

COSTS & CHARGES POLICY

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1. Introduction

This Costs and Charges Policy provides Clients and prospective Clients with information about the costs and charges that may arise in connection with the investment services and financial instruments offered by the Company.

The actual costs incurred by a client will depend on the financial instrument traded, the size and duration of the position, market conditions and any other applicable trading or account conditions.

Important Notice

This Policy provides general information regarding the costs and charges that may apply to the Company's investment services. The exact costs applicable to a transaction will depend on the financial instrument traded, the size and duration of the position, prevailing market conditions and the specific account configuration. Clients should always review the applicable trading conditions available through the trading platform before entering into any transaction.

2. Legal Framework

This Policy has been prepared in accordance with Directive 2014/65/EU on markets in financial instruments (MiFID II), Commission Delegated Regulation (EU) 2017/565, and the applicable Cyprus legal and regulatory framework governing the provision of investment services.

The Company provides Clients and potential Clients with information on applicable costs and related charges in accordance with the requirements applicable to the investment services and financial instruments offered by the Company.

3. Ex-Ante and Ex-Post Disclosure of Costs and Charges

The Company provides **ex-ante** (before the investment service is provided) information on applicable costs and charges before the provision of the relevant investment service, based on the applicable pricing arrangements and, where necessary, reasonable assumptions.

The Company provides **ex-post** (after the relevant reporting period) information after the relevant reporting period, showing the actual costs and charges incurred by the Client, where required under the applicable legal and regulatory framework.

Applicable costs and charges may be aggregated, and their cumulative effect may be illustrated where required under the applicable regulatory requirements.

4. Types of Costs and Charges

The following table provides a summary of the main costs and charges that may apply to the Company's investment services. Further details are provided in the relevant sections of this Policy.

Type of Cost and Charge	Current Fee / Treatment	When It Applies	Further Information
Spread / mark-up	Included in the applicable spread for the relevant financial instrument.	When trading	Section 4.1
Trading commission	No separate trading commission under the current configuration.	Not currently applicable	Section 4.2
Swap / overnight financing	Instrument-specific debit or credit.	Positions held over the applicable rollover	Section 4.3
Triple swap	Applies on the designated rollover day for the relevant financial instruments.	Relevant rollover day / instruments	Section 4.3.1
Currency conversion	May apply where an amount is calculated or denominated in a currency other than EUR.	Where conversion into EUR is required	Section 4.6
Company withdrawal fee	No Company withdrawal fee currently applies.	Not currently applicable	Section 4.7
Third-party bank charges	May apply depending on the banks involved in the transaction.	Bank wire transfers	Section 4.7
Dormant account maintenance fee	€20 per year.	Eligible Dormant Accounts with sufficient funds	Section 4.5
Islamic / swap-free account administrative fee	Not currently applicable.	Islamic / swap-free accounts are not currently offered	Section 4.8

Product-specific costs and charges are also available in the relevant Key Information Document (KID), which is available on the Company's [Legal Documents](#) webpage.

4.1 Spreads

The principal transaction cost is the spread, being the difference between the bid price and the ask price of a financial instrument. Spreads may vary between financial instruments and may change depending on market conditions, liquidity, volatility and other relevant market factors.

Example – Spread Calculation

Item	Example
Instrument	EUR/USD
Volume	1 Lot (100,000 UNITS)
Bid / Ask Price	Bid: 1.14419 / Ask: 1.14429
Spread	Ask – Bid = 0.00010
Calculated Spread Cost	10 EUR

4.2 Trading Commission

The Company does not currently charge a separate trading commission under the current instrument configuration. Accordingly, trading costs are currently reflected through the applicable spread and any other applicable costs described in this Policy.

4.3 Swap / Overnight Financing

A swap or overnight financing adjustment may apply where a position remains open after the relevant daily rollover time. Depending on the financial instrument and applicable trading conditions, the adjustment may result in a debit or, where applicable, a credit to the Client's trading account.

The applicable swap is instrument-specific. Swap values are based on the liquidity provider's applicable swap rates, and no additional Company mark-up is applied. The daily rollover time is 01:00 server time (UTC+03:00). The Company will disclose or make available the applicable instrument-specific swap information through its approved client-facing channels.

Example – Swap Calculation

Item	Example
Account Currency	EUR
Instrument	EUR/USD
Position	BUY
Contract Size	1 Lot (100,000 units)
Swap (Points)	-8.337
Currency Conversion	Included in swap value
Holding Period	1 DAY
Overnight Swap Charged	-7.25 EUR

4.3.1 Triple Swap

For certain financial instruments, the overnight financing adjustment may be applied as a multiple-day swap on the relevant rollover day to account for non-trading days.

Under the Company's current configuration, triple swap is applied on Wednesdays for Forex and Metals (Gold&Silver) while for Indices and Commodities, it is typically applied on Fridays. The applicable rollover day and swap rates may vary depending on the financial instrument and may change from time to time.

4.4 Combined Trading Cost Example

The following example shows how different trading costs may be combined for a single transaction. Actual costs may vary depending on the financial instrument and the trading conditions.

Item	Amount
Account Currency	EUR
Instrument	EUR/USD
Contract size	1 Lot (100,000 units)
Position	BUY
Spread	7 EUR
Swap / Overnight Financing	-7.31 EUR
Currency Conversion	Included in swap value
Trading Commission	€0
Total Cost	7 + 7.31 = 14.31 EUR

4.5 Inactive and Dormant Accounts

Inactive Accounts

A trading account may be classified as an **Inactive Account** where the Client has not deposited funds, opened or closed positions, or otherwise used the account for a continuous period of ninety (90) calendar days.

An Inactive Account that has never been funded or used for trading purposes is not subject to a maintenance or dormant account fee.

Dormant Accounts

Where a Client has previously funded and/or used the account, but no trading activity, login activity, deposit, withdrawal or other account activity has taken place for a continuous period of ninety (90) calendar days, the account may be classified as a Dormant Account.

The Company reserves the right to charge an annual maintenance fee of €20 (twenty euros) on a Dormant Account, provided that sufficient funds are available in the account balance. The fee will not result in a negative account balance. Where sufficient funds are not available to cover the fee, no fee will be charged.

Further information regarding Inactive and Dormant Accounts is available in the Company's Client Services Agreement.

4.6 Currency Conversion

Client trading accounts are denominated in EUR. Where a cost, charge, realised profit, realised loss or other amount is calculated or denominated in a currency other than EUR, the amount may need to be converted into EUR before being credited to or debited from the Client's trading account.

Currency conversions are performed using the applicable exchange rate provided by the Company's liquidity provider at the time the conversion is processed. As exchange rates may change, the final EUR amount credited to or debited from the Client's trading account may differ from the original amount in the foreign currency. The exchange rate applied may differ from publicly available market rates due to timing and liquidity provider pricing.

Example – Currency Conversion

Item	Example
Account Currency	EUR
Amount in Other Currency	100 USD
Applicable Exchange Rate	1 EUR = 1.10000
Calculation	100: 1.10000
Final Amount in EUR	90.91 EUR

4.7 Deposits and Withdrawals

The Company currently accepts deposits and withdrawals by bank wire transfer.

The Company does not currently charge deposit or withdrawal fees. However, your bank or any intermediary bank may apply its own charges. Any such charges are outside the Company's control and remain the responsibility of the Client.

Any third-party bank charges may reduce the amount ultimately received by the Client. If the Company introduces deposit or withdrawal fees in the future, the applicable client documentation will be updated before such fees are applied.

Further information about deposits and withdrawals is available on the Company's [Deposits & Withdrawals](#) webpage.

4.8 Islamic / Swap-Free Accounts

Islamic or swap-free accounts are not currently offered by the Company. Accordingly, no Islamic or swap-free account administrative fee currently applies.

If such accounts are introduced in the future, the applicable conditions and charges will be approved and the relevant client documentation will be updated before the product is offered to Clients.

5. Professional Clients

This Policy also applies to Clients classified as **Professional Clients**.

Unless otherwise agreed and disclosed by the Company, the applicable costs and charges for Professional Clients are the same as those applicable to Retail Clients.

Professional Clients may be offered lower spreads under a commission-based pricing model. Where a commission applies, the applicable commission is displayed on the trading platform before the Client executes a trade.

Certain costs and charges disclosure requirements may also apply differently to Professional Clients. The Company will apply any such differences only where permitted by law.

Professional Clients remain responsible for reviewing all applicable trading costs before entering into transactions.

6. Annual Ex-Post Information

The Company will provide Clients, where required, with annual ex-post information on the costs and charges actually incurred during the relevant reporting period. The information will be based on the Client's actual transactions and the services received and will be provided in accordance with applicable regulatory requirements.

The annual ex-post costs and charges information will be made available through the Client Portal. Clients may also generate and download account statements and trading reports for the available reporting periods. Additional reports related to costs and charges may also be provided by the Company upon request, where applicable.

7. Changes to Costs and Charges

The Company may amend its costs and charges from time to time due to changes in market conditions, liquidity arrangements, third-party costs, product configuration, operational arrangements or applicable legal and regulatory requirements.

Material changes will be communicated in accordance with applicable contractual and regulatory requirements. Relevant client-facing documentation will be updated where necessary.