



EXECUTION QUALITY SUMMARY STATEMENT (EQSS) – RTS 28 for 2020



Execution Quality Summary Statement (EQSS) for the year 2020

AAATrade Ltd. (hereinafter referred to as “AAATrade”) is a Cyprus Investment Firm (CIF) supervised and regulated by the Cyprus Securities and Exchange Commission (CySEC) with CIF Licence number 244/14 and Company registration number HE 322745. Under Commission Delegated Regulation 2017/576 (RTS 28) with respect to the publication of the annual Execution Quality Summary Statement (EQSS), AAATrade is required to publish for each class of financial instruments, a summary of the analysis and conclusions we draw from our detailed monitoring of the quality of execution obtained on the execution venues where we executed all client orders in the previous year. In the tables below, the required information is disclosed.

This EQSS provides a summary of the analysis and conclusions which the Company has drawn through its detailed monitoring of the quality of execution obtained on the execution venues where it executed all client orders during the previous calendar year, covering a full year cycle.

1. Best Execution Factors and Criteria

AAATrade takes all reasonable steps to act in the best interest of its Clients when receiving, transmitting and executing Client Orders and obtain the best possible result for Clients taking into account the following factors when dealing with Client Orders: price, costs, speed, likelihood of execution and settlement, size, market impact or any other consideration relevant to the execution of the order. AAATrade does not consider the above list exhaustive and the order in which the above factors are presented shall not be taken as priority factor.

AAATrade will determine the relative importance of the above best execution factors by using AAATrade commercial judgment and experience in the light of the information available on the market and taking into account the criteria described below:

1.1. Price: For specific Financial Instruments the Company will quote two prices: the higher price (ASK) at which the Client can buy (go long) that Financial Instruments, and the lower price (BID) at which the Client can sell (go short) it. Collectively, the ASK and BID prices are referred to as the Company’s price. The difference between the lower and the higher price of a given Financial Instrument is the Spread. Orders such as Buy Limit, Buy Stop and Stop Loss, Take profit for opened Short Position are executed at ASK price. Such orders as Sell Limit, Sell Stop and Stop Loss, Take profit for opened Long Position are executed at BID price. The Company’s price for a given CFD is calculated by reference to the price of the relevant Financial Instrument, which the Company obtains from third party external reference sources plus, the Company’s mark-up and/or Spread.

The Company acting in the Client’s best interest, obtains from such third party external reference sources, the best price for all Underlying Assets other than Virtual Currencies and the average aggregated price plus mark-up and/or Spread for Virtual Currencies. The Company’s prices can be found on the Company’s Website and/or the Platform. The Company updates its prices as frequently as the limitations of technology and communication links allow. The Company reviews its third party external reference sources from time to time to ensure that the data obtained continues to remain competitive. The Company will not quote any price outside the market’s operations time therefore no orders can be placed by the Client during that time.



If the price reaches an order such as: Stop Loss, Take Profit, Buy Limit, Buy Stop, Sell Limit or Sell Stop, these orders are immediately executed. However, under certain trading conditions it may be impossible to execute orders (Stop Loss, Take Profit, Buy Limit, Buy Stop, Sell Limited or Sell Stop) at the Client's requested price. In this case, the Company has the right to execute the order at the first available price. This may occur, for example, at times of rapid price fluctuations if the price rises or falls in one trading session to such an extent that, under the rules of the relevant exchange, trading is suspended or restricted, or this may occur at the opening of trading sessions. The minimum level for placing Stop Loss, Take Profit, Buy Limit, Buy Stop, Sell Limit and Sell Stop orders, for a given Financial Instruments, is specified on the Platform.

- 1.2. **Costs:** For opening a position in some types of Financial Instruments, the Client may be required to pay commission or financing fees, the amount of which is disclosed on the Company's Website and/or the Platform. Commissions may be charged either in the form of a percentage of the overall value of the trader or as fixed amounts. In the case of financing fees, the value of opened positions in some types of Financial Instruments 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 the Platform. The final transaction costs charged to the Client can be found on the Company's Website and/or the Platform.

The Spreads for the list of Financial Instruments can be found on the Company's Website and/or the Platform.

It is also noted that Client Trading Account may be charged with additional fees such as Client Trading Account maintenance fees, found here:

https://www.aaatrade.com/company/legal_terms_and_conditions

Should the Company at any period of time decide not to charge such costs, it shall not be construed as a waiver of its rights to apply them in the future, with prior notice to the Client.

- 1.3. **Speed of Execution:** The Company places a significant importance on the speed of execution when executing Client's Orders and strives to offer high speed of execution within the limitations of technology and communication links.

It is clarified that when the Company receives and transmits a Client Order for execution to a third party (another Execution Venue) and does not execute the order towards the Client as principal to principal, execution will also depend on that third party.

- 1.4. **Likelihood of Execution:** The likelihood of execution depends on the availability of prices of other market/makers/financial institutions. 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 of a specific Financial Instrument at the declared price, or if 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. In addition, the Company is entitled at any time and at its discretion without giving any notice or explanation to the Client, to decline or refuse to transmit or arrange for the execution of any order or Request or Instruction of the Client in circumstances explained in the Client Agreement. In addition, when the Company transmits orders for execution to another third party, the likelihood of execution depends on the availability of prices by such other third party.

1.5. 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 Client had bought securities. The settlement date for securities offered by the Company is usually two (2) business days after the execution date (T+2).

1.6. Size of Order: the actual minimum size of an order may be different for each type of Client Trading Account. A Lot is a unit measuring the transaction amount and it is difference for each type of Financial Instrument. Please refer to the Platform for the value of minimum size of an order and each 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. Please refer to the Platform for the value of the maximum volume of a single Transaction.

1.7. Market Impact: some factors may rapidly affect the price of the underlying instruments/products from which the Company's quoted price is derived and may also affect other factors listed herein. The Company will take all reasonable steps to obtain the best possible result for its Clients.

The Company does not consider the above list exhaustive and the order in which the above factors are presented shall not be taken as priority factor. Nevertheless, whenever there is a specific instruction from the Client, the Company shall make sure that the Client's order shall be executed following the specific instruction.

Please refer to our Best Interest and Order Execution Policy for further information as published on our website.

2. Conflict of Interest

There are no any close links, conflicts of interests or common ownerships with respect to any execution venues used to execute orders.

Please refer to our Best Interest and Order Execution Policy for further information as published on our website.

3. Arrangements with Execution Venues

As to arrangements with Execution Venues regarding payments made or received, discounts, rebates or non-monetary benefits received, AAATrade maintains an agreement with Gain Capital UK Limited, incorporated in England & Wales under company number 1761813 and with FCA registration number



113942, whose registered office is located at Park house, 16 Finsbury Circus, London, EC2M 7EB. Under the agreement AAATrade pays commissions for most of the instruments covered by the Agreement and receives a rebate calculated as a percentage (%) from the market spread on the order flow of certain non-equity instruments.

Moreover, order flowing decisions are taken based only on the risk appetite of AAATrade.

In addition, AAATrade maintains an agreement with UBS Switzerland AG, incorporated in Switzerland under corporate identification number CHE-395.345.924 and subject to the consolidated supervision of the Swiss Financial Market Supervisory Authority (FINMA), whose office is located at Bahnhofstrasse 45, P.O. Box, 8098 Zurich for the execution of securities. Under the agreement, AAATrade pays commission to UBS Switzerland AG for each executed order (including any external fees imposed by the exchange) and a custody fee for the safekeeping of the assets.

4. Factors which led to a change in the list of Execution Venues

AAATrade has been included in the list as an Execution Venue as it follows a hybrid model (STP and Market Maker). AAATrade has also added an additional Execution Venue, UBS Switzerland AG, for the execution of securities.

5. Client Categorisation and Order Execution

In general, we treat categories of clients in scope of best execution equally in terms of order execution.

For retail clients, the best possible result will be determined in terms of the total consideration. Total consideration means the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.

For professional clients, the best possible result will usually be determined by price and cost, but may be dependent on other execution factors, such as size and type, specific to the order given.

Please refer to our Best Interest and Order Execution Policy for further information as published on our website.

6. Criteria for executing retail client orders

When executing retail client orders, AAATrade does not apply any different criteria. On the contrary, the same criteria are being applied and no other criteria are being given precedence over immediate price and cost.



7. Data or tools relating to the quality of Execution, including any data published under Delegated Regulation (EU) 2017/575 (RTS 27)

The Company, has not used any data or tools relating to the quality of execution, including data published under Delegated Regulation (EU) 2017/575 (RTS 27).

8. Consolidated Tape Provider (CTP)

The Company, as of today has not used output of a Consolidated Tape Provider (CTP) established under Article 66 of L.87(I)/2017.

9. Summary of the analysis and conclusions drawn from our detailed monitoring of contracts for difference

The conclusions drawn from our monitoring of the quality of execution, confirm that the execution venue used to execute client orders in contracts for differences meets our standards in delivering best execution to our clients on a consistent basis.

The information regarding the Execution Venue(s) used to execute Retail Client and Professional Client orders, as well as Client Orders executed in SFTs, can be found in the tables below, together with detailed information on the volume and number of orders executed.

TABLE 1: RETAIL CLIENTS

[http://aaatrade.com/documents/reports/RTS28-EQSS-Statement-for-2020\(Table-1-Retail-Clients\).xlsx](http://aaatrade.com/documents/reports/RTS28-EQSS-Statement-for-2020(Table-1-Retail-Clients).xlsx)

TABLE 2: PROFESSIONAL CLIENTS

[http://aaatrade.com/documents/reports/RTS28-EQSS-Statement-for-2020\(Table-2-Professional-Clients\).xlsx](http://aaatrade.com/documents/reports/RTS28-EQSS-Statement-for-2020(Table-2-Professional-Clients).xlsx)

TABLE 3: CLIENT ORDERS IN SFTs

[http://aaatrade.com/documents/reports/RTS28-EQSS-Statement-for-2020\(Table-3-Client-Orders-inSFTs\).xlsx](http://aaatrade.com/documents/reports/RTS28-EQSS-Statement-for-2020(Table-3-Client-Orders-inSFTs).xlsx)