

# **L.F. Investment Limited**

*(Regulated by the Cyprus Securities & Exchange Commission)*

# **EXECUTION QUALITY SUMMARY STATEMENT**

Execution of Orders during 2021

## 1. INTRODUCTION

L.F. Investment Limited (hereinafter, the “Company”) is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) under the license number 271/15.

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 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 2021.

## 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

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 Order Execution policy of the Company for further details on the above.

### 4. EXECUTION VENUES USED BY THE COMPANY

The Company during 2021 cooperated and routed orders to the execution venue(s) listed below:

No.	Name of the Execution Venue	Country of Origin	Commencement date of routing orders for execution	End date in the event of termination
1	IS Prime Limited	United Kingdom	1 <sup>st</sup> of April 2018	N/A
2	IS Prime Hong Kong Limited	Hong Kong	19 <sup>th</sup> of March 2020	N/A
3	Lmax Limited	United Kingdom	8 <sup>th</sup> of April 2018	N/A
4	European Investment Centre, o.c.p., a. s	Slovakia	04 <sup>th</sup> of October 2018	N/A
5	EXT Ltd	Cyprus	20 <sup>th</sup> of May 2019	N/A
6	GBE Brokers Ltd	Cyprus	18 <sup>th</sup> of May 2021	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 and common ownership structures with its Liquidity Provider(s). 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 instrument 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
- 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. CLIENT CATEGORISATION AND ORDER EXECUTION**

In general, we treat categories of clients in scope of best execution equally in terms of order execution. The Order Execution of the Company does not differ according to client categorization, the Company does not treat categories of clients differently, the same execution factors exist for all client categories. 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.

## **8. 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 parties whom we may engage to transmit Client orders to. The Brokerage Department is monitoring and reports to the Senior Management of the Company on an ongoing basis, the execution arrangements by checking the orders executed and evaluates them taking into consideration the price updates, the latency, the Price freezing or halts, the Spreads widening, any possibility of wrongly matched orders, the connectivity of platforms with the execution venues, the slippage monitoring, etc.

## **9. USE OF OUTPUT OF A CONSOLIDATED TAPE PROVIDER**

The company did not use output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU in 2017