



Galaxy Digital UK Limited (“GDUK”) Best Execution Policy Summary

1 Background

This document summarises the best execution policy for Galaxy Digital UK Limited (“GDUK”). GDUK forms part of the Galaxy group of companies (“Galaxy”).

GDUK is authorised by the FCA as a UK MiFID investment firm, and GDUK is subject to the FCA’s rules on “best execution”. Best execution is the requirement to take all sufficient steps to obtain the best possible results for clients when executing orders, taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

2 Scope

2.1 Clients

GDUK’s best execution policy applies to the execution of orders where GDUK has classified you as a professional client; it does not apply where you have been classified as an eligible counterparty. GDUK does not conduct business with or for retail clients.

2.2 Financial instruments

GDUK’s best execution policy only applies with respect to cryptoasset derivatives, such as options, futures, swaps, or forward agreements which are financial instruments within the scope of MiFID.

3 When best execution requirements apply

Galaxy, including GDUK, act as liquidity providers in the cryptoasset space; this includes executing transactions in cryptoasset derivatives (which are subject to MiFID). GDUK will execute such transactions:

- between Galaxy entities and clients (dealing as agent on behalf of the Galaxy entities); and
- facing clients as a principal counterparty (dealing as principal).

GDUK does not act as your agent when it is executing trades. It is possible that a duty of best execution exists when GDUK trades with you as a principal counterparty, but only where it can be determined that you are “legitimately relying” on GDUK for best execution. In order to make this determination, GDUK applies a four-factor test, considering (i) which party initiates the transaction, (ii) market practice and the existence of a convention to ‘shop around’, (iii) the relative levels of price transparency within a market, and (iv) the information provided by GDUK and any agreement reached.

GDUK trades with you on a request for quote basis, where you approach Galaxy for a quote, [or respond to Galaxy’s streamed prices/indications of interest] where Galaxy predominantly act in a principal capacity. You ultimately decide whether to proceed with the transaction (or to engage in negotiations with Galaxy) based upon the price provided by Galaxy (and any other liquidity providers from whom you have sourced quotes).

As such, we do not expect you to be legitimately relying on GDUK to provide best execution, particularly given the market practice for clients to shop around for quotes, and the levels of transparency in the market for cryptoasset derivatives. Our Terms of Business also include an acknowledgement that you are not legitimately relying on GDUK for best execution.

Regardless of whether best execution requirements apply, GDUK shall treat you fairly and manage any conflicts of interest that may arise (in accordance with GDUK's Conflicts of Interest Policy).

4 Execution venues

The only class of financial instrument which GDUK executes orders in are cryptoasset derivatives. As GDUK trades with you on an OTC basis, the transactions we execute with you are executed outside a trading venue. GDUK does not execute/place orders in cryptoasset derivatives with external execution venues on your behalf.¹

5 Policy Administration

GDUK reviews the best execution policy bi-annually, and we will notify you of any material changes to the policy. A change is considered "material" where its disclosure is necessary to enable you to make a properly informed decision about whether to continue utilising our services.

¹ "Execution venues" meaning regulated markets, multilateral trading facilities, organised trading facilities, systematic internalisers, market makers, or other liquidity providers