

Execution Quality Summary Statement for the year 2018 on execution arrangements for CFDs

VPR Safe Financial Group Limited

CIF 236/14

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Purpose

The Execution Quality Summary Statement (hereinafter the EQSS or the Statement) is a statement that VPR Safe Financial Group Limited (hereinafter, the “Company”), an Investment Firm authorised and regulated by the Cyprus Securities and Exchange Commission with Licence Number 236/14 is required to disclose to its clients under Regulation EU 2017/576 of 8 June 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council with regard to regulatory 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 2018 covering a full year cycle (hereinafter, the “Year Under Review”).

The Company urges its clients and/or potential clients to read the Statement carefully as it contains information on how the Company executes orders to various execution venues when operating under the STP model and Dealing on own Account in relation to the Asset Class of CFDs.

The EQSS along with the accompanied tables will remain on the Company’s website for two years at least post its publication.

1. Relative Importance of Execution Factors during the Year Under Review

The Company when executing Clients' Orders is required under the relevant regulatory framework to assign a relative importance on the following execution factors:

- (a) Price;
- (b) Cost;
- (c) Speed of Execution;
- (d) Likelihood of execution;
- (e) Likelihood of settlement;
- (f) Size of order;
- (g) Market Impact;
- (h) Nature of order.

For details on how each factor is assessed ex ante when executing clients' orders please refer to the Company's [Best Interest and Order Execution Summary Policy](#). During the Year Under Review the Company offered services to the following categories of clients:

i. Retail Clients

For these clients, the Company by virtue of the applicable regulatory framework is required to provide best execution in accordance with total consideration whereby total consideration represents the price of the Financial Instrument and the costs related to execution, which include all expenses incurred by the client which directly related to the execution of the Order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order, as applicable.

ii. Elective Professional Clients

For these clients during the year under review the Company placed emphasis on price and execution costs aligning its execution arrangements for these clients as those applicable to Retail Clients (see point i. above).

2. Execution Venues during the year under review

The Company's execution venue(s) during the year under review were:

No.	Name of Execution Venue	Country of Establishment	Commencement date of the relationship with the Company	End date of the Business relationship with the Company
1	Triple B Group Corporation	Republic of Panama	OCTOBER/2014	DECEMBER/2018
2	Leverate Financial Services Ltd	Cyprus	OCTOBER/2014	N/A
3	VPR Safe Financial Group Ltd	Cyprus	DECEMBER/2018	N/A

The Company does not have close links nor common ownership structures with any of the first two (2) execution venues (i.e. Triple B Group Corporation and Leverate Financial Services Ltd). With respect to the third execution venue, this refers to the fact that the Company acts as the execution venue for Clients' trades.

3. Change of Execution Venues during the year under review

The Company notes that during the year under review and further to the extension of its CIF license to include the investment service of "Dealing on Own Account" (obtained in November 2018), the list of execution venues were changed as shown and listed in its current [Best Interest and Order Execution Summary Policy](#).

4. Conflicts of Interest

The Company lists (non-exhaustive) the possible conflicts of interest it is facing (inclusive of conflicts of interest in relation to the execution venues it uses), as well as the relative mitigation measures in its [Conflicts of Interest Summary Policy](#).

Since December 2018, the Company, as an execution venue, acts as the Client's counterparty. In this respect, the Company has established robust mechanisms for mitigating all conflicts of interest. For further information, please refer to the Company's Conflicts of Interest Summary Policy.

5. Payments or non-monetary benefits (made or received) to/by Execution Venues

During the year under review, the Company's arrangements with Triple B Group Corporation and Leverate Financial Services Ltd stipulated that the Company neither paid nor received any monies or non-monetary benefits from Triple B Group Corporation and Leverate Financial Services Ltd.

6. Tools and Data used during the Year Under Review.

The Company during the year under review, 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 on an ongoing basis its execution arrangements by selecting appropriate samples of orders executed and evaluates the samples in accordance to the following dimensions:

- (a) Evaluating the Company's execution facility in accordance to the following:
 - Pricing Frequency (price updates in real time);

- Speed of execution;
 - Frequency and duration of price freezing ;
 - Depth of liquidity;
 - Pricing transparency ;
 - Slippage frequency etc.
- (b) Price Fairness by comparing independent prices relayed by independent market data providers with the prices quoted by its execution venues/the Company. For this purpose, the Company has subscribed to independent price aggregators.

7. Reviews of Execution Monitoring - Control Functions

The Company’s brokerage department produces reports on a monthly basis as per the evaluation process described above (please refer to Section 6) and if further actions are required the said department will liaise with the Company’s senior management for determining the next steps.

The Company’s control functions (Compliance and Internal Audit) scrutinise the monitoring procedure conducted by the brokerage department and the actions taken by the Company’s senior management. The Company’s control functions present their findings to the Company’s Board of Directors at least annually, for further scrutiny and actions.

The Company, under the applicable rules, is obliged to present the top five execution venues/transmission venues report on an annual basis. In this respect, kindly find in the tables below the relevant information for the year under review for Professional and Retail Clients.

VPR Safe Financial Group Limited					
Information on the top five execution venues during the year 2018 (Retail Clients)					
Class of Instrument	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 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
Triple B Group Corporation LEI: 549300LWTGDD26R27P61	99.6479%	93.5263%	0%	100%	0%
VPR Safe Financial Group Limited	0.3521%	6.4737%	0%	100%	0%

LEI: 5493005LFR3XVSOHOS43					
Leverate Financial Services Ltd LEI: 549300LIT450323BK688	0.0000%	0.0000%	0%	0%	0%

VPR Safe Financial Group Limited					
Information on the top five execution venues during the year 2018 (Professional Clients)					
Class of Instrument	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 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
Triple B Group Corporation LEI: 549300LWTGDD26R27P61	92.2034%	85.24%	0%	100%	0%
VPR Safe Financial Group Limited LEI: 5493005LFR3XVSOHOS43	7.7966%	14.76%	0%	100%	0%
Leverate Financial Services Ltd LEI: 549300LIT450323BK688	0.0000%	0.0000%	0%	0%	0%