

ALTi Wealth Management (Singapore) Pte. Ltd.

Best Execution Policy

Version 2.1

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Contents

1	Introduction	4
2	Order Placement and Execution	4
2.1	Timing of execution	4
2.2	Likelihood of execution and settlement	5
2.3	Other considerations	5
2.4	Disclosure to customers on order execution	5
3	Execution Factors and Prioritisation	5
4	Monitoring	5
5	Payment for Order Flow.....	5

1 Introduction

AITi Wealth Management (Singapore) Pte. Ltd. (“**AITi Singapore**”), is a wholly owned subsidiary of AITi Global, Inc, a company incorporated in Delaware, United States listed on NASDAQ. AITi Singapore is a Capital Markets Services Licence holder for fund management activity, issued by the Monetary Authority of Singapore (“**MAS**”).

As part of its ongoing efforts to ensure financial institutions act in clients’ best interest, MAS has issued Notice SFA04-N16 on Execution of Customers’ Order (the “**Notice**”) on 3 September 2020, which came into effect on 3 March 2022.

As an Exempt Financial Adviser, AITi Singapore has policies in place for fair trade execution practices, and adheres to MAS Guidelines on Fair Dealing [FSG-G04].

Pursuant to paragraph 3 of Guidelines to the Notice, the Best Execution Policy (the “**Policy**”) is designed to govern the trading practices applied by all staffs allowed to instruct trades on behalf of the clients (the “**Representatives**”) in AITi Singapore, with effect from the date of approval of the Policy. In the event of any conflict in meaning or interpretation of our trading policies, this Policy will take precedence.

While the Notice exempts Institutional Investors from requirement of best execution, the Policy will apply to all trades, on-exchange or off-exchange, for all clients, regardless of whether the investment agreement is Discretionary or Non-Discretionary as best practice.

2 Order Placement

AITi Singapore has External Asset Management Agreements with various custodian banks used by its clients where such custodian banks have been selected by the clients. However, AITi Singapore takes into account the fees involved, reliability, reputation, quality of delivery, and compatibility for ease of administration of trades, before working with the custodian bank.

All trades execution is done by each client’s respective custodian bank or broker. AITi Singapore will only pass such orders to the bank for their processing.

2.1 Timing of passing orders to custodian

As a general rule of thumb, all trade requests must be passed to respective bank or broker in a prompt, fair and expeditious manner with accurate records. Comparable orders should be carried out sequentially and promptly in accordance with the client’s best interests and in a way that complies with applicable regulatory standards. Orders will be processed on a first-come, first-served basis unless AITi Singapore is required to prioritise certain orders based on specific client needs, or the exchange trading hours fall outside of local working hours, such as US exchanges.

There are no exceptions to this as late trade placements may be detrimental for both the client(s) and AITi Singapore, and may result in reputation and monetary risks.

2.2 Likelihood of execution and settlement

Representatives should exercise judgment and consider the likelihood of execution and settlement for each trade.

Unexecuted limited orders will be held in accordance with the agreed terms with clients and be subject to the AITi Singapore's ongoing monitoring.

Subject to Section 2.1 of the Policy, all orders received must be passed to respective bank or broker within the same business day which order instruction(s) has/have been received, in particular, orders of Non-Discretionary clients.

As AITi Singapore does not custodise any of clients' assets, trade confirmation will be sent by the respective brokers to the clients.

2.3 Other considerations

Staffs are strictly not allowed to trade before clients' orders are placed. Explicit approvals from Portfolio Manager (or Head of Investments, Singapore) and Compliance must be granted *prior* to any trades with the exception of foreign exchange transactions..

2.4 Disclosure to customers on order execution

A copy of this Policy is available on our website <https://alti-global.com> and will be provided to clients upon request.

3 Execution Factors and Prioritisation

AITi Singapore may prioritise certain execution factors based on the specific circumstances of the client order. For example, special instructions from clients (e.g., price limits or time constraints) may override AITi Singapore's standard execution practices.

4 Monitoring

Pursuant to Paragraph 39(1)(d) of Securities and Futures (Licensing and Conduct of Business) Regulations, all trades placed by clients are required to be recorded in the trade blotter. Compliance reviews the blotter quarterly to ensure that the trades have been properly recorded.

The information in the trade blotter is captured in a manner where the trade can be reconstructed in the future with such information.

5 Payment for Order Flow

AITi Singapore is not allowed to receive any form of payment or commissions from another order taking Capital Market Intermediaries in return for routing clients' orders to them as this will give rise to conflict of interests, and would be inconsistent with the spirit of the Policy.

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