

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”), Eurivex Ltd (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:
- 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 itemised separately, and the aggregated costs and charges will be totalled and expressed both as a cash amount and as a percentage; and
 - all costs and associated charges associated with the manufacturing and managing of the financial instruments.

The costs referred to in points (a) and (b) above include:

I. Charges associated with the provision of investment services:

1. Brokerage Fees			
Description:	CSE & ASE Equities	Global Equities	Other Markets
Commission:	0.20%	0.40%	On request
Transaction Fees*:	0.04% – 0.085%	On request	On request
Minimum Commission**:	€10	€30	On request

*Stock Exchange and Central Depository Fees are determined by the relevant Stock Exchange and Central Depository. Each client is charged according to the latest fee policy of each Stock Exchange and Central Depository respectively.
 **For transactions in currencies other than EUR, the equivalent amounts will be charged. Stock Exchange fees are excluded. Foreign Stock Exchanges fees and taxes are NOT included in above transaction costs and are charged additionally.

II. Charges associated with the provision of ancillary services:

2. Custody and settlement Fees for Retail Clients (individuals)			
Description:	CSE & ASE Equities	Global Equities	Other Markets
Safe-keeping Custody fees*	€15 per account	On request	On request
Share Account Fees**	€50 per account	On request	On request
Share Transfer - Internal	€100 per transfer	On request	On request
Share Transfer – External/Global	€200 + 0.11%	On request	On request

For transactions in currencies other than EUR, the equivalent amounts will be charged.
 *Safe-keeping Custody Fees: The Custody fees are charged annually in advance either as a flat fee for safe-custody for financial instruments listed on the CSE/ASE or on the average value of the portfolio for global markets. The charge for custody fees on shares/bonds listed in global stock markets is based on a progressive scale as listed in section 3 below
 **Share Account fees refer to a one-off Administration Charge for new application for Share Processing fees of shares listed on the Regulated Markets or the Emerging Companies Market of the Cyprus Stock Exchange (CSE).

3. Custody fees for Professional Clients	
Value of shares/bonds*	Safekeeping fee per annum (on the average value)
Under €5m	11 bps
Above €5m and under €20m	6 bps
Above €20m	5 bps
Above €50m	4 bps
Omnibus account setup fee	€850 p.a. or 0.50%

*CREST setup fee GBP 6,500 plus UK VAT. CREST custody GBP 15,000 per annum minimum fee plus above bps.

III. Admin Fees

4. Admin fees	
Online Account Opening Fees	€0
Re-activation fees	€20
Inactivity fee on positive cash balances	€50 per quarter

For incoming transfers, the processing fees including bank and other charges amount to EUR 4 per transaction for amounts up to EUR 5,000, EUR 8 for amounts between EUR 5,001 and EUR 10,000 and 0.16% for amounts in excess of EUR 10,000. For outgoing transfers, the fees for either SEPA or Swift payments can amount up to EUR 50 per transaction. For amounts in excess of EUR 10,000 there will be an additional charge of 0.16% over and above bank charges that the bank may apply.

Clients acknowledge and accept that the Company may have to pay fees to third parties who act as intermediaries for transactions in Financial Instruments.

The Company reserves the right to amend at its discretion all such commission, costs and fees and timely information on such amendments will be available on the main website which the Client must review during the period the Client is dealing with the Company and especially before placing any orders with the Company. Placing an order or transaction request is deemed as consent to any changes on the Company webpage each time.

IV. Charges related to the financial instrument:

One-off charges and on-going charges as per the ones cited in point A(I) above, which refer to the cost of the product, will also be disclosed.

V. 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.

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 personalised 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.