

RTS 28 - DISCLOSURE Capital Com (UK) Ltd

Period of Reporting 2019
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Table 1: Retail Clients

Client Classification	Retail Clients				
Class of Instrument	(j) Contract for difference - FX, indices, shares, commodities, 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 2138001R35G3IZJZC68	100%	100%	N/A	100%	N/A

II

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 2138001R35G3IZZZC68	100%	100%	N/A	100%	N/A

III. Trading volumes for all executed client orders in SFTs

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

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

Capital Com (UK) Ltd, when executing your order, will take in to account the following criteria in achieving the best possible result for our clients.

1. The characteristics of the client (regulatory Client Classification under MiFID)
2. The characteristics of the client order (type of order)
3. The characteristics of the financial instrument that are subject to that order, and
4. The characteristics of the execution venue to which that order can be directed

Retail Clients - In addition to the above there will be other factors as well that will have an effect on the execution. The best possible result for our Retail clients 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 execution 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.

Professional Clients - The most important factor for executing order for Professional Clients is also Price. There are other factors also that may become more important while executing the orders such as settlement for CFDs where underlying asset is an illiquid financial instrument or likelihood of execution. Please note that in practice we not differ between retail and professional clients.

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

Capital Com (UK) Ltd only executes its orders with Capital Com SV Investments Limited which our parent company and is a part of the Capital Com group. This may appear to be a potential conflict of interest, however, Capital Com (UK) Ltd is sufficiently satisfied that executing its order with Capital Com SV Investments Limited as its sole execution venue is sufficient to satisfy its best execution obligations to its clients.

VI. Change in the list of execution venues

There is no change occurred in the list of execution venue. However, if the company assess a need to add more execution venues in the near future then it will provide such disclosure in its Order Execution Policy.

VII. Monitoring of Execution and Data or tools the Company has used relating to the quality of execution

Capital Com (UK) Ltd will review the performance by Capital Com SV Investments Limited on a regular basis against the criteria of quality of the execution offered to check that it is meeting the best execution requirements.

Capital Com SV Investments Limited 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 that is being offered at any given time is always considered to be fair and the best price it can obtain. It consistently monitors the inputs to its proprietary pricing and alerts which are in place for when relevant parameters go beyond thresholds set.

In addition, our execution venue 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;
 - 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.

Our execution venue's relevant personnel monitors the 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 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 of the data in 2019.