

Key Investor Information Document

Purpose

The following document contains key information about the investment product. This is not a marketing material. This information is required by law to help you understand the nature of this investment product and the risks, costs, potential profits and losses associated with it, and to help compare it to other products.

Warning

You are about to buy a product that is complicated and may be difficult to understand.

Product name

Contract for Difference (CFD) based on ETF DMA (Exchange Traded Fund Direct Market Access).

List of Instruments: <https://conotoxia.com/forex/trading/instrument-overview>

ISIN/UIP number

Contract for Difference

Product manufacturer

The manufacturer and distributor of the product is Conotoxia Ltd. Which is registered in Cyprus, authorized and regulated by the Cyprus Securities and Exchange Commission (license no. 336/17). The Company is regulated by the Investment Services and Activities and Regulated Markets Law 87(I) 2017.

Electronic contact

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Competent Authority

Cyprus Securities and Exchange Commission (CySEC)

Document date

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What is this Product? - Product type

A Direct Market Access CFD is a product entered into with the Company on a bilateral basis. A DMA CFD allows the order to be passed directly to the stock exchange without a third-party intervention, giving the opportunity for real time execution and genuine exchange price feed. As the DMA model passes all orders to the underlying physical market, you will interact with the demand and supply of the instrument you are trading on and participate in determining the underlying price.

Objectives

The purpose of the DMA product is to give possibility for speculating on the price movement (either up or down) without owning the physical ETF. The rate of return on investment in a product depends on the purchase price and the selling price of the offered product and the size of the position, as well as the costs associated with the product. Direct Market Access CFDs are offered with 1:1 leverage. Both loss and profit when opening a position on the product are unlimited and you need to be aware that trading on margin may magnify your potential losses or gains, however, the Company offers Negative Balance Protection ensuring that you will not lose more than you invested. For example, you believe that there would be a positive movement on Vanguard ETF, so you may decide to purchase (long position) a DMA CFD on this product, with the intention to sell it with the price higher than the initial level. The difference between the price at which you buy and sell equals your profit minus any relevant costs if applicable. The same works in the opposite direction, if you believe that the price of Vanguard will drop you may sell the DMA CFD (short position) with the intention to buy it later at the lower price, and the same as above the difference between the price at which you buy and sell equals your profit minus any relevant costs if applicable.

Intended retail investor

The product is not intended for every investor. The product is intended for retail and professional investors who understand the principles of derivative instruments and the risks associated with them, actively invests in such instruments and at the same time are aware of investment risks. The investor should become familiar with the applicable regulations, take part in available training and become acquainted with the demo version of the trading platform in order to obtain the sufficient knowledge, education and experience to be able to manage risks of leveraged trading. When trading this instrument, you are responsible for opening and closing your position as well as choosing the size of your position and any risk management tools we offer such as stop loss or take profit.

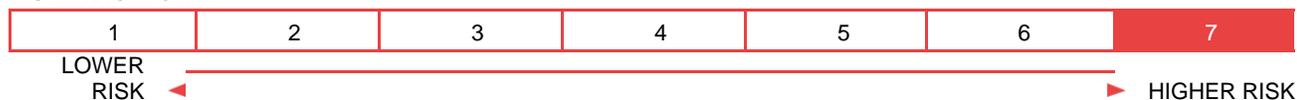
Term

CFDs generally do not have a specific maturity date or minimum holding period or pre-set conditions and will only expire if you choose to close the trade or in case you do not have a margin available to sustain your opened positions.

Risks associated and possible benefits

Risk level

RISK INDICATOR



The summary risk indicator is a guide to the level of risk of this product compared to other products. It shows how likely it is that the product will lose money because of movements in the markets or because we are not able to pay you. We have classified this product as 7 out of 7, which is the highest risk class. This rates the potential losses from a future performance at a very high level.

Be aware of the risk.

An investor may lose all invested capital, understood as a deposit protecting the open position on the product. Therefore, you should ensure that your account possesses the necessary margin to avoid any stop outs. Before, deciding to trade on margin products you should take into consideration your investment objectives, risk tolerance and level of the experience you have obtained on these products.

These products may not be appropriate for everyone; therefore, you should ensure that you understand the risks involved and seek independent advice if required. There are several types of trading risk, which you should be aware of before beginning to trade. Factors that affect the performance of this product include but are not limited to:

- Risk of unlimited loss
- Margin risk
- Foreign exchange risk
- Market risk
- Unregulated market risk
- Market disruption risk
- Counterparty risk
- Online trading platform and IT risk
- Conflicts of interest

Performance scenario

*Market developments in the future cannot be accurately predicted. The scenarios shown are only an indication of some of the possible outcomes based on recent returns. Actual returns could be lower.

This key information document is not specific to a particular product, but to the category of products DMA CFD on ETF. The table below represents outcomes of profits and losses under various scenarios. In this scenario, we assume you buy a DMA CFD contract on Vanguard S&P 500 ETF with a volume of 1 lot (1 unit) at a price of \$386.30. This means that your national exposure to the contract is \$386.30 (1 contract x the price \$386.30). However, keep in mind that the initial margin is with 1:1 leverage and you will have to deposit \$386.30. The same pattern applies in the scenario when you wish to sell a DMA CFD contract on Vanguard S&P 500 ETF with the same volume, price, and leverage.

Long Performance Scenario (1 year)	Opening Price	Closing Price	Price Change	Profit/Loss	Return in % on invested Capital of \$386.30
Favourable	\$386.30	\$390.16	1.00%	\$3.86	1.96%
Moderate	\$386.30	\$388.23	0.50%	\$1.93	0.98%
Unfavourable	\$386.30	\$384.37	-0.50%	\$(1.93)	-0.98%
Stress	\$386.30	\$370.85	-4.00%	\$(15.45)	-7.83%
Short Performance Scenario	Opening Price	Closing Price	Price Change	Profit/Loss	Return in % on invested Capital of \$386.30
Stress	\$386.30	\$390.16	-1.00%	\$(3.86)	-1.96%
Unfavourable	\$386.30	\$388.23	-0.50%	\$(1.93)	-0.98%
Moderate	\$386.30	\$384.37	0.50%	\$1.93	0.98%
Favourable	\$386.30	\$370.85	4.00%	\$15.45	7.83%

The scenario above represents potential performance of your investment. Please bear in mind that a volatile price movement can rapidly lead either to profit or loss on your investment, and a small percentage of the price change could result in significant changes in your potential returns or losses.

Costs over time

The table below shows the amounts that are deducted from your investment to cover different types of costs. These amounts depend on how much you invest, how long you hold the product [and how well the product is doing (where applicable)]. The amounts shown here are illustrations based on an example investment amount and different possible investment periods. *We have assumed holding periods of 1, 3 and 5 years and an investment of \$ 10 000 and used Vanguard S&P 500 ETF as an example. Client opens a short position of 1 lot (1 unit/contract) on Vanguard S&P 500 ETF at a price 388.30 paying commission of \$0.77. The relevant Swap percentage charged per year is 3.8% for short position and 0% for long swap and the required margin amount of \$ 388.30.

Cost Type	Ask	Bid	Margin	Total Cost	Percentage of margin
Spread (386.30-388.30)* 1	386.30	388.30	\$ 388.30	\$2.00	0.52% of margin
Commission for opening a position 0.2% from the nominal value	\$0.77				0.20% of margin
Commission for closing a position 0.2% from the nominal value	\$0.77				0.20% of margin
Conversion fee if acc currency is different than the currency of the asset 0.4%	\$1.55				0.40% of margin
Short Swap client's cost 3.8% yearly	-0.0380	1	year	\$(14.68)	3.78% of margin
Long Swap	0.0000	1	year	\$0	0.00% of margin
Short Swap client's cost 3.8% yearly	-0.0380	3	years	\$(44.04)	11.34% of margin

Long Swap	0.0000	3	years	\$0	0.00% of margin
Short Swap client's cost 3.8% yearly	-0.0380	5	years	\$(73.40)	18.90% of margin
Long Swap	0.0000	5	years	\$0	0.00% of margin

Costs	If you exit after 1 year	If you exit after 3 years	If you exit after 5 years
Total costs	\$ (18.22)	\$ (47.58)	\$ (76.94)
Annual cost impact	-0.18%	-0.48%	-0.77%

What happens if Conotoxia is unable to pay out?

Conotoxia Ltd is a member of the Investor Compensation Fund within the definition of Directive D187-07 of the Cyprus Securities and Exchange Commission for the continuance of operation and the operation of the CIF Investor Compensation Fund.

The amount of compensation payable to each covered client is calculated in accordance with the legal and contractual terms governing the relation of the covered client with the Company, subject to the setoff rules applied for the calculation of the claims between the covered client and the Company. The calculation of the payable compensation derives from the sum of total established claims of the covered client against the Company, arising from all covered services provided by the Company and regardless of the number of accounts of which the client is a beneficiary, the currency and place of provision of these services. Currently, the maximum amount of cover is either the 90% of the cumulative covered claims of the covered investor, or the amount of €20.000, whichever is lower.

What are the costs?

Before you begin to trade Contract for Difference you should familiarize yourself with all commissions, fees, and other charges for which you will be liable. These charges will reduce any net profit or increase your losses. For more information, please visit our [website](#) (section Documents and Announcements – Legal Documents – Contract Specifications and Cost and Charges).

Possible costs associated with Contracts for Difference

One-off costs

Spread

The difference between the bid (sell) price and the offer (buy) price. Spread is dependent on many different factors, including but not limited to, the underlying liquidity and volatility and time of day.

Commission

The fee charged for the service of carrying out the transaction, subject to a minimum fee on small notional trade sizes.

Currency conversion fee

Applies in cases when the account currency and a currency in which a buying asset nominates are different.

Ongoing costs

Swap points

Swap fee is charged to your account for every night that you hold a short position. The amount could be positive or negative depending on the instrument you are holding and whether you are long or short. The longer you hold a position, the more it costs. Formula to calculate Swap fee in Ctrader/MT5: (Swap Rate * $10^{-(\text{Pip Position})}$ * Quantity * Number of Nights). Swap Rates are available on both platforms under each product's description.

How long should I hold the product and can I take money out early?

The product has no recommended holding period. Provided that Conotoxia and the underlying market is open for trading you can enter and exit your positions at any time. You can open and close your positions at any time during market hours which can be found on our website. Such a decision does not entail any extraordinary costs, other than the standard costs of closing the position. Your position will expire only when you decide to close it or in the event, you do not have the available margin to hold your opened position. You are responsible for monitoring the product at all times in order to determine whether it is an appropriate time to open or close your position. However, please bear in mind that we may close your position without the prior consent in case you do not maintain a sufficient margin, or your position may be closed automatically due to the set of stop loss or take profit.

How can I complain?

Complaints about the products and services offered by Conotoxia may be submitted in writing (by post) or in electronic form (by e-mail). If you are not satisfied with the Company's final decision then you can submit a complaint to the Financial Ombudsman at <http://www.financialombudsman.gov.cy> and for clients with Polish residency at www.rf.gov.pl

Detailed information on the rules of submission, acknowledgment and processing of complaints can be found in the Client Complaint Procedure available on Company's website.

Other relevant information

Additional information on regulations, services and financial instruments traded on the OTC market are available at Company's [website](#)



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