



EXECUTION POLICY

GoDo Ltd Services (hereinafter as “GoDo” or “the Firm”) provides mainly automated execution-only services to retail and professional clients (“client”) in the following instruments:

- Contracts-for-difference (“CFD”) on forex
- Stocks
- Indices
- Commodities

GoDo deals as principal acting as the counterparty to most of its clients’ trades, which places a huge trust on the Firm to offer the best execution to its clients. GoDo executes clients’ orders at the best price offered by our credited Liquidity Providers. The system is set to automatically select the best available price and show it to the clients on our online platforms. GoDo considers ‘price’, ‘cost’ and ‘speed’ as highly important execution factors, and other execution factors such as size and likelihood of execution having relatively lower importance.

Trading platforms

GoDo customers can trade using the following trading platforms (“platforms”):

- Web Trader
- MetaTrader

4 Trading is subject to trading hours’ restrictions and are provided per investment instrument on the platforms.

Execution Venues

GoDo provides two types of execution venues. Primarily, GoDo operates as a principle which means that the Company is the counterparty of client transactions.

In rare circumstances, the Company also operates as an agent whereby client transactions are received and transmitted to other reputable liquidity providers.

Price

GoDo provides two-way pricing quoted live across all its products to clients, which can be accessed on GoDo’s platforms. GoDo aims to provide clients with fast, reliable and uninterrupted prices.

GoDo receives raw price data for all trading instruments from its Liquidity Providers (“LPs”) and Data Providers such as regulated markets, multilateral trading facilities (MTFs), executing brokers, etc. GoDo avoids over-reliance on any single provider and manages its risk in compliance with its Risk Management Framework.

Each LP is carefully on-boarded, and due diligence is performed by Risk and Compliance

departments to ensure that the LP can offer the best possible prices to Godo's clients. For example, upon adding a new LP, the Risk and IT department perform detailed tests to confirm the speed and accurateness of raw inputs by comparing it against independent benchmark services.

LPs and all data sources are reviewed continually by the Risk department. All pricing sources are subject to due diligence before they are activated. If a pricing source is to be re-activated a review of its due diligence will be required.

After receiving the raw data, it is fed to Godo's price engines, which have the purpose of delivering to the end user terminal a smooth and consistent flow of quotes in accordance with the target and average spreads disclosed on the website. Godo has developed an in-house application that tracks price level discrepancies and latency of all price feeds.

In the rare circumstances a client is unable to execute trades on the Firm's system (e.g. due to internet connectivity issues), Godo allows clients to submit instructions via phone or e-mail. When running client instructions over the telephone, Godo aims to quote the price as if the client is trading through the trading platforms subject to any delays due to the manual process of trading over the phone/e-mail. GoDo confirms the execution of clients trades immediately after the client indicates the desired action. If a trader is confirmed by telephone, the client may request a confirmation of the execution in writing.

Cost

Spreads and commissions are the critical aspects of the expenses Godo's clients can incur, and Godo always aims to ensure that these are reasonably competitive as compared to other operators in the CFD market (e.g. Spreads are monitored continuously by Godo's Risk department). The costs the client will incur in executing an order with Godo will be related to the spread and commissions. Spreads are dynamic and are dependent on several factors including market liquidity and volatility.

Information on "spreads", "swaps" and "commissions" is available for the various securities at where the target spread applied, along with average spreads, updated weekly, commissions and swaps (where applicable) are displayed.

For transparency purposes, further details of the spreads, commissions and other costs for each underlying instrument will be provided on Godo's website. Clients are encouraged to understand the associated costs prior to executing with Godo fully.

Speed, size, and likelihood of execution

Godo's clients receive immediate execution capability, meaning that, if a client sees a price on the screen, in most cases the trade is executed at the displayed price. Godo provides latency allowance on orders; if our system executes the market price moves before a request, the order is filled at the order price if the difference between the order and market prices is still within the relevant slippage parameter. On the other hand, if latency causes the difference between the

order and market prices to be higher than the relevant slippage parameter, the order is rejected.

Being the main counterparty to client trades, Godo is ready to absorb trade requests up to the maximum trade size set for each trading instrument. Maximum trade size is available in the contact specifications of each instrument in each trading platform.

Godo determines the maximum size of trade available to clients for each CFD instrument. Regardless of the type of the order Godo executes any order at VWAP (Volume-Weighted Average Price) should the size of an order exceed the tradable size at the time of the execution. Depending on the tradable size, Godo's clients may experience that their orders may be executed at a less favourable price.

However, under all circumstances, Godo pays due regard to 'slippage' and passes on positive slippage to clients in case the market moves in favour of them.

No order aggregation

Godo general practice is not to aggregate any client orders with other client orders or any transactions for its account.

Client-Specific instructions

If clients provide Godo with instructions on how to execute an order, complying with those instructions may prevent Godo from taking the steps that are set out in its Order Execution Policy to obtain the best execution for its clients. In those circumstances, Godo's execution in accordance with the client's instructions will be deemed the best execution.

Also, specific instructions from clients may sometimes rate some execution factors over others: for example, size as a factor may take precedence over price and cost.

Client protection

Despite ensuring that Godo's clients receive the best execution, Godo has implemented further measures to ensure that its clients are protected at all times. Godo also provides that its systems automatically offer default protections to its clients.

Stop Loss Orders

Clients have the option to trade "stop loss" and "trailing stop loss" orders. This allows clients to autonomously set the level at which they will sell out to limit losses. If the security price reaches this level, the position will be closed automatically.

Such orders are always connected to an open position or a pending order.

Negative Balance Protection

Godo offers all retail clients negative balance protection. This means that clients will never lose more than their invested capital.

Negative balance protection means that any trading losses cannot exceed the funds on your account and thereby giving you, the customer greater protection. Therefore, whilst you can still lose all your account funds, you cannot exceed that loss on your account which means that, in accordance with the policy below, you will not owe money to us. Please note however that your entire capital may still be at risk. Below is the policy by which Godo shall manage and calculate the negative balance on your trading account.

1) This policy is only applicable to retail customers.

2) Godo's systems have always incorporates the requisite safeguards to protect the customers from encountering negative balances when trading under normal market conditions. Customers are provided with margin monitoring functionality. If the margin level on customer account is equal to, or drops below, 50%, Godo's system automatically initiates the closing of current open positions, starting from the most unprofitable considering trading hours of particular instruments traded by the customer. Positions will be automatically closed at the current market price. Also, the customers can and should set personal limits for risk management purposes which can help limit losses and maximize profits.

3) In the event that there are certain market conditions which cause a significant market gap and thereby making it possible to incur a negative balance while trading, Godo shall absorb the negative balance. The customer shall therefore be protected against such loss because the purpose of the negative balance protection also provides a backstop in the case of extreme market conditions.

4) The customer should always maintain the appropriate levels of margin in the trading account as the recommended method of risk management

Automatic Stop Out

Godo sets minimum margin requirements that result in automatic Stop Out levels to protect clients from losses. If during an open trade, the net worth of the account reaches the "margin level" equal to 50% of the required margins, all positions would be automatically closed.

Conflicts of interest disclosure

Godo is the main execution venue as described above, and it acts as the principal counterparty to its clients' trades. However, in rare cases, Godo acts as an agent and transfers its trades to a reputable counterparty.

Although there is a general conflict of interest when GoDo acts as the principal counterparty or execution venue for its clients, Godo does not compromise on its commitment to its clients to provide the best execution. Most orders are executed at the 'top of the book', and there is no discrimination in the price for one client vs any other. Godo has a robust back-end price feed infrastructure that ensures that prices are fed by several exchanges, MTFs, and by many different liquidity providers.

In addition, Godo is bound by its Order Execution Policy and continuously looking to enhance its best execution monitoring capabilities.

Also, Godo monitors its Complaints in this respect actively, and it is done independently by the Compliance department, which further ensures to comply with the Firm's best execution obligations. With regards to its clients, Godo offers the best execution to both retail and professional clients, and its automatic execution flow does not differentiate or treat client orders differently. The variation may apply depending on the client's risk appetite when compared to another. For example, professional clients may choose to take more risk or higher leverage as compared to retail clients.

Best execution monitoring

Godo is continuously monitoring its 'prices' compare to the market through internal monitoring measures and third-party vendor solutions. Prices are monitored around execution time within set thresholds against market price and the underlying instrument.

Where the underlying instruments are traded over the counter (OTC), such as Forex and Metals, the critical factor is the spread. Godo monitors the spread to ensure it sources the most competitive price. The following parameters are taken into consideration for low, normal, and high volatility trading periods latency of price feed, the frequency of price updates, and complete representation of top of the book of orders.