

ECOMMBX **INVESTMENTS LTD**

GENERAL FEES

CONTENTS

1. Introduction	3
2. Investment Services and Associated fees	3
3. Investment Services Scenarios	6

1. INTRODUCTION

Pursuant to the Markets in Financial Instruments Directive 2014/65/EU and the Commission Delegated Regulation (EU) 2017/565, (collectively “**MiFID II**”) and in accordance with the Investment Services and Activities and Regulated Markets Law of 2017 (the “**Law**”) of the Cyprus Securities and Exchange Commission (“**CySEC**”), ECOMMBX Investments Ltd (the “**Company**”) has an obligation to inform its Customer (“**you**”), before the provision of services, about the fees (or interchangeably and associated fees) that relate to investment services and/or ancillary services offered by the Company. This is done in order to ensure the Customer’s awareness of and associated fees to be incurred as well as to enable the Customer to evaluate such information and compare with different financial instruments and investment services, further to the information already provided in the investment services Terms and Conditions.

Two types of disclosures will be made to the Customer:

- (i) On an ex-ante basis (i.e. before you trade) disclosures of aggregated expected and associated fees for the relevant investment service and financial instrument
- (ii) On an ex-post basis (i.e. after you trade), disclosures of aggregated and associated fees that have actually been incurred by you for the relevant investment service and financial instrument. This will be provided to you annually on a personalised basis

2. INVESTMENT SERVICES AND ASSOCIATED FEES

The tables below presents the associated fees for the financial investment services and instruments offered:

- **Table 1:** Brokerage services
- **Table 2:** Investment advice services

In relation to the brokerage services (table 1) and for each of the financial instrument categories, we will show separate figures comprising:

- Entry Fees which may include one-off, incidental, transaction and ancillary services fees which occur upon entry
- Running Fees which may include on-going, incidental, transaction and ancillary services fees
- Exit Fees which may include one-off, incidental, transaction and ancillary services fees which occur upon the sale of a financial instrument

TABLE 1 FEES FOR BROKERAGE SERVICES AND FINANCIAL INSTRUMENTS

BROKERAGE SERVICES	Transaction Commission Fee (Entry/ Exit Fee per transaction)		Settlement Fee	Foreign Exchange Fee*	Running Fee
SHARES					
For transactions on Regulated Stock Exchanges	Up to 1.50% (max)	Up to €70 (min)	N/A	FX COMMISSION <ul style="list-style-type: none">Up to 0.40% (for all currencies) for transactions above €20,000	(i) Safekeeping Fee <ul style="list-style-type: none">Up to 0.35% per annum (minimum up to €75 per annum and minimum up to €15 for gross investment amount less than €10,000). <p>Calculation of safekeeping fee depends on the financial instrument – Equities on International Markets, Structured products, Bonds, Futures and T-Bills) and charged monthly or quarterly in arrears and ad hoc on the sale, maturity or transfer out of a security to another custodian/portfolio.</p>
For transactions at any other market venue (e.g. Banks/ Brokers or Over the Counter)	Up to 2.00% (max)	Up to €70 (min)	N/A		(ii) Cancellation of securities fee <ul style="list-style-type: none">Up to 0.25% of transaction value (minimum €250 per title) (iii) Transfer of securities from/to another custodian fee <ul style="list-style-type: none">Up to 0.20% of the average portfolio value (minimum €100 per security)

TABLE 1 FEES FOR BROKERAGE SERVICES AND FINANCIAL INSTRUMENTS

BROKERAGE SERVICES		Transaction Commission Fee (Entry/ Exit Fee per transaction)		Settlement Fee	Foreign Exchange Fee*	Running Fee
BONDS						
Corporate Bonds	Up to 1.00% (max)	0.015% (min)	Up to €70	Foreign Exchange Fees* apply as disclosed above	Running fees apply as disclosed above	
Government Bonds	Up to 1.00% (max)	0.015% (min)	Up to €50			
DERIVATIVE AND COMPLEX FINANCIAL INSTRUMENTS						
	Up to 1.50% (max)	Up to €70 (min)	N/A			

NOTES

* Occurs when base currency is different than asset currency

TABLE 2 INVESTMENT SERVICES FEES

INVESTMENT ADVICE	FEES
Advisory Fee Advisory fee includes processing of corporate actions and account administration as applicable. The fee does not include third party expenses, such as stock market fees, stamp duty and or tax stamp/duty.	Up to 0.50% (max) based on the average value of assets under advisory management, valued at market prices, on a monthly or quarterly basis.
Safekeeping Fee	Up to 0.35% per annum, (calculation of safekeeping fee depends on the financial instrument – Equities on International Markets, Structured products, Bonds, Futures and T-Bills) and charged monthly or quarterly in arrears and ad hoc on the sale, maturity or transfer out of a security to another custodian/portfolio (minimum up to EUR 75 per quarter).
Performance Fee Performance fee is always on a high-water mark basis, which means that the fee is only charged on new profits that exceed the highest value the investment fund account has previously reached and is calculated and charged on a quarterly or annual basis.	0.00% up to 30% (max) based on: <ul style="list-style-type: none"> • On the performance of the investment (method A), or • On the profit generated over and above the benchmark which is clearly stated in the signed agreement (method B).

DISCLAIMERS

- (i) Additional product and service fees may occur at entry or exit as well as during the holding period of the financial instrument; these will be charged as incurred
- (ii) The commission rate is negotiable. The Customer has the right to apply for a better rate. The application is submitted in writing to the Management Committee for approval. Among the criteria that will determine approval or rejection of the application are the value and frequency of transactions, the total value of the portfolio, the length of Customer relationship with the Company etc
- (iii) Stock Exchange Fees and Central Depository Fees are determined by the regulated Stock Exchanges and the Central Depositories. Each customer is charged according to the latest fee policy of each Stock Exchange respectively.
- (iv) The Customer's Investments, Funds and Transactions carried out under or in connection with the services agreement may be subject to Taxes. Customers should consult their own legal and tax advisors for the tax implications involved hereunder, which may be affected by, among other things, their country of tax residence and or the type of Investment or tax profile

3. INVESTMENT SERVICES SCENARIOS

The information provided herein is required under MiFID II and you are advised to read it so that you can make an informed decision on the potential and associated fees related to investments in shares through ECOMMBX Investments.

3.1. INDICATIVE EXAMPLE – SHARES

This example provides you with the associated fees information as defined in this document. The underlying instrument (ABC Company Ltd) is only used for illustration purposes.

CONTRACT DETAILS e.g. 1

Product Asset Class	Shares
Product Name	ABC Company Ltd
Product ISIN	GRxxxxxxxxxx
Share Class (if applicable)	N/A
Stock Exchange (if applicable)	Athens Exchange Group (AthexGroup)
Quantity/Nominal Amount	3,000
Price per share	18.60
Gross Investment Amount	55,800
Currency	EUR
Action	Buy

ASSUMPTIONS

Performance	0.00%
Holding period in years	5
Further investment (or redemption) during holding period	No
Fees applicable rates	Maximum

FEES			
	Description / Frequency	Amount (EUR) (accumulated for 5 years)	% of investment amount
Entry Fees:			
Transaction Commission	One-off	837	1.50%
Settlement Fee	One-off	0	0.00%
Running Fees:			
Custody Fee	Per annum (195 = 55,800*0.35% p.a.)	975	1.75%
Exit Fees:			
Transaction Commission	One-off	837	1.50%
Settlement Fee	One-off	0	0.00%
Total Service Fees		2,649	4.75%

Notes related to the above example:

- No exchange fees
- Customer's available funds are in the asset currency
- Dividend payment once a year
- Safekeeping fee is above the minimum €75 per quarter

Other:

- If the transaction is terminated before the end of the holding period indicated above, exit fees will occur earlier
- Estimations & associated fees are based on assumptions and may deviate from fees that may actually be incurred

CONTRACT DETAILS e.g. 2	
Product Asset Class	Shares
Product Name	ABC Company Ltd
Product ISIN	GRxxxxxxxxxx
Share Class (if applicable)	N/A
Stock Exchange (if applicable)	Athens Exchange Group (AthexGroup)
Quantity/Nominal Amount	200
Price per share	18.60
Gross Investment Amount	3,720
Currency	EUR
Action	Buy

ASSUMPTIONS	
Performance	0.00%
Holding period in years	5
Further investment (or redemption) during holding period	No
Fees applicable rates	Maximum

FEES			
	Description / Frequency	Amount (EUR) (accumulated for 5 years)	% of investment amount
Entry Fees: Transaction Commission	One-off	70	1.88%
Settlement Fee	One-off	0	0.00%
Running Fees: Custody Fee	Per annum	75	2.02%
Exit Fees: Transaction Commission	One-off	70	1.88%
Settlement Fee	One-off	0	0.00%
Total Service Fees		215	5.78%

Notes related to the above example:

- No exchange fees
- Customer's available funds are in the asset currency
- Dividend payment once a year
- Transaction Commission fee for entry and exit is below €20 and gross investment amount less than €10,000, therefore minimum is charged
- Safekeeping fee is below the minimum €75 per quarter, therefore minimum is charged

Other:

- If the transaction is terminated before the end of the holding period indicated above, exit fees will occur earlier
- Estimations & associated fees are based on assumptions and may deviate from fees that may actually be incurred

3.2. INDICATIVE EXAMPLE – BONDS

This example provides you with the associated fee information as defined in the Associated Fee table above. The underlying instrument (ABC Government Bond) is only used for illustration purposes.

CONTRACT DETAILS	
Product Asset Class	Bonds
Product Name	XYZ Government Bond
Product ISIN	XSxxxxxxxxxx
Share Class (if applicable)	N/A
Stock Exchange (if applicable)	London Stock Exchange
Quantity	60
Min Piece	1,000
Nominal Value	60,000
Price	115.00
Gross Investment Amount	69,000
Currency	EUR
Action	Buy

ASSUMPTIONS

Performance	0.00%
Holding period in years	Hold to maturity (2026)
Further investment (or redemption) during holding period	No
Fees applicable rates	Maximum

FEES UNTIL BOND MATURITY

	Description / Frequency	Amount (EUR) (accumulated for 2 years)	% of investment amount
Entry Fees:			
Transaction Commission	One-off	690	1.00%
Settlement Fee	One-off	50	0.07%
Running Fees:			
Custody Fee	75 per quarter	600	0.86%
Exit Fees:			
Transaction Commission	One-off	0	0.00%
Settlement Fee	One-off	0	0.00%
Total Service Fees		1,340	1.93%

Notes related to the above example:

- No exchange fees
- Customer's available funds are in the asset currency
- Coupon payment once a year
- Transaction Commission fee for entry and exit is below €70, therefore minimum is charged
- Safekeeping fee is the minimum €75 per quarter (per annum $(241 = 69,000 \times 0.35\% \text{ p.a.})$, therefore minimum is charged

Other:

- If the transaction is terminated before the end of the holding period indicated above, exit fees will occur earlier
- Estimations & associated fees are based on assumptions and may deviate from fees that may actually be incurred
- The total consideration paid by the client for purchasing the bond would include accrued interest

3.3. INDICATIVE EXAMPLE – FUTURES

This example provides you with the associated fees information using the Company's rates as defined in the General and the Financial Instrument Specific and Associated Fees table above. It is not marketing material or a recommendation to buy or sell the underlying instrument used in the example. The underlying instrument (Futures – Traded via trading platform) is only used for illustration purposes.

CONTRACT DETAILS

Product Asset Class	Products traded via trading platform
Product Name	Future - (September 24)
Nominal Amount	83,270 (GBP 10 per index point)
Invest Currency	GBP
Underlying	FTSE 100
Side	Client Buys 10 Lots

ASSUMPTIONS

Holding period in months	2 months
Fees applicable rates	Maximum

FEES UNTIL BOND MATURITY

	Description / Frequency	Amount (GBP)
Entry Fees:	GBP 15 per lot	150
Exchange Fee per contract	GBP 0.4 per lot	4
Exit Fees:	GBP 15 per lot	150
Exchange Fee per contract	GBP 0.4 per lot	4
Total Service Fees		308

3.4. INDICATIVE EXAMPLE – INVESTMENT ADVICE

It should be noted that the below is a past performance scenario and thus, please note that past performance is not a guarantee of future performance of the holding assets and the portfolio value.

ASSUMPTIONS

Covered period in months	12 months
Fees applicable rates	Maximum
Portfolio risk type	Conservative
Opening portfolio value	€10,000,000
Closing portfolio value	€10,500,000
Annual portfolio return	€500,000
Investment Instruments	Stocks, Bonds

INVESTMENT SERVICES ANNUAL FEES	DESCRIPTION	AMOUNT (EUR)
Advisory Fee	0.35% per year based on the average portfolio value	35,000
Safekeeping Fee	0.05% per year based on the average portfolio value	4,992
Performance Fee:		
Method A	Performance rate: +10%	50,000
Method B	Benchmark agreed: 3% Return of the portfolio: 3.5%	2,500