



Execution quality summary Statement RTS 28 Report

For the period 1 January 2022 – 31 December 2022

1. Introduction

Amana Capital Ltd (hereinafter “the Company” or “Amana”) is a Cyprus Investment Firm (CIF) authorised and regulated by the Cyprus Securities and Exchange Commission (the “CySEC”), under Licence No. **155/11**.

In compliance with the Markets in Financial Instruments Directive II (MiFID II – EU Directive 2014/65/EU), and under Commission Delegated Regulation 2017/576 (RTS 28), the Company is required to publish on an annual basis the Regulatory Technical Standard 28 “RTS 28” to enable the public and investors to evaluate the quality of a firm’s execution practices and ensures that the Company takes all sufficient steps to obtain the best possible result when executing client orders.

For your benefit and protection, we urge you to read the Statement carefully as it contains analysis and conclusions the Company drew from its detailed monitoring of the quality of Clients’ orders execution during the year under review.

You should contact us for any further clarification or seek independent professional advice (if necessary).

This document is solely for your own use and cannot be published elsewhere without the written consent of the Company.

2. Execution factors: Relative importance

The Company takes all reasonable steps to act in the best interest of its Clients and obtain the best possible results when receiving, transmitting and executing Clients’ Orders.

When executing Clients’ Orders, Amana is required under the relevant regulatory framework to assign a relative importance on the following execution factors. Therefore, we place relative importance to each execution factor as follows:

Price:

Prices carry the highest importance when executing transactions for our clients. Amana receives price feeds from reputable price feed service providers. Having reliable price feeds from reliable price feed providers is important especially during abnormal market conditions such as times of extreme volatility; under these conditions and even if a certain number of liquidity providers decide to widen the spreads or stop quoting prices at all, the Company is still able to provide clients with competitive prices. For further info, please refer to the [“Order Execution Policy”](#).

Speed of Execution:

Amana places significant importance in this factor when executing Client orders and to this end we maintain high speed connections through servers hosted globally. Our execution is fully automated apart from minimal manual execution. However, the use of any form of unstable connection at the Client's end, whether wireless or dial-up, may result in poor or interrupted connectivity, which may cause delays in the transmission of data between Clients and the Company.

Costs:

Costs and currency conversion carry a high importance when executing transactions for our clients.

For opening a position in some types of Financial Instruments, the Client may be required to pay commission or other fees. Financing fees (swap) are based on the overnight rate, which may vary, plus reasonable mark-up spread. The swap rate and mark-up could vary depending on the specific instrument and on prevailing market interest rates.

For all types of Financial Instruments that the Company offers, the commission and financing fees (if applied) are not incorporated into the Company's quoted price and are instead charged explicitly to the Client account.

If applicable, fees and commissions are disclosed in the contract specifications available in the Company's website: <https://amanacapital.com.cy//pdf/product-specifications.pdf>

The company conducts certain quality checks to ensure that the costs and charges implemented remain competitive and fair for the clients.

Likelihood of execution:

The Company acts as principal and not as agent on the Client's behalf; therefore, the Company is the sole Execution Venue for the execution of the Client's orders for the Financial Instruments provided. However, the Company relies on its price service providers for prices, therefore execution of the Client's orders will depend on the pricing and available liquidity of the price feed providers. Although the Company executes all orders placed by the Clients, it reserves the right to decline at any time and with no prior notice an order of any type.

Market Order, Buy Limit, Sell Limit, Sell Stop, Buy Stop, Stop Loss, Take Profit on Financial Instrument are executed in the manner explained in '[Order Execution Policy](#)'. It should be noted that the price at which a trade is executed at may be subject to variation from original requested price during abnormal market conditions.

This may occur, for example, in the following cases:

- a. during market opening,
- b. during news times,

- c. during volatile markets where prices may move significantly up or down and away from declared price,
- d. where there is rapid price movement, if the price rises or falls in one trading session to such an extent that under the rules of the relevant exchange, trading is suspended or restricted,
- e. if there is insufficient liquidity for the execution of the specific volume at the declared price. The Company strives to provide the best possible price to its clients, and makes every effort and necessary arrangements to do so.

Clients' trades are executed in the same manner and with the same ranking of importance of Execution Factors irrespective of the Clients' categorization. Therefore, the Company ensures that Best Execution obligation is met towards to both Retail and Professional Clients.

Other execution factors:

- Likelihood of settlement; Size of order;
- Size of order;
- Market Impact;
- Nature of order;

3. Execution venues

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 at all times. Even where the Company transmits the orders for execution to third party liquidity providers, which the Company evaluate and select based on a number of criteria including but not limited to the regulatory status of the institution, financial strength, quality of service, accuracy of trade confirmations, settlement and clearing; the Company remains the sole execution venue for execution of 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. Please refer to the [Order Execution Policy](#) for further information as published on our website.

4. Conflicts of interest

Amana maintains relationships with a sufficient number of liquidity providers in accordance with the extent and nature of its trading activities.

The Company does not receive any financial or non-financial benefits from the liquidity providers for the execution of Clients orders. The liquidity providers fee is based on trading volume that does not create a conflict of interest.

In addition, Amana does not have close links or/and common ownerships with respect to its liquidity providers.

Conflicts of interest between the Amana's own interests as an execution venue and a client's interests are managed in accordance with the Company's [conflict of interest](#) policy.

5. Review and monitoring

The Company during the year under review deployed several methodologies and tools in order to monitor, and where applicable adjust, its execution parameters in order to ensure consistency with its overarching obligation to offer the best possible result for its clients' orders.

In broad terms the Company utilises a price aggregator and monitors on an ongoing basis its execution arrangements by selecting appropriate samples of orders executed and evaluates the samples in accordance to the following factors.

- Pricing Frequency (price updates in real time);
- Speed of execution;
- Frequency and duration of price freezing;
- Depth of liquidity;
- Pricing transparency;
- Slippage frequency etc.

Price Fairness is achieved by comparing independent prices, in real time, relayed by independent market data providers with the prices quoted by its execution venues. For this purpose, the Company has subscribed to independent price aggregators.

6. RTS 28 summary table

The information refers to the Asset Class of CFDs for the year **2021**.

Class of Instrument	Contracts for Difference				
Notification if <1 average trade per business day in the previous year	No				
Top five execution venues ranked in terms of trading volumes (descending order)	Proportion of volume trades as a percentage of total in the class	Proportion of orders executed as a percentage of total in the class	Percentage of passive orders	Percentage of Aggressive Orders	Percentage of Directed Orders
Amana Capital Ltd LEI:5493006M96F5KNONQE31	100%	100%	0%	100%	0%