
Zero-Commission Investments Policy

Version 3, July 2023

1. Introduction

1.1 Key Way Investments Ltd (hereinafter the “Company”), is incorporated under the Laws of the Republic of Cyprus with Registration No. HE 341196. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) to act as a Cypriot Investment Firm (License No. 292/16).

1.2 The purpose of this Policy is to set out the guidelines binding Company’s Zero-Commission trading relating to Clients trading in Transferrable 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 Classification Policy). If the Company classifies a Client as an Eligible Counterparty, this policy does not apply to such a Client.

3. Conditions

3.1 This Policy applies **only** to the Client’s that were onboarded before 1st of August 2023.

3.2 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	2
Essential	3
Classic	4
Original	5
Premium	6
Signature	10

- The commission free will be applied to the first transactions performed that month, either opened or closed.
- **Example:** If in August, a Basic account closes a position on Actual Shares or ETFs that was opened in July, 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.