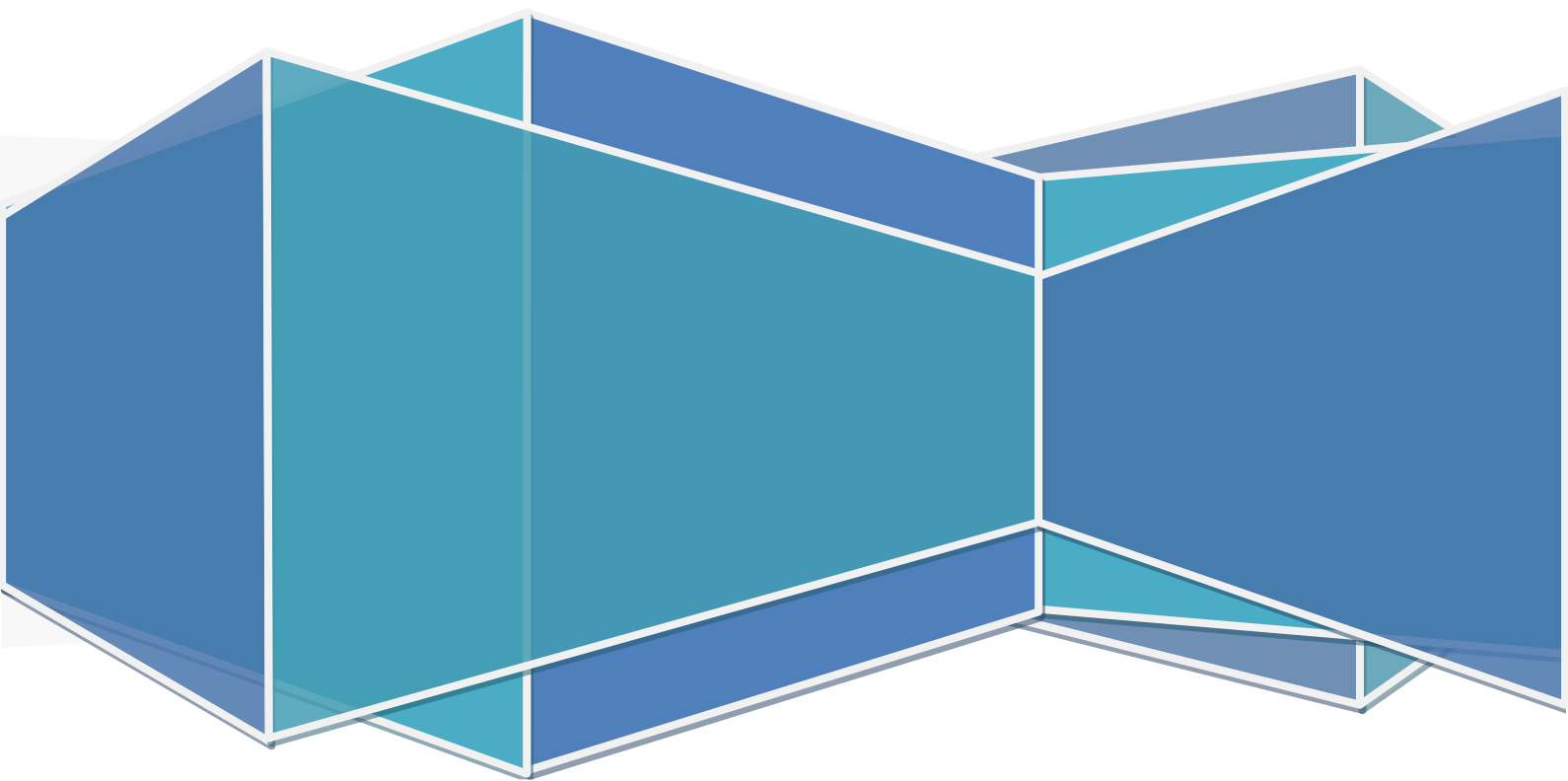




RTS 28 Disclosure
2020



INTRODUCTION AND SCOPE

RTS 28 Disclosure provides an explanation of the relative importance Blue Suisse Limited (hereafter “BlueSuisse”) gives to the execution factors of price, costs, speed, and likelihood of execution and other consideration including qualitative factors when assessing the quality of execution in line with the *Order Execution Policy*.

CLOSE LINKS, CONFLICT OF INTEREST, AND COMMON OWNERSHIP

There are no close links between multiple execution venues (also known as “Liquidity Providers”), within the meaning of Art. 4 of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments. There are no close links between BlueSuisse and the used execution entities. During the year in review, BlueSuisse had no conflict of interest with its clients or its executions venues. There is no common ownership of assets or companies between the execution venues or between BlueSuisse and its execution venues.

SPECIAL ARRANGEMENTS WITH EXECUTION VENUES

BlueSuisse and its execution venues conduct business on a contractual basis. BlueSuisse pays its execution venues a volume-based commission or a fixed monthly amount in case the minimum volume is not met. There are no special arrangements outside the main contract with regards to payments made or received, discounts, rebates, or non-monetary benefits received.

EXECUTION VENUES

During the year in review, BlueSuisse clients were mainly traded on two different Trading Venues as also explained in the below table:

Swissquote Bank Ltd.	
Proportion of volume traded as percentage of total	86.3%
Proportion of orders executed as percentage of total	84.7%

Finalto Financial Services Limited	
Proportion of volume traded as percentage of total	13.7%
Proportion of orders executed as percentage of total	15.3%

Equiti Capital UK Limited	
Proportion of volume traded as percentage of total	<0.1%
Proportion of orders executed as percentage of total	<0.1%

LMAX Broker Limited	
Proportion of volume traded as percentage of total	<0.1%
Proportion of orders executed as percentage of total	<0.1%

In line with ESMA Q&A 14 on *MiFID II and MiFIR investor protection and intermediary topics*, since BlueSuisse is receiving and transmitting orders on behalf of clients, the only distinction being made is in respect of volume traded and orders executed with the Execution Venue.

During the period under review, BlueSuisse added Finalto Financial Services Limited. AFX Capital Markets Limited which was acting as an Execution Venue as from 2019 saw its license suspended by CySEC during 2019.

During the period under review, BlueSuisse financial instruments were Contract for Difference.

EXECUTION OF ORDERS ACCORDING TO CLIENT CATEGORISATION

BlueSuisse classifies its clients into three categories:

- Eligible Counterparty
- Professional Clients
- Retail Clients.

BlueSuisse makes no difference between the different client categories with respect to the execution of their orders. In case of Eligible Counterparties, BlueSuisse will open a designated account at the named Execution Venue.

DATA OR TOOLS

BlueSuisse has not used any external data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) 2017/575.