

# Zero-Commission Investments Policy

Version 2, July 2023

## 1. Introduction

- 1.1 Key Way Markets Ltd (hereinafter the “Company”), is incorporated under the Laws of Abu Dhabi Global Market (“ADGM”) with registration number 000003041 and trades as [ae.capex.com](http://ae.capex.com). The Company is authorized and regulated by the Financial Services Regulatory Authority (“FSRA”) to undertake the regulated activity of Dealings in investments as Principal and Dealings in investments as Agent (License no. 190005).
- 1.2 The purpose of this Policy is to set out the guidelines binding the Company’s Zero-Commission trading relating to Clients trading in Transferable Securities/Actual Shares (hereinafter “Stock” or “Stocks”) and stock related Exchange Traded Funds (hereinafter “ETFs”) instruments, based on their account type.

## 2. Scope

- 2.1 This Policy applies to clients who will receive zero-commissions for stock-related instruments and stock related ETF related instruments, based on their account type.
- 2.2 This Policy applies to both Retail and Professional Clients (as defined in the Company’s Client Categorization Policy). If the Company categorizes a Client as an Eligible Counterparty, this policy does not apply to such a Client.

## 3. Conditions

- 3.1 Based on your Account type below, you will receive the following number of zero-commission investments per month.

Account Type	Number of Zero-commission Investments
Basic	0
Classic	4
Signature	10

- The commission free will be applied to the first transactions performed that month, either opened or closed.

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- Example: If in October, a Basic account closes a position on Actual Shares or ETFs that was opened in September, then opens two new positions, he/she will pay the closing commission for the first transaction and the opening commission for the second transaction. He/she will also pay for the opening of the third transaction. At the end of the month, the client's balance will be adjusted, and the commissions paid for closing of the first transaction and the opening of the second transaction will be added back to the client's balance.
  - The number of free commission investments will be reset at the beginning of each calendar month.