



MERITKAPITAL LIMITED

**Execution Quality Summary Statement  
for the year 2022**

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## 1 PURPOSE

The Execution Quality Summary Statement (“EQSS” or the “Statement”) is a statement that MeritKapital Limited (“MK” or the “Company”), an Investment Firm authorised and regulated by the Cyprus Securities and Exchange Commission with Licence Number 077/06 is required to disclose to its clients under Regulation EU 2017/576 of 8 June 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council with regard to regulatory technical standards for the annual publication by investment firms of information on the identity of execution venues and on the quality of execution.

The EQSS is a summary of the analysis and conclusions the Company drew from its detailed monitoring of the quality of execution obtained on the execution venues where it executed all client orders during the year 2022 covering a full year cycle (hereinafter, the “Year Under Review”).

The Company urges its clients and/or potential clients to read the Statement carefully as it contains information on how the Company executes orders to various execution venues when operating under the STP model / offering the investment service of Portfolio Management in relation to the Asset Classes of:

- (a) Equities
- (b) Bonds
- (c) Money Market Instruments
- (d) Collective Investments
- (e) Exchange Traded Funds

The information on the type of order and respective percentage should be disclosed, where applicable:

- “Passive Orders” – characterised as an order that is entered into the order book of a trading venue and provides liquidity;
- “Aggressive Orders” – defined as an order that is entered into the order book of a trading venue and removes liquidity;
- “Directed Orders” – when a specific Execution Venue was specified by the client prior to the execution of the order.

The EQSS along with the accompanying tables will remain on the Company’s website for two years at least post its publication.

## 2 RELATIVE IMPORTANCE OF EXECUTION FACTORS DURING THE YEAR UNDER REVIEW

The Company when executing Clients' Orders is required under the relevant regulatory framework to assign a relative importance on the following execution factors:

- (a) Price;
- (b) Cost;
- (c) Speed of execution;
- (d) Likelihood of execution;
- (e) Likelihood of settlement;
- (f) Size of order;
- (g) Market impact;
- (h) Nature of order.

For details on how each factor is assessed ex ante when executing clients' orders please refer to the Company's [Order Execution Policy](#). During the Year Under Review the Company offered services to the following categories of clients:

### (a) Retail Clients

For these clients, the Company by virtue of the applicable regulatory framework is required to provide best execution in accordance with total consideration whereby total consideration represents the price of the financial Instrument and the costs related to execution, which include all expenses incurred by the client which directly related to the execution of the Order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order, as applicable.

### (b) Professional Clients

**(including per-se Professional and elective Professional client)**

For these clients during the year under review the Company placed emphasis on price and execution costs aligning its execution arrangements for these clients as those applicable to Retail Clients (see point (a) above).

## 3 EXECUTION VENUES DURING THE YEAR UNDER REVIEW

During the year under review the Company maintained a business relationship with several execution venues. Moreover, the Company is a Clearing Member in Cyprus Stock Exchange, a Regulated Market authorised and regulated in the European Union. The Company's other execution venues include investment firms and banks from across the globe including the EU, North America, CIS and MENA regions.

The venues were selected after a due diligence procedure followed by the Company. The execution venues were selected based on multiple criteria that include (non-exhaustive list):

- (a) reputation
- (b) financial strength
- (c) depth of market
- (d) regulatory standing
- (e) ability to provide a wide selection of financial instruments.

The Company has close links through the common ownership with Meritkapital UK Limited, which is authorised under the Financial Conduct Authority with the license number 720609, which has access to the credible liquidity providers, which MK uses as a bridge to access the best quotes available on the market. Other than that, the Company does not have close links or common ownership structures with any of its execution venues.

#### **4 CHANGE OF EXECUTION VENUES DURING THE YEAR UNDER REVIEW**

The Company notes that the during the list of execution venues majorly changed comparing to the year of 2022, as the venues were able to provide better liquidity and achieve best possible results of execution. Please refer to the Section 9 for the full breakdown.

#### **5 CONFLICTS OF INTEREST**

The Company lists (non-exhaustive) the possible conflicts of interest it is facing (inclusive of conflicts of interest in relation to the execution venues it uses) as well as the relative mitigation measures in its [Conflicts of Interest Policy](#).

The Company from the time of its inception up to this point has not entered into a business relationship with an Execution Venue that will give rise to potential conflicts of interests that may inhibit the Company from acting in accordance with the Best Interest of its Clients.

#### **6 PAYMENTS OR NON-MONETARY BENEFITS (MADE OR RECEIVED) TO/BY EXECUTION VENUES**

During the Year Under Review the Company's arrangements with its Execution Venues stipulated that the Company neither paid nor received any monies or non-monetary benefits from said venues. The Company generates its revenues from Commissions/spreads paid by its Clients upon initiating a trading order or under portfolio management fees.

#### **7 TOOLS AND DATA USED DURING THE YEAR UNDER REVIEW.**

The Company during the Year Under Review deployed a number of methodologies and tools in order to monitor, and where applicable adjust, its execution parameters in order to ensure consistency with its overarching obligation to offer the best possible result for its clients' orders.

In broad terms the Company monitors on an ongoing basis its execution arrangements by selecting appropriate samples of orders executed and evaluates the samples in accordance with the following dimensions:

(a) Evaluating the Company's execution venues in accordance with the following:

- Pricing Frequency (price updates in real time);
- Speed of execution;
- Frequency and duration of price freezing;
- Depth of liquidity;
- Pricing transparency;
- Slippage frequency etc.

(b) Price Fairness by comparing independent prices relayed by independent market data providers with the prices quoted by its execution venues, as well as comparing prices between execution venues not listed in the company's execution venues list. For this purpose, the Company has subscribed to independent price aggregators (such as Bloomberg,) and uses quarterly reports published by other Execution Venues that trade similar or identical financial instruments with those offered by the Company.

(c) Technological prowess of Company systems (responsiveness of interface, lag, integration with the IT systems of the execution venues etc.).

## 8 REVIEWS OF EXECUTION MONITORING - CONTROL FUNCTIONS

The Company's brokerage department produces reports on a weekly/monthly/quarterly basis with the evaluation process described above (please refer to Section 7) and if actions are required liaise with the Company's senior management for next steps.

The Company's control functions (Compliance and Internal Audit) scrutinise the monitoring procedure conducted by the brokerage department and the actions taken by the Company's senior management. The Company's control functions present their findings to the Company's Board of Directors at least annually, for further scrutiny and actions.

## 9 TOP FIVE EXECUTION VENUES FOR THE YEAR UNDER REVIEW PER ASSET CLASS

### 9.1 EQUITIES

Information on the top five execution venues during the year 2022 (Professional Clients)						
Class of Instrument	Illiquid Equities (Liquidity Bands 1-2)					
Notification if < 1 average trade per business day in the previous year	Y					
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	
<b>JP Morgan Securities LLC</b> ZBUT11V806EZRVTWT807	22.53%	3.62%	100%	0%	0%	
<b>London Stock Exchange PLC</b> 213800D1E14B9WTWWD28	21.68%	33.33%	100%	0%	0%	
<b>FF-Exchange Transactions - Listed Instruments</b> NO LEI	20.55%	7.97%	100%	0%	0%	
<b>J.P. Morgan Securities PLC</b> K6Q0W1PS1L1O4IQL9C32	9.48%	11.59%	100%	0%	0%	
<b>Turquoise International Limited</b> 213800739ZBQLRGTTN27	8.04%	2.17%	100%	0%	0%	

Information on the top five execution venues during the year 2022 (Retail Clients)

Class of Instrument	Relatively liquid Equities (Liquidity Bands 1-2)				
Notification if < 1 average trade per business day in the previous year	Y				
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 <sup>⊖</sup>	Percentage of aggressive orders <sup>⊖</sup>	Percentage of directed orders
<b>NASDAQ - All markets</b> NO LEI	24.25%	22.50%	100%	0%	0%
<b>NYSE ARCA</b> NO LEI	20.99%	22.50%	100%	0%	0%
<b>Citadel Securities LLC</b> 12UUJYTN7D3SW8KCSG25	18.21%	17.50%	100%	0%	0%
<b>Cboe Global Markets, Inc.</b> 529900RLNSGA90UPEH54	13.22%	12.50%	100%	0%	0%
<b>MEMX LLC</b> 254900ZJZM9RSYHE7D79	5.38%	5.00%	100%	0%	0%



Information on the top five execution venues during the year 2022 (Professional Clients)

Class of Instrument	Relatively liquid Equities (Liquidity Bands 3-4)				
Notification if < 1 average trade per business day in the previous year	Y				
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
<b>Citadel Securities LLC</b> 12UUJYTN7D3SW8KCSG25	25.22%	7.57%	100%	0%	0%
<b>FF-Exchange Transactions - Listed Instruments</b> NO LEI	19.13%	43.96%	100%	0%	0%
<b>London Stock Exchange PLC</b> 213800D1EI4B9WTWWD28	6.96%	5.71%	100%	0%	0%
<b>NYSE ARCA</b> NO LEI	5.22%	1.71%	100%	0%	0%
<b>VIRTU VEQ LINK</b> NO LEI	5.22%	1.45%	100%	0%	0%

Information on the top five execution venues during the year 2022 (Retail Clients)

Class of Instrument	Relatively liquid Equities (Liquidity Bands 3-4)				
Notification if < 1 average trade per business day in the previous year	Y				
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 <sup>**</sup>	Percentage of aggressive orders <sup>**</sup>	Percentage of directed orders
<b>Cboe Global Markets, Inc.</b> 529900RLNSGA90UPEH54	49.38%	33.33%	100%	0%	0%
<b>Citadel Securities LLC</b> 12UUJYTN7D3SW8KCSG25	26.59%	33.33%	100%	0%	0%
<b>New York Stock Exchange, Inc.</b> NO LEI	24.03%	33.33%	100%	0%	0%

Information on the top five execution venues during the year 2022 (Professional Clients)

Class of Instrument	Liquid Equity (Liquidity Bands 5-6)				
Notification if < 1 average trade per business day in the previous year	Y				
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
<b>FF-Exchange Transactions - Listed Instruments</b>					
NO LEI	44.38%	20.07%	100%	0%	0%
<b>JP Morgan Securities LLC</b>					
ZBUT11V806EZRVTWT807	6.41%	6.25%	100%	0%	0%
<b>VIRTU VEQ LINK</b>					
NO LEI	5.79%	3.95%	100%	0%	0%
<b>UBS Securities LLC</b>					
T6FIZBDPKLYJKFCRVK44	5.26%	5.26%	100%	0%	0%
<b>Aquis Exchange Europe</b>					
9695002NSIQWF9A09R56	5.12%	2.30%	100%	0%	0%

Information on the top five execution venues during the year 2022 (Retail Clients)

Class of Instrument	Relatively liquid Equities (Liquidity Bands 6)				
Notification if < 1 average trade per business day in the previous year	Y				
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
<b>NYSE ARCA</b> NO LEI	44.20%	30.00%	100%	0%	0%
<b>Citadel Securities LLC</b> 12UUJYTN7D3SW8KCSG25	19.63%	30.00%	100%	0%	0%
<b>NASDAQ - All markets</b> NO LEI	15.30%	20.00%	100%	0%	0%
<b>Intercontinental Exchange, Inc.</b> 5493000F4ZO33MV32P92	10.45%	10.00%	100%	0%	0%
<b>Cboe Global Markets, Inc.</b> 529900RLNSGA90UPEH54	10.42%	10.00%	100%	0%	0%

## 9.2 DEBT INSTRUMENTS (BONDS)

Information on the top five execution venues during the year 2022 (Professional Clients)					
Class of Instrument	Bonds				
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
<b>FF-Exchange Transactions - Listed Instruments</b>					
NO LEI	81.65%	87.57%	100%	0%	0%
<b>Bloomberg Trading Facility B.V.</b>					
254900QBKK4WBSO3GE51	18.35%	12.43%	100%	0%	0%

Information on the top five execution venues during the year 2022 (Retail Clients)					
Class of Instrument	Bonds				
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
<b>FF-Exchange Transactions - Listed Instruments</b>					
NO LEI	63.24%	60.00%	100%	0%	0%
<b>Tradeweb EU B.V.</b>					
724500D4BFEWKWVC1G62	26.46%	20.00%	100%	0%	0%
<b>Bloomberg Trading Facility B.V.</b>					
254900QBKK4WBSO3GE51	10.30%	20.00%	100%	0%	0%

9.3 EXCHANGE TRADED PRODUCTS (EXCHANGE TRADED FUNDS)

Information on the top five execution venues during the year 2022 (Professional Clients)						
Class of Instrument	Exchange Traded Funds					
Notification if < 1 average trade per business day in the previous year	Y					
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	
<b>VIRTU VEQ LINK</b> NO LEI	17.51%	6.62%	100%	0%	0%	
<b>Citadel Securities LLC</b> 12UUJYTN7D3SW8KCSG25	15.31%	29.80%	100%	0%	0%	
<b>LEVEL ATS</b> NO LEI	8.29%	7.95%	100%	0%	0%	
<b>FF-Exchange Transactions - Listed Instruments</b> NO LEI	8.04%	5.30%	100%	0%	0%	
<b>Hudson River Trading LLC</b> 549300SMOBUC8O5UOE10	7.95%	1.99%	100%	0%	0%	

9.4 MONEY MARKET INSTRUMENTS (REPOS)

Information on the top five execution venues during the year 2022 (Professional Clients)					
Class of Instrument	Money Market Instruments (Repos)				
Notification if < 1 average trade per business day in the previous year	Y				
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 <sup>o</sup>	Percentage of aggressive orders <sup>o</sup>	Percentage of directed orders
<b>FF-Exchange Transactions - Listed Instruments</b>					
NO LEI	100%	100%	100%	0%	0%



9.5 FX DERIVATIVES (SWAPS)

Information on the top five execution venues during the year 2022 (Professional Clients)						
Class of Instrument	Swaps					
Notification if < 1 average trade per business day in the previous year	Y					
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 <sup>⊕</sup>	Percentage of aggressive orders <sup>⊕</sup>	Percentage of directed orders	
<b>FF-Exchange Transactions - Listed Instruments</b>						
NO LEI	100%	100%	100%	0%	0%	