Execution Policy

Trade Republic is obliged to strive for the best possible execution of Customer orders (hereinafter: "**Securities Orders**"). In this context, Trade Republic shall establish Execution Policies and inform the Customer of these Execution Policies prior to the first provision of investment services and obtain the Customer's consent to these Execution Policies.

Personal and material scope of application

These basic principles for executing orders apply to those Customers who have entered into a Framework Agreement with Trade Republic. They apply to the Securities Orders placed by the Customer under the Framework Agreement.

Order execution

An order execution in this sense occurs when Trade Republic concludes a corresponding Execution Transaction with another party on an appropriate market by way of commission trading for the account of the Customer. Trade Republic is also authorized to commission another trading partner as an Intermediary Commission Agent with the execution of the transaction.

Trade Republic offers various execution channels and Execution Venues for the execution of orders. Orders may be executed on exchanges or other trading venues, both in floor trading on the one hand and in electronic trading on the other hand.

If Trade Republic and the Customer conclude a purchase agreement for financial instruments with each other at a fixed or determinable price, the present principles shall apply accordingly.

The Customer's claims for payment against Trade Republic are limited to Trade Republic's obligation as commission agent to hand over the commission received. The Customer shall bear the risk of insolvency of the issuer or producer of the relevant financial instrument.

If Trade Republic and the Customer conclude a purchase agreement for financial instruments at fixed or determinable conditions, Trade Republic takes over the securities from the Customer as buyer or delivers the securities to the Customer as seller.

Selection criteria

Trade Republic’s selection criteria for the Execution Venues offered to the Customer are primarily based on the total fee resulting from the execution of the Securities Order at the Execution Venue for the Customer. The total fee results from the price for the security and all costs associated with the execution of the Securities Order. The costs to be taken into account when calculating the total fee include fees and charges of Trade Republic or the Execution Venue, costs for clearing and settlement and all other fees paid to third parties involved in the execution of the order.

Trade Republic will also consider other execution factors and relevant criteria such as market model, liquidity, speed and likelihood of execution, technical infrastructure, regulations and security of settlement when selecting its Trading Partners.

For the selection of Trading Partners, Trade Republic also considers existing exchange access, access to multilateral trading systems or access to liquidity pools or the Trading Partner's capacity as a systematic internalizer.

Execution Venues

Trade Republic offers Customers a carefully selected number of tradable securities as well as Execution Venues and execution channels. Trade Republic regularly reviews the price and execution quality of the connected Execution Venues.

If an Execution Venue is unavailable for execution (e.g. due to a trading venue failure), Trade Republic may route the Securities Order to another Execution Venue. Trade Republic provides comprehensive information in the Application as well as a detailed presentation of the fees for the Execution Venues offered and current price data. In addition, Trade Republic provides further information on the Execution Venues and Trading Partners offered in the Application. In particular, the Customer can also view the regulations on mistrades (see Special Conditions for Securities Transactions with Execution Policies for the individual Execution Venue (see Legal documents//General documents//Trading Venues) that may be relevant in the case of an OTC execution. The Customer can view further information on the execution rules at the connected Execution Venue in the Application.

Trade Republic may aggregate the buy orders in identical financial instruments of multiple customers and execute them on an aggregated basis while maintaining these principles, provided that the order volume, current market liquidity, price sensitivity, and type of financial instrument to be traded permit this. The execution may take place off-exchange and by way of a purchase agreement in compliance with the present principles.

Trade Republic may, at its own discretion, deliver or take over the Securities concerned, either partially or completely. The Customer expressly agrees to the execution outside of a trading venue within the meaning of Section 2 (22) WpHG.

Risks of trading outside trading venues

If the Customer instructs Trade Republic to execute transactions in financial instruments outside of trading venues, special risks also arise. There is no supervision comparable to the stock exchange supervision. Price fixing is also not subject to any comparable supervision. Often, special regulations apply which are specified by the counterparty. These include, for example, conditions on the cancellation of concluded transactions in the event that the counterparty has mistakenly concluded the transaction at a price that deviates significantly and obviously from the market price at the time the transaction was concluded (so-called mistrade regulations; see the Special Conditions for Securities Transactions and Execution Policies). According to these rules, the contracting parties are obliged to cancel a legal transaction at the request of one of the parties and if the conditions set out in the respective terms and conditions are met. The individual regulations for the definition of a mistrade and the cancellation of transactions vary depending on the contracting party. The Customer can always access them in the Application (see Legal documents//General documents//Trading Venues).

To the extent that Trade Republic, as counterparty to a transaction, executes the delivery or takeover of financial instruments, Trade Republic may cancel a transaction that Trade Republic has mistakenly concluded at a price that deviates significantly and obviously from the price that was in line with the market price at the time the transaction was concluded (so-called mistrade regulations; see the Special Terms and Conditions for Securities Transactions and Execution Policies).

Special notes

The prices currently displayed in the Application for the securities (so-called quotes) are indicative and represent an invitation to submit offers. Securities transactions are only concluded when Trade Republic submits an offer to the trading partner on the basis of the Customer's order for the conclusion of securities transactions, which can be accepted by the trading partner at the current price or Trade Republic executes the delivery or acceptance of the securities itself.

In the case of a purchase agreement for securities, Trade Republic fulfills its requirements for best execution by offering a price that corresponds at least to the market prices, taking costs and fees into account. Trade Republic continuously incorporates the available prices of the carefully selected relevant reference markets with tradable quotes into its pricing and, on this basis, calculates the price for the Customer, taking into account the current market conditions. Currency conversion is taken into account as an essential component of the price determination.

The use of electronic tools for quote requests and the conclusion of transactions (so-called quotemachines) by Customers is considered improper use of the trading system by both Trade Republic and its trading partners.

The data of “what analysts say” and some of the key figures in the application are provided by Refinitiv Copyright 2018 Refinitiv Holdings Limited (and affiliated companies if any).

Review of the principles

Trade Republic reviews the Execution Policies on a regular basis, at least once a year. Trade Republic monitors the quoting and execution quality of the Execution Venues that can be selected by the Customer via the Application. Trade Republic carries out the review in particular if there is a significant change in the market environment, which could result in the need for changes with regard to the Execution Policy. The Customer can access the applicable Execution Policy in the Application. They are also available on the website. Trade Republic will also post the amended Execution Policy in the Customer's Mailbox (Timeline) in the Application.

Crypto Execution Policy

Trade Republic Bank GmbH (“**Trade Republic**”) is a credit institution licensed in Germany and a crypto-asset services provider under Regulation (EU) 2023/1114 on Markets in Crypto-Assets (“**MiCAR**”) and maintains respective governance arrangements in order to achieve the best possible execution of orders in Crypto-Assets to its Customers.

Trade Republic executes transactions in Crypto-Assets on behalf of its Customers in its own name but for the account of the Customer.

Trade Republic will only execute Customer orders in Crypto-Assets (hereinafter “**Crypto Order**”) after a Customer has agreed with the terms of the “**Crypto Execution Policy**” and has placed a Crypto Order via the Trade Republic Application.

Trade Republic is obliged to take all necessary steps to obtain, while executing Crypto Orders, the best possible result for its Customers. In this context, Trade Republic established this Crypto Execution Policy, informed the Customer of this prior to the first provision of crypto-asset services and obtained the Customer's consent to this Crypto Execution Policy.

I. Personal and material scope of application

The Execution Policy applies to Customers who have accepted the terms of the “Special Terms and Conditions for Trading in Crypto-Assets” with Trade Republic and use Trade Republic’s crypto-asset trading services.

II. Order execution

Trade Republic executes Crypto Orders. Such an order execution occurs when Trade Republic concludes a corresponding Execution Transaction with another party on an appropriate market by way of brokerage trading for the account of the Customer. Trade Republic is also entitled to engage another crypto-asset service provider as an intermediary commission agent to execute the transaction.

If a Crypto Order cannot be fulfilled in whole or in part by a purchase or sale transaction with another crypto-asset service provider, Trade Republic may, at its own discretion, deliver or accept the Crypto-Assets in question in whole or in part itself.

The Customer expressly agrees that Trade Republic may execute Crypto Orders outside of "trading platforms for crypto-assets" within the meaning of Article 3 para. 1 no. 18 MiCAR.

III. Selection criteria

Trade Republic’s selection criteria for the Crypto Execution Venues offered to the Customer are primarily based on the total fee resulting from the execution of the Crypto Order at the Crypto Execution Venues for the Customer. The total fee results from the price for the Crypto-Asset concerned and all costs associated with the execution of the Crypto Order. The costs to be taken into account when calculating the total fee include fees and charges of Trade Republic or the Execution Venue, settlement costs and all other fees paid to third parties involved in the execution of the Crypto Order.

IV. Execution Venues

Trade Republic uses a limited number of carefully selected Crypto Execution Venues for the execution of Crypto Orders in order to provide efficient and cost-effective execution.

This is because access to a larger number of Crypto Execution Venues would result in a more complex cost structure and operational set-up. Given that lower transaction costs are in the best interests of clients, Trade Republic believes that this approach is consistent with achieving the best possible execution in the interests of its clients. Trade Republic regularly reviews the quality of quotes and executions at the Crypto Execution Venues it uses to execute Crypto Orders.

In the course of execution of Crypto Orders, Trade Republic considers the factors of price, costs, speed, likelihood of execution and settlement, size, nature, and custody arrangements. With the view of the characteristics of the Trade Republic’s customer base, which consists of retail customers, the main focus is on the Customer's total consideration. The total consideration represents the price of the Crypto-Asset and all costs related to its execution. The costs to be included when calculating the total consideration include the fees and charges of the Crypto Execution Venue on which the transaction is executed, costs of settlement and all other fees paid to third parties involved in the execution of the order.

The execution of orders in Crypto-Assets is subject to ongoing monitoring of effectiveness of order execution within the existing governance arrangements in order to maintain the efficiency of the process and correct deficiencies where necessary.

V. Special notes

The prices for the Crypto-Assets currently displayed in the Application (so-called quotes) are indicative and represent an invitation to submit offers. Crypto Transactions are only concluded when Trade Republic submits an offer to the Crypto Execution Venue on the basis of the Customer's order for the conclusion of Crypto Transactions, which can be accepted by the Crypto Execution Venues at the current price or Trade Republic itself executes the delivery or takeover of the Crypto-Assets.

The use of electronic aids for quote requests and concluding trades (so-called quotemachines) by Customers is considered improper use of the trading system by both Trade Republic and the Crypto Execution Venues.

VI. Customer instruction

Trade Republic does not execute orders for Crypto-Assets following specific instructions given by its Customers.

VII. Mistrade Conditions

Trade Republic maintains a dedicated process for handling Mistrades. Mistrades are often subject to special rules set by the Crypto Execution Venues.

These include, for example, conditions on the cancellation of concluded transactions in the event that the Crypto Execution Venue has mistakenly concluded the transaction in error at a price that deviates significantly and obviously from the price in line with the market at the time the transaction was concluded (see section XIII. of Part A of this Appendix).

According to these rules, the contracting parties are in general obliged to cancel a legal transaction at the request of one of the parties and if the conditions set out in the relevant terms and conditions are met. The specific rules for the definition of a mistrade and the cancellation of trades vary from counterparty to counterparty. The applicable mistrade rules for each Crypto Execution Venues can be found in the Application.

To the extent that Trade Republic, as counterparty to a transaction, executes the delivery or takeover of financial instruments, Trade Republic may cancel a transaction that Trade Republic has erroneously concluded at a price that deviates significantly and obviously from the price that was in line with the market at the time the transaction was concluded (see section XIII.2. of Part A of this Appendix 7).

VIII. Review of the principles

Trade Republic reviews the Crypto Execution Policies on a regular basis, at least once a year.

Trade Republic carries out the review in particular if there is a significant change in the market environment, which could result in the need for changes with regard to the Crypto Execution Policy.

The Customer can view the applicable Crypto Execution Policy in the Application. They are also available on the website.

Trade Republic will also post the amended Crypto Execution Policy in the Customer's Mailbox (Timeline) in the Application.