



**INVESTMENTS
LIMITED**

COSTS AND CHARGES POLICY

Approved by the Board of Directors
on 26 of April 2019
Limassol

POLICY REVISION HISTORY

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1	December 2017	Draft (by Meerkat)
2	27 December 2017	Approved by Board of Directors
3	December 2018	Changes are approved by Board of Directors
4	26 April 2019	Approved by Board of Directors
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RECIPIENTS:

- Board of Directors
- Senior Managers
- Department Heads
- Compliance Officer
- Risk Manager

CONTENTS

1. INTRODUCTION	4
2. EX-ANTE DISCLOSURE OF INFORMATION ON COSTS AND CHARGES	4
3. EX-POST DISCLOSURE OF INFORMATION ON COSTS AND CHARGES	5
4. ANNEX 1	6
5. ANNEX 2: CUMULATIVE EFFECT OF COSTS ON RETURN	11

1. INTRODUCTION

Following the implementation of the Markets in Financial Instruments Directive 2014/65/EU (“MiFID II”) and in accordance to the provisions of the Financial Services and Activities and Regulated Markets Law of 2017 (the “Law”) of the Cyprus Securities and Exchange Commission (“CySEC”), NBI Investments Limited (the “Company”) is required to provide to clients or potential clients in good time information on all costs and related charges. Such information relates to both investment services and ancillary services, including the cost of advice, where relevant, the cost of the financial instrument recommended or marketed to the client and how the client may pay for it, also encompassing any third-party payments.

When providing investment services to professional clients, the Company has the right to agree to a limited application of the detailed requirements set out in this policy with these clients, except irrespective of the investment service provided, the financial instruments concerned embed a derivative.

When providing investment services to eligible counterparties, the Company has the right to agree to a limited application of the detailed requirements set out in this policy, except when, irrespective of the investment service provided, the financial instruments concerned embed a derivative and the eligible counterparty intends to offer them to its clients.

2. EX-ANTE DISCLOSURE OF INFORMATION ON COSTS AND CHARGES

- A. For ex-ante disclosure of information on costs and charges to clients, the Company shall aggregate the following:
1. All costs and associated charges charged by it or other parties where the client has been directed to such other parties, for the investment services(s) and/or ancillary services provided to the client. Third party payments received by the Company in connection with the investment service provided to a client will be itemised separately, and the aggregated costs and charges will be totalled and expressed both as a cash amount and as a percentage; and
 2. All costs and associated charges associated with the manufacturing and managing of the financial instruments.

The costs referred to in points 1) and 2) above include:

- a) **Charges associated with the provision of investment services**
As per the attached Annex 1.
- b) **Charges associated with the provision of ancillary services**
As per the attached Annex 1.
- c) **Charges related to the financial instrument**
One-off charges and on-going charges as per the ones cited in point A(a) above, which refer to the cost of the product, will also be disclosed.
- d) **Incidental costs**
Where any part of the total costs and charges is to be paid in or represents an amount of foreign currency, the Company will provide an indication of the currency involved and the applicable currency conversion rates and costs.

- B. When calculating costs and charges on an ex-ante basis, the Company will use actually incurred costs as a proxy for the expected costs and charges. Where actual costs are not available, the Company will make reasonable estimations of these costs. The Company will review ex-ante assumptions based on its ex-post experience and will make adjustment to these assumptions, where necessary.
- C. The Company will provide its clients with an illustration showing the cumulative effect of costs on return when providing investment services. The Company will ensure that the illustration meets the following requirements:
- a) the illustration shows the effect of the overall costs and charges on the return of the investment;
 - b) the illustration shows any anticipated spikes or fluctuations in the costs; and
 - c) the illustration is accompanied by a description of the illustration.

A relevant ex-ante illustration of the effect of costs on returns is depicted in Annex 2 of this document.

3. EX-POST DISCLOSURE OF INFORMATION ON COSTS AND CHARGES

- A. The Company will also provide annually ex-post information about all costs and charges related to both the financial instrument(s) and investment and ancillary service(s), where it has recommended or marketed the financial instrument(s) and it has or has had an ongoing relationship with the client during the year. Such information will be based on costs incurred and will be provided on a personalised basis.

The Company may choose to provide such aggregated information on costs and charges of the investment services and the financial instruments together with any existing periodic reporting to clients.

- B. The illustration showing the cumulative effect of costs on return when providing investment services cited in Section 2(C) above will be provided on an ex-post basis as well.

4. ANNEX 1

Annex 1 is attached (on 5 pages).

RATES AND TERMS OF THE COMMISSIONS of NBI INVESTMENTS LTD for the brokerage and ancillary services							
		For transactions in DMA electronic systems (Quik, CQG etc.) made by the Client itself/ Для операций в электронных торговых системах (Quik, CQG etc.), совершаемых клиентом самостоятельно		For non-electronic transactions / Для операций вне электронных-торговых систем			
		Rate / Fee Ставка комиссии	Minimum fee for an active trading day (unless otherwise stated)/ Минимальная комиссия за активный торговый день (если не указано иное)	Transaction Volume / Объем сделки	Rate / Fee Ставка комиссии	Minimum fee for an active trading day (unless otherwise stated)/ Минимальная комиссия за активный торговый день	Notes / Комментарии
1	OTC-instruments / Внебиржевые инструменты (OTC)						
1.1	OTC Eurobonds / Евробонды			< 1 mio USD/EUR for a trading day / за торговый день	0.30%	EUR/USD 100 for an active trading day / за активный торговый день	USD / EUR - depending on the currency of the transaction/ в зависимости от валюты транзакции
				>1<5 mio USD/EUR for a trading day / за торговый день	0.20%		
				> 5 mio USD/EUR for a trading day / за торговый день	0.10%		
1.2	OTC other instruments/transactions not specified herein / Прочие внебиржевые инструменты/сделки, не указанные здесь				0.30%	USD/EUR 50	
1.3	Private placement yield enhancement products, derivative products and structured notes				flexible from 0.3% to 3%.	Eur/USD 1000 for an active trading day / за активный торговый день	

2	Stock exchanges / Операции на биржах							
2.1.	USA	USD 0.02 for a share / за акцию	USD 10 for an active trading day / за активный торговый день		0.30%	USD 30		
2.2.	LSE	0.05%			0.30%	USD 30		
2.3	Moscow SE / Московская Биржа	0.05%	RUR 300 for an active trading day / за активный торговый день		0.30%	RUR 1000		
2.4	Other stock exchanges / Прочие биржи	0.05%	USD/EUR 10 for an active trading day / за активный торговый день		0.30%	EUR 30 / USD 30	USD / EUR - depending on the currency of the transaction / в зависимости от валюты транзакции	
2.5	Moscow SE (FORTS section) / Московская Биржа (Срочный рынок)	0.01%	RUR 300 for an active trading day / за активный торговый день		0.05%	RUR 1000	of amount of the opened/closed position / от суммы открытой/закрытой позиции	
2.6	Derivatives on global markets / Деривативы на глобальных рынках	3 USD/EUR for a contract / за контракт	USD/EUR 10 for an active trading day / за активный торговый день		6 USD/EUR for a contract / за контракт	EUR 30 / USD 30	USD / EUR - depending on the currency of the transaction / в зависимости от валюты транзакции	
3	REPO / РЕПО (ОТС)	As agreed with the Client / По договоренности с клиентом						
4	Currency transactions / Операции с валютой							
4.1.	Currency conversion (for securities trading only) / Конверсионная операция (исключительно для целей приобретения инвестиционных инструментов)				0.10%	EUR 20 for an order / за поручение		
5	Special transactions / Специальные транзакции							
5.1.	Transaction with non-public (non-listed) instruments / Операции с непубличными (небиржевыми) инструментами	As agreed with the Client / По договоренности с клиентом					EUR 500	

5.2.	Transaction with banking deposit instruments of Russian banks (deposit certificates, promissory notes etc.) / Операции с банковскими депозитными инструментами российских банков (депозитные сертификаты, векселя)		EUR 300	
6	Safe-custody services (if not specified otherwise for some kinds of instruments/transactions / Депозитарные услуги (если для некоторых видов инструментов/операций не утсановлено иное)			
6.1.	safe-keeping of the listed securities / Хранение листингованных ценных бумаг	From EUR 5 per month for each financial instrument / от 5 Евро в месяц за каждый фин. инструмент to 0.2% per annum from average assets value per year/ до 0.2% годовых от средней стоимости активов		Incl. structured notes and Eurobonds / Включая структурные ноты. и Евробонды
6.2.	safe-keeping of non-listed securities / Хранение нелистингованных ценных бумаг	Up to 3.5 % per annum from average assets value / До 3.5 % годовых от средней стоимости активов		
6.3.	safe-keeping of "hard paper" securities / Хранение ценных бумаг в бумажно-документарной форме	Up to 3.5 % per annum from average assets value / До 3.5 % годовых от средней стоимости активов		Incl. promissory notes / вкл. Векселя
6.4.	Accepting securities to brokerage account and/or for safe-keeping / Зачисление ценных бумаг на брокерский счет и/или депозитарное хранение	Free of charge / Бесплатно		
6.5.	Transfer of listed securities out of the acc. / Вывод с брокерского счета биржевых ценных бумаг	EUR 20 for each order / за поручение		
6.6.	Transfer of non-listed or "hard-paper" securities out of the acc. / Вывод с брокерского счета внебиржевых ценных бумаг и ЦБ в бумажно-документарной форме	As agreed with the Client / По договоренности с клиентом		EUR 100
6.7.	Withdrawal of monetary funds out of the acc. / Вывод с брокерского счета денежных средств	EUR 20 for an order / за поручение		
7	Documentary services / Документарные услуги			
7.1.	Representing Client's interests as the holder of securities (shares or bonds). Including but not limited to: /	As agreed with the Client / По договоренности с клиентом		EUR 200 Extra Reimbursement of all expenses for the communications, business-

	Представление интересов клиента как владельца ценных бумаг (акций или облигаций). В том числе (но не ограничиваясь):			trips, involvement of third parties etc. / Плюс возмещение всех расходов на коммуникации, командировки, привлеченных третьих лиц и т.д.
		<i>taking part in shareholders meeting (incl. distant voting) / участие в собрании акционеров (вкл. заочное голосование)</i>		
		<i>submission of the securities for the buy-out / предъявление ценных бумаг к выкупу</i>		
		<i>initiation and execution of any other holder's rights provided by securities / инициация и реализация иных прав владельца, предоставляемых ценными бумагами</i>		
7.2.	Issuance by NBI of power-of-attorney to the Client for realisation of securities holder's rights / Выдача NBI доверенности клиенту на реализацию прав владельца ценных бумаг		EUR 20	Extra Reimbursement for third party's certification, Apostille etc. / Плюс возмещение расходов на заверение третьей стороной, Апостиль и т.д.
8	Minimum commission threshold / Минимальный порог комиссии			
8.1.	Minimum quarterly (or yearly - as chosen by client below) commission threshold (to be recouped by any working fees paid to NBI within the reporting period under either brokerage or safe-custody agreement) / Минимальный порог комиссии в квартал (или год - как выбрано клиентом ниже). (Зачитывается против любых комиссий в рамках брокерского и депозитарного договоров, уплаченных клиентом NBI в течение отчетного периода)		EUR 150 quarterly OR EUR 1000 yearly (at client's choice) / EUR 150 в квартал ИЛИ EUR 1000 в год (на выбор клиента)	The commissions of the third parties reimbursed to NBI for the client's account do not relate to this point. / Комиссии третьих лиц, возмещаемые NBI за счет клиентских средств, не относятся к настоящему пункту.
	In case the summarized commissions paid to NBI by the Client within the reporting period are equal or more than the said minimum commission threshold no additional fees are to be paid. Otherwise NBI shall withhold the difference between the total commission amount and the minimal threshold amount from the Client's account as a special fee for the account maintenance / В случае, если совокупные комиссии, уплаченные NBI клиентом в течение отчетного периода, равны или превышают указанный минимальный порог комиссии, дополнительной комиссии не уплачивается. В противном случае, NBI удерживает со счета клиента разницу между совокупной суммой комиссий и минимальным порогом комиссии в качестве специальной комиссии за ведение счета.			
	IF THE CLIENT CHOOSES A QUATERLY COMISSION THRESHHOLD. The reporting period is equal to a calendar quarter. The first one starts: (a) if there have not been any transactions on the account - from the calendar quarter next to the agreement date; (b) if there have been any transactions on the account - from the calendar quarter of the account opening. ЕСЛИ КЛИЕНТ ВЫБИРАЕТ КВАРТАЛЬНЫЙ ПОРОГ КОМИССИИ. Отчетный период равен календарному кварталу. Первый период начинается: (a) если по счету не было никаких операций - с календарного квартала, следующего за датой договора; (b) если по счету были любые операции - с календарного квартала, в котором счет был открыт.			

<p>IF THE CLIENT CHOOSES A YEARLY COMISSION THRESHHOLD. The reporting period is equal to a year (365 calendar days) since the 1st day of the month nex to to the agreement date. ЕСЛИ КЛИЕНТ ВЫБИРАЕТ ГОДОВОЙ ПОРОГ КОМИССИИ. Отчетный период равен одному году (365 календарных дней) с 1го числа месяца, следующего за датой договора.</p>			
<p>In case of closing the account or withdrawal of all assets (remaining less than threshold amount) from the account, the calculation and withholding of the minimum remuneration is done as if for the full reporting period (a quarter or a year as chosen by client) in which such event takes place / При закрытии счета или выводе со счета всех активов (остается менее суммы минимального порога комиссии), расчет и удержание минимальной комиссии происходит как за полный отчетный период (квартал или год - как выбрано клиентом), в котором такое событие наступило</p>			
<p>The option of the commission threshold reporting period chosen by the Client as per clause 8. of the present tariffs is: / Касательно п. 8. настоящих тарифов, Клиент выбирает период для минимального порога комиссии:</p>	<p>EUR 150 QUATERLY / ЕЖЕКВАРТАЛЬНО</p>		<p>Sign here to choose / Для выбора подпишите здесь</p>
	<p>EUR 1000 YEARLY / ЕЖЕГОДНО</p>		<p>Sign here to choose / Для выбора подпишите здесь</p>
<p>Other NOTES</p>			
<p>The commission "rate" shall meen a percentage of a transaction (deal) amount / Комиссионная "ставка" означает процент от суммы операции (сделки)</p>			
<p>The commissions specified here are understood on the terms ALL EXTRA. It means that the commissions of the third parties (stock-exchanges, upper brokers, custodians etc.) as well as other NBI's expenses related to providing the brokerage and ancillary services are to be reimbursed to NBI for the client's account separately and irrespective of the NBI's fees, as specified in the brokerage and/or safe-custody agreements/ Приведенные здесь комиссии понимаются на условиях ALL EXTRA ("все отдельно"). Это означает, что комиссии третьих лиц (бирж, верхних брокеров, депозитариев и т.д.), а также прочие расходы NBI, относящиеся к оказанию брокерских и сопутствующих услуг, подлежат возмещению NBI за счет клиентских средств отдельно и независимо от вознаграждения NBI - как определено в брокерском и/или депозитарном соглашениях.</p>			

5. ANNEX 2: CUMULATIVE EFFECT OF COSTS ON RETURN

Investment Scenario 1		
Amount invested	EUR100,000	
Investment / ancillary services offered	Reception & Transmission, Execution of orders and safekeeping	
Expected return before the deduction of costs and charges	5,00%	
Charges Summary		
Charge	Amount	% of investment
Investment / Ancillary Services		
• Transaction services	500	0,50%
• Settlement services	50	0,05%
• Custody services	200	0,20%
Total services cost	750	0,75%
Investment product cost	0	0,00%
Third party payments	0	0,00%
Total costs and charges	750	0,75%
Cumulative effect of costs and charges on return		
Expected return before the deduction of costs and charges (gross)	5,00%	
Expected return after the deduction of costs and charges (net)	4,25%	
Cumulative effect	0,75%	

Investment Scenario 2		
Amount invested	EUR100,000	
Investment / ancillary services offered	Portfolio Management	
Expected return before the deduction of costs and charges	5,00%	
Charges Summary		
Charge	Amount	% of investment
Investment / Ancillary Services		
<ul style="list-style-type: none"> • Investment Management • Custody services 	1,000	1,00%
	50	0,05%
Total services cost	1050	1,05%
Success fee	400	0,40%
Third party payments	0	0,00%
Total costs and charges	1,450	1,45%
Cumulative effect of costs and charges on return		
Expected return before the deduction of costs and charges (gross)	5,00%	
Expected return after the deduction of costs and charges (net)	3,55%	
Cumulative effect	1,45%	

Investment Scenario 3		
Amount invested	EUR100,000	
Investment / ancillary services offered	Investment Advice	
Expected return before the deduction of costs and charges	5,00%	
Charges Summary		
Charge	Amount	% of investment
Investment / Ancillary Services		
<ul style="list-style-type: none"> • Investment Advice • Transaction Services • Settlement services • Custody services 	500	0,50%
	500	0,50%
	50	0,05%
	200	0,20%
Total services cost	1250	1,25%
Investment product cost	0	0,00%
Third party payments	0	0,00%
Total costs and charges	1250	1,25%
Cumulative effect of costs and charges on return		
Expected return before the deduction of costs and charges (gross)	5,00%	
Expected return after the deduction of costs and charges (net)	3,75%	
Cumulative effect	1,25%	