

KVB PRIME (UK) Limited
RTS 28 Disclosure

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1 Introduction

KVB PRIME (UK) Limited is primarily a matched principal broker offering CFDs. It is therefore the sole execution venue for orders and acts as principal in the execution of those trades. Prices provided to clients are sourced from high quality Liquidity Provider(s).

This report ("Report") is published by KVB PRIME in fulfilment of its obligations under Commission Delegated Regulation (EU) 2017/576 and article 27(6) of Directive 2014/65/EU, as implemented (collectively, "MIFID II RTS 28").

The terms "passive orders", "aggressive orders" and "directed orders" shall have the meanings assigned to them under MIFID II RTS 28.

2 Qualitative Report

2.1 Relative importance of execution factors

The firm is mainly active in CFDs for retail clients, and therefore has to assess its Best Execution quality in terms of Total Consideration which is in relation to price and costs. To achieve the best possible results, the firm has strived to source the best price for the instruments traded from top quality liquidity providers. As we have no data for a year we shall be monitoring the results to ensure we are satisfied it has managed to achieve the anticipated results.

If the client order is very large and to ensure that the slippage will not jeopardise the quality of execution obtained, the firm will systemically split the order into orders of maximum size 5,000,000.

Should Clients give KVB PRIME specific instructions as to how they require the transactions to be executed, the duty of best execution will be limited to those matters that are not covered by specific instructions.

2.2 Conflicts of interests

The firm sources liquidity solely from Tradetech Alpha Limited. Tradetech Alpha Limited is a company registered in the United Kingdom under registration number 8663212. The only commonality was the fact that a previous Director, Peter Romilly was a Director of Tradetech Alpha however he resigned on 17th April 2019. So currently no conflicts of interests are presented.

2.3 Payments or other arrangements with third party execution venues

KVB PRIME does not have any specific arrangements with any external execution venues or brokers used to execute client orders as we are the sole execution venue.

2.4 Venue Changes

There were no changes to KVB PRIME's execution venue(s).

2.5 Order execution across client categories

In line with our best execution policy, best execution for retail clients was determined in terms of total consideration. For professional clients, best execution was generally determined by price and cost but where required, however, other execution factors such as likelihood of execution were given priority.

2.6 Precedence of other execution factors in executing retail client orders

Not applicable as price and cost always take precedence over other factors in executing orders for retail clients except where specific instructions have been received from the client in respect of that order.

2.7 Use of any data or tools relating to execution quality

KVB PRIME does not use such tools

Top Five Venues and brokers

Class of instrument	Contracts for Differences				
Notification if <1 average trade per business day in the previous year	N/A				
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	Proportion of passive orders ¹	Percentage of aggressive orders ²	Percentage of directed orders
KVB PRIME (UK) Limited 213800S8F9EWJX787N61	100%	100%	0%	100%	0%

¹ Orders entered into the order book that provided liquidity

² Orders entered into the order book that took liquidity. KVB PRIME is the execution venue, all orders executed are defined as taking liquidity