KPMG Center, Level 2
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3025 Limassol, Cyprus

CFD ON ETFs
KEY INFORMATION DOCUMENT

PURPOSE

The present document provides Clients with key information about this investment product. It is not marketing material.

The information included in this document is required by law to assist Clients to understand the nature, risks, costs, potential gains and losses that may occurred by this product and to assist Clients to compare it with other products.

Clients are about to purchase a product that is not simple and may be difficult to understand.

PRODUCT

PRIIP Name: *ETFs CFD*

PRIIP Manufacturer: VPR Safe Financial Group Limited ("**Alvexo**") hereinafter the "**Company**"
Website: https://www.alvexo.eu/
Competent Authority: authorised and regulated by the **Cyprus Securities and Exchange Commission (CySEC)**, CIF License No. 236/14

WHAT IS THIS PRODUCT?

Type

This is a 'Contract for Difference' ("CFD"). It allows an indirect (also described as "synthetic") exposure to an underlying product or financial instrument (for example, to a security, commodity or index). Clients will have no direct interest in the underlying product/financial instrument. Accordingly, Clients can make gains or suffer losses as a result of price or value movements in relation to the underlying product or financial instrument to which they have the indirect exposure.

The Company offers trading opportunities on many different CFDs on ETFs.

Clients can visit the Company's website for information on the CFDs on ETFs available to trade with the Company.

Objectives

CFDs are derivative financial instruments. A CFD is an agreement between two counterparties to exchange the price difference of a specific underlying instrument for the time period the deal was opened.

CFDs are leveraged products and are traded not on an exchange basis but Over-The-Counter (OTC) and there is no central clearing of the transactions. The Company is the principal to the execution of client's trades. CFD on ETFs is tracking the performance of an underlying ETF, for example ETF to a particular industry (e.g. a financial sector).

A CFD is a speculative instrument and while trading CFDs with different underlying assets, the trader does not become the owner of this asset. CFD pricing reflects the pricing of the underlying assets received by the Liquidity Providers. Long position means buying the instrument with the expectation for its value to rise. Short position suggests selling the asset expecting its value to decrease.

Trading in CFDs carries high level of risk and thus can generate great profits as well as great losses. Clients should never invest more than what they are willing to lose, as it is possible to lose their initial investment.

Unless investors know and fully understand the risks involved in CFD trading, they should not engage in any trading activity.

Investors should consider whether CFDs are appropriate for them according to their financial status and goals before trading. If investors do not have enough knowledge and experience to trade, the Company suggest to seek independent advice before they invest. If Investors still don't understand these risks after consulting an independent financial advisor, then they should refrain from trading at all. Trading in CFDs comes with a significant risk of losses and the investment value can both increase and decrease. CFDs require constant monitoring and may not be appropriate for persons who cannot devote time in this respect.

Prior to commencing trading in CFDs it is prudent for Clients to consult with this KID and evaluate whether trading in CFDs is appropriate for them

Intended Retail Investor

Trading these products will not be appropriate for everyone. These products to be used by persons who:

(i) Want to generally gain short-term exposures to financial instruments;
(ii) Are trading with money which they can afford to lose;
(iii) have a high risk tolerance;
(iv) have experience with, and are comfortable trading on, financial markets and, separately, understand the impact of and risks associated with margin trading; and
(v) want to generally gain short term exposures to financial instruments/markets, and have a diversified investment and savings portfolio.

Clients that are risk intolerant should not invest in the respective target market as these instruments are risky and bear significant amount of risk.

Insurance Benefits

None

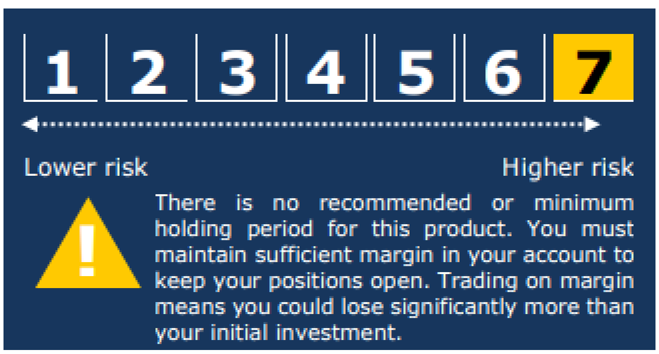
Term

There is no predetermined investment holding period or contract expiration implicit in this instrument – It can be characterized as open-ended because ETF shares can be created as necessary to meet demand.

WHAT ARE THE RISKS AND WHAT COULD I GET IN RETURN?

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.

Risk Indicators



The Company has classified this product as 7 out of 7, which is the highest risk class.

This rates the potential losses from future performance at a "**very high**" level. Clients need to be aware of currency risk. Clients may receive payments in a different currency, so the final return the client will receive depends on the exchange rate between the two currencies.

For example, Clients maintaining a trading account in Euros and trading in CFDs that are not priced in Euros are subject to foreign exchange risks and may be affected in fluctuations of the underlying currencies. This risk is not considered in the indicator shown above.

In some circumstances Clients may be required to make further payments to pay for losses. Trading risks are magnified by leverage – the total loss Clients may incur, is losing all their invested funds.

Margin can be thought of as a good faith deposit required to maintain open positions. This is not a fee or a transaction cost, it is simply a portion of your account equity set aside and allocated as a margin deposit.

The Company's Margin Requirements are updated monthly and can be increased temporarily to mitigate risks prior to major market events or in increasingly volatile markets. Current margin requirements will differ depending on account type.

Margin Call's will occur when the equity of the account falls below the required margin. Depending on your account type and/or trading platform, a margin call may liquidate all open the positions on your account or may only close specific positions.

The Company processes all liquidations for CFD products automatically, for more information on how Margin Calls work.

The Company aims to provide clients with the best execution available and to get all orders filled at the requested rate. However, there are times when, due to an increase in volatility or volume, orders may be subject to slippage. Slippage most commonly occurs during fundamental news events or periods of limited liquidity.

During periods such as these, your order type quantity demanded, and specific order instructions can have an impact on the overall execution you receive.

CFD trading is decentralised and pricing will vary from broker to broker. The Company's instruments are not listed on any exchange, and the prices and other conditions are set by the Company's in accordance with our Best Execution Policy. CFD contracts can be closed only with the Company, and are not transferable to any other provider. If you have multiple positions, your risk is cumulative and not limited to one position.

The Company offers Negative Balance Protection to its Clients, meaning that they will never be in a position to lose more funds than the amounts invested with the Company. In case the account balance of a Client enters in the negative territory for example due to a gap in the market, this amount will not be requested by the Company, and the Client's account will be brought back to zero (0).

Prior to any trading client should trade only after they have acknowledged and accepted the risks. Clients should carefully consider whether trading in leveraged products is appropriate for them.

Performance Scenarios

This key information document is not specific to a particular product. It applies to a CFD on any ETF that we offer on our platform. For each trade Clients enter will be responsible for choosing the instrument, when they open and close, the size (risk) and whether to use any risk mitigation features (such as stop loss orders).

The scenarios shown illustrate how your investment could perform. You can compare them with the scenarios of other products. The scenarios presented are an estimate of future performance based on evidence from the past on how the value of this investment varies, and are not an exact indicator. 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.

What you get will vary depending on how the market performs and how long you hold the CFD. The stress scenario shows what you might get back in extreme market circumstances, and it does not take into account the situation where we are not able to pay you.

CFD ON ETFS INTRADAY (OPENED AND CLOSED WITHIN THE SAME DAY)		
Account currency		USD
ETF opening price	P	333.11
Type of order (Buy/Sell)	B/S	BUY
Trade Size (Per CFD)	TS	10
Margin %:	M	20%
Leverage	L	1:5
Margin Requirement (USD)	MR = P*TS*M	$666.22
Notional Value of Contract	TN =MR/M	$3331.10
Client's equity		$666.22
Overnight fee	OF	$-0.99

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Scenarios		Actions taken on position	Results
Favorable Scenario A: *The sell price increases and you close your position the same day*	What will you lose (after costs) and the percentage of loss on the initial margin	Closed the same day at a sell price of 334.71	$15.99(2.4%)
Favorable Scenario B: The sell price increases and you close your position after 3 days	What will you lose (after costs) and the percentage of loss on the initial margin	Closed after 3 days at a sell price of 336.27	$28.68 (4.3%) Details: $31.65 profit -$2.97 OF
Moderate Scenario A: *The sell price falls and you close your position the same day*	What will you lose (after costs) and the percentage of loss on the initial margin	Closed the same day at a sell price of 331.38	-$17.32 (-2.6%)
Moderate Scenario B: The sell price falls and you close your position the next day	What will you lose (after costs) and the percentage of loss on the initial margin	Closed the next day at a sell price of 332.21	-$9.98(-1.5%) Details: -$8.99 loss -$0.99 OF
Unfavorable Scenario A: *The sell price falls and you close your position the same day*	What will you lose (after costs) and the percentage of loss on the initial margin	Closed the same day at a sell price of 329.71	-$33.98 (-5.1%)
Unfavorable scenario B: The sell price falls and you close your position the next day	What will you lose (after costs) and the percentage of loss on the initial margin	Closed the next day at a sell price of 330.71	-$24.97 (-3.75%) Details: -$23.98 loss -$0.99 OF

Stress *Scenario A:* *The sell price falls rapidly which resulted the equity to margin level to fall below 50%, therefore your open position is automatically closed by our system*	What will you lose (after costs) and the percentage of loss on the initial margin	Closed intra-day on close out by our system at the price of 266.49	-$666.20 (-100%)
Stress *Scenario B:* The sell price falls and your position is closed on close out at 50%	What will you lose (after costs) and the percentage of loss on the initial margin	Closed intra-day at a sell price of 299.80	-$333.10(-50%)

**Under the stress scenario the losses of the client are limited to the initial account margin, due to Negative Balance Protection.*

Costs of execution are not included in this section, but are presented in detailed in the Section 'What are the costs'.

Costs of execution must be taken into consideration when planning your trading activity. For contract specifications of each instrument offered by the Company please visit www.alvexo.eu

WHAT HAPPENS IF ALVEXO IS UNABLE TO PAY OUT?

If the Company is unable to meet its financial obligations to its Clients, this could cause Clients to lose the value of any CFD's they have with the Company. The Company segregates Clients funds from its own money in accordance with the CySec's Investors Compensation Fund. Should segregation fail Clients that are classified as RETAIL, their investments are covered by the Investors Compensation Fund which covers eligible investments up to €20,000 per person, per firm.

WHAT ARE THE COSTS?

Costs of execution must be taken into consideration when Clients are planning their trading activity.
The Company offers a set of accounts were transaction costs differ between them. Please visit the Company's website for further information.

COMPOSITION OF COSTS

The Company's cost consist of One-Off costs and on-going costs as presented below:

One-off Costs	**Entry and Exit Costs**	**Spread** Spread is the difference, usually indicated in pips, between the Bid and Ask price. The Spreads values vary for different accounts as well as depend on the instrument traded. The spread on CFDs on ETFs is floating, hence, the spread might increase or decrease, depending on the market conditions. Spread is a cost presents both at entering and exiting a trade, and it applies to all the accounts. All the minimum and typical spreads for each CFD are reflected at the Company's website. **Commissions** Commissions are only charged on existing ECN account types at entry. The amount of the commissions are based on the asset and the account type, hence, the commissions might vary from asset to asset and from account type to account type.
	Currency Conversion Rates	Investing in CFDs with an underlying asset listed in a currency other than your account type base currency entails a currency risk, due to the fact that when the CFD is settled in a currency other than your base currency, the value of your return may be affected by its conversion into the base currency.
Ongoing Costs	**Overnight Financing**	**Swaps** Swap is the fee for keeping the position opened over the night. The swap can be positive or negative depending on the instrument. Swap Values can be found on https://www.alvexo.eu/trading-specifications

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

- Clients can open and only exit any trades, during the trading hours of the market of the underlying instrument being made available on the Company's Website.

- Clients can request to withdraw their funds at any time. The Company will process withdrawal requests within 24 hours irrespective of payment method. Minimum withdrawal amounts apply, depending on the mode of remitting funds to you (between USD 5- USD 100). The Company will not charge any withdrawal fees, although some banks may charge transaction fees.

How can I complain?

In case a Client is dissatisfied by the services provided by the Company, they must address any complaints to the Company's Compliance Department by filling out the following form and submitting it to the Company via email at: compliance@alvexo.com

If Clients do not feel their complaint has been resolved satisfactorily, they are able to refer their complaint to the Financial Ombudsman Service (FOS). See www.financial-ombudsman.gov.cy for further information.

Other relevant information

Clients should ensure to read the Company's Term and Conditions, Best execution policy and risk warning notice displayed in the legal section of the website, at the Legal Documentation page on our website. Such information is also available on request.

This document was last updated on **October 2021.**