

EXECUTION QUALITY SUMMARY STATEMENT

Execution of Orders on CFDs during 2024

Contents

1. INTRODUCTION	3
2. APPLICATION	3
3. RELATIVE IMPORTANCE OF EXECUTION FACTORS DURING 2024	4
4. EXECUTION VENUES USED BY THE COMPANY	4
5. CONFLICTS OF INTEREST	5
6. PAYMENTS OR NON-MONETARY BENEFITS BETWEEN THE COMPANY AND ITS EXECUTION VENUES	5
7. ONGOING MONITORING	6

1. INTRODUCTION

TTCM Traders Trust Capital Markets Limited (“TTCM CY”) is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE250591. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) under the license number 107/09.

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 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 2024.

2. APPLICATION

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

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.

In the case of Professional Clients, in applying the overarching principle in the normal course of business, price merits a high relative importance. In considering price, we also consider the steps that we may reasonably take to minimize the market impact of execution. The application of the best execution is subject to prevailing market conditions and our understanding of the professional Client’s preferences. Therefore, there may be circumstances in which we conclude that other execution factors are as important, or more important than price in applying the best execution.

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 2024

For the assessment of the 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 2024 cooperated and routed orders to the execution venue(s) listed below:

Name and country of the Execution Venue	LEI	% Volume traded	% Number of trades	% Passive Orders	% Aggressive orders	% Directed Orders
Infinox Capital Limited	21380029BXU3FNU2HL90	99.78	99.50	N/A	100	N/A
SwissQuote	H6IQ3SWWWBLDBI06ZX04	0.22	0.50	N/A	100	N/A

In selecting an execution venue for the execution of a transaction, the Company considers 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 discrimination and under no circumstances discriminates unfairly between execution venues.

During the year under review, the company evaluated the pricing of various execution venues and it considers that the pricing provided through the utilized execution venues throughout 2024 as competitive and in accordance with the best interest of its clients.

5. CONFLICTS OF INTEREST

The Company does not maintain close links and common ownership structures with the execution venue it cooperates with.

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 offering 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 consider 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
- 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 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 the below:

- Price updates (ticks per minute)
- Latency (speed of execution – time from reception to execution)
- Price freezing or halts
- Technology – connectivity of platforms with the execution venues
- Comparison of pricing (for the quotes provided pre-execution and the price obtained post execution) with independent price data providers such as Bloomberg, Thomson Reuters etc.
- Slippage monitoring (where occurs to be balanced and reasonably justified)

The Company's Brokerage Department monitors the above in coordination with the IT Department and reports to the Senior Management of the Company at least on a weekly 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.