



## **RTS 28 Disclosure**

**June 2018**

## 1 Introduction

Valutrades Limited is primarily a matched principal broker offering CFDs. It is therefore the sole execution venue for orders and acts as principal in the execution of those trades. Prices provided to clients are sourced from high quality Liquidity Providers.

This report ("Report") is published by Valutrades in fulfilment of its obligations under Commission Delegated Regulation (EU) 2017/576 and article 27(6) of Directive 2014/65/EU, as implemented (collectively, "MIFID II RTS 28").

The terms "passive orders", "aggressive orders" and "directed orders" shall have the meanings assigned to them under MIFID II RTS 28.

## 2 Qualitative Report

### 2.1 Relative importance of execution factors

The firm is mainly active in CFDs for retail clients, and therefore has to assess its Best Execution quality in terms of Total Consideration which is in relation to price and costs. To achieve the best possible results, the firm has strived to source the best price for the instruments traded from top quality liquidity providers. The firm has monitored the results obtained and is satisfied that in 99.9% it has managed to achieve the thought results.

Where the client order was very large to ensure that the slippage will not jeopardise the quality of execution obtained, the firm has systemically split the order into orders of maximum size 5,000,000.

However, where Clients gave the Firm specific instructions as to how they require the transactions to be executed, the duty of best execution was limited to those matters which are not covered by specific instructions.

### 2.2 Conflicts of interests

In 2017, the firm sourced liquidity solely from one LP- AMB PRIME LTD- over the reporting period. AMB PRIME is a company registered in Cyprus and shares common shareholders with Valutrades Limited. The potential conflict was however mitigated by regular check of pricing offered to our clients against market. These checks revealed the prices obtained from the LP were fair. As the business has grown, the firm has now expanded its pool of LPs in 2018.

### 2.3 Payments or other arrangements with third party execution venues

Valutrades did not have any specific arrangements with any external execution venues or brokers used to execute client orders as we are the sole execution venue.

## 2.4 Venue changes

There were no changes to Valutrades's execution venues.

## 2.5 Order execution across client categories

In line with our best execution policy, best execution for retail clients was determined in terms of total consideration. For professional clients, best execution was generally determined by price and cost but where required, however, other execution factors such as likelihood of execution were given priority.

## 2.6 Precedence of other execution factors in executing retail client orders

Not applicable as price and cost always take precedence over other factors in executing orders for retail clients except where specific instructions have been received from the client in respect of that order.

## 2.7 Use of any data or tools relating to execution quality

We have not used any such tools.

Top Five Venues and brokers

Class of instrument	Contracts for Differences				
Notification if <1 average trade per business day in the previous year	N/A				
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 <sup>1</sup>	Percentage of aggressive orders <sup>2</sup>	Percentage of directed orders
Valutrades Limited 549300ZPVPPY57SGQM 34	100%	100%	0%	100%	0%

<sup>1</sup> Orders entered into the order book that provided liquidity

<sup>2</sup> Orders entered into the order book that took liquidity. Valutrades is the execution venue, all orders executed are defined as taking liquidity