

Execution Quality Statement — RTS28

1. Introduction

The Markets in Financial Instruments Directive 2014/65/EU (the “MiFID II”) and the Commission Delegated Regulation (EU) 2017/565 (“CDR 2017/565”) as well as the Commission Delegated Regulation (EU) 2017/576 (RTS 28) introduced the requirements on the information which must be published to the market in relation to the best execution reporting requirements.

In this respect, T.C.R. International Ltd (the “Company”) has published this Report on the quality of execution obtained (the “Report”) which is based on summary of the analysis and monitoring of execution obtained on the execution venues where the Company executed all clients’ orders in the year 2019, covering a full year cycle. The aim is to provide the clients as well as the public at large with meaningful information in order to effectively assess and scrutinize the execution quality achieved during the year.

The Company urges its existing and potential clients to read the statement carefully as it contains the information which will assist the clients to evaluate the quality of the Company’s execution practices.

2. Best execution Factors and Criteria

The Company takes all sufficient steps to act in the best interest of its customers when executing customer’s orders and obtain the best possible result for customers taking into account the following factors when dealing with customers’ orders:

- ***Price:*** The Company is working on the client’s best interest and gives strong emphasis on the quality and level of the price data that it receives from external sources in order to provide our Clients with competitive price quotes. The Company does not however guarantee that the quoted prices will be as good, or better, than prices one might have seen elsewhere.
- ***Costs:*** Third party costs such as settlement costs and execution costs are always taken into consideration when determining the best execution for a client.
- ***Speed of Execution:*** The Company places a significant importance when executing clients’ orders and strives to offer high speed of execution within the limitations of technology and communication links.
- ***Likelihood of Execution:*** The availability of prices of other market/makers/financial institutions/liquidity can make it impossible for the Company to execute an order. When the Company transmits orders for execution to another third party, the likelihood of execution depends on the availability of prices/liquidity by such third party.
- ***Likelihood of Settlement:*** Credit worthiness, as well as previous experience of counterparties and execution venues, are always assessed and factored in the best execution criteria.
- ***Size and Nature of Order:*** The minimum size of an order may be different for each asset type and/or financial instrument. An unusual order may be executed differently than a standard order.

- **Market Impact:** Some factors may affect rapidly the price of the underlying financial instruments from which the quoted Company price for its Financial Instruments is derived. These factors may influence some of the factors listed above. The Company will take all reasonable steps to obtain the best possible result for its clients.

For the application of best execution to the client order, the Company will consider the relative importance of the abovementioned execution factors by reference to the following criteria in order to provide clients the best possible result:

- the characteristics of the client, including the categorisation of the client as a retail or professional;
- the characteristics of the client order;
- the characteristics of the financial instrument that are subject of that order; and
- the characteristics of the execution venues or entities to which that order can be directed.

3. Close links and conflicts of interest

The Company does not have any close links, conflicts of interests or common ownerships with respect to any execution venues used to execute orders.

4. Payments or Non-Monetary Benefits between the Company and its Execution Venues

The Company does not have any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits.

5. Arrangements with execution venues

There are no specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.

6. Factors which led to a change in the list of execution venues

There were no changes in the execution venues.

7. Execution and Client Categorisation

During the year 2019 the Company only provided investment services to professional clients. More information on Company's Client Categorization policy can be found here <http://tcr-int.com/regulation/>.

8. Data or tools relating to the quality of Execution

The Company has not used any data or tools relating to the quality of execution.

9. Consolidated Tape Provider (CTP)

During the year 2019 the Company has not used output of a Consolidated Tape Provider (CTP).

Execution Quality Summary Statement (EQSS) presenting information on the quality of execution obtained for client orders in 2019

Top five execution venues in terms of trading volumes per each class of financial instruments were the Company executed clients' orders in 2019.

Professional clients:

Equities

Class of Instrument			Equity			
Notification if <1 average trade per business day in the previous year			N			
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	Percentage of passive orders	Percentage of aggressive orders	Percentage of direct orders
1	Vision Financial Markets LLC 549300J0X8HK9GUADL55	77.118%	74.729%	52.58%	47.42%	100%
2	Instinet Europe Limited 213800MXAKR2LA1VBM44	22.871%	25.263%	59.69%	40.31%	100%
3	Dolfin Financial (UK) Ltd 549300FGG5C5WJ6LVR97	0.006%	0.003%	100%	N/A	100%
4	XNT Ltd 635400MMGYK7HLRQGV31	0.002%	0.003%	100%	N/A	100%
5	Alaric Securities Ltd 549300I48OJHSE9OZS95	0.002%	0.002%	100%	N/A	100%

Debt Instruments

Class of Instrument			Debt Instruments			
Notification if <1 average trade per business day in the previous year			N			
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	Percentage of passive orders	Percentage of aggressive orders	Percentage of direct orders
1	Shore Capital Markets Limited 2138009KZO3MK7TV6372	48.07%	55.86%	100%	N/A	100%
2	Dolfin Financial (UK) Ltd	43.63%	27.03%	100%	N/A	100%

	549300FGG5C5WJ6LVR97					
3	Cowen International Limited 213800S7FGLGM4J4MV84	5.07%	10.81%	100%	N/A	100%
4	Castle Harbour Securities Ltd 254900R3VM PG60MQEZ08	1.21%	0.90%	100%	N/A	100%
5	Elavon Financial Services Ltd 5493008GNQHVI377MY19	1.19%	0.90%	100%	N/A	100%

Equity Derivatives

Class of Instrument		Equity Derivatives				
Notification if <1 average trade per business day in the previous year		N				
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	Percentage of passive orders	Percentage of aggressive orders	Percentage of direct orders
1	Vision Financial Markets LLC 549300J0X8HK9GUADL55	100%	100%	24.49%	75.51%	100%

Retails clients

The Company did not provide any investment services to retail clients during the year 2019.

Summary of the analysis and conclusions drawn from the monitoring:

Brokerage firms on our list of execution venues are regulated entity and are subject to ongoing monitoring process, which includes, regular reviews of the performance of execution services provided by the broker, and the broker's ability to trade effectively on our clients' behalf.

The analysis and conclusions drawn from our monitoring of the quality of execution confirm that the execution venues and brokers used to execute client orders meet our standards in delivering best execution to our clients on a consistent basis.

Key definitions under RTS 28

“execution venue” means a regulated market, an MTF, a systematic internaliser, or a market maker or other liquidity provider or an entity that performs a similar function in a third country to the functions performed by any of the foregoing;

"execution of orders of behalf of clients" means acting to conclude agreements to buy or sell one or more financial instruments on behalf of clients;

“passive order” means an order entered onto the order book that provided liquidity;

“aggressive order” means an order entered onto the order book that took liquidity;

“directed order” means an order where a specific execution venue was specified by the client prior to the execution of the order;

"financial instruments" means any of the instruments specified in Part III of the First Appendix of the Investment Services and Activities and Regulated Markets Law of 2017;

“investment services” means any of the services and activities, respectively, listed in Part I of the First Appendix of the Investment Services and Activities and Regulated Markets Law of 2017, and which relate to any of the instruments listed in Part III of the First Appendix of the Investment Services and Activities and Regulated Markets Law of 2017.

"client" means every person to whom the Company provides investment or/and ancillary services;

“professional clients” means " the client meeting the criteria and observing the procedures laid down in the Second Appendix of the Investment Services and Activities and Regulated Markets Law of 2017;

"retail client" means every client that is not a professional client;

“close links” means a situation in which two or more natural or legal persons are linked by:

(a) participation which means the ownership, direct or by way of control, of at least 20% of the voting rights or capital of an undertaking;

(b) control which means the relationship between a parent undertaking and a subsidiary, in all the cases referred to in Article 22, paragraph 1 and 2, of Directive 2013/34/EU, or a similar relationship between any natural or legal person and an undertaking, any subsidiary of a subsidiary undertaking also being considered a subsidiary of the parent undertaking which is at the head of those undertakings;

(c) a permanent link of both or all of them to the same person by a control relationship;