



EXECUTION QUALITY SUMMARY STATEMENT(EQSS) For the year 2020

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1. Introduction

Easy Forex Trading Ltd (hereinafter referred to as 'the Company') is an Investment Firm, which is authorized and regulated by the Cyprus Securities and Exchange Commission ('CySEC') with License No. 079/07. The Company is registered in the Republic of Cyprus through the Department of Registrar of Companies and Official Receiver with registration number HE 203997.

In compliance with the Markets in Financial Instruments Directive II (MiFID II – EU Directive 2014/65/EU) and with regards to the regulatory technical standards, the Company is required to make available to its Clients the Execution Quality Summary Statement (hereinafter referred to as 'EQSS') on annual basis and provide sufficient information in regards to the execution venues and on the quality of the execution of client orders.

2. Scope of the Summary Report

This report provides a summary of the analysis and conclusions drawn from the monitoring of client's orders upon execution. The information provided in this report has main purpose to allow clients to assess the effectiveness of the monitoring carried out by the Company and ensures that the Company takes all sufficient steps to obtain the best possible result when executing or transmitting client orders.

Further, the Summary Report discloses the volume and number of orders executed on the execution venues for the year of 2020, as a percentage of the total volumes and the total number of orders for each class of financial instruments. It is worth noting that the Company ensures that Best Execution is offered for both Retail and Professional Clients.

For the purposes of this Report; an Order is the instruction to buy or sell a financial instrument, a Trade is the execution of the Order and a Position is the total of all Trades for a specific financial instrument.

3. Best Execution Obligation

Best Execution is the process by which the Company seeks to obtain the best possible result when executing client orders. Best Execution is determined based on the total amount paid to or by the client, including the price of the order and all expenses incurred which are related to the execution of the order; such as venue execution fees and any other fees paid to third parties for the execution of the order.

The Company's internal procedures and high-performance standards ensure that clients receive the best possible result when dealing with their orders and does not transfer its execution responsibilities to any other party. The company ensures that all sufficient steps have been taken for the continuity of high performance, while continuously monitors the

capacity and efficiency of trading platforms and update the software and servers where are deemed necessary.

The company has the obligation to ensure that all sufficient steps are taken when executing Client's Orders while taking into consideration the below execution factors and their relevant importance.

- Price is on high Importance, as this is the Company's quoted market rates at which the order is executed.
- Costs are on high Importance, as are any additional charges that may be incurred in executing the order over and above Company's normal charges.
- Speed of Execution is on Medium Importance and can be particularly important in fast-moving markets.
- Likelihood of Execution and Settlement are on Medium Importance, as the best price obtained does not have relevance if the Company cannot execute the order or if the transaction failed to be completed.
- Size, nature and any other considerations of the transaction are on Low Importance, as this is the way the Company may execute an order with unusual characteristics (for instance, an order which is larger than the normal market size or has unusual features such as an extended or shortened expiry date).

More details on the execution factors and their relative importance can be found in the Company's [Order Execution Policy](#).

4. Execution Venues

The Company acts as principal and not as agent on the client's behalf for all trades in the instruments provided by the Company and, therefore, is the sole execution venue for execution of clients' orders. All orders and trades entered through the company's trading platforms are NOT executed on a Trading Venue (Regulated Market, Multilateral Trading Facility or on an Organised Trading Facility) but they are executed by the Company. Thus, the Client is only 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. Further, the company transfers the market risk arising from client's transactions to the parent company, while the company does not transfer any execution responsibilities to the parent company neither to any other party.

The Company has chosen to be the sole execution venue for execution of clients' orders due to its business strategy and mainly because of its unique offering of trading tools and trading conditions. The below factors were considered;

- The high costs involved when transferring execution responsibilities to another execution venue. Those costs would impact its best execution obligations.
- The Company seeks to execute clients' orders with the fastest execution reasonably possible and within the limitations of technology and communication links. The Company's order flow logic is designed in such a way to accept automatically all orders, with no partial filling and without manual intervention.
- The Company offers fixed spreads (all times) to its Clients in all financial instruments and trading platforms, while most of the execution venues do not have fixed spreads. The Company considers that price is of high importance when executing client orders.
- The Company's proprietary trading platforms are designed in such a way that they provide the requested market rate for execution (not the prevailing market rate) in all Type of Orders and with no additional fees.
- The execution of all Stop Loss Orders and all Take Profit Orders is guaranteed in all platforms. In the Proprietary platform, the requested rate for Stop Loss and Take Profit is the same as the executed rate (no slippage). In the Non-Proprietary platform, Stop Loss and Take Profit Orders are executed at the prevailing market rate (subject to slippage). When a deal is closed due to a Stop Out, it will be closed at the prevailing market rate.
- Clients trading on Proprietary platforms have the ability to use the trading tool 'dealCancellation' on selected financial instruments (This tool is not offered in any other execution venue) and cancel a losing day trade within one, three or six hours, for a fee. The fee calculation is based on the realised volatility of the selected product and it is paid once the Client initiates a day trade order. The trade that used the trading tool 'dealCancellation' can be cancelled with zero P&L at any time before the expiration time and the Margin at Risk provided upfront for the trade will be returned to the account balance. The fee paid is non-refundable and the 'dealCancellation' cannot be renewed once it is expired or exercised.
- The company safeguards its clients by providing negative balance protection and clients are not required to cover their negative balance; in case the client balance goes negative after all positions close.
- The premium charged when Clients trade 'Vanilla Options' or 'easyTrade' is calculated using sophisticated methods and systems owned by our company. Thus, the execution of Vanilla Options and easyTrades cannot be transferred into any other execution venue.

5. Trading Platforms

a) Proprietary platforms

- Web Trading Platform for desktop and mobile devices
- Android Application and iOS Application (Compatible with iPhone™, iPad™)

b) Non-proprietary platforms

- MetaTrader 4 (MT4) desktop and mobile - proprietary rights of MetaQuotes Software Inc.

6. Classes of Financial Instruments

The below classes of financial instruments are Contracts for Difference (CFDs) traded 'over-the-counter' ('OTC'), with no physical exchange of the assets and no central clearing of the transactions. Best Execution applies when the Company executes a client order in financial instruments including;

- Market Orders/Day Trading, Limit and Stop Spot Orders on Currencies,
- Market Orders/Day Trading, Limit and Stop Spot and Future Orders on Metals,
- Market Orders/Day Trading, Limit and Stop Future Orders on Commodities,
- Market Orders/Day Trading, Limit and Stop Future Orders on Indices,
- Market Orders/Day Trading, Limit and Stop CFD Orders on Cryptocurrencies,
- Market Orders/Day Trading, Limit and Stop CFD Orders on Shares,
- Forward Orders on Currencies,
- Vanilla Options on Currencies and Metals .
- easyTrades on Currencies, Metals, Commodities, Indices, and Cryptocurrencies.

The trading characteristics of the Order Types; Market Orders/Day Trading, Limit and Stop, Forward Trades and Vanilla Options are unveiled with all details in the Order Execution Policy which appears in the Company's website.

7. Monitoring the Quality of Execution of Orders

The Company provides live streaming quotes for the financial instruments provided on its platforms. These rates are being reviewed continuously in real time in order to ensure live feeding quotes are competitive and in line with the market (known as "on market"). They are calculated with reference to the rate of the relevant underlying financial instrument, which

the Company obtains by the parent company. The Company has access to parent's company systems and assesses the price quality provided and ensures that prices proposed to the client are aligned with market benchmarks. Further, the company has procedures in place to review regularly the feed provided and check the fairness of the price proposed to the client.

More specifically, the Company has in place procedures involving meaningful predefined compliance thresholds that are monitored continuously and real time which are aligned with market benchmarks. Those procedures comprise quote validations thresholds that identify off-market pricing and reject any possible off-market spike by validating the new and last rate received by the parent company.

The Company does not charge commission fees since they are incorporated into the offered spread quoted in Bid (at which client can sell) – Ask (at which client can buy) rates. The company applies consistent pricing methodology at all times; in which the offered spread is a mark-up and mark-down from the mid-rates provided by the parent company.

For the reasons mentioned in section 4, the Company is the sole execution venue with LEI: 213800RD5MC7XGLSSB72 and the Company did not have less than 1 trade per business day in the previous year. All orders that entered into the trading book during the year of 2020 were 'aggressive' orders, as all of them took liquidity. The Company did not have any 'passive' or 'directed' orders as the Company is the sole execution venue and the Client cannot have a choice of execution venue.

Retail Clients					
Class of Instruments	Contracts for Differences (CFDs)				
Notification if <1 average trade per business day in the previous year	N				
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
EASY FOREX TRADING LTD (213800RD5MC7XGLSSB72)	100%	100%	N/A	100%	N/A
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					

Professional Clients					
Class of Instruments	Contracts for Differences (CFDs)				
Notification if <1 average trade per business day in the previous year	Y				
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
EASY FOREX TRADING LTD (213800RD5MC7XGLSSB72)	100%	100%	N/A	100%	N/A
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					

8. Close Links and conflicts of interest

The Company acts as a principal and not as an agent on client's behalf for all orders executed for the instruments provided by the Company. Consequently, the Company is the sole execution venue used to execute clients' orders and the disclosure related to any close links, conflicts of interest, and common ownerships with respect to another execution venue used to execute clients' orders is not considered relevant.

9. Governance and overview of Best Execution

The Company always ensures to act fair, honest and to the best interest of its clients. The Company applies the same policy for all its clients and does not discriminate any groups of clients. Further, the firm verifies that the staff is well trained and fully understands the best execution obligations. Training seminars are held at least once a year and when material changes occur. The Risk Manager presents into the Senior Management any changes are required in the Order Execution Policy and any deficiencies arose during the regular reviews of the execution of orders.

EASY FOREX TRADING LTD

ADDRESS: Griva Digeni 1, KRIEL COURT, 3035 LIMASSOL CYPRUS

TELEPHONE: +357 25 828899 | FAX: +357 25 817 183

<http://www.easymarkets.com/> | support@easymarkets.com

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APRIL 2021

Trade Responsibly: CFDs and Options are complex instruments and come with a high risk of losing money rapidly due to leverage. You should consider whether you understand how CFDs and Options work and whether you can afford to take the high risk of losing your money. Please refer to our full risk disclaimer. Easy Forex Trading Ltd (CySEC – License Number 079/07).