

## EXECUTION QUALITY SUMMARY STATEMENT – RTS28 (EQSS) 2023

### INTRODUCTION

JFD Group Ltd (hereinafter “the **Company**”, “**JFD**”, “**we**”, “**us**”) is a limited liability Company incorporated under the laws of the Republic of Cyprus with registration number HE 282265. The Company is a Cyprus Investment Firm (hereinafter “**CIF**”) authorised and regulated by the Cyprus Securities and Exchange Commission (hereinafter “**CySEC**”) under license number 150/11.

The present Statement is the Execution Quality Summary Statement (hereinafter the “**EQSS**”) which the Company prepared in accordance with 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.

### EXECUTION QUALITY SUMMARY STATEMENT – RT28 (EQSS)

The Company is required to inform all its Retail and Professional Clients about all sufficient steps taken to obtain the best possible result for its Clients (“**Best Execution**”) either when executing Client orders or receiving orders for execution in relation to financial instruments.

This Statement is a summary of those sufficient steps taken by the Company in addition to those referred in the Best Execution Policy of the Company, as well as analysis and conclusions derived by the monitoring undertaken with respect to Clients orders’ execution on the execution venues utilized by the Company within 2023.

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.

Important note: Before opening an account and/or carrying out any activity with the Company, please ensure that you read the RTS28 and any other additional documentation and information which is available on our website. Please do not hesitate to contact us through email at [support@jfdbrokers.com](mailto:support@jfdbrokers.com) for any further clarification.

## A) EXPLANATION OF EXECUTION FACTORS AND CRITERIA

The Company when receiving, transmitting, and executing client orders takes all reasonable steps to act in the best interest of its clients and obtain the best possible result taking into account the following factors: price, costs, speed of execution, likelihood of execution, size, market impact and/or any other consideration relevant to the execution of the order.

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. The said factors that affecting the execution of orders and their importance can be seen below:

FACTOR	EXPLANATION	IMPORTANCE
<p><b>Costs</b></p>	<p>The Company takes all sufficient steps to keep the costs of clients' transactions as low and competitive, to the extent possible. Additional costs might be charged by the Company's Liquidity Providers.</p> <p>For opening a position in some types of Financial Instruments, the client may be required to pay commissions or financing fees, the amount of which is disclosed in the Company's Website and/or the Trading Platform.</p> <p>Commissions may be charged either in the form of a percentage of the overall value of the trader or as fixed amounts.</p> <p>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 Trading Platform.</p> <p>The final transaction costs charged to the client can be found on the Company's Website and/or the Platform.</p> <p>The Spreads for the list of Financial Instruments can be found on the Company's Website and/or the Trading Platform.</p> <p>It is also noted that Client Trading Account may be charged with additional fees such as inactivity fees.</p> <p>For any further clarification, please visit JFD's website and read the <a href="#">Best Execution Policy</a></p>	<p><b>High</b></p>

<p><b>Price</b></p>	<p>The Company acting on the best interest of its clients gives strong emphasis on the quality and level of the price data it offers, which are received from external sources aiming to provide its clients with competitive price quotes.</p> <p>The Company's prices can be found in the Company's Website and/or the Trading Platform.</p> <p>The Company updates its prices as frequently as the limitations of technology and communication links allow.</p> <p>The Company reviews its third-party external sources from time to time to ensure the quality of the data obtained as well as to ensure that it continues to remain competitive. However, we do not guarantee that our quoted prices will be at a price which is as good or better than one might have been available elsewhere.</p> <p>The Company does not offer prices or any orders outside the market's operation time.</p> <p>Please note that due to the market's volatility, the price of an order might be influenced, and price may go up or down and a financial instrument may be suspended or restricted.</p> <p>For further information please check <a href="#">JFD's website</a>.</p>	<p><b>High</b></p>
<p><b>Speed of Execution</b></p>	<p>The Company gives a high effort on the speed of execution of client's orders withing the limitation of technology and communication links.</p> <p>We also repeatedly monitor these factors to ensure that we maintain high execution standards.</p> <p>For further clarification please check the Company's <a href="#">Best Execution Policy</a>.</p>	<p><b>High</b></p>
<p><b>Likelihood of Execution</b></p>	<p>The likelihood of execution of orders depends on the markets' available prices.</p> <p>In some case it may not be possible to arrange an order for execution, for example in cases like: 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.</p> <p>Due to the volatility of the market, it is likely to have a price raise or falls from the declared priced.</p>	<p><b>High</b></p>

	Even though the Company reserves the right to decline a client order we aim to execute all clients' orders, to the extent possible.	
<b>Size of Order</b>	The Company does not take into account the size of the client's order in accepting, scheduling or prioritizing its execution. However, order execution is subject to size consideration including a minimum deal size.	<b>Medium</b>
<b>Likelihood of Settlement</b>	The Company shall proceed to a settlement of all transaction upon execution of such transactions however, there are factors affecting the likelihood of execution.	<b>Medium</b>
<b>Market Impact</b>	The Company takes all reasonable steps to provide its customers with the best possible results. However, 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.	<b>Medium</b>
<b>Other Order-Type Particular Factors</b>	Depending on circumstances not included above.	<b>As applicable per affecting factor.</b>

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 a client, the Company shall make sure that the Client's order shall be executed following the specific instruction.

Please refer to the Company's [Best Execution Policy](#) for further information as published on our website.

## **B) CONFLICTS OF INTEREST - CLOSE LINKS**

As an execution venue, the Company may serve as the counterparty for some of the client's trades. In this respect, the Client have implemented robust measures to identify and mitigate any conflicts of interest. These measures are outlined in our [Conflicts of Interest Policy](#), where the Company identify and disclose potential conflicts, including those related to the execution venues we utilize, along with the corresponding mitigation strategies.

### C) ARRANGEMENTS WITH EXECUTION VENUES

Execution Venues are the entities with which the client's orders are placed for execution. For the purposes of orders for the financial instrument offered by the Company, some third-party Financial Institutions will act as the Execution venue, while in other cases, the Company itself may serve in this capacity.

The Company maintains a specific agreement with its Execution Venues for the client's orders, in order to establish contractually the obligations and services offered. The fees paid to the Execution Venues for their services during 2023 was based on trading volume transmitted.

### D) FACTORS WHICH LED TO THE CHANGE IN THE LIST OF EXECUTION VENUES

During 2023 the Company has added new Execution Venues to its list of Execution Venues.

The first one is Broctagon Prime Ltd., a company incorporated in accordance with the laws of the Republic of Cyprus, with registration number HE360194, having its registered office at 2 Christou Samara Street, MORFO COURT, 4001, Mesa Geitonia, Limassol, Republic of Cyprus.

The second one is MTG Liquidity Ltd, a company incorporated in accordance with the laws of the Republic of Cyprus with registration number HE 392680. Its registered office is at, Center Point Tower 37 Stasikratous Street, 6th Floor, Office 602, 1065, Nicosia, Cyprus and head/business office at 1st Floor, Office 101, 64, Leoforos Aglantzias, 2108, Nicosia, Republic of Cyprus.

Also, during 2023 the Company has activated its Dealing on Own Account service therefore, depending on the type of client account and based on the Company's own discretion, the Company may act either as a principal towards the client i.e the Company shall be the sole Execution Venue (as defined in Commission Directive 2014/65/EU implementing MIFID II) for the execution of Client's Order(s) or the Company may decide to place for execution the Client Orders to a third party Execution Venue i.e the Company shall act as the agent and/or intermediary transmitting the Client Order(s) to some other Financial Institution for execution.

The Company is undertaking a selection process of its Execution Venues so it can ensure the best possible result when executing its client's orders. Execution venues are selected based on their ability to meet the best execution factors listed above and their service delivery is monitored (and analyzed based on statistical data and regular reviews) on an ongoing basis by the Company.

## E) CLIENT CATEGORISATION AND ORDER EXECUTION

The Company execute all the clients trading orders fairly, honestly and on the best interest of the clients. The Company does not execute the orders differently according to client categorization.

The Company utilize the same execution factors for all client categories, including retails, professionals, and eligible counterparties. Even though the factors affecting the Order Execution of Retail and Professional clients does not differ, the importance of each factor might vary depending on the categorization and the needs of the clients.

The Company will determine the relative importance of the above Best Execution Factors by using its commercial judgment and experience in the light of the information available on the market and taking into account the criteria described below:

- a) The characteristics of the Client including the categorization of the Client as retail or professional;
- b) The characteristics of the Client Order;
- c) The characteristics of financial instruments that are the subject of that Order;
- d) The characteristics of the execution venues to which that Order can be directed.

Detailed information as to the execution factors and the criteria for the determination of their importance can be found at the Company's Best Execution Policy.

The Company always ensures to act fair, honest and to the best interest of its clients. The Company applies the same policy for all its clients and does not discriminate any groups of clients.

Furthermore, the Company verifies that the staff is well trained and fully understands the best execution obligations. The Risk Manager with the Head of RTO presents into the Senior Management any changes are required in the Order Execution Policy and any deficiencies arose during the regular reviews of the execution of orders.

## F) DATA OR TOOLS RELATING TO THE QUALITY OF EXECUTION

The Company monitors via external tools the arrangements described in this Statement in order to identify any deficiencies and to assess whether we need to make any changes. This monitoring includes relates to the performance of connected parties and other third parties to whom we may engage in the future to transmit Client orders to.

The Company monitors via its tools on an ongoing basis its execution arrangements by checking that the orders are executed and assessing the below:

- Price updates (ticks per minute)

- Latency (speed of execution – time from reception to execution)
- Price freezing or halts.
- Any possibility of wrongly matched orders
- Technology – connectivity of platforms with the execution venues
- Slippage monitoring (where occurs to be balanced and reasonably justified)
- Availability of platform and pricing freezes – Zabbix signaling system, real time Quote Alarm (internally developed tool)
- Wrongly matched orders – Bridge
- Outtrades or execution mismatches – Bridge and own developed Exposure Check Tool

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.

### G) 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.

### H) RTS28 - INFORMATION ON THE TOP FIVE 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 and professional clients. The information refers to the asset class of the Contract for Differences (CFDs) for the year 2023.

**TABLE 1. RETAIL CLIENTS**

CLASS OF INSTRUMENT	Contract for Difference (CFD)				
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
JFD Group / LEI (213800AOC8U3XBYIRD50)	46.49%	61.06%	0%	100%	0%
Broctagon / LEI (213800AYVP83GMTLSE33)	29.91%	17.80%	0%	100%	0%
IS Prime / LEI (549300F62BRRDZKCUZ58)	23.55%	20.90%	0%	100%	0%
Invast / LEI (549300OREYLNWD2E9Y62)	0.04%	0.14%	0%	100%	0%
LMAX/ LEI (213800FIDYGIQ9SJK78)	0.01%	0.09%	0%	100%	0%

JFD Group Ltd is authorised and regulated by the Cyprus Securities and Exchange Commission - CySEC (Licence number: 150/11) and is a Member of the Investor Compensation Fund (ICF). JFD Group Ltd operates in accordance with the Markets in Financial Instruments Directive (MiFID II) and is licensed to provide the investment services of reception and transmission of orders in relation to one or more financial instruments, execution of orders on behalf of clients, dealing on own account, portfolio management and investment advice. JFD Group Ltd is also licensed to provide the ancillary services of safekeeping and administration of financial instruments, granting credits or loans to one or more financial instruments, foreign exchange services where these are connected to the provision of investment services and investment research and financial analysis.

**TABLE 2. PROFESSIONAL CLIENTS**

CLASS OF INSTRUMENT	Contract for Difference (CFD)				
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
IS Prime / LEI (549300F62BRRDZKCUZ58)	40.136%	20.47%	0%	100%	0%
Broctagon Prime / LEI (213800AYVP83GMLSE33)	35.80%	15.03%	0%	100%	0%
JFD Group / LEI (213800AOC8U3XBYIRD50)	24.058%	64.35%	0%	100%	0%
MTG Liquidity/ LEI (9845002C9B4DR1COEE25)	0.003%	0.04%	0%	100%	0%
Invast / LEI (549300OREYLNWD2E9Y62)	0.002%	0.06%	0%	100%	0%

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 and professional clients. The information refers to the asset class of the Single / Physical Stocks for the year 2023.

**TABLE 3. RETAIL**

CLASS OF INSTRUMENT	SINGLE / PHYSICAL STOCKS				
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
EXT LTD / LEI (213800K13N6U5B2BU244)	100%	100%	0%	100%	0%



**TABLE 4. PROFESSIONAL**

CLASS OF INSTRUMENT	SINGLE / PHYSICAL STOCKS				
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
EXT LTD / LEI (213800K13N6U5B2BU244)	100%	100%	0%	100%	0%

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 and professional clients. The information refers to the asset class of the Exchange Traded Fund (ETFs) for the year 2023.

**TABLE 5. RETAIL**

CLASS OF INSTRUMENT	EXCHANGE TRADED FUNDS (ETFs)				
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
EXT LTD / LEI (213800K13N6U5B2BU244)	100%	100%	0%	100%	0%

**TABLE 6. PROFESSIONAL**

CLASS OF INSTRUMENT	EXCHANGE TRADED FUNDS (ETFs)
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
EXT LTD / LEI (213800K13N6U5B2BU244)	100%	100%	0%	100%	0%