

Transmission Quality Summary Statement
for the year 2019
on execution arrangements for financial
instruments

D.T. Direct Investment Hub Ltd

CIF 347/17

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Purpose

The Transmission Quality Summary Statement (hereinafter the TQSS or the Statement) is a statement that D.T. Direct Investment Hub Ltd (hereinafter, the “Company”), an Investment Firm authorised and regulated by the Cyprus Securities and Exchange Commission with Licence Number 347/17, is required to disclose to its clients under [Regulation EU 2017/576](#) (RTS 28) 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 TQSS 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 2019, 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 offering the investment service of reception and transmission of Client orders in relation to each Asset Class of financial products.

The TQSS along with the accompanying 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 clients' orders are transmitted for execution to the broker who has been selected by the client. The Company works mainly as social copy trading provider utilizing the investment service of reception and transmission of clients' orders. The Client maintains an account with the Broker of his choice and his orders in relation to social trading service are transferred/ submitted for execution to this Broker.

The Company when receiving and transmitting clients' orders for execution to the broker of their choice 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 receiving and transmitting clients' orders for execution, please refer to the Company's '[Duty to Act in the Best Interest of the Client 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. Professional Clients (including per-se Professional and elective Professionals)

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. Transmission 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	Ava Trade EU Ltd	Ireland	January / 2018	N/A

As already stated above, the client chooses his preferred execution venue, and the Client establishes a business relationship directly with the Execution Venue. Thereafter, the Company acts only as an agent transmitting the client order received from the client to the execution venue that is specified by the Client.

3. The Company maintains close links or common ownership structures with the execution venue Ava Trade EU Ltd established in Ireland. Change of Execution Venues during the year under review

The Company notes that during the year under review did not change the list of execution venues as these are listed at point 2 above. The Company notes that the only transmission venue for 2019 is Ava Trade EU Ltd.

4. Conflicts of Interest

The Company maintains close links and/or common ownership structures with Ava Trade EU Ltd. Irrespective of the fact that both the Company and Ava Trade EU Ltd share a close relationship the Company has in place sufficient safeguards against such conflicts of interest.

The Company lists (non-exhaustive) the possible conflicts of interest it is facing as well as the relative mitigation measures in its [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 Ava Trade EU Ltd stipulated that the Company neither paid nor received any monies or non-monetary benefits from Ava Trade EU Ltd. The Company generates its revenues from Commissions/spreads paid by its Clients upon initiating a trading order. The Company's costs and charges are listed here.

6. Reviews of Transmission Monitoring - Control Functions

The Company's brokerage department ensures that the relevant orders are automatically submitted for execution to the execution venue that is specified by the Client without undue delay.

The Company's control functions (Compliance and Internal Audit) scrutinise the monitoring procedure conducted by the brokerage department. 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 a machine readable format (separately for retail and professional clients). Please click here to download the report for the year under review as a .csv file.