



TOP 5 EXECUTION VENUES REGULATORY TECHNICAL STANDARD 28

YEAR ENDED 31st DECEMBER 2017

Last Updated: June 2018

Overview

Rynat Trading Limited remains responsible for the completeness and accuracy of the information transmitted to Leverate Financial Services Limited.

Rynat Trading Limited takes all sufficient steps to obtain, when executing orders, the best possible result for its clients taking into account price, costs, speed, likelihood of execution and settlement, size, nature or any other consideration relevant to the execution of the order.

We give equivalent importance to price, costs, speed, likelihood of execution as qualitative factors when assessing the quality of our execution venues. Rynat Trading Limited is striving to add in the near time future additional execution venues to enhance its execution of client orders.

Rynat Trading Limited has not any close links, conflicts of interests, and common ownerships with any execution venues used to execute orders. There are not any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

Rynat Trading Limited is executing orders on behalf of client orders after receiving and transmitting them to relevant execution venues utilizing own funds as deposit in the execution venues for enhanced security of its clients' funds.

The main factors used in the change of execution venues is the enhanced regulation Leverate Financial Services is following as well as the access to more financial instruments, while the cost of the company decreased and turned in favor of our clientele. In addition, we get better and faster execution for our client orders because of a wider pool of execution venues engaged with Leverate Financial Services Limited compared to Speed Solutions Limited.

At Rynat Trading Limited, we appreciate every euro entrusted by our clientele irrelevant of the classification received due to licensing, and relevant characteristics. We strive to provide best execution for both our retail as well as professional clients.

Where Rynat Trading Limited executes an order on behalf of a retail client, the best possible result is determined in terms of total consideration, representing the price of the financial instrument and the costs relating to execution which includes all expenses incurred by the client which are directly relating 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.

Rynat Trading Limited does not receive any remuneration, discount or non-monetary benefit to send orders to any execution venue.

All our execution venues are known by our clientele via our best execution policy, as this is updated from time to time. We constantly receive prior consent from our clientele before amending the execution policy as agreed at our initial terms of our business relationship with our clients.

At Rynat Trading Limited we apply on a proportionate basis procedures and arrangements which provide prompt, fair and expeditious execution of client orders, relative to our client orders.

Table 1 – Retail Clients					
Class of Instrument	(j) Contracts for difference				
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
Speed solutions limited (549300XFGS8XNREPYS04)	96.35%	96.35%	0%	0%	0%
Leverate financial services limited (549300LIT450323BK688)	3.65%	3.65%	0%	0%	0%

Table 2 – Professional Clients					
Class of Instrument	(j) Contracts for difference				
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
Speed solutions limited (549300XFGS8XNREPYS04)	100%	100%	0%	0%	0%
Leverate financial services limited (549300LIT450323BK688)	0%	0%	0%	0%	0%

Table 3		
Class of Instrument	(j) Contracts for difference	
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 executed as a percentage of total in that class	Proportion of orders executed as percentage of total in that class
Speed solutions limited (549300XFGS8XNREPYS04)	96.51%	96.51%
Leverate financial services limited (549300LIT450323BK688)	3.49%	3.49%