



RAINBOW SECURITIES & INVESTMENT COMPANY LIMITED

BEST EXECUTION POLICY

Document Control	Details
Version	1.0
Effective Date	1 August 2026
Review Date	Annual review
Owner	Operation
Classification	Internal / Board Approved
Approval	Board of Directors

1. Policy Statement

RAINSEC is committed to integrity, trust, professionalism and compliance with applicable laws, rules and standards set by capital market regulators. This Best Execution Policy sets out the steps RAINSEC takes to obtain the best reasonably available result when executing client mandates.

2. Scope

This Policy applies to all client mandates and orders in securities or other instruments handled by RAINSEC, whether received physically, electronically, by telephone, email, approved digital channel or Direct Trading Access channel.

3. Best Execution Obligation

When purchasing or selling securities on behalf of clients, RAINSEC shall take reasonable steps to obtain the best available result for the client within the shortest practicable time frame and in accordance with the client's mandate and applicable market rules.

Relevant execution factors include price, cost, speed, likelihood of execution, likelihood of settlement, size, nature of order, fill rate, price improvement, market impact, client instruction and any other factor relevant to the execution of the client mandate.

4. Client Order Handling

- Client mandates shall be handled promptly, fairly and expeditiously.
- Orders executed on behalf of clients shall be promptly and accurately recorded and allocated.
- Client mandates shall not be aggregated with another client's mandate unless permitted and properly documented.
- Client mandates shall not be aggregated with proprietary transactions without client authorization and consent.
- RAINSEC shall not misuse information relating to pending client orders and shall take reasonable steps to prevent such misuse.

5. Direct Trading Access

Where a client chooses to execute an order through Direct Trading Access or any approved electronic trading facility, the client selects the parameters of the trade. In such cases, RAINSEC shall treat the client as having given specific execution instructions, provided that the transaction complies with applicable laws, NGX rules, client mandate and platform controls.

6. Notification and Publication

RAINSEC shall make this Policy available to clients through its website, client portal, office or other approved client-facing channel. Clients shall be notified of material changes to this Policy where required. Evidence of publication or hosting shall be retained for regulatory purposes.

7. Audit Trail and Monitoring

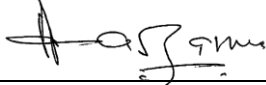
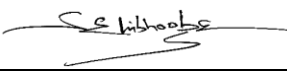
- RAINSEC shall maintain systems for tracking, monitoring and recording client orders.
- Evidence of order execution, allocation, mandate and related audit trail shall be maintained.
- Internal Control/Internal Audit shall review order handling and execution arrangements daily.
- Deficiencies shall be escalated to Management and corrected promptly.

8. Definitions

Term	Definition
Client Mandate / Order	An authorisation from a client to RAINSEC to trade securities or take related action in the client's registered trading account.
Best Execution	The obligation to take reasonable steps to obtain the best possible result for a client when executing or arranging execution of a client order.
Direct Trading Access	An approved electronic trading facility that allows a client to interact directly with the order book or trading system under applicable rules and controls.

9. Review

This Best Execution Policy is subject to mandatory annual review by the company and earlier review where required by regulation, market practice, technology changes or changes in business operations.

		
Chief Compliance Officer Name: <u>Kolawole Martins</u> Date: <u>22 July 2026</u>	Managing Director / CEO Name: <u>Iribhogbe Steve</u> Date: <u>22 July 2026</u>	Executive Director Name: <u>Ken Oboh</u> Date: <u>22 July 2026</u>

BOARD OF DIRECTORS

Executive Director Name: Mrs M A Obob Date: 22 July 2026 Signature: 	Chairman Name: Mr GAT Obob Date: 22 July 2026 Signature: 
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