

Colmex Pro Limited

(Regulated by the Cyprus Securities & Exchange Commission)

EXECUTION QUALITY SUMMARY STATEMENT

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1. INTRODUCTION

Colmex Pro Ltd (hereinafter referred to as the “Company”) is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE260064. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) under the license number 123/10.

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.

This Statement provides information on the Order Execution Policy.

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If you have any questions about this Statement or the Best Execution Policy, please contact us at support@colmexpro.com.

2. APPLICATION

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

When executing Clients’ Orders, the Company takes sufficient measures to obtain the best possible results for its clients, as required by the order execution requirements laid down in MiFID II. The Company is doing so in its role as a principal and the sole execution venue for over-the-counter CFD instruments and as an agent with respect to Equities (Shares & Depository Receipts), Exchange traded products (Exchange traded funds, exchange traded notes etc.), and Options for which orders are executed via execution venues in a third country (United states) and traded on regulated execution venues. Factors taken into consideration when assessing the execution quality of clients' orders for retail and professional clients, in the order of importance, are: a) Price; b) Cost as a total consideration c) Speed of execution; d) Likelihood of execution. When assessing the quality of execution, the Company puts greater emphasis on price and transactional costs.

Speed of execution is an important consideration as well. The Company utilizes trading platforms and execution venues which provide a satisfactory level of order execution speed. Likelihood of execution is achieved due to the liquid nature of the financial products that the Company offers to its clients

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.

During the year under review there were no differences between professional and retail clients with relation to order execution, hence, the Company did not waive any of the requirements related to order execution in its engagement with professional clients.

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 2021

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

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	Type of Financial Instruments
1	Colmex Pro Ltd	Cyprus	CFDs
2	Vision Financial Markets LLC	United States	Equities
3	ViewTrade Holdings Inc	United States	Equities

In general, when selecting an execution venue for the execution of a transaction, the Company considers the following in respect of the venue concerned:

- Price fairness
- Price frequency and reliability (real time tick updates)
- Outages/failure in provision of liquidity
- Transaction costs
- Ratings (where applicable); and
- such other factors as we consider relevant to the application of the overarching principle.

In relation to CFD products, during the year under review, the Company assessed the price fairness and evaluated the frequency of quotes by comparing between different liquidity/price feed providers as well as by comparisons to market information relayed by independent market data providers.

In relation to its role as an agent regarding Equities, ETPs, and options the Company and its intermediary US based brokers are applying due monitoring and evaluation to ensure best execution for its clients. For that purpose, the Company operates a route which directs clients' orders to different execution venues (US based Market makers and ECNs).

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

5. CONFLICTS OF INTEREST

The Company acts as the sole execution venue acting as a principal to its clients' orders, does not maintain any close links and/or common ownership structures nor does it have any specific arrangements, with any third-party execution venue(s)/liquidity provider(s) used and as a principal to clients' order executed may profit from clients' losses.

The Company implements and has in place sufficient measures to mitigate any conflicts that might arise from the execution venues it uses. 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

As indicated in previous sections, the Company is acting as a principal and the sole execution venue for over-the-counter CFD instruments and as an agent with respect to Equities (Shares & Depository Receipts), Exchange traded products (Exchange traded funds, exchange traded notes etc.), and Options for which orders are executed via execution venues in a third country (United states) and traded on regulated execution venues.

Therefore, during the year under review, no payments or benefits were relevant for the transactions executed in CFDs as the Company acted as a principal.

In addition, for orders executed via US based execution venues fees for adding/removing liquidity might be received/paid. The fees structure is publicly available and the company or its intermediary US based broker has no direct arrangements deviating from the publicly available fees published by the abovementioned execution venues

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 fairness
- Price frequency and reliability (real time tick updates)
- Transaction costs

The Company's Brokerage Department is monitoring the above and relevant records are kept in the Company's records.

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.

8. TOP EXECUTION VENUES PER CLASS OF INSTRUMENTS

The Company's execution venues for retail and professional clients during 2021 are the following:

Retail

1. Contracts for difference (CFDs)

Class of instrument	Contracts for difference (CFDs)				
Notification if <1 average trade per business day in the previous year	N				
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
Colmex Pro Ltd LEI(213800R72FXE6691UM97)	100%	100%	0%	0%	0%

2. Depositary Receipts

Class of instrument	Depositary Receipts				
Notification if <1 average trade per business day in the previous year	N				
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
ViewTrade Securities Inc. LEI(549300CHLQDUD0NL5851)	89.76%	87.52%	33.74%	66.26%	4.80%
Vision Financial Markets LLC LEI (549300J0X8HK9GUADL55)	10.24%	12.48%	13.60%	86.40%	0%

3. Exchange-Traded Fund

Class of instrument	Exchange-Traded Fund				
Notification if <1 average trade per business day in the previous year	N				
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
ViewTrade Securities Inc. LEI(549300CHLQDUD0NL5851)	88.51%	77.54%	51.66%	48.34%	4.85%
Vision Financial Markets LLC LEI (549300J0X8HK9GUADL55)	11.49%	22.46%	16.55%	83.45%	0%

4. Transferable Securities

Class of instrument	Transferable Securities				
Notification if <1 average trade per business day in the previous year	N				
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
ViewTrade Securities Inc. LEI(549300CHLQDUD0NL5851)	84.16%	80.06%	37.32%	62.68%	6.25%
Vision Financial Markets LLC LEI (549300J0X8HK9GUADL55)	15.84%	19.94%	15.76%	84.24%	0%

5. Options

Class of instrument	Options				
Notification if <1 average trade per business day in the previous year	N				
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
ViewTrade Securities Inc. LEI(549300CHLQDUD0NL5851)	100%	100%	0%	100%	100%

Professional

1. Contracts for difference (CFDs)

Class of instrument	Contracts for difference (CFDs)				
Notification if <1 average trade per business day in the previous year	N				
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
Colmex Pro Ltd LEI(213800R72FXE6691UM97)	100%	100%	0%	0%	0%