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ACCUINDEX EU LTD
(EX. RUIZEAN MARKETS LTD

(Regulated by the Cyprus Securities & Exchange Commission)

EXECUTION QUALITY SUMMARY STATEMENT

Execution of Orders on CFDs during 2017

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EXECUTION QUALITY SUMMARY STATEMENT

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1. INTRODUCTION

Accuindex EU Ltd (ex. Ruizean Markets Ltd) (hereinafter, the "Company") is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 360650. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (hereafter the "CySEC") under the license number 340/17.

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 2017.

It should be noted that the Company obtained its CIF authorisation on the 23rd October 2017 while this was activated during December 2017, thus, no transaction taking place during the year under review. As a new Company there was no trading activity to report under the Commission's Delegated Regulation 2017/576 (RTS 28).

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.

The Company did not provide any services to Professional Clients during the year 2017.

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.

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3. RELATIVE IMPORTANCE OF EXECUTION FACTORS DURING 2017

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 Interest and Order Execution Policy of the Company for further details on the above.

4. EXECUTION VENUES USED BY THE COMPANY

The Company during 2017 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	Swissquote Bank LTD	Switzerland	No trading activity during year 2017	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.

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5. CONFLICTS OF INTEREST

The Company does not maintain any close links and/or common ownership structures with the execution venue as descripted in the table listed under Section 4 above.

However, the Company implements and has in place sufficient measures to mitigate such conflicts. For additional information please refer to the "Summary of Conflicts of Interest Policy" disclosed in the Company's website www.accuindex.eu .

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;
- 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 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

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- Any possibility of wrongly matched orders
- 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)

Please note that relevant statistics that apply to the Company's execution quality assessment cannot be disclosed because, as already mentioned above, there was no trading activity to report under the Commission's Delegated Regulation 2017/576 (RTS 28).

The Company's Brokerage Department is monitoring the above and reports to the Senior Management of the Company at least on a daily 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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ANNEX 1

The table below include information in relation to the Company's top five execution venues in terms of trading volumes for all executed client orders of financial instruments '*Contracts for difference'*.

Class of Instrument	Contracts for Difference				
Notification if < 1 average trade per business day in the previous year	YES				
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
Swissquote Bank LTD LEI: H6IQ3SWWWBLDBI06ZX04	0%	0%	0%	0%	0%