Execution Quality Summary Statement of 2024

Vs5. April 2025

1. About TopFX

TopFX (hereafter the "Company") is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 274180. TopFX Ltd is authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the "CySEC") under the license number 138/11.

2. Purpose

This Document which is 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 2024, 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 and Activities and Regulated Markets Law of 2017, L. 87(I)/2017.

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 taking into account 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.

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

Price is the most important factor for the company when considering best execution. Prices are obtained from industry leading institutions. Our team continuously monitors the data feeds and internal pricing mechanisms to ensure the quality of the price generation process. Data feeds, pricing and connectivity are assessed in real time. 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.

b. Cost

Cost is an important factor when execute Clients' orders. In order to keep the costs low, we source the best available prices from our liquidity providers. 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.

c. 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.

d. 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.

e. Likelihood of Settlement

The CFDs offered by the Company do not involve the delivery of the underlying asset, so there is no settlement as there would be for example if the Customer had bought shares.

f. 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.

g. 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 sufficient 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. Close links, conflicts of interests and common ownerships with respect to execution venues

Execution venues are the entities with which the orders are placed or to which the Company transmits orders for execution. For the purposes of the orders submitted to the Company by the client, as mentioned above the Company acts as Principal on the client's behalf at all times. 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. For additional information please refer to the **Company's Conflict of Interest Policy**.

6. Payments or Non-Monetary Benefits between the Company and its Execution Venues

As previously stated, the Company is the sole execution venue for the execution of the client's orders and, therefore it does not have any specific arrangement with other execution venues regarding payments, discounts, rebates or other non-monetary benefits.

7. Client Categorisation and Order Execution

Clients who as per the 'Client Categorisation Policy' were classified as Retail Clients and Professional Clients are falling under the scope of the aforesaid Regulations, while Eligible Counterparties do not as per the abovementioned policy.
The order execution does not differ according to the client categorization and does not treat the two categories of clients differently, i.e. retail and professional clients.

8. Other criteria that were given precedence over immediate price and cost when executing retail client orders

When the client gives a specific instruction on an order, the Company will execute the order following such instruction and this may prevent the Company from implementing the best possible result for its Clients in accordance with the relative importance of the execution factors. In such circumstances, the Company executes the order in accordance with that specific instruction.

Nevertheless, if the client provides a specific instruction then by executing that order the Company will be complying with its duty to provide the client with best execution.

9. Use of data and tools relating to the quality of the 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 in 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:

- Price Latency
- Speed of Execution
- Frequency and Duration of Price Freezing
- Depth of Liquidity
- Price Transparency
- Re-quotes

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. Use of output of a consolidated tape provider

The Company did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU in 2023.