



4XHUB EU LIMITED

**EXECUSION QUALITY SUMMARY
STATEMENT 2023**

April 2024

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1. Introduction

4XHUB EU Limited (hereafter the “Company”) is incorporated and registered in Cyprus under the laws of the Republic of Cyprus with registration number HE 419115. 4XHUB EU Limited is licensed and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) as a Cyprus Investment Firm (hereafter “CIF”) with licence number 437/23. The Company’s registered office is at 210, Amathoundas Avenue, Energy House, Block A, Flat/Office 1, Pyrgos, 4534, Limassol, Cyprus.

In September 2023 the Company was authorised to provide the following investment and ancillary services:

Investment Services:

1. Reception and transmission of orders in relation to one or more financial instruments;
2. Execution of orders on behalf of clients;

Ancillary services:

1. Safekeeping and administration of financial instruments, including custodianship and related services;
2. Granting credits or loans to one or more financial instruments, where the firm granting the credit or loan is involved in the transaction;
3. Foreign exchange services where these are connected to the provision of investment services;

The Company is authorised to provide the aforesaid services in relation to all financial instruments outlined in Part III of the First Appendix of the Investment Services and Activities and Regulated Markets Law of 2017 – L.87(I)/2017/ (hereinafter the ‘Law’), as amended, with the exception of Emission allowances consisting of any units recognized for compliance with the requirements of Directive 2003/87/EC.

Purpose

This Document, which is called Execution Quality Summary Statement (hereinafter the “Statement”) sets out the technical standards for the annual publication by investment firms of information on the identity of execution venues and on the quality of execution.

The Company is required to inform all its Retail and Professional Clients about all sufficient 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.

The Statement 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 planned to be executed all client orders during the year 2023, covering the period after obtaining our licence in September 2023 (the year under review).

The Company did not have neither Retail nor Professional clients during the year 2023.

Applicable Regulations

This document is issued pursuant to, and in compliance with the requirements of Articles 28(3) and 28(6) of the Investment Services and Activities and Regulated Markets Law of 2017 - Law 87(I)/2017 (hereafter the ‘Law’) and Commission Delegated Regulation (EU) 2017/576 of 8 June 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 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 on markets in financial instruments. (‘MiFID II’).

In this Statement, we collectively refer to all the above legislations, regulations, and guidelines as ‘Regulations’.

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 considering the following factors when dealing with Customers Orders: price, cost, speed, likelihood of execution and settlement, size, market impact, nature of the order or any other consideration relevant to the execution of an order. The Company does not consider the above list exhaustive. The costs

that the clients are charged include all the expenses that are directly related to the order execution. The related expenses include the clearing, settlement, execution venue fees and any other fees paid to third parties that are involved in the execution process.

The application of best execution is neither a guarantee that the best price will be obtained nor a guarantee that the transaction will be executed in full.

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

Price is the most important factor for the company when considering best execution. Prices are obtained from industry leading institutions. Our team continuously monitors the data feed and internal pricing mechanisms to ensure the quality of the price generation process. Data feeds, pricing and connectivity are assessed in real time. The company updates its prices as frequently as the limitations of technology and communications links allow. The Company reviews its third-party external reference sources in frequent periods to ensure that the data obtained continues to remain competitive.

b. Cost

Cost is also the most important factor when execute Clients' orders. To keep the costs low, we source the best available prices from our liquidity providers. For opening a position in some types of CFDs the Client may be required to pay commission and/or financing fees, the amount of which is disclosed on the Company's website and/or trading platforms. Commissions may be charged either in the form of a percentage of the overall value of the trade or as fixed amounts. In the case of financing fees, the value of opened positions in some types of CFDs is increased or reduced by a daily financing fee "swap rate" throughout the life of the contract. Financing fees are based on prevailing market interest rates, which may vary over time. Details of daily financing fees applied are available on the Company's website and/or trading platforms.

c. Speed of Execution

The Company places a significant importance when executing Client's Orders and strives to offer high speed of execution within the limitations of technology and communication links.

d. Likelihood of Execution

The Company may not be able to execute the order at the best available price or the transaction may fail to be completed as stated in our Order Execution Policy. Although the Company strives to execute all orders placed by the clients, it reserves the right to decline or refuse to transmit or arrange for the execution an order of any type or execute the order at the first available market price.

e. Likelihood of Settlement

The Company shall proceed to a settlement of all transactions upon execution of such transactions. The Financial Instruments of CFDs offered by the Company do not involve the physical delivery of the underlying asset, so they are not settled physically

as there would be, for example, if the Client had bought shares. All CFDs are cash settled

f. Size of Order

The minimum size of an order may be different for each asset type and/or financial instrument. A Lot is a unit measuring the transaction amount and it is different for each type of Financial Instrument. Please refer to the website and/or platform for the value of minimum size of an order or minimum Lot for a given CFD type. The Company reserves the right to decline an order as stated in the Client Agreement entered with the Client.

g. Market Impact

Some market factors may rapidly affect the Company's quoted price of Financial Instruments. These factors may, in turn, affect some of the other execution factors listed above. The Company takes all sufficient steps to obtain the best possible result for its clients. For details on how each factor is assessed ex ante when executing clients' orders please refer to the Company's Order Execution Policy. Where the client provides the Company with a specific instruction in relation to his/her/it order or any part of it, including selection of execution venues, the Company will execute that order in accordance with those specific instructions and, in doing so, it will have complied with its obligations to provide the best possible results to the extent that those instructions are followed.

h. Nature of order

The nature of an order may affect the execution of that particular order. The client is given the option to place with the Company on its trading platform the orders.

3. Execution Venues Used by the Company

The Company during 2023 cooperated and was prepared to route orders to the execution venue(s) listed below:

No.	Name of Execution Venue	Country of Establishment	Commencement date of the relationship with the Company	End date of the Business relationship with the Company
1	Finalto Europe operated by Safecap Investments Limited LEI: 549300IIDRNKSFWCQO54	Cyprus	17 May 2023	-
2	LMAX Broker Europe Limited LEI: 2138009PHMXEMQXOGI34	Cyprus	04 October 2023	-

When choosing an execution Venue for the transactions' execution, the Company considers the following non exhaustive elements:

- a) Price
- b) Cost of Execution
- c) Speed of Execution
- d) Liquidity availability for the offered Financial Instruments
- e) Reliability and Good standing
- f) Quality of services and facilities

The Company during the year under review evaluated the pricing of several execution venues and considered that the pricing provided through the utilized execution venue was competitive and in line with the best interest of its clients.

4. Conflicts of Interest

The Company maintains and implements adequate measures to mitigate any conflicts of interests. The relevant "Summary of Conflicts of Interest Policy" can be found on the Company's Website www.4xhub.eu.

5. Payments or Non-Monetary Benefits Between the Company and its Execution Venue(s)

The Company offers the spread of the underlying CFD as received from its execution venues and apply a per- Volume basis Commission fee prior to offering it to its clients. We may consider several factors for charging commissions, 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.

6. Ongoing Monitoring

The Company monitors the arrangements described in this Statement 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.

The Company monitors on an ongoing basis its execution arrangements by checking the orders executed and evaluates them taking into consideration the below:

- Price updates (ticks per minute)
- Latency (speed of execution – time from reception to execution)
- Market depth of its venues with respect to all CFDs offered.
- Price freezing or halts
- Spreads widening
- Any possibility of wrongly matched orders
- Technology – connectivity of platforms with the execution venues
- Comparison of pricing (for the quotes provided pre-execution and the price obtained post execution) with independent price data providers such as Bloomberg, Thomson Reuters etc.
- Slippage monitoring (where occurs to be balanced and reasonably justified)

The Company's Brokerage Department is monitoring the above and reports to the Senior Management of the Company at least on a weekly basis.

Finally, the above monitoring procedure is under the review of the Control functions of the Company, namely the Compliance and Internal Audit functions which report directly to the Board of Directors of the Company their findings and recommendations on an annual basis at least.