

EXECUTION QUALITY SUMMARY REPORT FOR THE YEAR ENDED 31 DECEMBER 2023 REGULATORY TECHNICAL STANDARD 28 REPORT

Skilling Limited

30 April 2024

Skilling Ltd is authorised and regulated by the Cyprus Securities and Exchange Commission (CySEC) under CIF licence No. 357/18 (the 'Company'), and Cyprus Registration No.HE373524, 62 Athalassas Avenue, Strovolos, CY-2012 Nicosia, Cyprus.



OVERVIEW

The Company prepared a Report and RTS 28 to inform investors about its order execution practices and factors influencing it, in line with the Article 27 of the Directive 2014/65/EU (MiFID II), adopted in the EU Commission Delegated Regulation (EU) 2017/576 (the "RTS 28"). The Report provides information on execution venues where the Company executed its Clients' orders as of 31 December 2023.

This Report will remain on the Company's website for a period of two (2) years at least post its publication.

1. EXECUTION VENUES REPORT¹

The below table provides a summary of the top five execution venues for the Company's 2023 Contracts for Difference financial instrument:

Class Of Instrument	Contracts for Difference (CFDs)	
Notification if <1 average trade per business day in the previous year	Ν	
Top five execution brokers 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
Skilling Limited (LEI: 549300E0FB8IPAUXWV89)	100%	100%

2. RELATIVE IMPORTANCE ON EXECUTION FACTORS DURING THE YEAR UNDER REVIEW

In 2023, the Company prioritised achieving optimal results for its clients by considering various Execution Factors in order of importance as follows:

Cost and Charges: Skilling provides its services with associated fees including brokerage fees, commissions, swaps, spreads/rollover, mark-ups, and additional position fees/commissions on swap-free accounts, among others. Details regarding the costs and charges for our various Account Types, along with fee calculation, can be found on our 'Costs & Charges' page and in our 'Key Information Documents' (KIDs) available in 23 EU member state languages, on our website. Ensuring competitive and fair costs and charges for clients is a priority, with the execution factor ranking among the top two in importance. To maintain quality, the Company conducts regular checks to validate the competitiveness and fairness of the costs and charges applied.

Price: Skilling's pricing structure for CFD products is determined by the price of each underlying asset, sourced from Liquidity Providers or reputable third-party sources. Clients have access to all prices via our website or trading platforms, with regular updates subject to technological and communication limitations. External third-party sources undergo periodic review to ensure competitiveness and accuracy of market data. Price quotes are restricted to operational hours to prevent client orders

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¹ The information provided does not indicate the receipt and transmission of orders by clients classified as "Eligible Counterparties".



outside these times. Moreover, the Company conducts ex-ante and ex-post quality reviews to ensure competitive pricing based on parameters, spreads, and systems passed on to clients.

Likelihood of Execution: Skilling may encounter situations where it is unable to execute orders due to various factors, including volatile market conditions, significant price fluctuations from initial declared prices, rapid price movements, insufficient liquidity for specific volumes at declared prices, or occurrence of force majeure events. If Skilling cannot proceed with an order due to price, size, or other reasons, the order will either not be executed or executed only partially. Regarding Straight-Through-Processing (STP) executions, there were rare instances of such executions in 2023, and the likelihood of execution depends on the order pricing and available liquidity of execution venues.

Speed of Execution: Skilling aims to provide clients with high-speed order execution within the constraints of available technology and communication mediums. In 2023, the average execution time was within milliseconds, consistent with both our Liquidity Providers and industry standards. Regular review of processes ensures the continual improvement of order execution speed, monitored through weekly reports tracking execution speed, slippage, and other relevant factors to maintain execution quality.

The website provides additional information about the Order Execution Policy.

3. RECEPTION AND TRANSMISSION OF ORDERS TOP 5 AFFILIATED LIQUIDITY PROVIDERS

There were no changes in the execution venues during the year of 2023.

4. DATA ON PASSIVE AND AGGRESSIVE ORDERS

In 2023, there were no executions of passive or aggressive orders.

5. CLOSE LINKS WITH EXECUTION VENUES

In 2023, there were no close links, conflicts of interests, or common ownerships identified concerning any execution venues or affiliated liquidity providers used for executing clients' orders. Skilling maintained Liquidity Provider Agreements with StoneX Ltd, Broctagon Prime Ltd, and MTG Liquidity Ltd. Currently, there are no identified close links between the Company and these Liquidity Providers.

The Conflict of Interest Policy, which can be found on our website, is used to manage conflicts of interest.

6. PAYMENTS OR NON-MONETARY BENEFITS

Skilling received no rebates, payments, discounts, or non-monetary benefits (inducements) from Liquidity Provider Arrangements and/or Price Providers that could affect the services provided to clients during 2023. Similarly, there were no specific arrangements involving payments to Liquidity Providers or hedging venues to report for that year.

7. CHANGE OF EXECUTION VENUES DURING THE YEAR UNDER REVIEW

In 2023, there were no changes to the execution venues.



8. CLIENTS CATEGORISATION WITH RESPECT TO EXECUTION ARRANGEMENTS

Skilling applied the same best execution factors uniformly to all orders, regardless of client categorization in 2023. Both Retail and Professional Clients received equal consideration and priority in execution. Additionally, the company had no business relationships with Eligible Counterparties (ECPs) during the year.

9. DATA OR TOOLS USED RELATED TO THE QUALITY OF EXECUTION

In 2023, we relied on external technology providers to assess the performance of execution venues by evaluating execution speed, rejection rates, and slippage. Additionally, we employed a technology provider to gather the data required under RTS 27 for orders executed on Own Account.

10. EXPLANATION OF HOW THE INVESTMENT FIRM HAS USED OUTPUT OF A CONSOLIDATED TAPE PROVIDER ESTABLISHED UNDER ARTICLE 65 OF DIRECTIVE 2014/65/EU

As of 2023, the Company did not use any output from a consolidated tape provider.

11. SUMMARY OF EXECUTION QUALITY

Disclosure regarding other criteria that were given precedence over immediate price and cost when executing retail Clients orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the Clients: The Company's Best Execution criteria related to Retail Clients' orders are determined on the basis of the total consideration paid to or by the Clients.