

# EXECUTION QUALITY SUMMARY STATEMENT (EQSS) FOR THE YEAR ENDING 31.12.2021

## Introduction

NFS Network Financial Services Ltd (hereafter the “Company” or “NFS”) is authorised by the Cyprus Securities and Exchange Commission (CySEC) with authorisation number 328/17 and operates under the Provision of Investment Services and Activities and Regulated Markets Law of 2017 as subsequently amended from time to time (the Law). NFS is authorised to provide the Investment services of Reception and Transmission of orders on behalf of clients and Investment Advice.

This Execution Quality Summary Statement (“EQSS”) has been prepared in accordance with EU Commission Delegated Regulation (EU) 2017/576 and in particular with the regulatory technical standards under Article 27(10)(b) of MiFID II adopted by the EC on 08/07/2016 (“RTS 28”).

## Scope

The EQSS is prepared on annual basis and is required to provide information regarding the quality of the Company's execution practices and to identify the top five execution venues in terms of trading volumes in respect of each class of financial instruments where NFS has transmitted client orders during the year ending 31.12.2021.

The information presented in this report is based on the analysis and conclusions from the monitoring of the quality of execution obtained on the execution venues.

NFS is not authorized and therefore does not execute orders directly, all orders received from clients are transmitted on their behalf to a third party for execution. NFS may also transmit orders to a third-party venue selected by a client, in which case the standards of best execution that applies to NFS may not necessarily apply to the third party.

This report shall be available on our website of at least 2 years.

### 1. Conflicts of interest

NFS does not have any close links or common ownership with any of the execution venues in which client orders are transmitted for execution. The Company does not maintain participation in execution venues. The Company has in place a [Conflicts of Interest Policy](#) which is available on its website.

### 2. Special arrangements regarding payments and Non-Monetary Benefits.

During the year 2021, the Company did not receive any payment or non-monetary benefit from any execution venue in exchange for routing client's orders to a particular execution venue. The Company does however receive a commission, which is a percentage of the total amount invested by a client and is not differentiated between execution venues. The Company monitors and mitigates such payments to ensure that no conflict of interest or best interest of a client is placed at risk.

### **3. Execution Factors – Relative Importance**

The Company when receiving and transmitting orders will consider the following criteria appropriate to the execution venue for a specific transaction;

- Price
- Costs
- Speed
- Likelihood of Execution and settlement
- Size of Order
- Market Impact
- Nature of Orders

The Company in determining the relative importance of the best execution factors will in general consider the best execution criteria as described below:

- The characteristics of the client
- The characteristics of the client order
- The characteristics of financial Instruments that are the subject of that order
- The characteristics of the execution venues to which that order can be directed.

The Company determines the relative importance it assigns, in accordance with the above criteria, to the best execution factors by using its commercial judgment and experience considering the information available on the market, and the [Best Execution Policy](#) of the Company, available on the company website.

The Company regards the Price, Costs, Speed as the highest level of importance, the best possible result shall be determined in terms of the total consideration.

Where there is a “specific instruction” from a client the Company will take all appropriate and sufficient measures to ensure that clients’ orders shall be executed following the specific instruction and consequently the Company will not be deemed to have deviated from its obligation to provide clients with best execution through the Company’s Execution Venue(s).

### **4. Classification of Clients and execution differences.**

The Clients of the Company during the year 2021 that transmitted orders for execution were Retail or Elective Professional Clients. The Company does not differentiate between execution venues used for different categories of clients or apply any different criteria giving precedence over immediate price and cost.

### **5. Execution venues**

Execution Venues are the locations (with or without a physical presence) such as Regulated Markets, Multilateral Trading Facilities, Systematic Internalisers, Market Makers, liquidity providers or any other entity that facilitates trading of financial instruments.

With respect to Financial Instruments the Company is authorized to offer, Units in Collective Investment Undertakings, the primary execution venue will be a Regulated Market or a Multilateral Trading Facility via the third-party financial institutions to which the company passes instructions or through another broker with which they have an agreement for handling client orders. Where this is not possible or appropriate due to best execution integrity, orders may be executed outside of a Regulated Market or Multilateral Trading Facility.

With respect to collective investment schemes, orders will usually be placed directly with the manager/administrator of the scheme or through a settlement system. The Company will seek the best terms available and where possible.

### **6. Tools and data used**

The Company did not utilise any data published under Delegated Regulation EU 2017/575 (RTS 27) to monitor its performance as an execution venue as it does not operate as an execution venue.

## 7. Consolidated Tape Provider Use under Art65 of Directive 2014/65/EU.

This is not currently applicable to the company.

## 8. On-going monitoring and Control Functions

The Company monitors on an ongoing basis its execution arrangements to identify any weaknesses in the performance of its Best Execution and the performance of the execution venues to which it transmits client orders.

The Company's Reception and Transmission Department monitors on an ongoing basis all orders to ensure that they are executed by the venues according to the best execution policy and where any weakness is identified immediately reports to the Senior Management of the Company.

The monitoring procedure is under the review of the Control functions of the Company, which include the Compliance Function and the Internal Audit function which report directly to the Board of Directors. Any findings are reported on an annual basis along with any applicable recommendations who shall implement any action required for improvement.

## 9. Table of Top 5 execution venues where orders were received and transmitted to on behalf of all Clients.

Class of Instrument	UCITS				
<b>Notification if &lt; 1 average trade per business day in the previous year</b>	Yes				
<b>Top five execution venues ranked in terms of trading volumes (descending order)</b>	<b>Proportion of volume traded as a percentage of total in that class</b>	<b>Proportion of orders executed as percentage of total in that class</b>	<b>Percentage of passive orders*</b>	<b>Percentage of aggressive orders*</b>	<b>Percentage of directed orders*</b>
Novia Global Limited 213800L2STU1JK5JQA57	42.72%	42.72%	N/A	N/A	100%
Quilter International Ireland DAC 635400C5JBLAZ15LIE80	25.41%	25.41%	N/A	N/A	100%
Quilter International (Isle of Man) Ltd 213800S4DUJWMDMVYE58	12.15%	12.15%	N/A	N/A	100%
RL360 Life Insurance Company Ltd 2138007TK6SA3W9ZME90	11.55%	11.55%	N/A	N/A	100%
STM LIFE ASSURANCE PCC PLC 213800353JUOHGQN2E16	3.52%	3.52%	N/A	N/A	100%

\*The definition of Passive, Aggressive, Directed orders shall have the meaning given to them in accordance with Article 2 of Commission Delegated Regulation (EU) 2017/576. In accordance with Question 14 of Questions and Answers on MiFID II and MiFIR investor protection and intermediaries' topics, "If a receiver and transmitter of orders, sends an order to an entity for execution (broker), the distinction between passive and aggressive orders as defined in the above noted Article 2, is likely not relevant and will not need to be disclosed in the report to be published in accordance with Article 65(6) of the Delegated Regulation.