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## Execution Quality Summary Statement for the year 2024

RTS 28

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## Scope and Purpose of the statement

Klips CY LTD (hereinafter the "Company") is an investment firm, incorporated in Cyprus as a private limited liability Company under the provisions of the Cyprus Companies Law, Cap. 113. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (CySEC) under Licence Number 434/23, which is obligated to provide this statement to its clients.

The LEI Code of the Company is 213800HP6KZ9XS1D1U57. The Company's head office is located at 11, Riga Fereou Street, Ground Floor, 3095, Limassol, Cyprus.

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

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 2024. It encompasses a full year cycle (referred to as the "year under review").

The publication frequency of the Statement is once per annum, with all disclosures included referring to the year ended 31st of December 2024, whereby the said date is to be known as the "reference date".

The Statement is published on the Company's website [www.klips.com](http://www.klips.com). 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.

### 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 the 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.

## 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

During the year under review the Company deployed several methodologies and tools in order to monitor, and where applicable adjust, its execution parameters, 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

The 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 2024.

Information on the top five execution venues during the year 2024 (Retail Clients)					
Class of Instrument	Currency Derivatives				
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%	0%	100%	0%
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)					
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Information on the top five execution venues during the year 2024 (Retail Clients)					
Class of Instrument	Equity Derivatives				
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%	0%	100%	0%
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)					

Information on the top five execution venues during the year 2024 (Retail Clients)	
Class of Instrument	Commodities Derivatives & Emission Allowances Derivatives
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%	0%	100%	0%
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)					

Information on the top five execution venues during the year 2024 (Retail Clients)					
Class of Instrument	Contracts For Difference				
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%	0%	100%	0%
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)					

*Note: The Investment firm does not have any executed client orders in Securities Financing Transactions (SFTs)*