



Klips

**Execution Quality Summary Statement on
Execution Arrangements for Contracts for
Differences (CFDs)
RTS 28
For the year 2023**



Table of Contents

| | |
|---|----------|
| 1. Relative Importance of Execution Factors during the Year under Review | 4 |
| 2. Execution venues during the year under review | 4 |
| 3. Change of Execution Venues during the year under review..... | 4 |
| 4. Conflicts of Interest..... | 4 |
| 5. Payments or non-monetary benefits made to or received by execution venues | 5 |
| 6. Tools and Data used during the Year under Review | 5 |
| 7. Reviews of Execution Monitoring - Control Functions | 5 |
| 8. Report on Execution Venues | 6 |



Purpose

The Execution Quality Summary Statement (referred to as "EQSS" or "Statement") serves as a disclosure mandated by Regulation EU 2017/576, supplementing Directive 2014/65/EU of the European Parliament and the Council.

Klips CY LTD (referred to as the "Company"), an Investment Firm authorized and regulated by the Cyprus Securities and Exchange Commission (CySEC) under License Number 434/23, is obligated to provide this statement to its clients.

The EQSS offers a condensed overview of the Company's assessment and findings derived from meticulous monitoring of execution quality across all client orders executed on various execution venues throughout the year 2023. It encompasses a full year cycle (referred to as the "year under review").

Clients and potential clients are encouraged to review the Statement attentively as it furnishes insights into the execution venues utilized by the Company concerning Contracts for Differences (CFDs).

The EQSS, accompanied by relevant tables, will be accessible on the Company's website for a minimum of two years following its publication.

This document is intended for internal use only and may not be disseminated elsewhere without the written consent of the Company.



1. Relative Importance of Execution Factors during the Year under Review

The Company when executing clients' orders is required under the relevant regulatory framework to assign relative importance to the following execution factors:

- (a) Price;
- (b) Cost;
- (c) Speed of execution;
- (d) Likelihood of execution;
- (e) Likelihood of settlement;
- (f) Size of Order; and
- (g) Market Impact.

For details on how each factor is assessed *ex ante* when executing clients' orders please refer to the Company's [Order Execution 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 and which are directly related to the execution of the order.

ii. Professional 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 (as per point i above).

2. Execution venues during the year under review

The Company acts as principal and not as agent on the Client's behalf and, therefore, the Company is the sole execution venue for the execution of the Client's orders in financial instruments provided by the Company ("*supported financial instruments*").

3. Change of Execution Venues during the year under review

During the year under review, the Company was the sole execution venue for the execution of client's orders.

4. Conflicts of Interest

As mentioned in section 2 above, the Company is the sole Execution Venue for the execution

of the client's orders. Should the client decide to open a position in a financial instrument with the Company, then that open position may only be closed with the Company. The Company's approach to identify and prevent or manage conflicts of interest, which may arise during the course of its business activities is set out in the [Summary Conflict of Interest Policy](#).

5. Payments or non-monetary benefits made to or received by execution venues

As explained above, the Company is the sole Execution Venue for the execution of the client's orders and, therefore, it does not have any specific arrangements with other execution venues regarding payments made or received, discounts, rebates or other non-monetary benefits.

6. Tools and Data used during the Year under Review

The Company during the year under review deployed a number of methodologies and tools in order to monitor, and where applicable adjust, its execution parameters in order to ensure consistency with its overarching obligation to offer the best possible result for its clients' orders. In broad terms, the Company monitors its execution arrangements on an ongoing basis by selecting appropriate samples of orders executed and evaluating the samples as described below:

(a) evaluating the Company's execution quality in accordance with the following:

- pricing frequency (price updates in real time);
- speed of execution;
- frequency and duration of price freezing;
- depth of liquidity; and
- pricing transparency.

(b) evaluating price fairness by comparing prices relayed by market data providers with the prices quoted by the Company.

(c) evaluating the technological prowess of the Company's systems (e.g. responsiveness of interface, lag, integration with the IT systems of market data providers, etc.).

(d) the Company uses in-house tools to monitor slippage, on a regular basis, to ensure that it is symmetric (i.e. balance between positive and negative slippages) and fair.

7. Reviews of Execution Monitoring - Control Functions

Company's relevant personnel monitor execution on a regular basis using the evaluation process described in Section 6 above and, if actions are required, liaises with the Company's senior management for corrective measures.



The Company’s control functions (compliance function and internal audit) scrutinise the monitoring procedure and the actions taken by the Company’s senior management. The Company’s control functions present any findings to the Company’s Board of Directors, at least annually, for further scrutiny and actions.

8. Report on Execution Venues

The information presented below refers to the top five (5) execution venues in terms of trading volumes used by the Company for executing the orders of retail clients and professional clients. The information refers to the asset class of Contracts for Differences (CFDs) for the year 2023.

| Information on the top five execution venues during the year 2023 (Retail Clients) | | | | | |
|--|--|--|------------------------------|---------------------------------|-------------------------------|
| Class of Instrument | 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 |
| KLIPS CY LTD (213800HP6KZ9XS1D1U57) | 100% | 100% | N/A | N/A | 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) | | | | | |