

Execution Quality Summary Statement (the “EQSS”) for the year 2020 &

Regulatory Technical Standards 28 (the “RTS 28”) to Identify Venues and Quality of Execution



1. INTRODUCTION

1.1 Primus Global Ltd (the “FXPRIMUS” or “Company”) is a Cyprus Investment Firm (the “CIF”) incorporated in the Republic of Cyprus under the Department of the Registrar of Companies and Official Receiver, holding a Certificate of Incorporation with Number HE 337614.

1.2 FXPRIMUS is authorised and regulated by the Cyprus Securities and Exchange Commission (the “CySEC”) (www.cysec.gov.cy), with License Number 261/14 and the operations of the Company are governed by the Investment Services and Activities and Regulated Markets Law 87(I)/2017, which transposes the Directive 2014/65/EU on markets in Financial Instruments (the “MiFID II”). The foundations of the services offered to Clients are based on the license 261/14 granted to the Company by CySEC. The Company passports its services to European Union member states (the “EU”) subject to the provisions of the applicable European Union legislation.

1.3 This document shall be reviewed and updated on an annual basis and shall reflect the data of the previous year.

1.4 Capitalised terms have the same meaning as this is defined in the “Client agreement” document.

2. PURPOSE

2.1 The EQSS is a statement that, an Investment Firm authorised and regulated by the CySEC 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 (the “RTS 28”) 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.

2.2 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 2020, covering a full year cycle (the “Year under Review”).

2.3 The Clients and/or potential Clients, irrespective whether they are categorized as retail or professional should read the Statement carefully considering that it contains valuable information in regard to the orders’ execution.



3. RELATIVE IMPORTANCE OF EXECUTION FACTORS DURING THE YEAR UNDER REVIEW

3.1 The Company takes all reasonable steps to obtain the best possible result for its Clients taking into account the following factors when executing Clients' Orders against the Company's quoted prices:

- Price;
- Cost;
- Speed of Execution;
- Likelihood of Execution;
- Orders;
- Likelihood of Settlement;
- Order Size; and
- Market Impact

3.2 The Company does not consider the above list exhaustive and the order in which the above factors are presented shall not be taken as a priority factor. Nevertheless, whenever there is a specific instruction from the Client, the Company shall make sure that the Clients' Order shall be executed following the specific instruction. For details on how each factor is assessed when executing clients' orders please refer to the Company's Order Execution Policy, as it is published in its website.

4. BEST EXECUTION CRITERIA

4.1 The Company will determine the relative importance of the above factors by using its commercial judgement and experience in the light of the information available on the market and taking into account the criteria described below:

- the characteristics of the Client including the categorisation of the Client as retail or professional;
- the characteristics of the Client Order;
- the characteristics of Financial Instruments that are the subject of that Order and
- the characteristics of the execution venues to which that Order can be directed.

4.2 For retail Clients, 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.

4.3 Where there is more than one available execution venue for the execution of an Order, the commissions and the costs of the Company for transmitting the Order on each of the eligible execution venues shall be taken into account when assessing and comparing the results for the Client that would be achieved by executing the Order on each of the eligible execution venues.

4.4 The Company undertakes not to structure or charge its commissions in such a way as to discriminate unfairly between execution venues.



5. 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	Primus Global Ltd	CY	N/A	N/A

6. CHANGES OF EXECUTION VENUES DURING THE YEAR UNDER REVIEW

There was no change in the execution venues during the Year under Review, since the Company was the sole execution venue for the execution of Client's orders.

7. CONFLICT OF INTEREST

7.1 As per the Conflicts of Interest Policy listed in FXPRIMUS website the Company lists 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. The Policy applies to all its directors, employees and any persons directly or indirectly linked to the Company and refers to all interactions with all Clients.

8. PAYMENTS OR NON-MONETARY BENEFITS (MADE OR RECEIVED) TO/BY EXECUTION VENUE

8.1 The Company is the sole execution venue, therefore there are no payments or non monetary benefits to/by any execution venue.

9. TOOLS AND DATA USED DURING THE YEAR UNDER REVIEW

9.1 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. The execution arrangements that are monitored are described below:

- evaluate price fairness by comparing prices by market data providers with the prices offered by the Company;
- evaluate the Company's Order Execution Policy;
- evaluate the IT systems; and
- evaluate the inhouse tools used by the dealing department to monitor slippage.



10. REVIEWS OF EXECUTION MONITORING - CONTROL FUNCTIONS

10.1 The Company will monitor on a regular basis the effectiveness of the Order Execution Policy and, in particular, the execution quality of the procedures explained in the policy and, where appropriate, reserves the right to correct any deficiencies.

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

10.3 The Company will inform its Clients of any material change to this Policy by posting an updated version of this policy on its Websites.



11. EXECUTION VENUES REPORT - INFORMATION ON THE TOP FIVE EXECUTION VENUES AS PER ANNEX II OF COMMISSION DELEGATED REGULATION W(EU) 2017/576 OF 8TH OF JUNE 2016

Table 1: Retail Clients

Class of Instrument	Financial Contracts of Differences (CFD)				
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
Primus Global Ltd 2138007LWSOX9PMVF216	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)					



Table 2: Professional Clients

Class of Instrument	Financial Contracts of Differences (CFD)				
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
Primus Global Ltd 2138007LWSOX9PMVF216	100%	100%	N/A	100%	N/A
Name and Venue Identifier (MIC or LEI)					
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Name and Venue Identifier (MIC or LEI)					
Name and Venue Identifier (MIC or LEI)					

12. COMPANY'S CONTACT DETAILS

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

Correspondence Address:

Primus Global Ltd
25 Kolonakiou Street | Office 102 Zavos Kolonakiou Centre
4103 Limassol
Cyprus

Customer Service:

Phone: +357 25 262084

E-mail: support.cy@fxprimus.com



Primus Global Ltd
Customer Service:

Phone: +357 25 262084
E-mail: support.cy@fxprimus.com

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Standards 28 (the "RTS 28") to Identify Venues and Quality of Execution
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