

SSY Futures Ltd

Best Execution Policy

Introduction

When providing brokerage services, SSY Futures Ltd works solely on the best execution basis. This means that for all categories of clients we work with, which includes both Eligible Counterparties and Professional Investors, we will aim to give best executions taking into account the prices available to us. Such prices may originate from other market counterparties, both over the telephone or from other media including the SSY Global Coal Screen. Additionally from time to time they may originate from other “co-brokers”.

Our intention is to employ high standards and discover prices in a fair environment taking other customers’ orders into consideration. This means that we will take a number of factors into consideration in relation to your transaction.

Whilst Eligible Counterparties are owed a less stringent level of care from us from a regulatory basis, we will nonetheless extend all the due care and consideration to execution of their orders as any other client.

Market Practices

For the avoidance of doubt, SSY Futures Ltd is engaged in the execution of Forward Freight Agreements (FFAs), options on FFAs, iron ore swaps, steel and coking coal. Both these markets are transacted on the basis of knowing as many participants as possible so as to poll the best buying and selling prices.

SSY Futures Ltd is a major broker in these markets and consequently has access to a wide and varying source of pricing, nonetheless we will not always have all the pricing available. We will use our best efforts to find the best price from all sources. However, we will balance this with the client’s requirements for speed of execution and our understanding of underlying liquidity and price volatility, as well as any other relevant factors.

It is accepted by our clients that this is the current nature of the markets we offer a service in.

Dealing Screen

It must be particularly noted that the SSY Global Coal Screen, our on-line dealing screen is only utilised by such market participants who clearly understand the nature of liquidity in the markets it covers. Such traders accept that by dealing on a venue only populated by a sub set of the trading community and that the best price in the market will not necessarily be available to traders using the screen only. By using the SSY Global Coal Screen the best execution provisions of MiFID will devolve from the operator of the system to the user - therefore best execution provisions will not apply if a client places a specific instruction directly on the screen.

Execution Venues

SSY will transact business on your behalf via the following venues:

- SSY’s Customer base in the OTC markets;
- the SSY Global Coal Screen;
- as a member of the MTF operated by Baltic Exchange Derivatives Trading Limited known as Baltex;
- other regulated markets.

When selecting the venue for clients to execute by SSY will take reasonable measures to ensure the best results for its customers subject to the following factors:

- OTC pricing can only be supplied from those counterparties communicating them to SSY. Best execution will be within these limits.
- Prices available may vary significantly at different times as a result of the ebb and flow of the market.
- SSY cannot supply pricing to a client unless confident of their ability to transact it.
- SSY cannot influence the cost of credit or credit acceptance between its clients.
- Various clearers support the markets in which we are active, SSY can only match trades where both buyer and seller use a matching clearer.

Execution Factors

Unless given specific instructions SSY will use its discretion in deciding the factors to be taken into account in providing clients with the best outcome. These include but are not limited to:

- Order size particularly in relation to market capacity and in relation to trade reporting and the nature of the order
- Client characteristics
- Potential speed of or likelihood of execution
- Cost of execution and price availability
- Speed and likelihood of execution
- Execution criteria
- Any other considerations

Oversight and Scrutiny.

SSY has an ongoing policy of monitoring market conditions, transaction efficiency and the general impact of dealing procedures. Any changes to these policies resulting from alterations or attempts to improve will be reported via the SSY daily market reports. SSY will review its execution policy and this accompanying document on an annual basis. This policy is integral to our standard terms and conditions.

SSY's execution policy does not extend any fiduciary responsibility beyond specific regulatory obligations. Clients have sole responsibility for investment decisions and any resulting losses incurred.