



eurotrader

EXECUTION QUALITY SUMMARY STATEMENT 2022

Eurotrade Investments RGB Ltd ('Eurotrader') is a Cypriot Investment Firm (CIF) under the Registration Number HE317893, licensed and regulated by the Cyprus Securities and Exchange Commission (CySEC) under license 279/15. Registered address at 70, Kyrillou Loukareos Street, Kakos Premier Tower, 1st Floor, 4156, Limassol, Cyprus

1. ABOUT EUROTRADE INVESTMENTS RGB LTD

Eurotrade Investments RGB Ltd (hereafter the “Company”) is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with a certificate of Registration number HE 317893, Eurotrade Investments RGB Ltd is authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) under the license number 279/15.

2. PURPOSE

This Document which called Execution Quality Summary Statement (hereinafter the EQSS) sets out the technical standards for the annual publication by investment firms of information on the identity of execution venues and on the quality of execution. The EQSS is a summary of the analysis and conclusions the Company drew from its detailed monitoring of the quality of execution obtained on the execution venues where it executed all client orders during the year 2022, covering a full year cycle (the year under review). This Document shall be reviewed and accordingly updated on an annual basis and shall reflect the data of the previous year.

3. APPLICABLE REGULATIONS

This document is issued pursuant to, and in compliance with the requirements of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments (‘MiFID II’) and the investment services Law of CySEC (87(I)/2007). The purpose of this Document is to ensure the Company’s Compliance with the Commission’s Delegated Regulation (EU) 2017/576 (‘RTS 28’) as well as Section 9 of the Questions and Answers Document of the European Securities and Markets Authority (‘ESMA’) issued on 11 October 2016 with reference ESMA/2016/1454 with respect to the provision of CFDs and other speculative products to retail investors. In this Document, we collectively refer to all the above legislations, regulations and guidelines as “Regulations”.

4. BEST EXECUTION FACTORS AND CRITERIA

The Company takes all sufficient steps to act in the best interest of its Customers. When executing Customer’s Orders and obtain the best possible result for Customers, by considering the following factors when dealing with Customers Orders: price, cost, speed, likelihood of execution and settlement, size, market impact or any other consideration relevant to the execution of an order. The Company does not consider the above list exhaustive and the order in which the above factors are presented shall not be taken as priority factor. The Company when executing Clients’ Orders is required under the relevant regulatory framework to assign a relative importance on the following execution factors:

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- 4.1 PRICE:** For any given CFD, the Company will quote two prices: the higher price (ASK) at which the Client can buy (go long) that CFD, and the lower price (BID) at which the Client can sell (go short) that CFD. Collectively, the ASK and BID prices are referred to as the Company's price. The difference between the lower and the higher price of a given CFD is the spread. The Company's price for a given CFD is calculated by reference to the price of the relevant underlying asset, which the Company obtains from third party external reference sources. The Company's prices can be found on the Company's website and/or trading platforms. The Company updates its prices as frequently as the limitations of technology and communications links allow. The Company reviews its third-party external reference sources in frequent periods to ensure that the data obtained continues to remain competitive.
- 4.2 COSTS:** For opening a position in some types of CFDs the Client may be required to pay commission and/or financing fees, the amount of which is disclosed on the Company's website and/or trading platforms. Commissions may be charged either in the form of a percentage of the overall value of the trade or as fixed amounts. In the case of financing fees, the value of opened positions in some types of CFDs is increased or reduced by a daily financing fee "swap rate" throughout the life of the contract. Financing fees are based on prevailing market interest rates, which may vary over time. Details of daily financing fees applied are available on the Company's website and/or trading platforms. For all types of CFDs that the Company offers, the commission and financing fees are not incorporated into the Company's quoted price and are instead charged explicitly to the Client account.
- 4.3 SPEED OF EXECUTION:** The Company places a significant importance when executing Client's Orders and strives to offer high speed of execution within the limitations of technology and communication links.
- 4.4 LIKELIHOOD OF EXECUTION:** The Company may not be able to execute the order at the best available price or the transaction may fail to complete as stated in our Order Execution Policy. Although the Company strives to execute all orders placed by the clients, it reserves the right to decline an order of any type or execute the order at the first available market price.
- 4.5 LIKELIHOOD OF SETTLEMENT:** The Company shall proceed to a settlement of all transactions upon execution of such transactions. The Financial Instruments of CFDs offered by the Company do not involve the physical delivery of the underlying asset, so they are not settled physically as there would be for example if the Client had bought shares. All CFDs are cashsettled.
- 4.6 SIZE OF ORDER:** The minimum size of an order may be different for each asset type and/or financial instrument. A Lot is unit measuring the transaction amount and it is different for each type of Financial Instrument. Please refer to the website and/or platform for the value of minimum size of an order or minimum Lot for a given CFD type. The Company reserves the right to decline an order as explained in the Client

Agreement entered with the Client.

4.7 MARKET IMPACT: Some market factors may affect rapidly the Company's quoted price of the Financial Instruments. These factors may, in turn, affect some of the other execution factors listed above. The Company takes all reasonable steps to obtain the best possible result for its Clients.

For details on how each factor is assessed ex ante when executing clients' orders please refer to the Company's Order Execution Policy.

Where the client provides the Company with a specific instruction in relation to his/her/it order or any part of it, including selection of execution venues, the Company will execute that order in accordance with those specific instructions and, in doing so, it will have complied with its obligations to provide the best possible results to the extent that those instructions are followed.

5. CONFLICT OF INTEREST

Execution Venues are the entities with which the orders are placed or to which the Company transmits orders for execution. As the Company's license permits Dealing on own Account, the Company has executed majority of orders on Eurotrade Investments RGB Limited Execution Venue (as per Execution statistics tables below).

When providing the above service, the Company cannot make money unless the client loses money, which presents a conflict of interest between the Company and the client. To manage the above conflict, the Company has mostly adopted a business model whereby it will execute orders on behalf of clients and act as the client's counterparty whilst managing its market risk exposure by hedging all/or some of clients' trades on either one-to-one or aggregated basis.

Even where the Company transmits the orders for execution to third party liquidity providers, the Company remains the sole counterparty to your trades. Should the client decide to open a position in a financial instrument with the Company, then that open position may only be closed with the Company.

The Company implements and has in place sufficient measures to manage and/or mitigate such conflicts (including Personal Account Dealing, Inside and Proprietary Information, Inducements, Selection of service providers, Remuneration of staff, Access to electronic data, Supervision and segregation of departments).

For additional information please refer to the Company's Conflict of Interest Policy.
<https://www.eurotrader.eu/wp-content/uploads/2021/01/conflicts-of-interest-policy.pdf>

6. PAYMENTS OR NON-MONETARY BENEFITS BETWEEN THE COMPANY AND ITS THIRD-PARTY EXECUTION VENUES

The Company does not have any specific arrangement with other execution venues (third-party liquidity providers) regarding payments, discounts, rebates or other non-monetary benefits.

7. CHANGE IN THE LIST OF EXECUTION VENUES

The Company has proceeded with the following changes / additions in the list of Execution Venues during the year under review:

Ref. No.	Name of the Execution Venue	Type of Change	Country of Origin
1	LMAX BROKER LIMITED	Removed	United Kingdom
2	ARGON FINANCIAL LIMITED	Removed	United Kingdom
3	EUROTRADE INVESTMENTS RGB LIMITED	Added	Cyprus
4	BROCTAGON PRIME LTD	Added	Cyprus
5	FINALTO TRADING LIMITED	Added	United Kingdom
6	VTC Europe B.V.	Added	Netherlands

The Company has maintained the following Execution Venues during the year under review:

Ref. No.	Name of the Execution Venue	Type of Change	Country of Origin
1	FXCM EU LTD	No Change from 2021 to 2022	Cyprus
2	INVEST FINANCIAL SERVICES PTY LTD	No Change from 2021 to 2022	Australia

8. CLIENT CATEGORIZATION AND ORDER EXECUTION

Although as per the [Client Categorisation Policy](#), order execution requirements may differ between Professional and Retail Clients, the Company has not treated differently the orders of Retail vs Professional Clients during the year under review.

9. ASSESSMENT OF THE QUALITY OF EXECUTION

The Company monitored the effectiveness of its Order Execution Policy during the year under review and relevant order execution arrangements in order to identify and implement where necessary the appropriate measures. The Company on a constant basis reviews its order execution arrangements so as to provide best execution for its clients on a continuous basis.

The Company takes into account several factors when executing client's orders such as but not limited to the price, costs, speed of execution. The Company monitors its execution arrangements on an ongoing basis by selecting appropriate samples of orders executed and evaluating the samples as described below:

a) Evaluation of Execution Quality:

a. Price Latency

b. Speed of Execution

c. Frequency and Duration of Price Freezing

d. Depth of Liquidity

e. Price Transparency

b) Comparing prices relayed by price feed providers with the prices quoted by the Company.

c) Monitor Slippage on a regular basis to identify whether is asymmetric or not.

d) Monitor IT infrastructure (responsiveness of interfaces used, adequate integration with data providers, etc.).

The Company's control functions (compliance function and internal audit) scrutinize the monitoring procedure and the actions taken by the Company's senior management. The Company's control functions present any findings to the Company's Board of Directors, at least annually, for further actions that maybe is necessary to be implemented.

10. REPORT ON EXECUTION VENUES

The information presented below refers to the top five (5) execution venues in terms of trading volumes used by the Company for executing the orders of retail clients and professional clients. The information refers to the asset class of Contracts for Differences (CFDs) for the year 2022.

Top-five execution venues for 2022 (retail clients)

Class of Instrument	Contracts for Difference (CFDs)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
EUROTRADE INVESTMENTS RGB LIMITED LEI: 549300Q82SNSBMITH078	71.36%	94.03%	0%	100%	0%
INVEST FINANCIAL SERVICES PTY LTD LEI: 549300OREYLNWD2E9Y62	12.12%	0.95%	0%	100%	0%
FINALTO TRADING LIMITED LEI: 2138003C3AQBXS54WM47	9.30%	0.79%	0%	100%	0%
BROCTAGON PRIME LTD LEI: 213800AYVP83GMTLSE33	5.94%	4.15%	0%	100%	0%
FXCM EU LTD LEI: 549300LZMQXXYV4JJ603	1.28%	0.08%	0%	100%	0%

Top-five execution venues for 2022 (professional clients)

Class of Instrument	Contracts for Difference (CFDs)				
Notification if <1 average trade per business day in the previous year	N				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume traded as a percentage of total in that class	Proportion of orders executed as percentage of total in that class	Percentage of passive orders	Percentage of aggressive orders	Percentage of directed orders
EUROTRADE INVESTMENTS RGB LIMITED LEI: 549300Q82SNSBMITH078	63.20%	81.87%	0%	100%	0%
BROCTAGON PRIME LTD LEI: 213800AYVP83GMTLSE33	32.41%	14.52%	0%	100%	0%
FXCM EU LTD LEI: 549300LZMQXXYV4JJ603	3.40%	1.54%	0%	100%	0%
INVEST FINANCIAL SERVICES PTY LTD LEI: 549300OREYLNWD2E9Y62	0.51%	1.42%	0%	100%	0%
FINALTO TRADING LIMITED LEI: 2138003C3AQBXS54WM47	0.48%	0.65%	0%	100%	0%