



Key Information Document – CFDs on ETFs

Purpose

This document provides you with key information about this investment product. It is not marketing material. The information is required by law to help you understand the nature, risks, costs, potential gains and losses of this product and to help you compare it with other products.

Product – Contracts for Difference (“CFDs”) on ETFs.

Manufacturer of the Product – [NAGA Markets Europe Ltd](#) (“NAGA” or “the Company”), authorised and regulated by the [Cyprus Securities and Exchange Commission](#) (“CySEC”), license number [204/13](#) and operates as a Cyprus Investment Firm (“CIF”). Further details are as follows:

- The Company’s website is <https://naga.com/eu>.
- You can contact us at support@naga.com or by calling at +357 25 041410.
- CySEC is responsible for supervising the Company in relation to this Key Information Document (“KID”).
- The Company forms part of [The NAGA Group AG](#) (“the Group”).

Last Revision Date – The Key Information Document (“KID”) was last updated on 09/01/2026.

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

What is this Product?

Type – A CFD is a financial instrument classified as a derivative. This document sets out the key characteristics of CFDs where the underlying assets are ETFs. Additional information regarding the range of CFDs on ETFs offered by the Company is available on our [website](#).

When entering a CFD transaction, you may elect to buy (go “long”) units where the expectation is that the price of the underlying instrument will go up or sell (go “short”) units where the expectation is that the price will go down. For every point the price of the instrument moves in your favor, you gain multiples of the number of the CFD units you have bought or sold. For every point the price moves against you, you will make a loss. Therefore, your return depends on the size of the performance (or movement) of the underlying instrument and the size of your position.

CFDs are leveraged products commonly traded on margin, which means that you only need to deposit a percentage of the full value of the trade to open a position and to keep your position(s) open. This is called the initial margin and maintenance margin respectively.

Term – CFDs generally do not carry a fixed maturity date or a Recommended Holding Period (“RHP”). The opening and closing of positions is up to you. For the purposes of this KID, an RHP of one (1) day has been assumed. The Company retains the right to terminate CFD products immediately in the event of extraordinary circumstances. Where your margin level falls below the Margin Close-Out Level of 50%, you will be issued a margin call, and your open positions will be liquidated automatically.

Objectives – The objective of CFD trading is to speculate in general on short-term price movements in the underlying instrument without taking ownership of it. A CFD provides only indirect exposure, meaning that the investor does not acquire the underlying instrument, but will realize gains or incur losses depending on movements in its market price.

As an example, if you enter a buy trade on a CFD where the underlying price is 100 USD you will need to place an initial margin to be able to trade. Assuming the margin is 1:10, this means that the minimum margin you will need to place is 10 USD. If the price increases to 110 USD, you will profit 10 USD less any applicable costs (listed below). If the price reduces to 95 USD, you will lose 5 USD plus any applicable costs (listed below).

Intended Retail Investor – This product is not suitable for all retail investors. It is intended for individuals who meet one or more of the following criteria: i) have knowledge and/or experience of financial markets; ii) understand the impact and risks associated with margin trading and the pricing of CFDs; iii) are trading with funds they can afford to lose; iv) demonstrate a high tolerance for risk; and v) intend to use the product for short-term investment, speculative exposure, portfolio diversification, or hedging strategies.

What are the Risks and What Could I get in Return?

Summary Risk Indicator ("SRI")

1	2	3	4	5	6	7
Lower Risk			Higher Risk			

The SRI 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. **We have 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, as poor market conditions may impact our capacity to pay you. This risk is not considered in the SRI.

CFDs are leveraged financial instruments which, due to movements in the underlying instruments, may result in rapid and significant losses. However, the maximum loss you may incur is limited to the amount of funds you have invested. The Company provides Negative Balance Protection ("NBP"), ensuring that you cannot lose more funds than the amounts deposited with the Company.

Adverse market conditions, including but not limited to periods of heightened volatility, may negatively affect your positions. Should you fail to maintain the required minimum margin, or in the event of non-compliance with applicable market regulations, the Company may be required to close one or more of your open positions at a less favourable price. Such actions could materially impact how much you get back.

This product does not provide any guarantee or protection against future market performance. As a result, you may lose part or all your invested funds, including your deposit(s) and any accumulated profits. If we are unable to pay you what is owed, there is a risk of losing your entire investment. You may be entitled to compensation under a consumer protection scheme (refer to the section "What Happens if the Company is Unable to Pay Out?"). The indicator shown above does not consider this protection.

CFD Risks	
•	Capital protection against Market Risk, Credit Risk and Liquidity Risk is not available.
•	Currency Risk is present as you may receive payments in a different currency, so the final return you get will depend on the exchange rate between the two currencies.
•	Technology Risk is present as electronic platforms are being used, and downtimes may occur which could affect the ability to trade.
•	Market volatility may affect the pricing and trading conditions of instruments.
•	Leverage magnifies profits as well as losses.
•	Costs and Charges may have an impact on the overall return.

Performance Scenarios

The scenarios presented illustrate the potential value of a 10,000 USD notional CFD position (as specified in the table) after being opened, held within an RHP of one (1) day, and subsequently closed. These scenarios pertain to a single product, which is representative of the overall asset class to which it belongs.

What you will get from this product depends on future market performance. Market developments in the future are uncertain and cannot be accurately predicted.

The unfavorable, moderate and favorable scenarios shown are illustrations using the worst, average and best performance of the underlying instrument on which the CFD is based over the last ten (10) years. Markets could develop very differently in the future. The stress scenario shows what you might get back in extreme market conditions. The figures shown include all the costs of the product itself. The figures do not consider your personal tax situation, which may also affect how much you get back.

Performance Scenarios for CFDs on ETFs – DIA.P			
Scenarios and Metrics		Long	Short
Stress Scenario	What you might get back after costs (USD)	\$ 9,844	\$ 9,844
	Profit or Loss (USD)	-\$ 156	-\$ 156
	Return for RHP (%)	-1.56%	-1.56%
Unfavorable Scenario	What you might get back after costs (USD)	\$ 9,897	\$ 9,897
	Profit or Loss (USD)	-\$ 103	-\$ 103
	Return for RHP (%)	-1.03%	-1.03%
Moderate Scenario	What you might get back after costs (USD)	\$ 10,006	\$ 10,006
	Profit or Loss (USD)	\$ 6	\$ 6
	Return for RHP (%)	0.06%	0.06%
Favorable Scenario	What you might get back after costs (USD)	\$ 10,112	\$ 10,112
	Profit or Loss (USD)	\$ 112	\$ 112
	Return for RHP (%)	1.12%	1.12%

What Happens if the Company is Unable to Pay Out?

In the event of default due to insolvency, you may lose the value of your investment. If the Company unable to fulfil its financial obligations to you, you may be eligible for compensation from the Investor Compensation fund ("ICF"), which provides compensation for retail investors for eligible investment up to the amount of 20,000 EUR or 90% of the cumulative covered claims of the covered investor, whichever is lowest. For further information please check the information [here](#).

What are the Costs?

Before commencing trading, it is important to ensure that you are fully aware of all one-off and ongoing costs for which you may be liable. Such charges may reduce any net profits or increase potential losses. The information provided in the table below is for indicative purposes only. For further details, please refer to the [Hours and Fees](#) page and the [Costs and Charges Policy](#) available on our website.

Costs Over Time for CFDs on ETFs – DIA.P				
The tables show the amounts that are taken from your investment to cover different types of costs. These amounts depend on how much you invest and how long you hold the product. The amounts shown here are illustrations based on an example notional amount of 10,000 USD, which is held for an RHP of 1 day and then closed.				
If you close your investment in the RHP				
		Long	Short	
Total Costs (USD)*		\$ 40.28	\$ 36.94	
Cost Impact**		0.4028%	0.3694%	
*The illustration assumes that the instrument’s currency is equal to your account currency.				
**This illustrates the effects of costs over a holding period of less than one year. This illustration presents the costs in relation to the notional of the investment.				
Composition of Costs for CFDs on ETFs – DIA.P				
One-off Costs Upon Entry or Exit			If you close your investment in the RHP	
			Entry	Exit
Entry Costs & Exit Costs	Commission	When trading CFDs on ETFs you pay a commission when entering and exiting a position.	\$ 10.00	\$ 9.99
			0.1000%	0.0999%
	Spread	When trading CFDs you must pay the spread, which is the difference between the bid and the ask price. Our spreads can be fixed, variable or may be a subject to a minimum, and are added on top of the market spread.	\$ 7.37	\$ 7.37
			0.0737%	0.0737%
	Currency Conversion Fee	A conversion fee is applied when you have an account that is denominated in a currency that is not of the same currency as the instrument being traded. The fee is reflected as a markup.	\$ 0.00	\$ 0.00
			0.0000%	0.0000%
Ongoing Costs			Long	Short
Management Fees and Other Administrative or Operating Costs	Overnight Swap	An overnight swap is an overnight interest that you are charged or credited, for holding a position overnight. If the overnight swap amount is negative, then you are charged and if the overnight swap amount is positive, then you are credited.	\$ 5.56	\$ 2.22
			0.0556%	0.0222%
Transaction Costs	Transactions Tax	The tax legislation in your country of residence may have an impact on the actual pay out of your investment.	Dependent on the enforced tax treaty.	

How Long Should I Hold it and Can I Take Money Out Early?

CFDs do not have a recommended holding period. As long as the Company is open for trading, you may enter and exit positions at any time. Due to exceptional market conditions, trading may be temporarily unavailable, in which case you should contact us. It is essential to understand the implications of trading on margin and the associated costs, particularly if you intend to adopt a buy-and-hold strategy when trading CFDs.

How Can I Complain?

If you wish to make a complaint at any time, you may do so by submitting the [Customer Complaint Form](#), or by sending an email to complaints@naga.com, or in writing to Agias Zonis 11, Limassol 3027, Cyprus. All complaints will be treated strictly confidential. If you believe that your Complaint has not been handled in a fair and equitable manner by the Company you have the right to refer the matter to the [Financial Ombudsman](#) of the Republic of Cyprus. Please refer to our [Complaints Handling Policy](#) available on our website.

Other Relevant Information

Leveraged trading in foreign currency contracts, contracts for difference or other off-exchange products carries a high level of risk and may not be suitable for everyone. Before trading, please read our Terms and Policies, which include the Client Agreement, Order Execution Policy, Risk Disclosure and Warnings Notice and others. Terms and Policies are available in the Legal Documentation section of our website [here](#). Such information is also available on request. You have a right to request a hard copy of the present document.