



Execution Quality Summary Statement

Tickmill Europe Limited

April 2018



In accordance to the Regulatory Technical standard 28 for the annual publication by investment firms of information on the identity of execution venues and on the quality of execution, the Company shall publish for each class of financial instruments, a summary of the analysis and conclusions that were drawn from the detailed monitoring of the quality of execution obtained on the execution venues where the Company executed all client orders during 2017. In this respect, please find below a summary of our analysis per aspect required.

Importance of execution factors:

Tickmill Europe Limited rates the price and costs as the most important execution factors taken into consideration when providing best execution for its clients. Please see below the execution factors listed in consideration to their relative importance starting from the highest rated.

- i) **Price:** 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 or trading platforms. The Company updates its prices as frequently as the limitations of technology and communications links allow. The Company reviews and has reviewed its third party external reference sources from time to time to ensure that the data obtained continues to remain competitive. The Company has not and will not quote any price outside the Company's operations time (Liquidity Provision agreements maintained with LMAX Limited, Tickmill Ltd and ADS Securities) therefore no orders can be placed by the Client during that time. Certain ex-ante and ex-post quality checks are conducted by the Company to ensure that prices obtained and subsequently passed on to clients remain competitive. Such checks include, but not limited to, reviewing system settings/parameters, comparing prices with reputable price sources, ensuring symmetry of spread and checking the speed of price updating.
- ii) **Cost:** The provision of the Services by the Company is subject to payment of fees such as brokerage fees / commissions, Swaps/Rollover, additional position fees/commissions on Swap Free accounts and other fees. For further explanation on the costs and charges of our Account Types and their way of calculation, please refer to our Key Information Document available on the website. This execution factor is in the top two of highest importance factors considered by the Company, therefore the company conducts certain quality checks to ensure that the costs and charges implemented remain competitive and fair for the clients.
- iii) **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 communications links. The current average execution speed is 100 milliseconds. The Company conducts quality checks in order to maintain the provision of the best possible speed of execution of orders. In addition, the relevant department generates monthly reports so to review on ad hoc and ex post basis the speed of execution and related conditions such as slippage so to monitor the quality and take corrective measures if necessary.
- iv) **Likelihood of Execution:** In some case it may not be possible to arrange an Order for execution, for example but not limited in the following cases: during news times, trading session start moments, during volatile markets where prices may move significantly up or down and away from declared prices, where there is rapid price movement, where there is insufficient liquidity for the execution of the specific volume at the declared price, a force majeure event has occurred. In the event that the Company is unable to proceed with an Order with regard to price or size or other reason, the Order will not be executed or will be executed only partially. For the Straight Through Processing (STP) model which was applicable during the reporting period (2017), the likelihood of execution depends on the pricing and available liquidity of the execution venues. The Company has implemented an automated setting where one trade can be opened on one execution venue and close on another execution venue, in the case that the second execution venue offers more favourable conditions for the client at the close time of the trade. Also, this mechanism is used as the best efforts of the company to ensure the likelihood of a trade's execution in the event of default of one execution venue during the time that a trade is open.

Close links with execution venues:

Tickmill Europe (ex Vipromarkets) has maintained Liquidity Provision agreements with Tickmill Ltd and ADS Securities since 2015 and at the time being there were no close links between the Company and the selected execution venues.

However, since June 2017, the Company has been acquired by Tickmill Holdings Ltd. As a result, the Company and one of its execution venues -Tickmill Ltd- belong to the same group of companies after the acquisition occurred.

Rebates received by an Execution Venue:

In some cases where the Company sends orders for execution to its liquidity providers, the Company's liquidity provider pays the Company a rebate commission for the order flow sent for execution. In order for the Company to manage the potential conflicts arising out of this practice, it has put in place the below procedures and arrangements regarding the commissions received by its Liquidity Provider: (i) The Company has examined this and has recorded how the commissions received from its Liquidity Provider enhance the quality of the services provided to Clients and the steps taken in order not to impair the Company's duty to act honestly, fairly and professionally in accordance with the best interests of its Clients. (ii) The Company declares that this benefit does not induce it to favour the particular Liquidity Provider over other Liquidity Providers and it is confident that the Client would be better off under this arrangement compared to the use/employment of other arrangements (including other Liquidity Providers).

Changes in execution venues during the year:

A change in execution venues during 2017 was the addition of an extra venue, LMAX Limited -regulated and authorised by the Financial Conduct Authority (FCA UK). The change was implemented in an effort to enhance the quality of best execution factors on behalf of the Company's clients and to not depend predominantly on an execution venue closely related to the Company (Tickmill Ltd).

Differentiation of best execution per client categorisation:

During 2017, the Company has not treated differently the orders of clients and the best execution factors based on client categorisation. In detail, the same importance was rated and applied both to Retail and Professional Clients and best execution was delivered in the same priority and manner.

However, as designated by our Client Categorisation Policy available on the website, where the Company executes an order of a Retail Client, the best possible result shall be determined in terms of the total consideration, representing the price of the financial instrument and the costs related to execution, which shall include all expenses incurred by the Client which are 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.

Explanation of whether other criteria were given precedence over immediate price and cost when executing retail client orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client.

The price and costs are considered of the highest importance when determining and providing best execution to our Clients. Therefore, no other criteria were given precedence over immediate price and cost when executing client orders. Speed of execution and likelihood of execution are other best execution factors which are of high importance after the Company considers the price and overall costs factors for establishing the best possible results for the Clients.

Data or tools used related to the quality of execution

We use third-party technology providers to connect to execution venues and aggregate their prices into one universal feed that is provided to clients. This technology also enables us measure the performance of the execution venues based on the speed of execution, rejection rates, slippage.

Explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU

The firm has not used output of a consolidated tape provider during 2017.