






**XS Markets**

# EXECUTION QUALITY SUMMARY STATEMENT

Execution of Orders on CFDs during  
2022

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XS Markets Ltd (previously Rockfrost Ltd): a Cypriot Investment Firm (CIF) with registration number HE386563 which is authorized and regulated by the Cyprus Securities and Exchange Commission (CySEC) under Licence Number 412/22 and registered address: Agiou Andreou, 365, Efstathiou Court, 2nd Floor, Office 201, 3035, Limassol, Cyprus





## **EXECUTION QUALITY SUMMARY STATEMENT**

### Table of Contents

<b>1. INTRODUCTION.....</b>	<b>3</b>
<b>2. APPLICATION .....</b>	<b>3</b>
<b>3. RELATIVE IMPORTANCE OF EXECUTION FACTORS DURING 20223</b>	
<b>4. EXECUTION VENUES USED BY THE COMPANY .....</b>	<b>4</b>
<b>5. CONFLICTS OF INTEREST.....</b>	<b>4</b>
<b>6. PAYMENTS OR NON-MONETARY BENEFITS BETWEEN THE COMPANY AND ITS EXECUTION VENUES.....</b>	<b>4</b>
<b>7. ONGOING MONITORING .....</b>	<b>5</b>



## 1. INTRODUCTION

XS Markets Ltd (hereinafter, the “Company”) is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 386563. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) under the license number 412/22.

This is the **Execution Quality Summary Statement** (hereinafter, the “Statement”) of the Company, with the application of the Investment Services and Activities and Regulated Markets Law of 2017, pursuant to the requirement of disclosure of such information under Regulation EU 2017/576 supplementing MiFID II. MiFID II is the European Parliament and Council’s Directive 2014/65/EC.

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 Interest and Order 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 2022.

This Statement provides information on the Best Interest and Order Execution Policy. If you have any questions about this Statement or the Best Interest and Order Execution Policy, please contact us at [info@xsmarkets.com](mailto:info@xsmarkets.com).

## 2. APPLICATION

This Policy applies to Retail and Professional Clients of the Company.

During the year under review no orders of Professional Clients were executed.

In the case of Retail Clients, in applying the best execution in the normal course of business, we determine the best possible result in terms of total consideration. Total consideration is the price of the financial instrument concerned and the costs payable by the retail Client as a result of execution. These costs include all expenses incurred that are directly related to the execution of the order (such as execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order). These costs do not include our own commission, spread or margin. We may take the other execution factors into account where they are instrumental in delivering the best possible result (in terms of total consideration) for the retail Client.

The application of the best execution is neither a guarantee that the best price will be obtained nor a guarantee that the transaction will be executed in full.

## 3. RELATIVE IMPORTANCE OF EXECUTION FACTORS DURING 2022

For the assessment of execution of Clients’ Orders the Company takes into consideration the following factors:

- (a) Price
- (b) Cost
- (c) Speed
- (d) Likelihood of execution
- (e) Likelihood of settlement
- (f) Size of order
- (g) Market Impact
- (h) Nature of order.

You may refer to the best execution policy of the Company for further details on the above.

#### 4. EXECUTION VENUES USED BY THE COMPANY

The Company during 2022 cooperated and routed orders to the execution venue(s) listed below:

No.	Name of the Execution Venue	LEI Number	Country of Origin	Commencement date of routing orders for execution	End date in the event of termination
1	Broctagon Prime Ltd	213800AYVP83GMTLSE33	Cyprus	12/09/2022	N/A

In selecting an execution venue for the execution of a transaction, the Company takes into account the following in respect of the venue concerned:

- price
- cost of execution
- liquidity available for the financial instruments concerned
- speed of execution
- reliability of the venue
- continuity of trading
- creditworthiness – good standing of the venue
- quality of any related clearing and settlement facilities, and
- such other factors as we consider relevant to the application of the overarching principle.

The Company takes steps to avoid discriminating and under no circumstances discriminates unfairly between execution venues.

#### 5. CONFLICTS OF INTEREST

The Company does not maintain any close links nor common ownership structure with the execution venue.

The Company implements and has in place sufficient measures to mitigate such conflicts. For additional information please refer to the Conflicts of Interests Policy disclosed in the Company's website.

#### 6. PAYMENTS OR NON-MONETARY BENEFITS BETWEEN THE COMPANY AND ITS EXECUTION VENUES

The Company adds a mark-up on the spread of the underlying CFD as received from its execution venues prior to offer it to its Clients.

The quoted price includes any spread and/or margin above the price at which the Company may be able to transact in the market. We may take into account a number of factors in quoting a price, including the following:

- the risk that the Company assumes under the transaction
- operational costs
- counterparty, capital, and funding related costs





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- fees and costs that arise during the execution and lifetime of the transaction
- the level of service provided to the Client
- other factors specific to the Client, and
- any pre-agreed fee/spread charges.

The relative contribution of each of these factors may vary from transaction to transaction. It is the responsibility of the Client to determine whether or not to accept the quoted all-in price.

## 7. ONGOING MONITORING


The Company monitors 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 the monitoring of 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 on an ongoing basis its execution arrangements by checking the orders executed and evaluates them taking into consideration *inter alia* the below:


- Price updates (ticks per minute)
- Latency (speed of execution – time from reception to execution)
- Market depth of its venues with respect to all CFDs offered
- Price freezing or halts
- Spreads widening
- Any possibility of wrongly matched orders
- Technology – connectivity of platforms with the execution venues

The Company's Brokerage Department is monitoring the above and reports to the Senior Management of the Company at least on a or an ongoing basis.

Finally the above monitoring procedure is under the review of the Control functions of the Company, namely the Compliance and Internal Audit functions which report directly to the Board of Directors of the Company their findings and recommendations on an annual basis at least.

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