

ECOMMBX **INVESTMENTS LTD**

GENERAL FEES

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1. INTRODUCTION

In accordance with the Markets in Financial Instruments Directive 2014/65/EU and the Commission Delegated Regulation (EU) 2017/565 (together referred to as "MiFID II"), and pursuant to the Investment Services and Activities and Regulated Markets Law of 2017 (the "Law") as implemented by the Cyprus Securities and Exchange Commission ("CySEC"), ECOMMBX Investments Ltd (the "Company") is required to provide you, our customer, with clear information regarding all fees, costs, and associated charges related to the investment and/or ancillary services we offer.

This information is intended to ensure full transparency and to help you understand the total cost of the services and financial instruments you may choose to engage with. It also enables you to compare the associated costs with alternative investment products or service providers, as part of your decision-making process. These disclosures are in addition to the information already outlined in the Company's Investment Services Terms and Conditions.

We will provide you with two types of cost disclosures:

- (i) Ex-ante disclosure (before you invest or trade): This will include an estimate of the expected total costs and associated charges related to a specific investment service or financial instrument. It is designed to give you a clear understanding of the potential charges you may incur in advance
- (ii) Ex-post disclosure (after you invest or trade): This will include a summary of the actual costs and charges you have incurred over the course of the year, provided to you annually on a personalised basis. This allows you to review and assess the cost-effectiveness of your investments

WARNING

The costs and charges figures presented in this document are not fixed or guaranteed but rather an indication of the expected costs and charges you will incur as a Customer of the Company. The actual costs and charges you incur throughout your business relationship with the Company may be higher or lower than the costs and charges summarised below, which have been calculated using estimates and/or have been drawn from previously incurred costs and charges of the Company.

The Company reserves the right to change, from time to time, any of the charges applicable to Customers. Where such changes result in an increase in fees or otherwise materially affect the Customer, the Company shall notify the Customer in writing prior to the next provision of services to which the changes apply.

2. INVESTMENT SERVICES AND ASSOCIATED FEES

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

- **Table 1:** Costs and Charges related to Brokerage Services
- **Table 2:** Costs and Charges related to the investment service of Investment Advice
- **Table 3:** Applicable Regulatory Fees

TABLE 1: COSTS AND CHARGES RELATED TO BROKERAGE SERVICES

CHARGE TYPE	CHARGE DESCRIPTION	FEE	COMMENTS
SHARES			
All costs related to transactions initiated in the course of the provision of the investment service	Broker Commissions / Transaction Commission Fee	Up to 1.50%	For transactions on Regulated Stock Exchanges
		Up to 2.00%	For transactions at any other market venue (e.g. Banks/ Brokers or Over the Counter)
	Settlement Fees	Up to €70	For transactions on Regulated Stock Exchanges
		Up to €70	For transactions at any other market venue (e.g. Banks/ Brokers or Over the Counter)
	Major and Minor Foreign Exchange Pairs	Up to 2%	The foreign exchange fee will occur when the base currency is different from the asset currency.
	Exotic Foreign Exchange Pairs	Up to 3%	
	Stamp Duty	Please refer to Table 3 for the relevant taxes and other stock exchange fees	-
	Transaction Tax	Please refer to Table 3 for the relevant taxes and other stock exchange fees	-
One – off charges related to the provision of the investment service	Switching Costs	Up to 0.20% of the average portfolio value (minimum €100 per security)	Transfer of securities from/to another custodian.
Ongoing charges related to the provision of the investment service		€0	-
Any charges that are related to ancillary services	Custody Cost	Up to 0.35% per annum (minimum of €75 per annum)	The calculation of the custody cost depends on the financial instrument. Equities on International Markets, Structured products, Bonds, Futures and T-Bills are charged monthly, quarterly or annually in arrears and ad hoc on the sale, maturity or transfer out of a security to another custodian/portfolio.
Incidental Costs		€0	-

TABLE 1: COSTS AND CHARGES RELATED TO BROKERAGE SERVICES

CHARGE TYPE	CHARGE DESCRIPTION	FEE	COMMENTS
BONDS			
All costs related to transactions initiated in the course of the provision of the investment service	Broker Commissions / Transaction Commission Fee	Up to 1.00%	For Corporate Bonds
		Up to 1.00%	For Government Bonds
	Settlement Fees	Up to €70	For Corporate Bonds
		Up to €50	For Government Bonds
	Major and Minor Foreign Exchange Pairs	Up to 2%	The foreign exchange fee will occur when the base currency is different from the asset currency.
	Exotic Foreign Exchange Pairs	Up to 3%	
	Stamp Duty	Please refer to Table 3 for the relevant taxes and other stock exchange fees	-
	Transaction Tax	Please refer to Table 3 for the relevant taxes and other stock exchange fees	-
One – off charges related to the provision of the investment service	Switching Costs	Up to 0.20% of the average portfolio value (minimum €100 per instrument)	Transfer of bonds from/to another custodian
Ongoing charges related to the provision of the investment service		€0	-
Any charges that are related to ancillary services	Custody Cost	Up to 0.35% per annum (minimum of €75 per annum)	The calculation of the custody cost depends on the financial instrument. Equities on International Markets, Structured products, Bonds, Futures and T-Bills are charged monthly, quarterly or annually in arrears and ad hoc on the sale, maturity or transfer out of a security to another custodian/portfolio.
Incidental Costs		€0	-

TABLE 2: COSTS AND CHARGES RELATED TO THE INVESTMENT SERVICE OF INVESTMENT ADVICE

CHARGE TYPE	CHARGE DESCRIPTION	FEE	COMMENTS
All costs related to transactions initiated in the course of the provision of the investment service	Please refer to the corresponding row included under Table no.1 for the costs that will be charged in case of execution of the order.		-
One – off charges related to the provision of the investment service	€0		-
Ongoing charges related to the provision of the investment service	Advisory Fees	Up to 0.50% plus VAT	<p>Advisory fee includes account administration as applicable. The fee does not include third party expenses, such as stock market fees, stamp duty and or tax stamp/duty (for these costs and fees please refer to Table no. 3 below).</p> <p>Based on the average value of assets under advisory management, valued at market prices, on a monthly or quarterly basis.</p>
Any charges that are related to ancillary services	Custody Fee	Up to 0.35% per annum	The calculation of the custody fee depends on the financial Instrument. Equities on International Markets, Structured products, Bonds, Futures and T-Bills are charged monthly, quarterly or annually in arrears and ad hoc on the sale, maturity or transfer out of a security to another custodian/portfolio.
Incidental Costs	Performance Fees	0.00% up to 30% (max)	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.

NOTE

The Company does not charge anything additional other than the costs and charges indicated in the relevant tables above. Please refer to either table no.1 or no.2, depending on the investment service you are interested in, for the relevant costs.

TABLE 3: APPLICABLE REGULATORY FEES

COUNTRY	STOCK EXCHANGE	TAXES & OTHER STOCK EXCHANGE FEES
EUROPE		
Germany	XETRA	0 EUR
Holland	EURONEXT AMSTERDAM	0 EUR
France	EURONEXT PARIS	0.3% (Buy side only)
Italy	BORSA ITALIANA	0.12% (Buy side only)
Ireland	IRISH STOCK MARKET	1% (Buy side only)
Sweden	STOCKHOLM STOCK EXCHANGE	0 SEK
Belgium	EURONEXT BRUSSELS	0 EUR
Spain	MADRID S.E (MADE)/SPAIN ELECTRONIC R.E	0.2% (Buy side only)
Portugal	EURONEXT LISBON	0 EUR
Finland	HELSINKI STOCK EXCHANGE	0 EUR
Austria	VIENNA STOCK EXCHANGE	0 EUR
Denmark	COPENHAGEN STOCK EXCHANGE	0 DKK
UNITED KINGDOM		
United Kingdom	LONDON S.E (LNSE)	Stamp Duty 0.5% (Buy side only)
U.S.A.		
U.S.A	NYSE/NASDAQ/ARCA	0.00234% (Sales only)

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 must be 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 the Customer relationship with the Company etc
- (iii) Stock Exchange Fees and Central Depository Fees (Regulatory 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

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3. ANCILLARY SERVICES AND ASSOCIATED FEES

3.1. SAFEGUARDING OF CUSTOMER FUNDS AND INTEREST ALLOCATION

Where the Company provides ancillary services relating to the safeguarding and administration of customer funds, customer cash balances may be held in safeguarded accounts with credit institutions, in accordance with applicable regulatory requirements.

Pursuant to Section 25 (Interest on Customer Funds) of the General Terms and Conditions, any interest expressly agreed to be paid to the Customer shall be subject to prevailing market conditions and shall be applied in accordance with this Fees Schedule.

Where interest is payable under such an agreement:

- The Company will allocate between 70% and 90% of any net interest earned to the customer
- The remaining 10% to 30% may be retained by the Company as remuneration for safeguarding, administration, and associated operational costs

The exact percentage allocated to the customer is determined by objective factors, including but not limited to:

- The amount of customer funds held
- The duration for which such funds are held
- Prevailing market interest rates
- Third-party costs and charges

The applicable interest allocation may be disclosed to customers upon request or via their account statements where interest is credited.

Interest is not guaranteed. Depending on market conditions, interest may be lower, positive, negative or zero in which case no interest will be credited to the customer, and no payment obligation arises. Interest may be deducted from the customer's cash balance.

4. BROKERAGE SERVICES SCENARIOS

The information contained herein is provided in accordance with MiFID II requirements and is intended to support you in making an informed decision regarding the potential and associated fees of investing in financial instruments through ECOMMBX Investments.

4.1. INDICATIVE EXAMPLE – SHARES

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

SHARES-BUY TRANSACTION EXAMPLE	
Product Asset Class	Shares
Product Name	ABC Company Ltd
Product ISIN	GRxxxxxxxxxx
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

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ASSOCIATED FEES OF BUY TRANSACTION-EUR

	DESCRIPTION / FREQUENCY	AMOUNT (EUR)	% OF INVESTMENT AMOUNT
Transaction Commission (Buy)	Per transaction	837	1.50%
Settlement Fee	Per transaction	20	0.03%
Custody Fee	Per annum (average value of the asset x 0.05% p.a.)	27.9 (below threshold so minimum charge applies)	0.05%
Third Party Payments	Payments received by the Company from a third party	0	0%
Transaction Fees	One-off	857	1.53%
Custody Fees (If position is held for a year)	Per annum	75	0.13%
Total Fees		932	1.67%

NOTES RELATED TO THE ABOVE EXAMPLE:

- No foreign exchange fees were incurred as Customer's available funds are in the asset currency. Dividend payment is made once a year
- Estimations & associated fees are based on assumptions and may deviate from fees that may actually be incurred
- Estimations are based on the assumed invested amount displayed above

4.2. INDICATIVE EXAMPLE-SHARES

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

SHARES-BUY TRANSACTION EXAMPLE

Product Asset Class	Shares
Product Name	ABC Company Ltd
Stock Exchange (if applicable)	London Stock Exchange (LSE)
Quantity	3,720
Price per Share	18.60
Gross investment Amount	69192 GBP
Currency Action	Buy

ASSOCIATED FEES OF BUY TRANSACTION-EUR

	DESCRIPTION / FREQUENCY	AMOUNT (GBP)	% OF INVESTMENT AMOUNT
Transaction Commission (Buy)	Per transaction	0.5% x 69,192=345.96	0.5%
Regulatory Fees	Stamp duty on buy- side only, 0.5%	0.5% x 69,192=345.96	0.5%
Settlement Fee	One-off	20	0.04%
Third Party Payments	Payments received by the Company from a third party	0	0%
Transaction Fees		365.96	0.53%
Regulatory Fees		345.96	0.5%
Total Fees		711.92	1.29%

NOTES RELATED TO THE ABOVE EXAMPLE:

- No foreign exchange fees were incurred as Customer's available funds are in the asset currency
- Dividend payment is made once a year
- Stamp duty applied on UK listed stocks on buy-side only
- Estimations & associated fees are based on assumptions and may deviate from fees that may actually be incurred
- Estimations are based on the assumed invested amount displayed above

4.3. INDICATIVE EXAMPLE – BONDS

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

CONTRACT DETAILS

Product Asset Class	Bonds
Product Name	XYZ Government Bond
Product ISIN	XSxxxxxxxxxx
Share Class (if applicable)	N/A
Stock Exchange (if applicable)	Bond Markets (OTC)
Quantity (lots)	6
Lot size	100
Price	115.00
Gross Investment Amount	69,000
Currency	EUR
Action	Buy

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FEES UNTIL BOND MATURITY			
	DESCRIPTION / FREQUENCY	AMOUNT (EUR) (ACCUMULATED FOR 2 YEARS)	% OF INVESTMENT AMOUNT
Transaction Commission (Buy)	Per transaction	138	0.2%
Settlement Fee	Per transaction	20	N/A
Custody Fee	Per annum	34.5 (below threshold so minimum charge applies)	0.05%
Third Party Payments	Payments received by the Company from a third party	0	0%
Total Transaction Fees		158	0.23%
Custody Fees	Per annum	75	0.05%
Total Fees		233	0.34%

NOTES RELATED TO THE ABOVE EXAMPLE:

- No foreign exchange fees were incurred as Customer's available funds are in the asset currency
- Coupon payment is made once a year. If the bond is sold before the end of the holding period indicated above, transaction fees will occur
- Estimations & associated fees are based on assumptions and may deviate from fees that may actually be incurred
- The total consideration paid by the Customer for purchasing the bond would include accrued interest
- Estimations are based on the assumed invested amount displayed above

5. INVESTMENT ADVICE SCENARIOS

5.1. INDICATIVE EXAMPLE – INVESTMENT ADVICE

ASSUMPTIONS	
Covered period in months	12 months
Fees applicable rates	Maximum
Portfolio risk type	Conservative
Average portfolio value	€9,984,000
Investment Instruments	Stocks, Bonds

INVESTMENT SERVICES ANNUAL FEES	DESCRIPTION	AMOUNT (EUR)
Advisory Fee	0.35% per year based on the average portfolio value	34,944
Custody Fee	0.05% per year based on the average portfolio value	4,992
Third Party Payments	Payments received by the Company from a third party	0
PERFORMANCE FEE:		
Method A	Performance fee: 10% (Profit 10,000)	1,000
Method B	Performance fee: 10% HURDLE AGREED: 3% RETURN OF THE PORTFOLIO: 3.5%	10% * (3.5%-3%) * profit

NOTES RELATED TO THE ABOVE EXAMPLE:

- No foreign exchange fees were incurred as Customer's available funds are in the asset currency
- Estimations & associated fees are based on assumptions and may deviate from fees that may actually be incurred
- Estimations are based on the assumed invested amount displayed above

6. SAFEGUARDING OF CUSTOMER FUNDS SCENARIOS

6.1 INDICATIVE EXAMPLE-SAFEGUARDING OF CUSTOMER CASH BALANCES (EUR)

This example provides you with the associated information regarding interest allocation on customer funds held under safeguarding arrangements, as defined in this document. The figures used are for illustration purposes only.

ASSUMPTIONS	
Available cash balance	EUR 500,000
Currency	EUR
Holding period	Overnight (renewable on a daily basis)
Assumed overnight interest rate	1.30% p.a. (illustrative)
Gross interest before tax (per day)	EUR 18.06
Withholding tax @15%	EUR 2.71
Net Interest paid	EUR15.35

(Calculation: €500,000 × 1.30% ÷ 360 days)

INTEREST ALLOCATION – ILLUSTRATIVE

DESCRIPTION	AMOUNT (EUR)	% OF NET INTEREST
Net Interest after tax (per day)	15.35	100%
Interest allocated to Customer	10.75 - 13.82	70% - 90%
Interest retained by the Company	1.54 - 4.61	10% - 30%
Net interest credited to Customer (per day)	10.75 - 13.82	70% - 90%

NOTES RELATED TO THE ABOVE EXAMPLE:

- Customer funds are assumed to be held overnight on a rolling, daily renewable basis
- Interest allocation is subject to prevailing market conditions, third-party charges, and operational costs
- Interest is not guaranteed and may be lower, positive, negative or zero. The applicable allocation within the stated range may vary depending on the amount held and duration
- Estimations & associated figures are based on assumptions and may deviate from amounts actually credited

6.2 INDICATIVE EXAMPLE-SAFEGUARDING OF CUSTOMER CASH BALANCES (USD)

This example provides you with the associated information regarding interest allocation on customer funds held under safeguarding arrangements, as defined in this document. The figures used are for illustration purposes only.

ASSUMPTIONS

Available cash balance	USD 500,000
Currency	USD
Holding period	Overnight (renewable on a daily basis)
Assumed overnight interest rate	2.90% p.a. (illustrative)
Gross interest before tax (per day)	USD 40.28
Withholding tax @15%	USD 6.04
Net Interest paid	USD 34.24

(Calculation: $\text{USD } 500,000 \times 2.90\% \div 360 \text{ days}$)

INTEREST ALLOCATION – ILLUSTRATIVE

DESCRIPTION	AMOUNT (USD)	% OF NET INTEREST
Net Interest after tax (per day)	34.24	100%
Interest allocated to Customer	23.97 - 30.82	70% - 90%
Interest retained by the Company	3.42 - 10.27	10% - 30%
Net interest credited to Customer (per day)	23.97 - 30.82	70% - 90%

NOTES RELATED TO THE ABOVE EXAMPLE:

- Customer funds are assumed to be held overnight on a rolling, daily renewable basis
- Interest allocation is subject to prevailing market conditions, third-party charges, and operational costs
- Interest is not guaranteed and may be lower, positive, negative or zero. The applicable allocation within the stated range may vary depending on the amount held and duration. The applicable allocation within the stated range may vary depending on the amount held and duration
- Estimations & associated figures are based on assumptions and may deviate from amounts actually credited

DISCLAIMER

This document is provided for informational and illustrative purposes only. All examples contained herein are hypothetical and are used solely to demonstrate how various types of fees may be applied. They do not represent actual past transactions or performance and should not be interpreted as predictive or indicative of future results. This document does not constitute investment advice, a recommendation, or a solicitation to buy or sell any financial instruments or engage in any investment strategy. It is not intended to provide legal, tax, or other professional advice. Where past performance data or scenarios are referenced, they are provided solely for illustrative purposes. Past performance is not a reliable indicator of future performance. All investments involve risk, including the potential loss of the capital invested.

The information contained in this document is intended to be fair, clear, and not misleading, in accordance with applicable regulatory standards, including those set forth by the Cyprus Securities and Exchange Commission (CySEC) and under the Markets in Financial Instruments Directive II (MiFID II).

This document may be amended or updated periodically without prior notice. You should consult with a qualified investment advisor before making any investment or financial decisions based on the information herein.