



RTS 28 - Annual Best Execution Publication 2023

Purpose

The Execution Quality Summary Statement (hereafter the “EQSS” or the “Statement”) is a statement that Capital Com SV Investments Limited (hereafter the “Company”), a Cypriot Investment Firm authorised and regulated by the Cyprus Securities and Exchange Commission (the “CySEC”) with License Number 319/17, is required to disclose to its existing and/or potential Clients under the [Commission Delegated Regulation \(EU\) 2017/576](#) (hereafter the “RTS28”) supplementing Directive 2014/65/EU of the European Parliament and of the Council, with regards to the regulatory technical standards for the annual publication by Investment Firms (hereafter the “IFs”) of information on the identity of execution venues and on the quality of execution.

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 2023, covering a full year cycle (hereafter, the “year under review”).

The Company urges its existing and/or potential Clients and/or potential Clients to read the Statement carefully as it contains information as regards the execution venue(s) used by the Company in relation to the asset class of Contracts for Differences (CFDs).

The EQSS along with the accompanying tables will remain on the Company’s website for at least two years post its publication.

This document is solely for own use and cannot be published elsewhere without the written consent of the Company.



Information on the Quality of Execution

1. Publication of execution venues

The Company is always dealing on its own account as principal and therefore is the sole execution venue for all its retail and professional clients' orders.

2. Information on the top five execution venues

Table 1: Retail Clients

Client Classification	Retail Clients				
Class of Instrument	(J) Contract for difference - based on stock indices, shares, commodities, FX and cryptocurrencies				
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
Capital Com SV Investments Limited 2138001R35G3IZJZZC68	100%	100%	N/A	100%	N/ A



Client Classification	Retail Clients				
Class of Instrument	(ESVUFR) Equities				
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
Capital Com SV Investments Limited 2138001R35G3IZJZZC68	100%	100%	N/A	100%	N/A

Table 2: Professional Clients

Client Classification	Professional Clients				
Class of Instrument	(J) Contract for difference - based on stock indices, shares, commodities, FX and cryptocurrencies				
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



Capital Com SV Investments Limited 2138001R35G3IZJZZC68	100%	100%	N/A	100%	N/A
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Client Classification	Professional Clients				
Class of Instrument	(ESVUFR) Equities				
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
Capital Com SV Investments Limited 2138001R35G3IZJZZC68	100%	100%	N/A	100%	N/A



3. Trading volumes for all executed client orders in SFTs

Securities Financing Transactions are not applicable in the Company's business model.

4. Monitoring of the quality of execution: summary analysis and conclusions

I. Relative importance the IF gave to the execution factors

The Company when executing Clients' orders is required under the relevant regulatory framework to assessing 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;
- g) Market impact; and
- h) Nature of order.

The best possible result for our clients (retail and professional) will be determined in terms of the total consideration (unless the objective of the execution of the order dictates otherwise), represented primarily by the price of the financial instrument and the costs related to the execution. The costs related to the executions include the expenses incurred by the client which are directly related to



the execution of his/her order. The other execution factors of speed, likelihood of execution, size, nature or any other relevant consideration will, in most cases, be secondary to the price and costs considerations, unless they would deliver the best possible result for the client in terms of total consideration. The relative importance of these secondary criteria will be judged in line with our commercial experience and with reference to market conditions including the need for timely execution, availability of price improvement, the liquidity of the market and the size of your order (which may make it difficult to execute an order) and the potential impact on total consideration.

For further details with respect to the Company's best execution arrangements, please refer to the Company's [Order Execution Policy](#).

5. A description of any close links, conflicts of interests and common ownerships

The Company does not have any close-links, conflicts, and common ownerships with respect to any execution venues use to execute orders as the Company is the sole execution venue for all its clients' orders. 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 [Conflicts of Interest Policy](#).

I. A description of any specific arrangements with any execution venues

As mentioned in Point 1, 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 any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

II. Change in the list of execution venues

There is no change occurred in the list of execution venues in the Company's execution policy in 2023.



III. Order execution per client categorization

The Company does not differ its Order Execution based on client category. All clients' orders were executed with one execution arrangement. This arrangement is agreed between parties by acceptance of the order execution policy before the services are provided.

IV. Other criteria given precedence over immediate price and cost

All client categorizations are treated the same and therefore best execution is determined on the basis of total consideration as described in the Order Execution Policy at section 5.

v. Data or tools the Company has used relating to the quality of execution

The Company has procedures and process in place to regularly assess the quality of its order execution and of published prices in the underlying financial instruments provided by the external data providers. These procedures and processes

also include reviewing the data published under Delegated Regulation (EU) 2017/575 ("RTS27") as applicable. This ensures that the price the Company is offering at any given time is always considered to be fair and the best price it can obtain. The Company consistently monitors the inputs to its proprietary pricing and alerts which are in place for when relevant parameters go beyond thresholds set. In addition, the Company routinely monitor the quality of execution by analyzing client trading data which includes:

- a) Evaluation of the Company's execution quality in accordance with the following:
 - Execution Price;
 - Price frequency (price updates in real time);
 - Speed of execution;
 - Instrument traded; and



- Trade size;
- Pricing transparency.

b) Use of the Company's in-house tools to monitor slippage, on a regular basis, to ensure that it is symmetric (i.e. balance between positive and negative slippage) and fair.

The Company's relevant personnel monitor execution arrangements on a regular basis using the evaluation process described in the point above, and, if actions are required, liaises with the Company's Senior Management for corrective measures.

The Company's control functions (Compliance, Risk Manager and Internal Audit) scrutinize the monitoring procedure and the actions taken by 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.

The Company has not discovered any systematic deviation after continuous review of the data in 2023.

VI. Output of a consolidated tape provider

The Company did not make use of the output of a consolidated tape providers established under Article 65 of Directive 2014/65/EU.