Ex-Ante Costs & Charges Disclosure (Stocks Trading)

I. Introduction

Capital Com Group Ltd (the "**Company**", "**we**", "**Capital Com**") is a Cypriot Investment Firm (the "**CIF**") regulated by the Cyprus Securities and Exchange Commission (the "**CySEC**") for the provision of investment and ancillary services under the licence number 463/25 and registered in the Republic of Cyprus. Our business and registered address is at 66 Christaki Kranou, 7th Floor, City Tower, 4042, Germasogeia, Limassol, Cyprus.

II. Purpose

This Ex-Ante Costs & Charges Disclosure (the "**Disclosure**") provides you with information on the estimated costs and charges associated with trading stocks with the Company.

For the purposes of this disclosure, "stocks" shall mean transferable securities as defined under Article 4(1)(44) of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments (the "**MiFID II**"), including among others stocks, American Depositary Receipts (the "**ADRs**"), Real Estate Investment Trusts (the "**REITs**"), Exchange-Traded Funds (the "**ETFs**"), Exchange-Traded Notes (the "**ETNs**") and Exchange-Traded Commodities (the "**ETCs**"). Please note that cost structures may vary across instrument types.

It is provided to you prior to the execution of a transaction (ex-ante) in accordance with applicable regulatory requirements. This Disclosure is reviewed and updated on an annual basis or when a material change occurs.

The purpose of this disclosure is to:

- Inform you of the types of costs and charges that may apply;
- Identify who receives those costs — the Company or third parties;
- Explain how those costs are calculated;
- Set out when they are charged;
- Present aggregated cost illustrations in monetary and percentage terms;
- Demonstrate how costs may impact your investment return.

This Disclosure applies to cash equity transactions only and does not cover derivative instruments.

The figures presented are estimates based on reasonable assumptions and standard transaction scenarios. Actual costs may differ depending on transaction size, jurisdiction, currency, holding period, and market conditions.

III. Legal Framework

The Company is subject to the requirements of MiFID II and its implementing measures, as transposed into Cypriot law by the Investment Services and Activities and Regulated Markets Law of 2017, as amended from time to time (the "**Law 87(I)/2017**"). The obligation to provide clients with pre-contractual costs and charges information arises under Article 24(4) of MiFID II, which requires investment firms to provide clients, in good time before the provision of investment services, with information on all costs and associated charges relating to both the investment service and the financial instrument. This obligation applies to retail and professional clients.

The detailed methodology and content requirements for costs and charges disclosure are set out in Articles 50 and 51 of Commission Delegated Regulation (EU) 2017/565 (the "**Delegated Regulation**"). Article 50 of the Delegated Regulation specifies the categories of cost that must be disclosed, including one-off and ongoing charges, transaction costs, and incidental costs such as foreign exchange conversion charges. Article 51 of the Delegated Regulation

prescribes the format requirements, including the obligation to aggregate total costs as both a monetary amount and a percentage, and to illustrate the cumulative effect of costs on investment returns over time.

Where the Company acts as a receiving firm and transmits client orders to a third-party executing broker, the Company retains full responsibility for the accuracy and completeness of the costs and charges disclosure provided to clients. Costs incurred at the level of the executing broker form part of the total costs that must be disclosed.

This disclosure is provided in accordance with these requirements prior to the execution of any transaction in stocks through the Company's trading platform. It does not constitute investment advice.

IV. Nature and categories of costs and charges

When you trade stocks with Capital Com, costs may arise from different sources. For the purposes of Article 50 of Delegated Regulation (EU) 2017/565, these costs are grouped into the following categories:

- **Instrument Costs:** statutory taxes, stamp duties, FTT, regulatory transaction fees, settlement levies, ADR custody fees and similar market-imposed charges directly linked to the financial instrument.
- **Service Costs:** FX mark-ups, stock transfer fees applied by Capital Com in relation to the investment service provided.

There are no entry (onboarding), exit (offboarding), custody, commission, or other ongoing service charges applied by the Company in relation to execution-only services. The only service-level charges are those described in the Service Costs section below.

1. Service Costs (charged by Capital Com)

The Company charges the following fees in connection with the execution and administration of your transactions:

- **FX / Exchange mark-up:**
  If you trade a stock in a currency different from your account base currency, a currency conversion is required and may apply on both purchase and sale.

- **Stock transfer fee**
  If you request an outbound transfer of securities, a transfer fee may apply per position transferred.

2. Third-party charges and taxes

Some markets, regulators, custodians, or tax authorities may impose statutory charges on equity transactions. These are not set by Capital Com and may include:

- Stamp duties and similar taxes;
- Financial Transaction Taxes (FTT);
- Regulatory transaction fees;
- Settlement levies;
- Withholding taxes; and
- ADR custody fees/pass-through fees (where applicable)

V. How costs affect your investment

Costs and charges reduce your overall return. They may reduce:

- the amount initially invested (entry costs);
- the amount received upon sale (exit costs);
- the overall performance over time.

Costs are shown in monetary terms and as a percentage relative to the investment value. They apply regardless of whether your investment increases or decreases in value. The cumulative effect of costs over time is illustrated in

the aggregated cost scenarios in Section VIII of this Disclosure, including a scenario where the gross investment return is zero, demonstrating that costs are incurred independently of performance.

VI. Costs and Charges

1. Service Costs

Cost Type	Description	Charging Method	Amount / %
FX / Exchange Mark-Up	Currency conversion for non-base currency trades. Applied on both buy and sell where conversion is required.	Per conversion	0.40% of converted amount
Stock Transfer Fee	Outbound transfer of securities to another broker or custodian.	Per position, upon request	50 EUR per position

2. Regulatory charges, taxes and other third-party costs (pass-through)

Jurisdiction	Charge	Applies to	Rate	Key Information
United States	SEC Section 31 Transaction Fee	Sales of US-listed securities	$20.60 per $1,000,000 of gross sale proceeds	A regulatory fee collected by the SEC to fund US securities market supervision. Charged on sell transactions, minimum $0.01. The applicable rate is set annually by the SEC and is subject to change. Please refer to the Company's fee page for the current rate.
United States	FINRA Trading Activity Fee (TAF)	Sales of US securities	$0.000195 per share**	A regulatory fee funding FINRA's oversight of US broker-dealers. Charged on sell transactions. Minimum $0.01, maximum $9.79 per trade. Rate subject to change by FINRA.

Jurisdiction	Charge	Applies to	Rate	Key Information
United States	Consolidated Audit Trail Fee (CAT Fee)	Buys and sales of US-listed equities and ETFs	$0.000003 per share	A regulatory fee funding the Consolidated Audit Trail system, which records and tracks orders and trades across US securities markets. Charged on both buy and sell transactions, passed through at order level. Rate is set by the CAT NMS Plan operating committee and is subject to change.
United Kingdom	Stamp Duty / Stamp Duty Reserve Tax (SDRT)	Purchases of UK-incorporated stocks	0.50%	A UK government tax on purchases of stocks in UK-incorporated companies. Does not apply to: ETFs, ADRs, AIM-listed stocks, newly issued stocks (3-year stamp relief), or stocks of non-UK-incorporated companies even where listed on UK exchanges (e.g. Irish, US, Jersey, or Cayman-incorporated companies).
United Kingdom	Panel on Takeovers and Mergers (PTM) Levy	Buys and sells exceeding £10,000	£1.50 per trade	A levy funding the UK Takeover Panel. Charged on both buy and sell transactions where the transaction value exceeds £10,000.
Ireland	Irish Stamp Duty	Purchases of Irish-incorporated stocks	1.00%	A government tax on purchases of stocks in Irish-incorporated companies.
Ireland	Irish Takeover Panel Levy (ITP Levy)	Buys and sells exceeding €12,500	€1.25	A levy supporting the Irish Takeover Panel. Charged on both

Jurisdiction	Charge	Applies to	Rate	Key Information
				buy and sell transactions above the threshold.
France	French Financial Transaction Tax (FTT)	Purchases of eligible large-cap French companies	0.40%	A French government tax on purchases of certain large-cap French equities (market cap > €1bn). The list of in-scope companies is published annually by the relevant tax authorities. If the stock is not listed, FTT does not apply.
Italy	Italian Financial Transaction Tax (FTT)	Purchases of eligible Italian stocks	0.20%	A tax on purchases of certain Italian equities traded on regulated markets. Companies exempt from FTT are published annually by the Italian tax authority.
Spain	Spanish Financial Transaction Tax (FTT)	Purchases of eligible large-cap Spanish companies	0.20%	Applies to companies above the statutory market cap threshold (€1bn). The list of in-scope companies is published annually by the relevant tax authorities.
ADR Markets	ADR Custody Fee	Holding ADRs / dividend processing	USD 0.01–0.05 per ADR annually	A fee charged by the depositary bank for administering ADR programmes. May be deducted from dividend payments or charged separately, depending on the depositary's practice.

** Rates are subject to change by the relevant authority.*

*** FINRA has temporarily suspended the Trading Activity Fee (TAF) for transactions executed from 1 October 2026 to 31 December 2026 inclusive. The TAF will not be charged on sales of US securities executed during this period. Transactions executed up to and including 30 September 2026 remain subject to the TAF at the rate shown above. The TAF is expected to resume from 1 January 2027, in accordance with the applicable FINRA fee schedule.*

VII. Withholding Taxes on Dividends

When you hold stocks or ETFs, you may receive dividend payments. In many jurisdictions, dividend payments are subject to withholding tax (WHT) at source. This means that tax may be deducted before the dividend is paid to you. Withholding taxes are imposed by the relevant tax authorities and are not charged by Capital Com. They are not included in the aggregated trading cost illustrations below, as they depend on individual tax residency, treaty eligibility, and personal circumstances.

Capital Com does not provide tax reclaim services.

The applicable rate depends on:

- The country of the issuing company;
- The type of security (e.g. stocks or REITs);
- Your country of tax residence;
- Whether a valid tax treaty or declaration form has been submitted (where applicable).

Asset Country	WHT on Stocks	WHT on REITs	Notes
France	25% (standard)	15%	-
Germany	26.38%	15%	-
Ireland	25% (standard)	20%	-
Italy	26%	26%	-
Netherlands	15%	15%	-
Norway	25%	25%	-
Spain	19%	19%	-
Sweden	30%	30%	-

Asset Country	WHT on Stocks	WHT on REITs	Notes
UK	0%	20%	-
USA	10% / 15% / 30%	10% /15% / 30%	Depends on valid W-8BEN and treaty eligibility

Note: *Rates are subject to change and may vary depending on individual circumstances and documentation provided. Withholding tax reduces the net dividend amount you receive and therefore affects your overall return.*

VIII. Aggregated Cost Illustrations

The illustrations below show the estimated impact of costs on your investment across three scenarios: a positive return, a zero return, and a negative return. This demonstrates that costs apply regardless of investment performance.

Certain third-party costs, such as ADR custody fees and withholding taxes, are not included in the aggregated illustrations as they depend on factors specific to the instrument and the client's holding profile.

1. Scenario A - Without FX Conversion

Item	Value
Investment Amount	EUR 10,000
Holding Period	6 months
Applicable Jurisdiction	Germany
Applicable Taxes / Levies	None (no German stamp duty; German equities are generally not subject to FTT)

The PTM Levy of £1.50 does not apply in this scenario as the transaction value in GBP is assumed to be below the £10,000 threshold at prevailing exchange rates. Clients should note that this levy may apply depending on exchange rates at the time of execution.

Entry Costs

Cost Component	Amount	% of Investment
Stamp Duty	EUR 0	0.00%
Other Regulatory Charges	EUR 0	0.00%
Total Entry Costs	**EUR 0**	**0.00%**

Exit Costs

Cost Component	Amount	% of Investment
Regulatory Sell Charges	EUR 0	0.00%
Total Exit Costs	**EUR 0**	**0.00%**

Total Aggregated Impact

Scenario	Positive Return (+5%)	Zero Return (0%)	Negative Return (-5%)
Gross Final Value	EUR 10,500	EUR 10,000	EUR 9,500
Total Costs	EUR 0	EUR 0	EUR 0
Net Final Value After Costs	EUR 10,500	EUR 10,000	EUR 9,500
Reduction in Yield (RiY)	0.00%	0.00%	0.00%

Note: *Reduction in Yield (RiY) is calculated as: RiY = (Total Aggregated Costs / Investment Amount) × 100 = EUR 0 / EUR 10,000 = 0.00% across all return scenarios. For execution-only services with no ongoing fees, costs are fixed in absolute terms and therefore represent the same percentage of the initial investment regardless of performance. Actual reduction in annualised return will vary depending on holding period and realised performance.*

2. Scenario B - With FX Conversion

Item	Value
Investment Amount	EUR 10,000

Item	Value
Base Currency	EUR
Instrument Currency	USD (assumed)
Holding Period	6 months
Applicable Jurisdiction	United Kingdom
Applicable Taxes / Levies	UK Stamp Duty (SDRT) – 0.50% on purchase

FX and Other Costs

Cost Component	Amount	% of Investment
FX Conversion (Entry — buy)	EUR 40	0.40%
FX Conversion (Exit — sell)	EUR 40	0.40%
Stamp Duty / SDRT	EUR 50	0.50%
Total Costs	**EUR 130**	**1.30%**

Total Aggregated Impact

Scenario	Positive Return (+5%)	Zero Return (0%)	Negative Return (-5%)
Gross Final Value	EUR 10,500	EUR 10,000	EUR 9,500
Total Costs	EUR 130	EUR 130	EUR 130
Net Final Value After Costs	EUR 10,370	EUR 9,870	EUR 9,370
Reduction in Yield (RIY)	1.30%	1.30%	1.30%

Note: *Reduction in Yield (RiY) is calculated as: RiY = (Total Aggregated Costs / Investment Amount) × 100 = EUR 130 / EUR 10,000 = 1.30% across all return scenarios. For execution-only services with no ongoing fees, costs are fixed in absolute terms and therefore represent the same percentage of the initial investment regardless of performance. Actual reduction in annualised return will vary depending on holding period and realised performance.*

Note on holding period: *The illustrations above assume a six-month holding period. For execution-only services with no ongoing fees, the absolute cost in monetary terms is fixed regardless of how long the position is held. However, the annualised Reduction in Yield (RiY) will vary: the longer the holding period, the lower the annualised cost impact. For example, the same EUR 50 entry cost on a EUR 10,000 investment represents a 1.00% annualised RiY over 6 months, 0.50% over 12 months, and 0.25% over 24 months.*

3. Technical assumptions

- The illustrative examples assume a standard buy-and-sell transaction over the specified holding period.
- No ongoing custody, management, or advisory fees are assumed; no such fees are charged by the Company.
- The full investment amount is assumed to be deployed at purchase.
- All applicable entry and exit costs are applied.
- FX conversion is applied in Scenario B at 0.40% on both purchase and sale.
- Actual costs may vary depending on market conditions, execution venue, instrument type, and transaction characteristics.

IX. When and where are fees shown?

Fees are shown to you prior to the execution of any transaction, in accordance with the requirement under Article 24(4) MiFID II to provide information in good time before the provision of investment services. Specifically, fees are presented:

- Via the platform, before you place an order; and
- In the order confirmation screen following execution.

X. Ex-Post costs and charges disclosure

The Ex-post Costs and Charges Disclosure will be provided annually on a durable medium. It will detail the actual costs and charges incurred over the reporting period.

XI. Inducements (Article 24(9) MiFID II)

The Company does not accept or retain any fees, commissions, or monetary or non-monetary benefits from the third-party executing broker or any other third

party in relation to the execution of client orders in stocks. There are no payment for order flow (PFOF) arrangements, volume-linked rebates, or inducement arrangements in place that could conflict with the Company's obligation to act in the best interests of clients.

Any interest earned on clients' balances is retained by the Company and is not credited to clients. No interest is payable to clients on cash held in credit institutions.

The Company may pay a flat fee to third parties under partnership agreements. Such payments are not linked to trading volumes, revenues generated by clients, or account openings. They do not constitute a direct cost to the client and are not included in the aggregated cost tables above.

The Company maintains organisational arrangements to ensure compliance with its obligation to act honestly, fairly, and professionally in accordance with the best interests of clients. Further information is available in the Company's Conflicts of Interest Policy, which is available on the Company's website.

XII. Important information

The value of investments can go up as well as down. You may receive less than your original investment or lose the value of your entire initial investment. Past performance is not a reliable indicator of future results. Currency rate fluctuations can adversely affect the overall return on your investment.

This Disclosure is provided for informational and illustrative purposes only. The costs and charges presented are estimates based on assumptions and may not reflect each client's individual circumstances. Actual costs incurred may differ.

This Disclosure does not constitute marketing material, investment advice, or a recommendation, and it is not suitable for tax, legal, or accounting purposes.

Annex 1 - Definitions

"**ADRs**" shall mean American Depository Receipts.

"**CIF**" shall mean a Cyprus Investment Firm.

"**Client(s)**" or "**you**" shall mean the natural person or legal entity or the union of persons or group of assets devoid of legal personality who are clients of Capital Com.

"**Company**" or "**we**" or "**Capital Com**" shall mean Capital Com Group Ltd.

"**Cyprus Securities and Exchange Commission**" or the "**Commission**" or the "**CySEC**" shall mean the Cyprus Securities and Exchange Commission.

"**Delegated Regulation**" shall mean the Commission's Delegated Regulation (EU) 2017/565 supplementing MiFID II.

"ETCs" shall mean Exchange Traded Commodities.

"ETFs" shall mean Exchange Traded Funds.

"ETNs" shall mean Exchange Traded Notes.

"**Law 87(I)/2017**" and/or "**Law**" shall mean the Investment Services and Activities and Regulated Markets Law of 2017, as amended from time to time.

"MiFID II" or **"Markets in Financial Instruments Directive (2014/65/EU)"** shall mean the Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments and amending Directive 2002/92/EC and Directive 2011/61/EU.

"**Reduction in Yield**" or "**RiY**" means the annualised percentage reduction in investment return attributable to costs and charges, expressed in accordance with Article 51 of Commission Delegated Regulation (EU) 2017/565.

"REITs" shall mean Real Estate Investment Trusts.

"**Stocks**" or "**stocks**" shall mean transferable securities as defined under Article 4(1) point (44) of MiFID II, including among others, shares, ADRs, ETFs, ETNs and ETCs. The Company markets Transferable Securities commercially under the name "Stocks."