

# **Execution and Quality Statement for the year 2021, as per the Regulatory Technical Standards 28 ("RTS 28")**

**MARCH 2022**

## Scope of the Report

This report is published by ITRADE GLOBAL (CY) LTD (hereinafter referred to as 'the Company'), an Investment Firm authorized and regulated by the Cyprus Securities and Exchange Commission ('CySEC') under the license No. 298/16. The Company owns and operates the brand "TRADEFW" ([www.TRADEFW.com](http://www.TRADEFW.com)). The Company is registered in the Republic of Cyprus through the Department of Registrar of Companies and Official Receiver with registration number HE 335424 with registered office at Gladstonos 99, Elnor Hermes Building, 3<sup>rd</sup> Floor, 3032 Limassol Cyprus.

The Company is licensed to conduct the following investment and ancillary services

Investment Services	Ancillary Services
Reception and Transmission of orders in relation to one or more financial instruments	Safekeeping and administration of financial instruments, including custodianship and related services
Execution of orders on behalf of clients	Granting credits or loans to one or more financial instruments, where the firm granting the credit or loan is involved in the transaction
Portfolio management	Foreign exchange services where these are connected to the provision of investment services
Provision of investment advice	Investment research and financial analysis or other forms

This document was prepared in compliance to Article 27(10)b of MiFID II as adopted by the [Commission Delegated Regulation \(EU\) 2017/576](https://eur-lex.europa.eu/eli/reg/2017/576/oj). The Company is required to publish the Execution Quality Summary Statement of the regulatory technical standards 28 (hereinafter referred to as 'RTS 28') on an annual basis and provide sufficient information in regard to the execution venues and on the quality of the execution of client orders.

**Please ensure you read this document along with our Order Execution and Best Interest Policy, and any other documentation prior to opening an account or carrying out any activity with the Company.**

## Best Execution Obligation and Execution Factors

In accordance with the Markets in Financial Instruments Directive (MiFID) 2004/39/EC as well as the Investment Services and Activities and Regulated Markets Law of 2007 (Law 144(I)/2007) and its subsequent amendments, and Regulation (EU) 2017/565 when executing orders, the Company must take all reasonable steps to obtain, the best possible result for its Clients taking into account the price, costs, speed, likelihood of execution, size, nature or any other consideration relevant to the execution of the order.

The Company has established the “Order Execution and Best Interest Policy”, which provides all details on how the Company takes all steps into consideration when executing Client orders or receiving and transmitting orders for execution in relation to the financial instruments the Company offer to its Clients. It is worth noting that the Order Execution and Best Interest Policy does not apply to Eligible Counterparties as defined in the Company’s Client Categorization Policy.

In accordance with the regulation Best Execution is the obligation for the Company to ensure that the execution arrangements deliver the best possible result when executing Client Orders. As a result, Best Execution is determined by several execution factors and its relative importance, which is taken into consideration in achieving the best possible outcome.

The Policy applies to Retail and Professional Clients of the Company.

In the case of Retail Clients, in applying the best execution in the normal course of business, we determine the best possible result in terms of total consideration. Total consideration is the price of financial instrument concerned and the costs payable by the Retail Client as a result of execution. These costs include all expenses incurred that are directly related to the execution of the order (such as execution venue fees and any fees paid to third parties involved in the execution of the order). These costs do not include our own commission, spread or margin. We make take the other execution factors into account where they are instrumental in delivering the best possible result (in terms of total consideration) for the Retail Client.

In the case of Professional Clients, in applying the overarching principal in the normal course of business, price merits a high relative importance. In considering price, we also consider the steps that we may reasonably take to minimize the market impact of execution. The application of the best execution is subject to prevailing marketing conditions and our understanding of the professional Client’s preferences. Therefore, there may be circumstances in which we conclude that other execution factors are as important, or more important, than the price the price in applying the best execution.

The Company weights the importance of each execution factors below in delivering best execution:

- **Price** is the primary factor when considering best execution. Price is the Company’s quoted market rate at which the order is executed. The Company obtains the prices for each financial instrument from its Market Maker/Liquidity Provider and their names are disclosed in the execution venues below. Please refer to our order execution policy where we provide further information on how we determine our prices.
- **Costs** involved are of high importance as additional charges may be incurred in executing an order which will affect the quality of execution. The charges can be found on the Company’s website and trading platform. These charges include:
  - **Commissions**, which are charged as fixed percentage of the overall value of the trade or as a fixed amount.
  - **Financing fees (swaps)** apply in some types of financial instruments and on opened positions/pending orders. The financing fees (swaps) are based on prevailing market interest rates, which may vary over time, while the fee can be positive or negative.
  - **Currency conversions** apply from the Client’s base currency to the currency of

- the relevant financial instrument.
- The Company does not charge clearing or settlement fees for execution of orders.
- **Speed of Execution** is of high importance and can be particularly important in fast moving markets. For this reason, we maintain high speed connections through multiple servers and our execution is fully automated to provide seamless order execution.
- **Likelihood of Execution and Settlement** are of critical importance, as the Company transmits the Client's order to the Liquidity Providers for execution. The Company will still be the contractually counterparty to the client, yet the Company relies on its Market Makers/Liquidity Providers (as per the execution venues disclosed below) for prices and available liquidity. Therefore, the Company strives to execute all Client orders by having multiple Liquidity Providers available for all offered financial instruments.
- **Size, nature and any other considerations of the transaction** are of lower importance. The Client can place orders as long as the balance of the trading account is maintained. If the Client wishes to execute a large size order, the price may become less favorable considering the price obtained from the Market Maker/ Liquidity Provider. There is a maximum and minimum size of orders based on the financial instrument selected and the Company reserves the right to decline an order.

In exceptional circumstances it is in the Company's absolute discretion to decide that any other factors such as extreme volatility where price discovery is disputable are more important than the ones described above. In cases where the price at which a trade is executed at may vary significantly from the original requested price due to abnormal market conditions and/or the levels of volatility in the market, the Company reserves the right to execute the Client Order at the best available price given the market depth and volatility for the given financial instrument at that point in time. More details on the execution factors can be found in the Company's Order Execution and Best Interest Policy.

It is worth noting that the Company considers the following criteria when determining the relative importance of the abovementioned execution factors:

- characteristics of the Client,
- characteristics of the Client's order (market order, limit or stop order),
- characteristics of the financial instrument,
- characteristics of the Execution Venues to which the order can be directed.

All client orders are executed over the counter (OTC) via the Company's trading platforms as Contracts for Difference (CFDs), irrespective if the underlying is listed on stock exchanges or other organized venues. The Company provides live streaming quotes for all financial instruments provided on its platforms, which are supplied by third-party independent sources (Liquidity Providers).

The Company during the year of 2021, ensured that the Clients received best execution on their orders by comparing the prices provided to Clients against a range of underlying price providers and data sources.

The Company has deployed a number of tools in order to monitor the parameters that will ensure consistency and the best possible result for its Clients' orders, including tools to evaluate

- the price fairness by comparing prices by market data providers with the prices offered by the Company and its available Liquidity Providers,

- the IT systems and trading platforms,
- the slippage, price continuity, speed of execution.

As mentioned above and in the Order Execution and Best Interest Policy, the best possible result of a Client order is determined taking into consideration the price of the financial instrument and the costs related to the execution, which include all expenses incurred by the Client and these are directly related to the execution of the order.

To this end, the Company's internal manuals describe the internal processes and procedures that ensure clients receive the best possible result when executing client orders and the Company does not transfer its best execution responsibility to any other party. The Company monitors the capacity and efficiency of the trading platforms, the configuration systems and update the software, servers and its technology where it is necessary.

### Execution Venues

The Company acts as a principal and not as an agent on the Client's behalf. Client orders are not executed on a Trading Venue (Regulated Market, Multilateral Trading Facility or on an Organised Trading Facility), instead and as abovementioned they are executed by the Company on its trading platforms. This means that the Client is able to close its open positions only with the Company. The Company does not transfer its execution obligations to any other execution venue and retains the responsibility of delivering best execution to its clients.

During the year of 2021, the Company had relationship with three (3) third-party Liquidity Providers:

Execution Venue Name	Country of Establishment	Commencement Date of the Business relationship	End Date of the Business relationship
CTRL Investments Limited	New Zealand	2020	N/A
MKHONTO FINANCIAL SERVICES PTY LTD	South Africa	2021	N/A
4 Square SY Limited	Seychelles	2021	N/A

In accordance with the Commission Delegated Regulation (EU) 2017/576 Annex I, the Company did not offer the following classes of financial instruments during the reference period 1<sup>st</sup> of January and 31<sup>st</sup> of December 2021.

- Equities – Shares & Depositary Receipts
- Debt Instruments
- Interest Rate Derivatives
- Credit Derivatives
- Currency Derivatives

- f) Structured finance instruments
- g) Equity Derivatives
- h) Securitised Derivatives
- i) Commodities derivatives and emission allowances Derivatives
- j) Exchange traded products (Exchange traded funds, exchange traded notes and exchange traded commodities)
- k) Emission allowances
- l) Other instruments

The Company offers a single class of financial instrument, which is Contracts for Difference. In the tables below and in accordance with the Commission Delegated Regulation (EU) 2017/576 Annex II, the Company publishes the execution venues and information regarding retail and professional clients, during the reference period 1<sup>st</sup> of January and 31<sup>st</sup> of December 2021.

Table 1: Retail Clients

You may also refer to the [RTS 28](#) of the corresponding year for Retail Clients, available on the Company's Website in XML Format.

Class of Instrument	Contracts for Difference				
	N				
Notification if <1 average trade per business day in the previous year					
Top five execution venues ranked in terms of trading volumes	Proportion of volume traded 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
CTRL Investments Limited LEI: 549300F6G2V8LLZ9IU79	12.80%	14.71%	0%	100%	N/A
MKHONTO FINANCIAL SERVICES PTY LTD LEI: 549300BL3O377B061H90	55.21%	53.87%	0%	100%	N/A
4 Square SY Limited LEI: 894500R2YD9I7EYQNN31	31.99%	31.43%	0%	100%	N/A

Table 2: Professional Clients

You may also refer to the [RTS 28](#) of the corresponding year for Professional Clients, available on the Company's Website in XML Format.

Class of Instrument	Contracts for Difference				
	N				
Notification if <1 average trade per business day in the previous year					
Top five execution venues ranked in terms of trading volumes	Proportion of volume traded 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
CTRL Investments Limited LEI: 549300F6G2V8LLZ9IU79	12.67%	11.73%	0%	100%	N/A
MKHONTO FINANCIAL SERVICES PTY LTD LEI: 549300BL3O377B061H90	55.15%	47.09%	0%	100%	N/A
4 Square SY Limited LEI: 894500R2YD9I7EYQNN31	32.18%	41.18%	0%	100%	N/A

As per the Article 2 of the Regulation and Directive 2014/65/EU;

- A 'Passive order' is an order entered into the order book that provided liquidity,
- An 'Aggressive order' is an order entered into the order book that took liquidity,
- A 'Directed order' is an order where a specific execution venue was specified by the client prior to the execution of the order.

### Conflicts of Interest

The Company has in a place a Conflict of Interest Policy which applies to all directors, employees and any person has interactions to the Clients. The management of the Company provide training to all stakeholders with the Company's procedures and policies, including Conflicts of Interest Training seminars are held at least once a year or more frequently, when relevant laws, regulations or guidelines change.

### Governance and Review of execution monitoring

The Company acts fairly, honestly and to the best interest of its clients by:

- applying the same order execution policy for all its clients and
- does not discriminate between different groups of clients.

The company does not enter into specific arrangements with any execution venue regarding payments to be made or received, discounts, rebates or non-monetary benefits of any kind. The Risk Manager presents the Board of Directors with any required changes in the Order

Execution Policy and any deficiencies may have risen after the Risk Manager's reviews of the execution of orders.

The Company monitors on a regular basis the effectiveness of the Order Execution and Best Interest Policy. In particular, the Company monitors the execution quality of the procedures explained in the policy and, where appropriate the Company reserves the right to correct any deficiencies identified.

In addition, the Company reviews the policy at least annually. A review will be also carried out in case a material change occurs that affects the ability of the Company to continue executing the best possible result on Clients' Orders, using the execution venues included in this policy.

Finally, the Company publishes its Execution and Quality Statement reports as per the Regulatory Technical Standards 28 ("RTS 28") on annual basis and the reports remain in the Company's website for at least two years after the publication.

### Contact Details

Clients shall communicate with the Company with the communication methods described within this policy and/or at the following address:

Correspondence Address:  
ITRADE GLOBAL (CY) LTD,  
Gladstonos 99, Elnor Hermes Building, 3<sup>rd</sup> Floor, 3032 Limassol Cyprus.

Phone: + (357) 25 262 126

E-mail: [backoffice@tradefw.com](mailto:backoffice@tradefw.com)