

Order Handling Policy



Tulipshare Ltd. (“Tulipshare”, “we”, “us”, “our”) operates an activist investment platform which allows you to invest money and manage your investments as part of the ethical investment campaigns that we promote.

The purpose of this Order Handling Policy (the “Policy”) is to describe how the orders you submit to us are handled and how you receive best execution. Providing best execution is a regulatory obligation; it takes into account the nature of a particular order, the prices available, the execution venues available, and a reasonable assessment of relevant execution factors.

Our App (which includes our mobile application and our website) allows customers to buy and sell securities. Tulipshare acts as the introducing broker. DriveWealth, LLC (“DriveWealth”) acts as our executing broker and provides clearing, settlement, and custody services. As part of our terms and conditions and registering for a Tulipshare account, you will have accepted our terms as well as those of DriveWealth.

We are required to obtain your prior express consent before we arrange for an order to be executed outside of a UK trading venue. By consenting to our Terms of Service, which incorporates by reference this Order Handling Policy, you express your consent to us arranging for your orders to be executed outside of a UK trading venue.

Currently, we only accept market orders on our App. Once a market order is accepted by us, it will be sent to DriveWealth and executed at the best market price then available. If you place an order outside of regular U.S. market trading hours, your order will queue until the market opens.

When you place an order, you will be shown the last-traded price, which may differ from the actual execution price due to fluctuations in the market. All pricing information displayed on our App is sourced from DriveWealth.

Once you place an order on our App and we accept it, it is routed to DriveWealth for execution. DriveWealth will make order routing decisions to achieve best execution.

DriveWealth is not a UK trading venue. DriveWealth is a US-based broker-dealer that is registered with the U.S. Securities and Exchange Commission and is a member of FINRA. DriveWealth regularly reviews orders for quality of execution and has committed to comply with all of its regulatory obligations under best execution. In its sole discretion, DriveWealth will make order routing decisions to achieve best execution.

For the avoidance of doubt, we are deemed to have provided best execution when we receive and transmit an order for execution pursuant to the market order instruction provided by customers when placing an order.

We will review this Policy no less frequently than on an annual basis to ensure that it remains current, applicable, and fit for its intended purpose. On an annual basis, we will publish a report relating to our use of DriveWealth, the quality of execution, and any other relevant Financial Conduct Authority rules.

We do not receive any inducements from third-party brokers (including DriveWealth) or execution venues. We shall not receive any third-party payments that do not comply with MiFID II. For more information about our business practices and how we handle conflicts of interest, please see our Conflicts of Interest Policy (accessible at <https://tulipshare.com/documents/conflicts-of-interest>).

Customers are deemed to consent to this Order Handling Policy when they agree to the terms and conditions for Tulipshare.

Where applicable, our duty to provide our customers with best execution does not imply that we owe our customers any fiduciary responsibilities over and above the specific regulatory obligations placed upon us or as may be otherwise contracted between us and our customers. At all times, customers remain responsible for their investment decisions. We will not be responsible for any market trading loss that customers may suffer as a result of those decisions.

Should you have any further questions about our order handling or best execution, please contact us at support@tulipshare.com.

Date of Publication: 17 August 2021