

# KEY INFORMATION DOCUMENT

## Purpose

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

## Product

**Product name:** Contract for Difference (CFD) on ETFs (ETF CFDs),  
**Product Manufacturer:** RoboMarkets Limited,  
**Authorization:** # 191/13 issued by Cyprus Securities and Exchange Commission (CySEC),  
**Website:** [www.robomarkets.com.cy](http://www.robomarkets.com.cy), **Telephone:** +357 25 123275, **Date of revision:** 02.09.2024

**YOU ARE ABOUT TO PURCHASE A PRODUCT THAT IS NOT SIMPLE AND MAY BE DIFFICULT TO UNDERSTAND!**

## What is this product?

**ETF CFDs** [Over-The-Counter (OTC) Derivatives] - are not admitted to trading on organized trading venues. The positions you are taking in those derivatives can be covered by the Company with other brokers (so called A-Book). **ETF CFDs** rely on leverage (ex., in case of **1:20** leverage and investment of EUR 1 000 you can open positions with a size up to **EUR 20 000**).

The objective of the **ETF CFDs** for an investor is to receive profits, which is mainly affected by the price and volatility of the underlying asset, the extent of leverage used by the investor and the associated costs of the trade. The price of the underlying asset is driven by demand and supply which is greatly affected by various factors such as important political events (e.g. elections, referendums, etc), central bank announcements, economic and geopolitical developments and investors' behaviour.

This Product does NOT have a minimum holding period, thus does not have any maturity or termination date.

## Intended retail investor

Trading in this product will not be appropriate for everyone. This product would commonly be used by persons who want to generally have short term positions in financial instruments; are using (trading with) money which they can afford to lose; have a high risk tolerance; and understand the impact of and risks associated with margin (leveraged) trading.

**Knowledge** Must have base knowledge about the CFD products:  
- Basic principles of leveraged trading  
- Basic understanding of order types, profits & losses calculations, gaps

**Experience** Must have experience in ETF derivatives trading.

**Risk Tolerance** Must have an ability to bear risks of 100% losses of initial deposit.

## Insurance benefits and costs

The Company has a membership in the Investor Compensation Fund (ICF). The Fund provides insured clients of the companies registered in the CySEC with compensations up to 20,000 EUR. More info at:

[https://my.robomarkets.com.cy/files/document/information\\_on\\_investor\\_compensation\\_scheme\\_eu.pdf](https://my.robomarkets.com.cy/files/document/information_on_investor_compensation_scheme_eu.pdf)

## What are the risks and what could I get in return?

1 2 3 4 5 6 7

Lower risk Higher risk

**!** 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. There is no recommended holding period for the CFDs, however, very short holding period (less than 2-3 seconds) can be considered as non-appropriate.

The Negative Balance Protection on an account level is implemented for CFDs provided by our Company, however, there is a risk of losing all your invested capital in case of adverse market movements.

**Financial Leverage:** The high degree of "gearing" or "leverage" is a particular feature of derivative Financial Instruments. This stems from the margining system applicable to such trades, which generally involves a comparatively modest deposit or margin in terms of the overall contract value, so that a relatively small movement in the underlying market can have a disproportionately dramatic effect on the Client's trade.

**Stop Out:** The investor will have access to the information on the level of its margin through the trading platform, in particular on the need to deposit additional funds. If you do not do so and if the Margin Level (the percent ratio of account's equity to used margin for open position) of the investor's account less than Stop Out level (Margin Level which leads to automatic closure/liquidation of positions), the Company has the right to close the open positions on the account of the client.

**When the account Margin falls below 50% (100% for Prime accounts: <https://www.robomarkets.com.cy/forex-trading/trading/trading-accounts/>) positions will be closed, thus limiting your losses.**

**Be aware of currency risk.** You might receive payments in a different currency, so the final return you will get depend on the exchange rate between the two currencies. This risk is not considered in the indicator shown above.

**All clients have a negative balance protection in accordance with the legislation requirements. Clients can be sure that in any case they will not be charged more than they intended to invest into the market.**

Risk Factor	Description
Volatility of price and limitation on the available market	CFDs are not suitable for "buy and hold" trading. They can require constant monitoring over a short period of time (minutes/hours/days). Even maintaining your investment overnight exposes you to greater risk and additional cost. The prices of derivative Financial Instruments and CFDs and the Underlying Reference Instruments and Indices may fluctuate rapidly and over wide ranges and may reflect unforeseeable events or changes in conditions, none of which can be controlled by the Client or the Company.
Liquidity risk	Liquidity risk affects your ability to trade. It is the risk that your CFD or asset cannot be traded at the time you want to trade (to prevent a loss, or to make a profit).
"Stop loss" limits	To limit losses many CFD providers offer you the opportunity to choose "stop loss" limits. This automatically closes your position when it reaches a price limit of your choice. There are some circumstances in which a "stop loss" limit is ineffective - for example, where there are rapid price movements, or market closure. Stop loss limits cannot always protect you from losses.
Execution risk	Execution risk is associated with the fact that trades may not take place immediately. For example, there might be a time lag between the moment you place your order and the moment it is executed. In this period, the market might have moved against you. That is, your order is not executed at the price you expected.
Counterparty risk	Counterparty risk is the risk that the provider issuing the CFD (i.e. your counterparty) defaults and is unable to meet its financial obligations. If your funds are not properly segregated from the CFD provider's funds, and the CFD provider faces financial difficulties, then there is a risk that you may not receive back any monies due to you.

Full Risk Disclosure at: [https://my.robomarkets.com.cy/files/document/general\\_risk\\_disclosure\\_eu.pdf](https://my.robomarkets.com.cy/files/document/general_risk_disclosure_eu.pdf)

This product does not include any protection from future market performance so you could lose some or all of your investment.

If we are not able to pay you what is owed, you could lose your entire investment. However, you may benefit from a consumer protection scheme (see the section 'what happens if we are unable to pay you'). The risk indicator shown above does not consider this protection.

### Performance scenarios

**In the worst possible case**, the client's investment may incur losses that cannot be determined, and the customer may lose more than the total amount invested. If you held a long position (you bought), the loss will be more pronounced the greater the decrease in the price of the underlying asset between the moment of opening and closing of the position. If you held a short position (you sold), the loss will be more pronounced the greater the price increase of the underlying exchange rate between the opening moment and the moment of closure of the position.

**In the best possible case**, the client's investment may incur unrecordable gains, and the customer can earn more than the total amount invested. If you held a long position (you bought), the gain will be more pronounced the increase the price of the underlying asset between the opening moment and the closing moment of the position. If you held a short position (you sold), the gain will be more pronounced the greater the decrease of the price of the underlying exchange rate between the opening moment and the moment of closure of the position.

**Performance scenarios backgrounds:** Costs of execution are not included in calculations, but should be taken into account. Position holds during the day and is not a subject to rollover fees (swap).

Conditions: Instrument: SPDR S&P 500 ETF; Notional value: 10000 USD; Leverage: 1:1; Balance: 10000 EUR;

SPDR S&P 500 ETF (held intraday)									
Buy position (Long position)					Sell position (Short position)				
Scenario	Open price	Close price	Price change (%)	Profit/Loss (USD)	Scenario	Open price	Close price	Price change (%)	Profit/Loss (USD)
<b>Stress</b>	413.98	400.61	-3.23	-322.96	<b>Stress</b>	413.98	426.9922	3.14	-314.32
<b>Unfavourable</b>	413.98	406.655	-1.77	-176.94	<b>Unfavourable</b>	413.98	421.1663	1.74	-173.59
<b>Moderate</b>	413.98	413.9762	-0.0	-0.09	<b>Moderate</b>	413.98	413.9762	-0.0	0.09
<b>Favourable</b>	413.98	421.1663	1.74	173.59	<b>Favourable</b>	413.98	406.655	-1.77	176.94

**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.**

### What happens if RoboMarkets Limited is unable to pay out?

All retail investors are under protection of Investors Compensation Fund (ICF), an entity with its primary goal to provide investors with protection by the means of compensation in case the investment company fails to return monetary funds and financial instruments to the investor. Investors are protected for the invested amount of up to EUR 20 000. More information on ICF can be found at [https://my.robomarkets.com.cy/files/document/information\\_on\\_investor\\_compensation\\_scheme\\_eu.pdf](https://my.robomarkets.com.cy/files/document/information_on_investor_compensation_scheme_eu.pdf)

### What are the costs?

Before you begin to trade **ETF CFDs** 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:

<https://www.robomarkets.com.cy/forex-trading/platforms/stock-market/>

Composition of costs				Amounts	USD/Percentage*
Type	Costs	Definition	Additional information	Ranges	Example: Cost in USD / Costs in percentage

One-off costs	Market spread	The difference between ask and bid prices which is paid to open the position. The terms ask/bid refer to a two-way price quotation that indicates the best price at which a security can be sold (bid) and bought (ask) at a given point in time. The bid price represents the maximum price that a buyer is willing to pay for a security. The ask price represents the minimum price that a seller is willing to receive.	<a href="https://www.robomarkets.com.cy/forex-trading/platforms/stock-market/">https://www.robomarkets.com.cy/forex-trading/platforms/stock-market/</a>	0.04 USD per lot	0.04 USD / 0.03%
	Markup	The fee paid to open/close the position. Markup is the value the Company adds to the market Ask and Bid prices. The markup value affects the spread in the instrument, enlarging it; thus, the client buys the instrument at a higher price than the market price and sells at a lower price than the market price. The difference between the marked-up and market prices is the fee the Company charges for opening and closing the position.	<a href="https://www.robomarkets.com.cy/forex-trading/platforms/stock-market/">https://www.robomarkets.com.cy/forex-trading/platforms/stock-market/</a>	0.4 per lot/share [Depends on account type]	0.4 USD / 0.3% [rTrader]
	Deposit/Withdrawal commission	The costs of deposits/withdrawals expenses which are based on 3rd parties conditions.	<a href="https://www.robomarkets.com.cy/clients/funds/deposit-withdrawal/">https://www.robomarkets.com.cy/clients/funds/deposit-withdrawal/</a>	1) Deposits: 0% 2) Withdrawals: 0%-3% [Depends on payment system]	1) 0 USD / 0 % [Credit Card] 2) 0 USD / 0 % [Skrill, Tuesday withdrawal]
	Conversion	The expenses for conversion from one currency to another during transfers of funds between the client wallet/card and trading account.	<a href="https://my.robomarkets.com.cy/en/operations/inner-exchange-rates/">https://my.robomarkets.com.cy/en/operations/inner-exchange-rates/</a>	0%-3% [Depends on currencies used]	5 EUR / 0.5% [Deposited in USD on EUR account]
Ongoing costs	Swap	On the market, clients are charged with Rollover (Swap) charges for transiting the position over midnight (funds that are deposited/withdrawn to a client's account for keeping open position to the next day).	<a href="https://www.robomarkets.com.cy/forex-trading/platforms/stock-market/">https://www.robomarkets.com.cy/forex-trading/platforms/stock-market/</a>	7%	-0.09 USD / 0.06% [1 day: opened on Thursday, closed on Friday]
Incidental costs	Inactive accounts fees	Inactive accounts will be charged with a semi-annual maintenance fee of 5 USD.	<a href="https://my.robomarkets.com.cy/files/document/terms_of_business_for_clients_eu.pdf">https://my.robomarkets.com.cy/files/document/terms_of_business_for_clients_eu.pdf</a>	5 USD	0 USD / 0% [active account]

\*Conditions: Instrument: SPDR S&P 500 ETF; Volume: 1 lot; Leverage: 1:5; Balance: 1000 EUR; Deposited in USD; Withdrawal of 1000 EUR;

## How long should I hold it and can I take money out early?

**Recommended [Required minimum] holding period: No recommendations**

Due to the overall size and nature of the OTC market and how liquid it is, you can close your trade anytime. However, as mentioned in the paragraph "What are the risks and what could I get in return?", in case you trade outside working hours or on weekends, the cost incurred (namely, the spread) can be significantly higher.

Holding period may vary depending on your investment strategy, however please note that overnight positions are subject to rollovers (swaps), as mentioned in paragraph "What are the costs?", which can decrease possible income or increase possible loss.

## How can I complain?

If you wish to submit a complaint, you may do so by following the below instructions: Fill the respective "Client's Complaints Form" in the Member's Area or by the [link](#) and send it to Administration/Back Office Department by email: [info@robomarkets.com.cy](mailto:info@robomarkets.com.cy) or by fax: +357-25-580077, along with a copy of any additional documentation that would be relevant to the complaint.

If you are dissatisfied with Company's final response, you can refer the matter to the Financial Ombudsman Service

**Address:** 15 Kypranoros, 1061 NICOSIA, Phone: 22848900 (main number), **Facsimile (Fax):** 22660584, 22660118. **E-mail Complaints:** [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy), **Website:** <http://www.financialombudsman.gov.cy>.

The Company's Complaint Handling Procedure can be found [here](#).

## Other relevant Information

Our website contains important information regarding the products and services offered by the Company. You should ensure that you are familiar with all the terms and policies that apply to your account. These documents can be accessed at the Company's [website](#). All these documents are also available on request.