COSTS AND ASSOCIATED CHARGES POLICY

Last Updated on 29-10-2024

1. Introduction

1.1. Alma Europe Ltd (the "Company", "we"), is a Cyprus Investment Firm ("CIF") incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 401229. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission ("CySEC") under license number 408/22.

1.2. This Costs and Associated Charges Policy ("the Policy") is provided to you (our Client or prospective Client) in accordance with the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets and Other Related Matters Law 87(I)/2017, as subsequently amended from time to time ("the Law").

Pursuant to the Law, the Company is required to ensure that the information on costs and associated charges, which may have been incurred when trading with the Company, are disclosed to clients on both ex-ante and ex-post basis.

2. Costs & Charges Information

The aforementioned information will comprise, inter alia:

(a) The total price to be paid by the Client in connection with the Financial Instrument or Investment Advice;

(b) The commissions or any third-party payments as a monetary value and as a percentage of the total costs;

(c) Information on foreign currency conversion rates and costs (if applicable);

(d) Other possible charges and costs, including taxes;

(e) Information about the arrangements for payment or performance of this agreement and any other agreement relating to Financial Instruments offered by the Company and will be provided in good time before the provision of the Investment Services in a durable medium and included in all investment recommendation reports provided to the Client.

Arch. Makariou III 20, Hellenium Court, Office 401, Larnaca 6017, Cyprus
Phone: + 357 24 623208 www.almaeurope.finance

3. Costs & Charges:

3.1. Types of Costs and Charges Incurred

One-off charges related to the provision of an investment service:	On-Boarding Fee	An administration fee charged for each new portfolio. It covers the various administrative tasks associated with client onboarding and maintenance in term of Risk Classification. Amount will vary depending on the complexity of the onboarding process.	Nominal Fee of min. EUR 300 and max. EUR 10,000
	Success Fee	Clients will pay success fee at the end of each calendar year provided certain pre-agreed targeted performance returns are achieved by the portfolio manager.	The Fee will be calculated as either: i) % of the annual net return on investment, constituting the return rate net of monetary entries & exits, OR ii) % of the annual excess return on investment. The excess return is the return above a chosen benchmark.
	Distribution Fee	Indirect fee (charged by third parties/ execution venues/ fund managers) for distribution services the Company performs for certain investment products such as Structured Products or Funds.	The fee will be disclosed by the Company to the client.

Arch. Makariou III 20, Hellenium Court, Office 401, Larnaca 6017, Cyprus
Phone: + 357 24 623208 www.almaeurope.finance

	Exchange Advisory Mandate	This mandate is for Clients who wish to benefit of advice on one-time basis on products (including products recommended by the Company) and which are in line with the Client's investment profile.	Flat Nominal Fee of EUR 500 per investment advice.
	Third Party Charges	All Third-Party charges (Banks/Brokers/Others) in connection with financial instruments, trades, and/or investment services.	The total charge on each trade will be disclosed by the Company to the Client based on Third Party disclosure.
	Creation of LEI (for Company only)	Direct mandatory fee if Legal Entity Identifier is not already created and available. The LEI is designed to uniquely identify legal entities that are participants in financial transactions, thereby helping to create greater transparency in the marketplace. The standard for this identifier and its associated reference data has been established in ISO 17442. It has been accepted for global use and has become a reporting requirement for several market regulators and authorities.	Flat Nominal Fee of EUR 100 per LEI to create.
Ongoing charges related to the provision of an investment service:	Discretionary Management Fee	Discretionary Management mandates are for Clients who wish to entrust the management of their portfolio to the Company. Fees are charged on a quarterly basis and calculated based on the monthly weighted average of the total value of the managed portfolio.	Standard: as low as 1.5% per annum (below EUR 1M AUM) Advanced: as low as 1% per annum (EUR 1-5M AUM) Premium: as low as 0.7% per annum (above EUR 5M AUM).

Arch. Makariou III 20, Hellenium Court, Office 401, Larnaca 6017, Cyprus
Phone: + 357 24 623208 www.almaeurope.finance

	Portfolio Advisory Mandate	This mandate is for Clients who wish to manage their portfolio themselves while benefitting themselves of advice in investment allocation and/or products recommended and/or monitored by the Company and which are in line with the investment strategy defined by the customer.	Standard: as low as 1.5% per annum (below EUR 1M AUM) Advanced: as low as 1% per annum (EUR 1-5M AUM) Premium: as low as 0.7% per annum (above EUR 5M AUM).
	Active Advisory Mandate	This mandate is for Clients who wish to manage their portfolios themselves while benefitting of active advice including market analysis, asset allocation, product selection, investment products recommended/monitored/distributed by the Company and/or any other investment idea that corresponds to the Client's needs or wishes and are in line with the investment strategy defined by the customer.	Flat Nominal Fee of EUR 50,000 per annum and payable quarterly.
	Distribution Fee	Indirect fee (charged by third parties/ execution venues/ fund managers) for distribution services the Company performs for certain investment products such as Structured Products or Funds.	The fee will be disclosed by the Company to the client.
	Reception and Transmission of Orders (R.T.O)	This service refers to the reception of a purchase or sale order from the client and the immediate transmission of the instructions to the counterparty for execution.	Standard: as low as 1.5% per annum (below EUR 1M AUM) Advanced: as low as 1% per annum (EUR 1-5M AUM) Premium: as low as 0.7% per annum (above EUR 5M AUM).

Arch. Makariou III 20, Hellenium Court, Office 401, Larnaca 6017, Cyprus
Phone: + 357 24 623208 www.almaeurope.finance

	Renewal of LEI on a yearly basis. (for Company only)	Direct mandatory fee to renew any Legal Entity Identifier after one year.	Flat Nominal Fee of EUR 100

3.2. Example based on Fund Purchase

Fund Name: “Allya Growth Fund LLC”
Securities No.: 1141511159.30
Amount: BUY USD 100,000 Nominal
Execution Type: At Market
Account Base Currency: USD
Service Cost/Commission: 0.28% on trade size i.e. USD 280
Total Estimated Transaction Amount: USD 100,280

3.3. Annual Report on the Costs and Associated Charges

An overview of the aggregated costs and charges (including third party charges) derived from client transactions regarding each of their bank account(s) managed and/or monitored by the Company will be provided, via email, to each client on an annual basis. This information will be provided both as cash amount as well as a percentage imposed on the invested securities, on each account’s base currency. This will help client to understand the costs and associated charges imposed on their account(s) according to their activity throughout the year.

Arch. Makariou III 20, Hellenium Court, Office 401, Larnaca 6017, Cyprus
Phone: + 357 24 623208 www.almaeurope.finance