and order handling obligations by setting the methods by which we take all sufficient steps to obtain the best possible results when acting on their behalf.

This Policy sets out our transmission and execution model and our overarching approach to overseeing execution, including the execution factors considered. In addition, the Policy sets out the key risks to best execution and the governance relevant to the monitoring and oversight of this Policy.

3. What Best Execution Means

MiFID II requires the Company to take all sufficient steps to obtain the best possible result for Retail Clients when executing orders (or receiving and transmitting orders to a third party) on their behalf in respect of financial instruments, taking into account execution factors such as price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order (Execution Factors).

Best Execution does not mean that the Company can guarantee that the best price will be achieved for every single client order. However, the Company will seek to ensure that it is acting, to the extent that it is possible, in the best interests of its clients.

4. Approach For Retail Clients

According to the Policy, the Company shall provide best execution to Retail clients in all circumstances.

5. Execution factors for Retail clients

The Execution Factors have not been listed in any particular order of priority. In order to determine the relative importance of the Execution Factors, the Company takes into account the characteristics of:

- Client: The characteristics of the client - Plum considers all clients as Retail clients.
- Characteristics of order: The size, nature and characteristics of the client order, including the price and costs of the order.
- Financial Instrument: The characteristics of the financial instrument that is the subject of the order.
- Execution Venue: The characteristics of the execution venues or entities that the order is directed to, including the speed of execution.

The provision of Best Execution for Retail clients will be determined primarily in terms of total consideration, which is the sum of the price of the relevant Financial Instrument and execution costs (Total Consideration).

Total Consideration includes all expenses incurred which are directly related to the execution of the order (such as execution venue fees, clearing and settlement fees, FX conversion fees, and any other fees paid to third parties involved in the execution of the order).

6. Our Execution Model

Plum handles the reception and transmission of client orders for execution. The financial instruments to which this Policy applies to are:

- Transferable securities and their fractions; and
- Units in Collective Investment Undertakings and their fractions.

Note: *Given that Money Market Fund (MMF) orders are sent to the MMF Administrator for execution and are executed based on the daily Net Asset Value (NAV), no best execution is applied.*

7. Our Consideration For Execution Quality

Plum has a duty to take all sufficient steps to obtain the best possible result for the Client when receiving and transmitting orders for execution. To meet this obligation, we assess a range of execution factors, including:

- Price
- Costs
- Speed of execution
- Likelihood of execution and settlement
- Size of the order
- Nature of the order
- Any other factor relevant to achieving the best possible outcome for the Client

These execution factors are evaluated in light of the relevant execution criteria, with their relative importance determined by the elements most likely to influence the quality of the execution and, ultimately, the Client's outcome.

Determining the Importance of Execution Factors

When assessing the weighting of execution factors, Plum considers the following execution criteria and market conditions, including (but not limited to):

- Characteristics of the order (e.g., order type)
- Liquidity of the relevant instrument
- Size of the Client's order
- Time required to complete the execution
- Availability of price improvement
- Plum's fee model and its impact on total consideration

In most circumstances, price and cost will be the primary factors influencing execution quality.

Costs and Charges

Client fees and commissions are pre-agreed under Plum's fee model. As a result, Clients are not exposed to additional charges during the order handling and execution process. Plum provides Clients with both ex-ante and ex-post cost disclosures.

Any incidental or implicit transaction costs are also made available to Clients through trade confirmations and account statements.

8. Monitoring of the best execution

The Company assesses the effectiveness of its Order Execution Policy and overall execution arrangements on a regular basis, and at least annually. The review should be carried out whenever a material change occurs that may affect the Company's ability to continue to obtain the best possible result for its clients on a consistent basis.

The review will also take into consideration possible changes to the relative importance of the execution factors in meeting the overarching best execution requirement.

Any material changes to this Policy will be published on our website.