

TOMIL TRUST LIMITED
DOCUMENTED INFORMATION
BEST EXECUTION POLICY-TTL/DC3/A/QBEP-012-Dated -02/01/2026

A best execution policy for Tomil Trust Limited must prioritize compliance with the **Securities and Exchange Commission (SEC) Nigeria** and the **Nigerian Exchange Group (NGX)**. It ensures brokers take all reasonable steps to obtain the best possible result for client orders regarding price, cost, speed, and likelihood of execution.

Essential elements to include in the policy are:

1. Scope and Covered Instruments

- The policy must cover all classes of financial instruments traded on SEC-recognized venues, primarily equities (NGX, NASD) and fixed income (FMDQ).
- It applies to all trade types, including **Market Orders** (execute immediately at best available price) and **Limit Orders** (execute only at a specified price or better).

2. Core Execution Factors

When executing a client mandate, the firm must balance the following factors:

- **Price:** Securing the most favorable bid or offer price available in the market.
- **Speed and Likelihood:** Executing the trade as promptly as possible. The standard benchmark for many top-tier Nigerian brokers is to process and execute mandates within 2 hours of receipt, barring specific client instructions.
- **Settlement & Size:** Assessing market volume and ensuring seamless settlement via the Central Securities Clearing System (CSCS).

3. Order Handling Rules

- **Priority and Sequencing:** Compare and execute comparable client orders sequentially on a "first-come, first-served" basis.
- **Front-running & Proprietary Trading:** The firm must not trade on its own account (proprietary trade) ahead of an executable client order, nor aggregate client trades with proprietary trades to the detriment of the client.
- **Price Limits:** Adhere strictly to the NGX's daily price fluctuation limits (e.g., maximum upward or downward movement per stock per day).

4. Client Instructions

- If a client provides a specific instruction (e.g., specifying an exact price or execution venue), the firm satisfies its best execution obligation by following that exact instruction, even if it overrides standard practices.

5. Transparency and Reporting

- **Contract Notes:** Issue an official contract note before the close of business (COB) on the day of execution.

- **Trade Allocation:** Fair and equitable allocation of trades, especially in block or cross trades.
- **Audit Trail:** Maintain detailed logs of all orders, calls, and email mandates for regulatory review.

6. Monitoring and Review

- The firm's compliance department must review the effectiveness of the policy and the selected execution venues on a regular basis (typically quarterly or annually) and present findings to the board.