

Smartlands Platform LTD “Smartlands”

Best Execution Policy

1 Overview

This Best Execution Policy is applicable to dealing on the instructions of a client to invest in a specific project via the platform provided to you by Smartlands and this Execution Policy should be read in conjunction with Smartlands’s standard terms of business.

1.1 Introduction

Smartlands is a Crowdfunding firm, who offer investment via debt and equity into an SPV (a UK Limited Company, established specifically for each project) which invests into real estate projects. Smartlands will deal only in the shares and the security tokens representing the beneficial interest in the shares of each SPV at issue and wind-up.

In the case of Smartlands, as each investment is made into a single project via the client choosing a project into which they would like to invest, Smartlands will have no venue, pricing or liquidity considerations and Smartlands will be dealing on the instructions of a client to invest in a specific project in every case.

2 Exemptions from the provision of Best Execution

Notwithstanding the intentions expressed above, Smartlands does not undertake to provide “best execution” if you fall within any of the following exemptions:

2.1 Eligible Counterparties

If you are classified as an Eligible Counterparty you will not be entitled to best execution under the UK Financial Conduct Authority (“FCA”), or equivalent EU rules. This is in line with Article 24 of MiFID which provides that the best execution obligation under Article 21 will not apply.

3 Clients

Smartlands deals with Retail Clients, Professional Clients and Eligible Counterparties as defined in MiFID and by the FCA.

Because Smartlands always intends to handle orders and expressions of interest in an equitable and consistent manner, once a client is classified, for the purposes of a particular instrument, that client may not then elect to be re-classified for the purposes of one transaction of a type it customarily undertakes.

Exceptional circumstances may be taken into account at the time, with the consent of Smartlands (Smartlands may decline to provide a service should a re-classification be requested).

4 Execution Venues

Smartlands will not employ a Prime Broker. Smartlands will allocate all orders to a project in line with client’s instructions that will be transmitted for execution in line with our terms and conditions, set out within the platform.

Smartlands is able to transact trades on your behalf to the following execution venues:

- Smartlands Platform

5 Execution Factors

Smartlands offers no advice and will act only on express instructions from you. Smartlands has in place internal systems to ensure that client orders are processed within one transaction per project.

If a project was fully funded and your order could not be executed, Smartlands would return the monies to your wallet and advise you of alternative projects.

6 Fees and Costs

Smartlands charges investors a 2% fee for executing orders.

7 Conflicts of Interest

Smartlands recognises that conflicts may exist between the interests of Smartlands and its clients. Smartlands will take steps to manage, mitigate and avoid potential and actual conflicts and internal systems are in place to ensure that all client orders are carried out in a single transaction unless the characteristics of the order make this impractical or it is not in the best interests of the client.

8 Monitoring and Review

Smartlands will monitor the effectiveness of its order execution arrangements and order execution policy in order to identify and, where appropriate, incorporate any amendments to procedures.

Smartlands will review its order execution arrangements and order execution policy at least annually or whenever a material change occurs that affects its ability to continue to obtain the best possible result for the execution of client orders on a consistent basis using the venues included in its order execution policy.

Smartlands will notify you of any material changes to its order execution arrangements or order execution policy as described above by posting the information on its website.

9 No Fiduciary Relationship

Smartlands commitment to provide you with “best execution” does not mean that it owes you any fiduciary responsibilities over and above the specific regulatory obligations placed upon it or as may be otherwise contracted between Smartlands and yourself.

You remain responsible for your own investment decisions and SFS will not be responsible for any loss you suffer as a result of those decisions.