



QUALITY SUMMARY STATEMENT



QUALITY SUMMARY STATEMENT

Execution of Orders on CFDs during 2018

Annual publication of information on the identity of Execution Venues and on the quality of Execution as per the requirements of the

[Commission Delegated Regulation \(EU\) 2017/576](#) (“RTS28”)

A.N. ALLNEW INVESTMENTS LIMITED

CIF License No: 344/17

Incorporation Number: HE 348194



EXECUTION QUALITY SUMMARY STATEMENT

Table of Content

1. INTRODUCTION	4
2. APPLICATION	5
3. RELATIVE IMPORTANCE OF EXECUTION FACTORS DURING 2018	6
4. EXECUTION VENUES USED BY THE COMPANY	7
5. CONFLICTS OF INTEREST	8
6. PAYMENTS OR NON-MONETARY BENEFITS BETWEEN THE COMPANY AND ITS EXECUTION VENUES	8
7. ONGOING MONITORING.....	9
8. ANNEXES.....	10



1. INTRODUCTION

A.N. ALLNEW INVESTMENTS LIMITED (hereinafter, "**The Company**") is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 348194. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the "CySEC") under the license number 344/17.

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 enough 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 enough steps taken by the Company in addition to those referred in the best 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 2018.

This Statement provides information on the Best Execution Policy. If you have any questions about this Statement or the Best Execution Policy, please contact us at compliance@legacyfx.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 company had no Professional Clients within the Year 2018.

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 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.

You may refer to the best execution policy of the Company for further details on the above.



4. EXECUTION VENUES USED BY THE COMPANY

The Company during 2018 cooperated and routed orders to the execution venue(s) listed below:

No.	Name of the Execution Venue	Country of Origin	Contract Commencement date	End date in the event of termination
1.	Up Trend Ltd, LEI: 213800SL3NLK2GFKU177	Bulgaria	2 January 2018	
2.	Leverate Financial Services Limited, LEI: 549300LIT450323BK688	Cyprus	19 September 2016	
3.	Swissquote Bank SA, LEI: H6IQ3SWWWBLDBI06ZX04	Switzerland	25 September 2017	

In selecting an execution venue for the execution of a transaction, the Company considers 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.

The Company does not in any case discriminate unfairly between execution venues.

The Company during the year under review, evaluated the pricing of various execution venues and it considers that the pricing provided through the utilized execution venue throughout 2018 as competitive and in accordance to the best interest of its clients.



5. CONFLICTS OF INTEREST

The Company does not maintain any close links and/or common ownership structures with any execution venue of the Company.

6. PAYMENTS OR NON-MONETARY BENEFITS BETWEEN THE COMPANY AND ITS EXECUTION VENUES

The Company may add 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, while in the case on CFDs on Equities only an additional commission is requested from the Client (from 0.15% to 0.30% of the transaction value). We may take into account several 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 to accept the quoted all-in price and/or any commission associated with the transaction value.



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.



8. ANNEXES

Annex I: Classes of financial instruments

(j) Contracts for difference

Annex II

Table 1

Retail Clients

Class of Instrument Notification if < 1 average trade per business day in the previous year	Contracts for difference				
	No				
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	% of passive orders	% of aggressive orders	% of directed orders
Up Trend Ltd, LEI: 213800SL3NLK2GFKU177	100%	100%	100%	100%	N/A
Leverate Financial Services Limited, LEI: 549300LIT450323BK688	N/A	N/A	N/A	N/A	N/A
Swissquote Bank SA, LEI: H6IQ3SWWWBLDBI06ZX04	N/A	N/A	N/A	N/A	N/A
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-



Table 2
Professional Clients

Class of Instrument Notification if < 1 average trade per business day in the previous year	Contracts for difference				
	No				
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	% of passive orders	% of aggressive orders	% of directed orders
Up Trend Ltd, LEI: 213800SL3NLK2GFKU177	N/A	N/A	N/A	N/A	N/A
Leverate Financial Services Limited, LEI: 549300LIT450323BK688	N/A	N/A	N/A	N/A	N/A
Swissquote Bank SA, LEI: H6IQ3SWWWBLDBI06ZX04	N/A	N/A	N/A	N/A	N/A
-	-	-	-	-	-
-	-	-	-	-	-
-	-	-	-	-	-