



Execution Quality Summary Statement of 2025
GT INVESTMENT SERVICES LTD

1. About GT Investment Services Ltd

GT Investment Services Ltd (hereafter the “Company”) which is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 389575. GT Investment Services Ltd is authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) under the license number 382/20.

2. Purpose

The present Statement is the Execution Quality Summary Statement (hereinafter the ‘EQSS’) which 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 pursuant to the European Directive MiFID II – Market in Financial Instruments Directive and Commission Delegated Regulation 2017/576 (RTS 28).

The EQSS 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 executed all client orders during the year 2025, covering a full year cycle.

This Document shall be reviewed and accordingly updated on an annual basis and shall reflect the data of the previous year.

3. Applicable Regulations

This document is issued pursuant to, and in compliance with the requirements of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments (‘MiFID II’) and the Investment Services Law of CySEC (87(I)/2007).

The purpose of this Document is to ensure the Company’s Compliance with the Commission’s Delegated Regulation (EU) 2017/576 (‘RTS 28’) as well as Section 9 of the Questions and Answers Document of the European Securities and Markets Authority (‘ESMA’) issued on 11 October 2016 with reference ESMA/2016/1454 with respect to the provision of CFDs and other speculative products to retail investors.

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

4. Best Execution Factors and Criteria

The Company takes all sufficient steps to act in the best interest of its Clients when executing Clients’ Orders and obtain the best possible result for its Clients taking into account the following factors: price, cost, speed, likelihood of execution and settlement, size, market impact or any other consideration relevant to the execution of an order. The Company does not consider the above

list exhaustive and the order in which the above factors are presented shall not be taken as priority factor.

4.1. Price: For any given CFD, the Company will quote two prices: the higher price (ASK) at which the Client can buy (go long) that CFD, and the lower price (BID) at which the Client can sell (go short) that CFD. Collectively, the ASK and BID prices are referred to as the Company's price. The difference between the lower and the higher price of a given CFD is the spread. Such orders as Buy Limit, Buy Stop and Stop Loss, Take profit for opened short position are executed at ASK price. Such orders as Sell Limit, Sell Stop and Stop Loss, Take profit for opened long position are executed at BID price. The Company's price for a given CFD is calculated by reference to the price of the relevant underlying asset, which the Company obtains from third party external reference sources. The Company's prices can be found on the Company's website and/or trading platforms. 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.

4.2. Costs: 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.

4.3. 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.

4.4. Likelihood of Execution: The Company may not be able to execute the order at the best available price or the transaction may fail to complete 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 an order of any type or execute the order at the first available market price.

4.5. Likelihood of Settlement: The CFDs offered by the Company do not involve the delivery of the underlying asset, so there is no settlement as there would be for example if the Customer had bought shares.

4.6. Size of Order: The minimum size of an order may be different for each asset type and/or financial instrument. A Lot is 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 explained in the Client Agreement entered with the Client.

4.7. Market Impact: Some market factors may affect rapidly the Company's quoted price of the Financial Instruments. These factors may, in turn, affect some of the other execution factors listed above. The Company takes all reasonable 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 which can be found in the Company's Website.

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.

5. Conflict of Interest

Execution Venues are the entities with which the orders are placed or to which the Company transmits orders for execution. For the purposes of the orders submitted to the Company by the client, the Company acts as Principal on the client's behalf. Even where the Company transmits the orders for execution to third party liquidity providers, the Company remains the sole counterparty to the Clients' trades. Should the Client decide to open a position in a financial instrument with the Company, then that open position may only be closed with the Company. The Company implements and has in place sufficient measures to manage and/or mitigate such conflicts. For additional information please refer to the Company's Conflict of Interest Policy which can be found in the Company's Website.

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

As previously stated, the Company is the sole execution venue for the execution of the client's orders and, therefore it does not have any specific arrangement with other execution venues regarding payments, discounts, rebates or other non-monetary benefits.

7. Change in the List of Execution Venues

The Company has proceeded to change in the list of Execution Venues during the year under review by adding B2b Prime Services Eu Limited on the 09th of April 2025 in order to establish contractually the obligation and services offered.

8. Client Categorisation and Order Execution

Clients who as per the Client Categorisation Policy which can be found in the Company's Website, were classified as Retail Clients and Professional Clients are falling under the scope of the aforesaid Regulations, while Eligible Counterparties do not as per the abovementioned policy.

The order execution does not differ according to the client categorization and does not treat the two categories of clients differently, i.e. retail and professional clients.

The Company will determine the relative importance of the above Best Execution Factors by using its commercial judgment and experience in the light of the information available on the market and taking into account the criteria described below:

- a) The characteristics of the Client including the categorization of the Client as retail or professional
- b) The characteristics of the Client Order
- c) The characteristics of financial instruments that are the subject of that Order
- d) The characteristics of the execution venues to which that Order can be directed.

The Company always ensures to act fair, honest and to the best interest of its clients. The Company applies the same policy for all its clients and does not discriminate any groups of clients. Further, the Company verifies that the staff is well trained and fully understands the best execution obligations. The Risk Manager with the Head of Brokerage presents into the Senior Management any changes are required in the Order Execution Policy and any deficiencies arose during the regular reviews of the execution of orders.

9. Assessment of the Quality of Execution

The Company monitored the effectiveness of its Order Execution Policy during the year under review and relevant order execution arrangements in order to identify and implement where necessary the appropriate measures. The Company in a constant basis reviews its order execution arrangements so as to provide best execution for its clients on a continuous basis.

The Company takes into account several factors when executing client's orders such as but not limited to the price, costs, speed of execution. The Company monitors its execution arrangements on an ongoing basis by selecting appropriate samples of orders executed and evaluating the samples as described below:

a) Evaluation of Execution Quality:

- Price Latency
- Speed of Execution
- Frequency and Duration of Price Freezing
- Depth of Liquidity
- Price Transparency
- Re-quotes

b) Comparing prices relayed by price feed providers with the prices quoted by the Company

c) Monitor Slippage on a regular basis to identify whether is asymmetric or not

d) Monitor IT infrastructure (responsiveness of interfaces used, adequate integration with data providers, etc.)

The Company's control functions (compliance function and internal audit) scrutinize the monitoring procedure and the actions taken by the Company's senior management. The Company's control functions present any findings to the Company's Board of Directors, at least annually, for further actions that maybe is necessary to be implemented.

10. Consolidated Tape Provider (CTP)

The Company, as of today has not used output of a Consolidated Tape Provider (CTP) established under Article 65 of L.87(l)/2017.

11. Report on Execution Venues

The information presented below refers to the top five (5) execution venues in terms of trading volumes used by the Company for executing the orders of retail clients and professional clients. The information refers to the asset class of Contracts for Differences (CFDs) for the year 2025.

The Company's execution venues during 2025 were:

No.	Execution Venue	Country of Establishment	Commencement of the relationship with the Company
1	B2B PRIME SERVICES EU LIMITED	Cyprus	09/04/2025
3	LMAX Broker Europe Limited	Cyprus	20/10/2023

Table 1 (Retail Clients)

Information on the top five execution venues during 2025					
Class of Instrument	Contracts for Differences (CFDs)				
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
N/A	N/A	N/A	N/A	N/A	N/A

Table 2(Professional Clients)

Information on the top five execution venues during 2025					
Class of Instrument	Contracts for Differences (CFDs)				
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
N/A	N/A	N/A	N/A	N/A	N/A

Table 3(Eligible Counterparties)

Information on the top five execution venues during 2025					
Class of Instrument	Contracts for Differences (CFDs)				
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
GT Investment Services Ltd LEI: 5493009HIUXXIZW85Q58 (since 22/09/2023)	100%	100%	0% (none)	100%	0% (none)