Accuindex EU Limited
Thessalonikis & Ayias Zonis 1,
D.Nikolaou Pentadromos,
Office 603, Limassol, 3026,
Cyprus

Accuindex EU Limited

(Regulated by the Cyprus Securities & Exchange Commission)

EXECUTION QUALITY SUMMARY STATEMENT

Execution of Orders on CFDs during 2021

Accuindex EU Limited
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In accordance to the Regulatory Technical Standard 28 for the annual publication by investment firms of information on the identity of execution venues and on the quality of execution, the Company shall publish for each class of financial instruments, a summary of the analysis and conclusions that were drawn from the detailed monitoring of the quality of execution obtained on the execution venues where the Company executed all client orders during 2021. In this respect, please find below a summary of our analysis per aspect required.

EXECUTION QUALITY SUMMARY STATEMENT

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1. INTRODUCTION

Accuindex EU Limited (hereinafter, the "Company") is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE360650. 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, 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.

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 backoffice@accuindex.eu .

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.

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3. RELATIVE IMPORTANCE OF EXECUTION FACTORS DURING 2018

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.

For more information you may refer to the following Link.

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	LEI	End date in the event of termination
1	SM Capital Markets Ltd	Cyprus	29th March 2021	335800OC8OQ9VG3SF158	N/A
2	Orbex Limited	Cyprus	30th November 2020	549300RY7H6TTRCNU065	N/A
3	Swissquote Bank LTD	Switzerland	1st January 2018	H6IQ3SWWWBLDBI06ZX04	30/11/2021

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.

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.

The Company implements and has in place sufficient measures to mitigate such conflicts, in case they arise. 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;
- 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

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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)
- Slippage monitoring
- 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
- 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 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.