



**INVESTMENTS  
LIMITED**

# **COSTS AND CHARGES POLICY**

Approved by the Board of Directors  
on December 02 2019  
Limassol

## POLICY REVISION HISTORY

| No. | Date             | Description   |
|-----|------------------|---|
| 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                            |
| 5   | 02 December 2019 | Changes in Annex 1 are approved by the Board of Directors |
| 6   |                  |   |
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### RECIPIENTS:

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

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## 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 itemized separately, and the aggregated costs and charges will be totaled 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 personalized 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/<br>Для операций в электронных торговых системах (Quik, CQG etc.), совершаемых клиентом самостоятельно |   | For non-electronic transactions / Для операций вне электронных торговых систем      |   | Notes / Комментарии  |
|  |  | Rate / Fee<br>Ставка комиссии *<br>ALL EXTRA   | Minimum fee for an active trading day (unless otherwise stated)/<br>Минимальная комиссия за активный торговый день (если не указано иное) | Rate / Fee Ставка комиссии *  | Minimum fee for an active trading day (unless otherwise stated)/<br>Минимальная комиссия за активный торговый день (если не указано иное) |  |
| 1  | FIXED INCOME INSTRUMENTS AND STRUCTURED NOTES / ОБЛИГАЦИИ И СТРУКТУРНЫЕ НОТЫ   |  |   |   |   |  |
| 1.1.   | EUROBONDS / ЕВРООБЛИГАЦИИ  | 0.02%  | USD 20,00 for an active trading day / за активный торговый день   | 0.25%   | EUR/USD 200,00 for an active trading day / за активный торговый день  | USD / EUR - depending on the currency of the transaction/ в зависимости от валюты транзакции |
| 1.2.   | OTC other instruments/transactions not specified herein / Прочие внебиржевые инструменты/сделки, не указанные здесь  | 0.03%  | USD 20,00 for an active trading day / за активный торговый день   | 0.30%   | EUR/USD 200,00 for an active trading day / за активный торговый день  |  |
| 1.3.   | Private placement yield enhancement products, derivative products and structured notes/ Финансовые продукты повышенной доходности, деривативы и структурные ноты |  |   | flexible from 0,3% to 3% - As agreed with the Client / По договоренности с клиентом | EUR/USD 1000,00 for an active trading day / за активный торговый день   |  |

|      |  |                                 |   |                                 |  |   |
|------|--|---------------------------------|---|---------------------------------|--|---|
| 2    | <b>EQUITY INSTRUMENTS BY TRADING VENUE / АКЦИИ НА ТОРГОВЫХ ПЛОЩАДКАХ</b>   |                                 |   |                                 |  |   |
| 2.1. | <b>US Market (NYSE, NASDAQ) / Американские фондовые биржи</b>  | USD 0,02 for a share / за акцию | USD 20,00 for an active trading day / за активный торговый день     | 0.25%                           | USD 20,00 per order / за поручение     |   |
| 2.2. | <b>LSE / Лондонская биржа</b>  | 0.05%                           | USD 20,00 for an active trading day / за активный торговый день     | 0.25%                           | USD 20,00 per order / за поручение     |   |
| 2.3. | <b>Moscow SE / Московская Биржа</b>  | 0.05%                           | RUR 1 500,00 for an active trading day / за активный торговый день  | 0.25%                           | RUR 1 500,00 per order / за поручение  |   |
| 2.4. | <b>Other stock exchanges / Прочие биржи</b>  | 0.05%                           | USD/EUR 20,00 for an active trading day / за активный торговый день | 0.25%                           | EUR/USD 30,00 per order / за поручение | USD / EUR - depending on the currency of the transaction / в зависимости от валюты транзакции |
| 2.5. | <b>Moscow SE (FORTS section) / Московская Биржа (Срочный рынок)</b>  | 0.01%                           | RUR 1 500,00 for an active trading day / за активный торговый день  | 0.05%                           | RUR 1 000,00 per order / за поручение  | Of amount of the opened/closed position / от суммы открытой/закрытой позиции                  |
| 3    | <b>REPO / РЕПО (ОТС)</b>   |                                 |   |                                 |  |   |
| 3.1. | <b>ALL currencies except for RUR / Все валюты кроме RUR</b>  | 0,25% per annum (ALL EXTRA)     |   |                                 |  |   |
| 3.2. | <b>RUR only / Только RUR</b>   | 0,5% per annum (ALL EXTRA)      |   |                                 |  |   |
| 4    | <b>Currency transactions / Операции с валютой</b>  |                                 |   |                                 |  |   |
| 4.1. | <b>Currency conversion (for securities trading only) / Конверсионная операция (исключительно для целей приобретения инвестиционных инструментов)</b> | 0.10%                           |   | EUR 20 per order / за поручение |  |   |

|      |   |   |   |  |
|------|---|---|---|--|
| 5    | <b>Special transactions / Специальные транзакции</b>  |   |   |  |
| 5.1. | Transaction with non-public (non-listed) instruments, banking deposit instruments of Russian banks (deposit certificates, promissory notes etc. / <b>Операции с непубличными (небиржевыми) инструментами, банковскими депозитными инструментами российских банков (депозитные сертификаты, векселя)</b> | As agreed with the Client / По договоренности с клиентом  |   |  |
| 6    | <b>Safe-custody services (if not specified otherwise for some kinds of instruments/transactions / Депозитарные услуги (если для некоторых видов инструментов/операций не установлено иное)</b>  |   |   |  |
| 6.1. | <b>Safe-keeping of the listed securities / Хранение листингованных ценных бумаг</b>   | Account trading turnover is less than EUR 1 mln on annualized basis / <b>торговый оборот из расчета за год менее 1 миллиона Евро.</b>                                       | 0,2% per annum of the weighted average market value of securities / <b>годовых от средневзвешенной рыночной стоимости ценных бумаг</b>  | Incl. structured notes and Eurobonds / <b>Включая структурные ноты и Евробонды / Charged quartely / Удерживается ежеквартально</b> |
|      |   | Account trading turnover is more than EUR 1 mln but less than EUR 10 mln on annualized basis / <b>оборот из расчета за год более 1 миллиона Евро, но менее 10 млн Евро.</b> | 0,1% per annum of the weighted average market value of securities / <b>годовых от средневзвешенной рыночной стоимости ценных бумаг</b>  |  |
|      |   | Account trading turnover is more than EUR 10 mln on annualized basis / <b>торговый оборот из расчета за год более 10 миллионов Евро .</b>                                   | 0,05% per annum of the weighted average market value of securities / <b>годовых от средневзвешенной рыночной стоимости ценных бумаг</b> |  |
| 6.2. | <b>Safe-keeping of non-listed securities / Хранение нелистингованных ценных бумаг</b>   | Up to 3.5 % per annum from average assets value / <b>До 3.5 % годовых от средней стоимости активов / As agreed with the Client / По договоренности с клиентом</b>           |   |  |
| 6.3. | <b>Safe-keeping of "hard paper" securities / Хранение ценных бумаг в бумажно-документарной форме</b>  |   |   |  |



|      |   |   |            |  |
|------|---|---|------------|--|
| 6.4. | <b>Accepting securities to brokerage account and/or for safe-keeping / Зачисление ценных бумаг на брокерский счет и/или депозитарное хранение</b>   | Free of charge / Бесплатно  |            |  |
| 6.5. | <b>Transfer of listed securities out of the acc. / Вывод с брокерского счета листингованных ценных бумаг</b>  | EUR 20,00 per each order / за поручение (перевод в одно место хранения) (ALL EXTRA) |            |  |
| 6.6. | <b>Transfer of non-listed or "hard-paper" securities out of the acc. / Вывод с брокерского счета внебиржевых ценных бумаг и ценных бумаг в бумажно-документарной форме</b>  | As agreed with the Client / По договоренности с клиентом                            | EUR 100,00 |  |
| 6.7. | <b>Withdrawal of monetary funds out of the acc. / Вывод с брокерского счета денежных средств</b>  | EUR 20,00 for an order / за поручение (ALL EXTRA)                                   |            |  |
| 7    | <b>Minimum commission threshold / Минимальный порог комиссии</b>  |   |            |  |
| 7.1. | <p>Minimum quarterly 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 за квартал. (Зачитывается против любых комиссий в рамках брокерского и депозитарного договоров, уплаченных клиентом в течение отчетного периода)</p> <p>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.</p> | EUR 250,00 per quarter / EUR 250,00 в квартал                                       |            | 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. |

|  |  |  |
|--|--|--|
| <p>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. 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> |  |  |
| <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 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, в котором такое событие наступило</p>  |  |  |

\* The commission "rate" shall mean a percentage of a transaction (deal) amount / Комиссионная "ставка" означает процент от суммы операции (сделки)

\*\* 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.

## 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   |   |                                 |
| <ul style="list-style-type: none"> <li>• Transaction services</li> <li>• Settlement services</li> <li>• Custody services</li> </ul> | 500<br><br>50<br><br>200                                      | 0,50%<br><br>0,05%<br><br>0,20% |
| Total services cost   | 750   | 0,75%                           |
| Investment product cost   | 0   | 0,00%                           |
| Third party payments  | 0   | 0,00%                           |
| <b>Total costs and charges</b>  | <b>750</b>  | <b>0,75%</b>                    |
| 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%   |                                 |
| <b>Cumulative effect</b>  | <b>0,75%</b>  |                                 |

| 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"> <li>• Investment Management fee</li> <li>• Custody services</li> </ul> | <p>1,000</p> <p>0</p> | <p>1,00%</p> <p>0%</p> |
| Total services cost   | 1000                  | 1,00%                  |
| Success fee (10% from net profit)   | 400                   | 0,40%                  |
| Third party payments  | 0                     | 0,00%                  |
| <b>Total costs and charges</b>  | <b>1,400</b>          | <b>1,4%</b>            |
| 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)  | 3,6%                  |                        |
| <b>Cumulative effect</b>  | <b>1,4%</b>           |                        |

| 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                                   |                   |                 |
| • Investment Advice   | 500               | 0,50%           |
| • Transaction Services  | 500               | 0,50%           |
| • Settlement services   | 50                | 0,05%           |
| • Custody services  | 200               | 0,20%           |
| Total services cost   | 1250              | 1,25%           |
| Investment product cost   | 0                 | 0,00%           |
| Third party payments  | 0                 | 0,00%           |
| <b>Total costs and charges</b>                                    | <b>1250</b>       | <b>1,25%</b>    |
| 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%             |                 |
| <b>Cumulative effect</b>  | <b>1,25%</b>      |                 |