

RISK DISCLOSURE STATEMENT

1. Introduction

Capital Com SV Investments Limited ("we", "Capital Com" or the "Company"), is a Cypriot Investment Firm ("CIF") authorized and regulated by the Cyprus Securities and Exchange Commission (the "CySEC") under License No. 319/17 with registered office is at Vasileiou Makedonos 8, Kinnis Business Center, 2nd floor, 3040, Limassol, Cyprus.

The Financial Instruments offered by the Company include Stocks, Contract for Differences (the "CFDs") and Knock-Out Options (the "KOs") with a range of underlying assets, such as Shares, Indices, Cryptocurrencies, Commodities and Forex.

2. Legal and Regulatory Requirements

The Company is operating under the provisions of the Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments Directive 2014/65/EU) (the "MiFID II"), which was transported into Cypriot Law, the Investment Services and Activities and Regulated Markets Law of 2017 .

The Company's Risk Disclosure Statement (the "Statement") provides to its existing and/or potential clients ("you" or "they") with information about the risks associated with its products , which you may trade..

In addition, you can refer to the Key Information Document (hereafter "KID"), which provides you with key information about the Company's investment products. This information is required by law to help you understand the nature, costs, risks and rewards of this product and to help you compare it with other products.

3. Services offered by the Company

Our services are provided on an execution only basis. We do not provide either investment advice nor portfolio management in relation to our products. The Company acts as the principal in all dealings and is the sole execution venue for its clients' orders.

4. Contracts for Difference

A CFD is a derivative instrument priced with reference at an underlying asset price. CFDs are traded Over The Counter ("OTC") and no exchange or other external execution venue will be involved in the transaction. CFDs involve greater risk than investing in on-exchange products, as market liquidity cannot be guaranteed and it may be more difficult to liquidate an existing position. The prices and other conditions are set by us in accordance with our obligation to provide best execution as included in our Order Execution Policy and in accordance with our Terms & Conditions.

The services of Capital Com are available for retail clients, professional clients and eligible counterparties. CFDs are high risk and complex financial products, generally used for speculative purposes, and may not be appropriate for all individuals. CFDs are not suitable for "buy and hold" trading, therefore if the client does not have enough time to monitor such investment on a regular basis, he or she should not trade in CFDs.

5. Transferable Securities – Stocks

Stocks represent ownership in a specific company or corporation. In general, the price of a stock is primarily influenced by the company's performance—if the company is performing well, its stock price typically rises, and if the company faces difficulties, the stock price may fall.

- In the event that a company becomes insolvent or undergoes liquidation, holders of ordinary shares are at the bottom of the priority list for payment. This means that shareholders may not receive any compensation until all other debts and obligations (such as those owed to creditors and bondholders) have been settled.
- One key factor affecting stock prices is **perception risk**. The price of a company's shares is heavily influenced by investor sentiment and market perceptions of its future prospects. If investors are optimistic about the company's future, the stock price may rise. Conversely, if there is pessimism or negative sentiment, the stock price can fall. For example, if investors lose confidence in the company, the stock price might decrease, and if you decide to sell at that time, you might realize a loss. Even if the stock price recovers later, there's no guarantee you'll regain the amount you originally invested.
- Additionally, stock prices can be volatile, and they can be influenced by various external factors such as changes in the economy, interest rates, industry performance, or even broader market trends. Therefore, investing in stocks carries inherent risks, and investors must be prepared for the possibility of losses, especially in the short term, if market conditions are unfavorable.

6. Special Statement for Residents of Spain

CFD is a product that is complex and difficult to understand. The National Securities Market Commission of Spain (Comisión Nacional del Mercado de Valores) has determined that, due to the complexity of the CFDs and the risks involved, the purchase of CFDs by retail investors is not appropriate/suitable. A CFD is also a leveraged product and the losses incurred may be greater than the amount initially invested.

7. Knock-out options (KOs)

KOs are derivative financial instruments that give the buyer the right to speculate on the direction of a specific underlying asset upon the payment of an Option Price (also referred to "Size in Cash" on the Online Trading Platform) and that may become worthless if the price of the said underlying reaches the KO level price.

KO level is a predetermined price level of the underlying asset that, if reached, terminates the KO quantity at zero value. The KO level is selected by the trader when entering a trade by choosing either a Call or Put direction.

The services of Capital Com are available for retail clients, professional clients and eligible counterparties. KOs are high risk and complex financial products, generally used for speculative purposes, and may not be appropriate for all individuals. Due to their short-term nature and sensitivity to market movements, KOs are not suitable for passive or long-term investment strategies. Their structure requires active monitoring, as they are subject to rapid and significant changes in value. Therefore, if a client does not have sufficient time to monitor such investments on a regular basis, they should not trade in KOs.

8. Example of how a CFD works

Company ABC is a public company listed on London Stock Exchange. You think a listed share ABC is undervalued and that its price will rise. The price quoted is 60/65. That means you may sell at 60€ or buy at 65€. The difference between the price you can sell and the price you can buy is called "the spread".

You decide to buy 40 CFDs in the share ABC at the price of 65€ per CFD. Your position is therefore 2600€ (40 x 65€).

Leverage allows you to trade in positions larger than your own money. So, you do not actually pay 2600€. The amount you pay depends on the margin required. If the required margin is 20% that means your minimum initial payment is 520€ (2600€ x 20%). The return you get on this initial requirement depends on the price at which you decide to close your position (that is, when you sell the CFD).

If the price of ABC decreases by 5% (from 60/65€ to 57/61.75€), you will lose the difference between opening and closing price multiplied by the size of the contract. i.e. you lose $(65-61.75)*40=130\text{€}$.

The only cost paid to enter into such transaction is the spread, which is 200€ [i.e. $(65-60)*40$]. In addition to spread, if any position is carried overnight, there is an overnight funding adjustment/swap that needs to be debited or credited to your account. Overnight find adjustments or swaps can be found on the website and the trading app. You should be aware of the possibility that other costs, such as taxes, may exist that are not paid through or imposed by the Company. It is your sole responsibility to bear these additional costs. Costs related to trading CFDs may outweigh the gross profits from a trade.

CFD trading is risky and not suitable for everyone. If you choose to enter a trading relationship with us, it is important that you *remain aware of the risks involved, that you have adequate financial resources to bear such risks and that you monitor your positions carefully*. If you are in any doubt about the risks involved, you should seek professional advice.

This Statement provides a general description of the risks associated with trading CFDs over-the-counter. This Statement does not explain all the risks involved in trading CFDs or how such risks relate to your personal circumstances.

CFD trading involves high risk of losing your capital. You are highly recommended not to invest cash that you cannot afford to lose.

9. Examples of how a KO option works

1. Company X is traded on NYSE with a current price (Call 101, Put 99). Client selects a Call KO, speculating that the price of the underlying asset Company X will increase. The client decides to open 2 Call KO quantities and sets the KO level at 50 \$.
The client pays 102 \$ to open the trade (Option Price), which is the initial cost for entering the trade and is calculated as follows:

For KO Calls: (Open Price – KO level) × Quantity = (101–50) × 2 = 51×2 =102 USD

Later, the price of Company X rises to 120 \$. The value of each KO quantity is now 70\$. The client decides to close both KO quantities and makes a profit of 40 \$, calculated as follow:

New value per quantity: Current Price – KO level = 120 – 50 = 70

Since the client opened 2 quantities, the total value of these 2 quantities is:

Total value = 70 × 2 = 140 USD

The client closes the trade and realizes a profit of:

Profit = Total Value – Option Price paid = 140 – 102 = 38 USD

2. Another client opens 5 Put KO quantities with underlying Commodity Z, which is traded at 250\$, speculating that the price of Commodity Z will go down. The client sets the KO level at 300. Client pays 250\$ to open the trade (50\$ for each KO quantity).

Option Price per quantity = (KO level – Current price) × Quantity = (300 – 250) × 1 = 50 USD

The client pays 250\$ to open the trade (5 quantities, 50\$ each).

Later, the price of Commodity Z drops to 220\$ and the client closes the 2 Put KO quantities at 80\$ each.

The calculations are as follow:

Value per quantity = KO level - Current price = 300 - 220 = 80 USD

Since the client has 5 quantities, the total value for all quantities is:

Total value = 80 x 50 = 400 USD

The client decides to close 2 quantities at 80 USD each, which gives a total of:

Value from closing 2 quantities = 80 x 2 = 160 USD

The remaining 3 quantities still have the potential for profit if the price continues to fall.

Then, the price of Commodity Z suddenly rises at 301\$. The 3 remaining KO quantities expire worthless because the price of the underlying asset has touched or exceeded the KO level set by the client.

Therefore, the remaining 3 quantities result in a total value of 0\$, as they are knocked out.

At the end, the Client has made -90\$ losses, which is calculated as follow:

Total loss = Option Price paid - value of 2 quantities = 250 - 160 = 90 USD

In addition to the Option Price, if any trade is carried overnight, there is an overnight funding adjustment that needs to be debited or credited to your account. Overnight funding adjustment rates can be found on the website and the trading app. You should be aware of the possibility that other costs, such as tax, may exist that are not paid through or imposed by the Company. It is your sole responsibility to bear these additional costs. Costs related to trading KOs may outweigh the gross profits from a trade.

KOs trading is risky and not suitable for everyone. If you choose to enter a trading relationship with us, it is important that *you remain aware of the risks involved, that you have adequate financial resources to bear such risks and that you monitor your trades carefully*. If you are in any doubt about the risks involved, you should seek professional advice.

This Statement provides a general description of the risks associated with trading KOs over-the-counter. This Statement does not explain all the risks involved in trading KOs or how such risks relate to your personal circumstances.

KO trading involves a high risk of losing your capital. You are highly recommended not to invest cash that you cannot afford to lose.

By entering a CFD and/or KO transaction with Capital Com the client acknowledges, understands and agrees that:

1. Trading CFDs and KOs is highly speculative and risky

Trading CFDs and KOs is highly speculative, involves a significant risk of loss and is not suitable for all investors. CFDs and KOs are a risky type of investment and can result in large losses.

CFDs and KOs are only suitable for those clients who:

- understand and are willing to assume the economic, legal and other risks involved;
- are experienced and knowledgeable about trading in CFDs and/or KOs and in the underlying assets; and
- are financially able to assume losses significantly in excess of the margin.

2. CFDs and KOs may not be appropriate for you

Before the Company opens an account for you, the Company is required to make an assessment of whether the products and/or services are appropriate for you, and to warn you if, on the basis of the information you have provided, that any product or service is not appropriate.

We may ask you for information about your financial assets and earnings. We do not monitor on your behalf whether the amount of money that you have sent us or your profits and losses are consistent with that information. It is up to you to assess whether your financial resources are adequate and what level of risk you take.

If the client is warned that the given CFD and/or KOs is not appropriate for him/her and still decides to proceed with the Company, the client is deemed to have confirmed that he/she understands the risks involved and accepts them.

3. The past performance of a CFD and KO is not a reliable indicator of future performance

Past performance of a CFD and KO is not a reliable indicator of its future performance.

4. There are risks related to market liquidity

Liquidity risks affect your ability to trade. It is the risk that your CFD, KO or asset cannot be traded at the time you want to trade. In setting our prices, spreads and the size limits in which we deal, we take into account the markets for the relevant underlying assets. Market conditions can change significantly in a very short period of time. Under certain trading conditions it may be difficult or impossible to liquidate a position/trade.

5. Trading OTC entails risk

Trading over-the-counter (OTC) involves specific risks. When trading CFDs or KOs with us, the orders will not be executed on a recognized or designated investment exchange but rather directly with the broker, in what is commonly referred to as OTC trading. All positions/trades entered into with us must also be closed with us and cannot be transferred or closed with any other entity. OTC transactions may involve greater risk than investing in on-exchange transactions because there is no exchange market on which to close out an open position/trade. It may be impossible to liquidate an existing position/trade, to assess the value of the position/trade arising from an OTC transaction or to assess the exposure to risk. There is no central clearing and no guarantee by any other party of our payment obligations to you, so you are exposed to credit risk with Capital Com. You must look only to Capital Com for performance of all transactions in your account and for return of any margin.

6. Gap risk

Financial markets may fluctuate rapidly and the prices of our products will reflect this. Gap risk is a risk that arises as a result of market volatility. Gapping occurs when the prices of our CFDs or KOs suddenly shift from one level to another, without passing through the level in between. There may not always be an opportunity for you to place an order or for the platform to execute an order between the two price levels.

7. There are risks related to holding long CFD positions and/or Call KO trades

CFDs

Being long in CFDs means you are buying CFDs to speculate that the market price of the underlying asset will rise between the time of entry and exit. As the holder of a long CFD position, you will generally make a profit if the market price of the underlying asset increases while the position is open.

You will incur a loss if the market price of the underlying asset falls while your long CFD position is still open. Your loss will be the difference between the market price at the time of purchase and the price at the time of sale, multiplied by the number of CFD units involved. Your potential loss may therefore exceed your initial margin requirement.

You may also suffer a loss if your CFD position is closed by the Company due to insufficient funds in your account to maintain the position.

KOs

Opening a Call KO trade means you are speculating that the price of the underlying asset will rise. As the holder of a Call KO, you will generally make a profit if the underlying price increases while your KO trade (size in options) remains active.

You will incur a loss if the price of the underlying asset falls while your Call KO trade is open. Your loss will be the difference between the value of the KO at the time of entry and the value at the time of closing.

Additionally, you may lose the full Option Price paid if the price of the underlying asset reaches the predetermined KO level, in which case the KO will expire with zero value.

8. There are risks related to holding short CFD and/or Put KO positions/trades

CFDs

Being short in CFDs means you are selling CFDs to speculate that the market price of the underlying asset will fall between the time of entry and exit. As the holder of a short CFD position, you will generally make a profit if the price of the underlying asset decreases while your position is open.

You will incur a loss if the market price of the underlying asset rises while your short CFD position is still open. Your loss will be the difference between the market price at the time of entry and the price at the time of exit, multiplied by the number of CFD units involved. Your potential loss may exceed the initial margin required.

You may also suffer a loss if your CFD position is closed by the Company due to insufficient funds in your account to maintain the position.

KOs

Opening a Put KO trade means you are speculating that the price of the underlying asset will fall. As the holder of a Put KO, you will generally make a profit if the underlying price decreases while your KO trade (size in options) remains open.

You will incur a loss if the price of the underlying asset rises while your Put KO trade is open. Your loss will be the difference between the value of the KO at the time of entry and the value at the time of closing.

Additionally, you may lose the full Option Price paid if the underlying asset reaches the predetermined KO level, in which case the KO will expire with zero value.

9. High leverage can lead to quick losses for clients

Applicable only for CFDs. The high degree of "leverage" is a distinct feature of CFDs. The effect of leverage makes investing in CFDs riskier than investing directly in the underlying asset. This is a result of the margin system applicable to CFDs, which generally involves a small deposit relative to the size of the transaction, so that a relatively small price movement in the underlying asset can have a disproportional impact on your trade.

A small price movement in your favor can provide a high return, however, a small price movement against you may quickly result in significant losses.

If losses occur to your CFD trades, you may be required to pay additional funds on short notice to maintain your position open. If you fail to comply with a request for additional funds, your position may be liquidated.

*Please note that if a resident of Spain decides to trade CFDs a set of additional rules and procedures will become applicable. Such a set of additional rules and procedures can be found in Section 20.17 of the Company's [Terms & Conditions](#).

10. Stop Loss Orders cannot always protect you from losses

Capital Com offers the option to set Stop Loss Orders to help limit potential losses from an open position/trade. A Stop Loss Order is designed to automatically close your position/trade when the market reaches the price level you have specified.

However, Stop Loss Orders are not guaranteed and may be executed at a price that is worse than the one you set, particularly in volatile or fast-moving market conditions.

11. You have an obligation to maintain margin requirements when trading CFDs

The client must always maintain a minimum margin on his/her open positions. It is your responsibility to monitor your account balance. The client may receive a margin call to deposit additional cash if the margin in his/her account is too low. You may need to provide us with additional funds to meet your margin requirement on short notice to maintain your positions open. Failure to do so, may result in your positions being liquidated.

12. Only cash settlement is available

The client understands that CFDs and KOs can only be settled in cash and the difference between the buying and selling price partly determines the result of the investment.

13. You may lose the full amount invested

For CFDs, adverse market movements may result in the loss of your entire account equity.

For KOs, adverse market movements may trigger the automatic closure of your trade, resulting in the loss of the entire Option Price invested.

14. Failure to monitor positions/trades entails risks

It is important that you monitor all of your positions/trades closely. It is your responsibility to monitor your positions/trades and during the period that you have any open positions/trades you should always have the ability to access your account.

15. Prices, margins and valuations set by Capital Com may differ from those provided elsewhere

Capital Com sets the prices used for trading, the valuation of client positions/trades, and, in the case of CFDs, the determination of margin requirements. The performance of your CFD or KO position/trade will depend on the prices quoted by us and on market movements in the underlying asset to which your CFD or KO relates.

Each underlying asset carries its own risks, which may affect the outcome of the CFD or KO position/trade. Please note that prices and valuations provided by Capital Com may differ from those available on public exchanges or other data sources.

16. You have no rights to the underlying assets

You have no rights or obligations in respect of the underlying instruments or assets relating to your CFD or KO. The client should understand that CFDs and KOs can have different underlying assets, including, equity, cryptocurrencies, indices and commodities. For example, in case of an equity CFD or KO you will not receive any voting rights, as you do not hold the physical asset.

17. CFDs and KOs are not suited for long term investors

CFDs and KOs are designed for short-term trading and are not appropriate for long-term investing. Holding these instruments open for extended periods may result in increased costs, such as overnight funding adjustments for CFDs or premium erosion and expiry considerations for KOs.

Additionally, market volatility over time may increase the risk of margin calls for CFD positions or knock-out events for KOs. In many cases, it may be more appropriate for clients seeking long-term exposure to consider purchasing the underlying asset directly.

18. Investing in CFDs or KOs may entail a currency risk

Your account with Capital Com will be held in a currency which may be different from the currency you used to deposit, therefore, you should be mindful of the relevant currency fluctuations.

19. There are risks related to the features of Capital Com's trading platform

Once the Client enters an order into Capital Com's trading platform (by clicking Buy/Sell for CFDs or 'Call/Put' for KOs), this is immediately executed and thereafter the Client will not be able to cancel or modify the order. This feature may be different from other trading platforms you have used in the past. You should utilize the demo account to become familiar with Capital Com trading platform before actually trading with the Company. By using Capital Com trading platform, even through a demo account, you agree to the one-click system and accept the risks related to the immediate execution feature.

20. Capital Com is not your adviser or fiduciary.

Generic market information provided by Capital Com to its clients is not intended to be and does not constitute investment advice or personal trading recommendations. Such information is not and should not be considered as an advice to buy or sell any CFD or to enter Call or Put trades in KOs, nor as a solicitation to do so. Your decision to enter a trade with the Company and your decision as to whether such a transaction is appropriate for you, is your independent decision.

The Company is not acting as an advisor or serving as a fiduciary to its clients. You are responsible for managing your tax and legal affairs including making any regulatory filings and payments and complying with applicable laws and regulations. We do not provide any regulatory, tax or legal advice. If you are in any doubt as to the tax treatment or liabilities related to the CFDs or KOs offered, you may wish to seek independent financial advice.

21. Market commentary

The generic market commentary provided by the Company (which does not constitute a personal recommendation or investment advice) is generic and based solely on the judgment of the Company's personnel. Client acknowledges he/she enters into transactions relying only on his/her own judgment. The generic market commentary of the Company is based on information believed to be reliable, but the Company cannot and does not guarantee the accuracy or completeness thereof.

22. Your trades may be taxable.

Your trades may be or become subject to tax and/or any other duty, e.g., due to changes in the relevant laws and regulations or your personal circumstances. The Company does not offer tax advice. The client is responsible for any taxes and/or any other duty which may accrue in respect of his/her trades.

23. There is no guarantee of profit.

There are no guarantees of profit nor of avoiding losses when trading CFDs or KOs. Neither the Company nor its representatives intend to provide nor can they actually provide such guarantees. The Client has been alerted by means of this Statement that risks are inherent to trading CFDs or KOs and that he/she must be financially able to bear such risks and withstand any losses incurred.

24. Customer may not be able to close open positions/trades

Due to market conditions which may cause any unusual and rapid market price fluctuations, or other circumstances, the Company may be unable to close out Customer's position/trade at the price specified by Customer and the risk controls imposed by the Company might not work, therefore the Customer agrees that the Company will bear no liability for a failure to do so.

25. System failures

The CFD and KO trades are carried out exclusively on-line (via Internet). While trading on our platform, system errors might occur. You should be aware of the risks that may result from any failure, malfunction or disruption of any transmission, communication system, computer facility or trading software, whether belonging to the Company or to any other external party, which could mean that your order may be delayed or fail.

26. Quoting errors entails risk

Should a price quoting error occur (including responses to relevant client requests), Capital Com is not liable for any resulting errors in account balances and reserves the right to make necessary corrections or adjustments to the relevant account. Any dispute arising from such price quoting errors will be resolved on the basis of the fair market value, as determined by Capital Com in its sole discretion and acting in good faith, of the relevant market at the time such an error occurred. In cases where the prevailing market represents prices different from the prices we have posted on our platform, Capital Com will attempt, on a best efforts basis, to execute orders on or close to the prevailing market prices. This may or may not adversely affect the client's realized and unrealized gains and losses.

27. There are legal and regulatory risks involved

A change in laws or regulations made by the government or a regulatory body may increase the costs of operating a business, reduce the attractiveness of an investment and/or change the competitive landscape and by such materially alter the overall profit potential of your investment. This risk is unpredictable and may vary depending on the market for the underlying asset of a given CFD or KOs.

28. The protections we receive from third parties may not be extended to you

Any guarantees or legal protections that Capital Com is entitled to by means of a contract with any of our consultants, business process outsourcers, vendors or any other third party or intermediary, or that are available to us as a matter of law, may not cover or protect you in case you suffer a loss or damage as a result of such third party's failure to fulfill the obligations owed to us.

29. Client Money

All funds belonging to you ("client money") shall be held by us in a designated client money bank account; and are subject to a right of off-set for your liabilities towards us. The designated client money is segregated from the assets of the Company and is deemed client money for the purposes of the CySEC rules. We may place your funds in our designated client money account in a different currency to your base currency. Such client money will be at least equal in value to your base currency and will be in compliance with Cyprus regulatory requirements. No interest will be paid in respect of client money.

30. You are not automatically entitled to compensation under the Cyprus Investor Compensation Fund scheme and the compensation is not unlimited

Capital Com participates in the Investor Compensation Fund ("ICF") for clients of Cyprus Investment Firms regulated by the Cyprus Securities and Exchange Commission (CySEC).. Retail clients may be entitled to compensation under the ICF where the Company is unable to meet its obligations towards its clients due to its financial circumstances and when there is no realistic prospect of improvement in the above circumstances in the near future, e.g. liquidation. For a retail client to receive compensation he/she will have to file a compensation claim to the ICF in a timely manner and get it approved by the Fund's Administrative Committee. In any case, the compensation shall not exceed twenty thousand Euro (EUR 20.000) per retail client. For more details please refer to our [Investor Compensation Fund Policy](#).

31. Target Market Assessment

In compliance with the European Directive 2014/65/EU ("MIFID II") and the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87/(I)/2017), the Company is required to identify its target market. This will ensure that the Company provides its services only to Clients which fall within its target market assessment.

A target market refers to a specific group of clients that the Company aims to provide its services and products based on their needs, financial knowledge, experience, and risk tolerance. It helps the Company to ensure that its financial products and services are suitable for the right audience, protecting clients from potential risks. Therefore, before offering financial services or products, the Company evaluates whether they match the client's profile, investment objectives, and risk appetite.

32. Updates

The Company has the right to amend the current Policy as per its discretion and at any time it considers is suitable and appropriate. In such an event the Company will notify the client accordingly. The Company shall review and amend the current policy at least on an annual basis. The Policy is available for review by clients upon request and it is uploaded to the Company's website.

By accepting the Terms & Conditions of Capital Com , you confirm that you understand the risks associated with trading CFDs and KOs (including those outlined above), and that you are financially and otherwise capable of bearing these risks. You acknowledge that a total loss of your account balance would not compromise your financial well-being.

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