

This order execution policy applies to business conducted with professional and non-professional customers (hereinafter “customers”) of S-Bank Ltd (hereinafter “the bank”) but is not applicable to business conducted with eligible counterparties. The order execution principles described below concern all financial instruments offered by the bank for trading, defined by MiFID.

GENERAL PRINCIPLES REGARDING ORDER EXECUTION

When executing orders with financial instruments on behalf of customers (hereinafter “orders”), the bank will strive to take all reasonable steps to obtain the best possible result for the customer.

The bank will take into account the following factors to determine the manner in which each order will be executed to obtain the best possible result for the customer:

- Price
- Speed
- Likelihood of execution or settlement
- Order size
- Order costs
- Order nature
- Any other considerations relevant to the execution of the order.

The relative importance of these factors may differ depending on the following execution criteria:

- The characteristics of the customer, including the customer classification
- The characteristics of the order
- The characteristics of the financial instrument the order concerns
- The characteristics of the execution venues to which the order may be routed for execution, and
- other such matters that FIM considers to be material
- for the execution of the order.

As a rule, price will be the key factor when determining order execution in accordance with this policy. In certain market situations or in the case of certain financial instruments, however, other criteria may be considered more important than price when seeking the best order-specific execution for the customer. As a general rule, in cases where the bank executes an order for a customer classified as a non-professional customer, the price and costs related to the execution of the order will be the primary criteria.

The bank will independently evaluate the importance of the execution criteria if the customer has not provided the bank with special instructions for the execution. Such special instructions may include, for example, a request to route the order to be executed in a specific marketplace or other instructions related to the execution of the order.

Although the bank is committed to executing orders in accordance with this policy with the objective of achieving the best possible end result for the customer, the bank does not have any other obligations regarding the execution of orders other than those stated in authority regulations in force at the time and obligations determined in agreements made between the bank and the customer.

PROCESSING ORDERS PERTAINING TO LISTED SECURITIES

After the bank receives an order from a customer:

- The bank will route the order without delay to the execution venues used by the bank in accordance with this policy. The venues may differ depending on the financial instrument; the venues used in each case are listed in the bank's execution venues document.
- If necessary, the bank will combine the customer's order with orders received from other customers and then route the order to the market. The bank may only combine customer orders if this, in the bank's assessment, does not hinder the execution of an individual customer order. Customer orders are not combined when the customer is trading using the bank's electronic trading services.
- When executing orders, the bank may utilise various algorithms or other such electronic tools intended for the purpose of routing orders if the bank considers this to be necessary to ensure the best possible result for the customer. These tools can be utilised when the customer trades on equities via one of the bank's brokers.
- If an order is executed outside regulated markets or multilateral trading facilities or if the bank wishes to delay a limit price order, the bank must first obtain express approval from the customer to do so.
- To ensure the best possible result in executing customer orders, the bank will route all orders via the Smart Order Routing (SOR) service to the market.
- The bank may use SOR tools provided by several service providers or route orders to market via a different broker.

TRADING IN UNLISTED SHARES AND OTC PRODUCTS

In the case of financial instruments that are not subject to regular trading on a regulated marketplace, orders will be executed directly as an OTC trade between the bank and the customer. A binding trade is deemed to have taken place when the customer has approved the price quotation given by the bank. In an OTC trade, the bank does not serve as an agent of the customer. The bank cannot thus be considered to be carrying out a transaction on the customer's

behalf, as the bank is an agreement party in carrying out the transaction. Consequently, the bank's order execution policy described above does not necessarily apply in full to OTC trade.

An OTC trade is carried out at a price specifically approved by the customer. Such a price approved by the customer is considered a specific instruction given by the customer, which the bank must comply with.

At the bank, orders executed as OTC trades include orders concerning bonds and unlisted shares, among other orders.

EXCEPTIONAL SITUATIONS IN ORDER EXECUTION

If the customer provides the bank with special instructions concerning the execution of an order, the order will be executed in accordance with these instructions. When placing an order, the customer must clearly specify any special instructions concerning the order. If the special instructions provided by the customer are not comprehensive, the bank will follow the order execution policy described above as applicable.

Any special instructions provided by the customer to the bank always take precedence over this policy. The customer is aware of the fact that, by giving the bank special instructions, the customer may prevent the bank from complying with the principles of this order execution policy.

In exceptional market circumstances or due to an internal or external system failure, the bank may deviate from this policy, if necessary, as the key criterion under such circumstances is the bank's ability to execute the orders. In the case of a system failure, the bank may not be able to execute orders in all execution venues.

EXECUTION VENUES

In executing customer orders in accordance with this policy, the bank may use one or more of the following venue types:

- Regulated markets
- Other exchanges that are not regulated markets
- Multilateral trading facilities (MTF) and dark pools
- Systematic internalisers
- Third-party investment service providers or brokers acting as market makers or other liquidity providers.

The bank itself does not act as a direct market party in all of the execution venues listed; it uses other brokers when executing customer orders. When the bank gives the order to be executed by another broker in a market where the bank itself is not a market party, the bank will strive to ensure that the result is the best possible one for the customer. This does not, however, mean that the broker executing the order will have an order execution policy that is identical to that of the bank.

A list of the execution venues and order routing brokers used by the bank per financial instrument is available on the bank's website (s-pankki.fi). The list comprises all of the execution venues the bank uses to a significant degree when carrying out customer orders.

The bank reserves the right to use other execution venues if necessary and to update the list of execution venues as appropriate. Customers are not separately notified of such changes.

In the case of some financial instruments, there may be only one possible execution venue. When executing an order on the customer's behalf under such circumstances, the bank is deemed to have operated in accordance with this execution policy.

MONITORING AND UPDATING THE EXECUTION POLICY

The bank will monitor the effectiveness of this order execution policy. If any deficiencies in the policy are identified, the bank will update the policy. The bank will not notify customers of changes in the execution policy separately; the execution policy in force at any given time is available on the bank's website (s-pankki.fi).

The bank will review its order execution policy at least once a year or whenever material changes occur that could affect the bank's ability to carry out orders in a manner that ensures the best possible end result for the customer.

The bank deems the customer to have accepted this execution policy upon receipt of an order from the customer.

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