

## Gamma Capital Trader Ltd - RTS 28: Qualitative Analysis

<p>1. Explanation of the relative importance the firm gave to the execution factors of price, costs, speed, likelihood of execution or any other consideration including qualitative factors when assessing the quality of execution;</p>	<p>The importance of the various execution factors stipulated by the Rules will vary depending on the circumstances and context of the order. The main execution factors we consider in normal market conditions are execution price and costs. Secondary execution factors we take into account when assessing the quality of execution are speed, likelihood of execution, type &amp; size of the order, as well as settlement.</p> <p>In conditions where the market is poorly liquid, the main execution factors we consider are likelihood of execution and price.</p>
<p>2. Description of any close links, conflicts of interests, and common ownerships with respect to any execution venues used to execute orders;</p>	<p>Gamma Capital Trader Ltd does not have any close links, conflicts of interests or common ownerships with respect to any execution venues used to execute orders.</p>
<p>3. Description of any specific arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received;</p>	<p>The Firm does not have any arrangements with any execution venues regarding payments made or received, discounts, rebates or non-monetary benefits received.</p>
<p>4. Explanation of the factors that led to a change in the list of execution venues listed in the firm's execution policy, if such a change occurred;</p>	<p>This is the first Report and there are no changes to note in the list of Brokers listed in the firm's Best Execution Policy.</p>
<p>5. Explanation of how order execution differs according to client categorisation, where the firm treats categories of clients differently and where it may affect the order execution arrangements?</p>	<p>All Gamma Capital Traders clients are treated the same under its Best Execution Policy.</p>
<p>6. Explanation of whether other criteria were given precedence over immediate price and cost when executing retail client orders and how these other criteria were instrumental in delivering the best possible result in terms of the total consideration to the client?</p>	<p>For retail clients, the best possible result will always be determined in terms of the total consideration, being the price of the financial instrument together with the costs related to execution, including all expenses incurred by the client that are directly related to the execution of the order.</p>

	<p>However, if a retail client provides us with instructions regarding an order or any aspect of an order, we will execute the order in accordance with such instructions to the extent as reasonably possible, which may prevent us from taking the steps to execute at the best prices and/or costs.</p> <p>In 2017, Gamma Capital Trader did not execute any trades on behalf of Retail Clients.</p>
<p>7. Explanation of how the investment firm has used any data or tools relating to the quality of execution, including any data published under Commission Delegated Regulation (EU) .../...to be inserted before publication [RTS 27]?</p>	<p>During 2017, Gamma Capital Trader Ltd has regularly monitored the quality of execution obtained from the brokers used to place client orders for execution. Each trade is monitored by the traders when placing the trade instruction to ensure that it is executed on the best terms available. It is a prerequisite of the terms of business of all brokers used by Gamma Capital Trader Ltd that they must provide the firm's clients with best execution. From 2018, the company will have access to analysis published by brokers on a quarterly basis to indicate how well the brokers have performed in achieving best execution in relation to price against others in the market. The Company will use this on a regular basis to consider whether the brokers used have provided the best possible results for clients.</p>
<p>8. Where applicable, an explanation of how the investment firm has used output of a consolidated tape provider established under Article 65 of Directive 2014/65/EU?</p>	<p>This is not applicable, as there are currently no consolidated tape providers in Europe.</p>