



**INVESTMENTS
LIMITED**

COSTS AND CHARGES POLICY

Approved by the Board of Directors
on December 15, 2022
Limassol

POLICY REVISION HISTORY

No.	Date	Description
1	December 2017	Initial version (by Meerkat)
2	27 December 2017	Approved by Board of Directors
3	December 2018	Changes are approved by the 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	December 2021	Review by Compliance
7	15 December 2022	Changes are approved by the Board of Directors
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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”) , Commission Delegated Regulation (EU) 2017/565 of 25.04.2016, and in accordance with 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 the 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



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from 2023.pdf

5. ANNEX 2: INDICATIVE CUMULATIVE EFFECT OF COSTS ON RETURN

Investment Scenario 1		
Amount invested	EUR100,000 (Equities stock exchange, trading via DMA)	
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 (EUR)	% of investment
Investment / Ancillary Services		
<ul style="list-style-type: none"> • Brokerage and transactional services • Third party Settlement and custody services • Safekeeping fee 	300.00 50.00 300.00	0,30% 0,05% 0,30%
Total services cost	650.00	0,65%
Investment product cost	0.00	0,00%
Third party payments	0.00	0,00%
Total costs and charges	650.00	0,65%
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)	4,35%	
Cumulative effect	0,65%	

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 (EUR)	% of investment
Investment / Ancillary Services		
<ul style="list-style-type: none"> • Management fee • Third party services fee 	800.00	0.80%
	200.00	0.20%
Total services cost	1000.00	1,00%
Success fee (10% from net profit)	400.00	0,40%
Third party payments	0.00	0,00%
Total costs and charges	1,400.00	1,40%
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%	
Cumulative effect	1,4%	

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 (EUR)	% of investment
Investment / Ancillary Services		
<ul style="list-style-type: none"> • Investment Advice fee • Brokerage fee • Settlement services and third party fee • Safekeeping fee 	500.00 500.00 50.00 200.00	1,00% 0,10% 0,05% 0,20%
Total services cost	1250.00	1,25%
Investment product cost	0	0,00%
Third party payments	0	0,00%
Total costs and charges	1250.00	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%	