

INSTANT TRADING EU LTD

# Execution Quality Summary Statement (RTS 28)

For year 2021

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## I. Introduction

INSTANT TRADING EU LIMITED (referred to as “the Company”) is a Cyprus Investment Firm (CIF) supervised and regulated by the Cyprus Securities and Exchange Commission (CySEC) with the CIF License number 266/15 and the Company registration number 266937. Under Commission Delegated Regulation 2018/576 (RTS 28) and with respect to the publication of the annual Execution Quality Summary Statements (hereinafter “the EQSS”), the Company is required to publish a summary of the analysis and conclusions for each class of financial instruments which are drawn from the Company’s detailed monitoring of the quality of execution obtained on the execution venues where the Company executed all clients’ orders in the previous year. The required information is disclosed in the table presented hereof.

## II. Scope

This EQSS provides a summary of the analysis and conclusions which the Company has drawn through its detailed monitoring of the quality of execution obtained on the execution venues where it executed all clients’ orders during the previous calendar year, covering a full year cycle.

## III. Best Execution Factors

The Company acts either as a principal or an agent (a riskless principal) when executing clients’ orders. The Company treats the execution of orders of retail and professional clients in the same manner and follows its Order Execution Policy to act in the best interest of its clients.

During 2021 and as per the Company’s Order Execution Policy, and Policy to Act in the Best Interest of the Client, the Company assigned the following importance level to the below best execution factors when executing orders on the range of Contracts for Difference (the CFDs) it offers:

| Factor | Importance Level | Comments                                                                                                                                                                                                                                                                                                                                                             |
|--------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Price  | High             | The Company acts in the clients’ best interest and gives strong emphasis on the quality and level of the price data that it receives from external sources in order to provide the clients with competitive price quotes. However, the Company does not guarantee that the quoted prices will be the same as the prices in some other resources or better than them. |

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|                          |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Costs                    | High   | The client may be required to pay commission or financing fees, the amount of which is disclosed on the Company's Website and/or Platform. Commissions may be charged either in the form of a percentage of the overall value or as a fixed amount. The client may be charged other costs such as spreads and swaps. The Company takes all sufficient steps to keep the costs of clients' transactions as low and competitive as possible.           |
| Speed of Execution       | High   | The Company uses Instant execution and Market execution.                                                                                                                                                                                                                                                                                                                                                                                             |
| Likelihood of Execution  | High   | The availability of prices of other market makers/financial institutions/liquidity can make it impossible for the Company to execute an order. When the Company transmits orders for execution to a third party, the likelihood of execution depends on the availability of prices/liquidity provided by the third party. Though the Company reserves the right to decline a client's order, it aims to execute as many clients' orders as possible. |
| Likelihood of Settlement | Medium | The Company proceeds with a settlement of all transactions upon execution of such transactions.                                                                                                                                                                                                                                                                                                                                                      |
| Size of Order            | Medium | The volume and structure of the order affecting the price due to Market Depth.                                                                                                                                                                                                                                                                                                                                                                       |
| Nature of Orders         | Medium | The particular characteristics of the order may affect the execution of the order.                                                                                                                                                                                                                                                                                                                                                                   |
| Market Impact            | Medium | Some factors may rapidly affect the price of the underlying instruments from which the Company's quoted price is derived, and it may also affect the rest of the factors therein. The Company will take all sufficient steps to obtain the best possible result for its clients.                                                                                                                                                                     |

During 2021, the best possible result was determined in terms of total consideration of the factors representing the price of the financial instrument and the costs related to execution, hence the Company gave precedence to these criteria over the rest when executing orders of retail clients.

More information about the Company's Execution Policy can be found on this [link](#).

#### IV. Execution and Price Data Summary

##### A. CFDs on FX

The Company acts as the execution venue when executing orders on CFDs on FX. The Company adds its markups. As part of its monitoring, the Company benchmarks its prices to independent price sources on a random basis to ensure that execution of orders takes place with market standards. The relevant arrangements and price sources are reviewed on a monthly basis.

##### B. CFDs on Commodities

The Company acts as the execution venue when executing orders on CFDs on Commodities. The Company adds its markups. As part of its monitoring, the Company benchmarks its prices to independent price sources on a random basis to ensure that execution of orders takes place with market standards. The relevant arrangements and price sources are reviewed on a monthly basis.

##### C. CFDs on Shares

The Company acts as the execution venue when executing orders on CFDs on Shares. The Company provides the pricing to clients together with the markups.

##### D. CFDs on Indices

The Company acts as the execution venue when executing orders on CFDs on Indices. The Company provides the pricing to clients together with the markups.

##### E. CFDs on Futures

The Company acts as the execution venue when executing orders on CFDs on Futures. The Company provides the pricing to clients together with the markups.

#### V. Conflict of Interest

A conflict of interest arises when there is a reason, within the Company's control, that prevents the Company from putting the interests of its clients before those of itself and its employees, or the interests of one client or a group of clients before the interests of another client or a group of clients. In such a situation, the Company must pay due diligence to the interests of each client and manage any potential conflicts of interest accordingly. The underlying principle that must be followed at all times is that the clients' interests must always be put before the interests of the Company and/or its employees. A conflict may exist, or be perceived to exist, if an employee's activity is or has the reasonable appearance of being inconsistent with the best interests of the Company's clients. In case a conflict of interest between a client and the Company or another client/group of clients arise and Company for any reason can not guarantee the Client's interest it will disclose all the relevant information to the parties involved.

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More information on the Company's Conflict of Interest Policy can be found on this [link](#).

## VI. Data or tools relating to the quality of Execution

During the year under review, the Company deployed a number of methodologies and tools in order to monitor and, where applicable, adjust its execution parameters in order to ensure consistency with its overarching obligation to offer the best possible result for its clients' orders. In broad terms, the Company monitors its execution arrangements on an ongoing basis by selecting appropriate samples of orders executed and evaluating the samples as described below:

1. evaluating the Company's execution quality in accordance with the following:
  - pricing frequency (price updates in real time);
  - speed of execution;
  - frequency and duration of price freezing; and
  - abnormal market conditions.
2. evaluating price fairness by comparing prices relayed by market data providers with the prices quoted by the Company.
3. evaluating the technological prowess of the Company's systems including but not limited to responsiveness of interface, lag, and integration with the IT systems of market data providers.

## VII. Additional Affirmations

During the year 2021, the Company:

- did not use any output of a consolidated tape provider;
- did not identify any additional conflicts of interest;
- did not use any execution venues to execute orders where it has common ownerships (as the Company is the sole execution venue when executing orders of its clients);
- did not use any close links when executing clients' orders.

### I. Execution and Client Categorization

#### 1. Retail Clients

By virtue of the applicable regulatory framework, the Company is required to provide the best execution to retail clients in accordance with the total consideration whereby the total

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consideration represents the price of a financial instrument and the costs related to the execution which include all expenses incurred by the client and which are directly related to the execution of the order.

## 2. Professional Clients

During the year under review, the Company placed emphasis on the price and execution costs factors.

## II. Conclusion

During the year of 2021 and based on the Company's best execution arrangements and monitoring, the Company has taken all sufficient measures to obtain the best possible results for its clients.

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**APPENDIX 1**

## RTS 28 Summary Table

| Information on the top five execution venues during the year of 2021 (Retail Clients) |                                                                    |                                                                      |                              |                                 |                               |
|---------------------------------------------------------------------------------------|--------------------------------------------------------------------|----------------------------------------------------------------------|------------------------------|---------------------------------|-------------------------------|
|                                                                                       | Contracts for Difference (CFDs)                                    |                                                                      |                              |                                 |                               |
| Notification if <1 average trade per business day in the previous year                | No                                                                 |                                                                      |                              |                                 |                               |
| Top five execution venues ranked in terms of trading volumes (descending order)       | Proportion of trade volumes as a percentage of total in that class | Proportion of orders executed as a percentage of total in that class | Percentage Of Passive Orders | Percentage Of Aggressive Orders | Percentage of Directed Orders |
| InstantTradingEULTD (LEI: 213800XNMPSN6WZQLV25)                                       | 92.78%                                                             | 99.86%                                                               | 0%                           | 100%                            | 0%                            |
| GBE PRIME (GBE BROKERS Ltd.)                                                          | 7.16%                                                              | 0.14%                                                                | 0%                           | 100%                            | 0%                            |
| BROCTAGON PRIME Ltd                                                                   | 0.06%                                                              | 0%                                                                   | 0%                           | 100%                            | 0%                            |

| Information on the top five execution venues during the year of 2021 (Professional Clients) |                                                                    |                                                                      |                              |                                 |                               |
|---------------------------------------------------------------------------------------------|--------------------------------------------------------------------|----------------------------------------------------------------------|------------------------------|---------------------------------|-------------------------------|
|                                                                                             | Contracts for Difference (CFDs)                                    |                                                                      |                              |                                 |                               |
| Notification if <1 average trade per business day in the previous year                      | No                                                                 |                                                                      |                              |                                 |                               |
| Top five execution venues ranked in terms of trading volumes (descending order)             | Proportion of trade volumes as a percentage of total in that class | Proportion of orders executed as a percentage of total in that class | Percentage Of Passive Orders | Percentage Of Aggressive Orders | Percentage of Directed Orders |
| InstantTradingEULTD (LEI: 213800XNMPSN6WZQLV25)                                             | 5.44%                                                              | 73.15%                                                               | 0%                           | 100%                            | 0%                            |
| GBE PRIME (GBE BROKERS Ltd.)                                                                | 91.90%                                                             | 25.70%                                                               | 0%                           | 100%                            | 0%                            |
| BROCTAGON PRIME Ltd                                                                         | 2.66%                                                              | 1.15%                                                                | 0%                           | 100%                            | 0%                            |

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