

KEY INFORMATION DOCUMENT



CFD on ING Groep NV

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, costs, risks and rewards of this product and to help you compare it with other products.



ALERT

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

Product

Product name: ING Groep NV

Product code: ING Groep

Product Manufacturer: Up Trend Ltd., an investment firm registered in Bulgaria, address: 51A Nicola Vaptsarov Blvd. Sofia 1407, licensed and regulated by the Financial Supervision Commission in Bulgaria, License № PF-03-110/13.07.2017.

More information: Call +35928155660 or go to <http://www.Ainvesting.eu/>

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What is the product?

Type of the Product: The Product is a Contract for Difference (CFD) which is a type of derivative financial instrument. The Product's underlying asset is:

- **ING Groep NV, Exchange traded Netherlands SHARES - Financial, ISIN NL0011821202**

Objectives: This is a leveraged CFD product which is traded on an OTC (over-the-counter) market that mirrors the movements of the underlying asset. The return from this product is in a linear dependency on the price fluctuation of the product's underlying asset. The expected returns depend on the market direction and the position taken by the investor. Buying or selling this Product means you take a buy position and, respectively, sell position. The Product is offered on margin, which allows investors to take positions of a value larger than the capital invested. The increased value of an investment, due to the use of leverage, may lead to both significant profits and losses exceeding the invested capital. The product does not require initial payments.

Intended retail investor: This product is intended for retail investors who in the short-term are prepared to take a higher level of risk of loss for a higher potential return on the capital invested in the product. The product is targeted at retail investors having speculation or hedging objectives, and who have experience in trading derivatives on margin. The margin requirement on this product may differ depending on the trading experience and relevant knowledge of the retail investor. An overnight holding cost is charged.

Terms: The Product is open-ended and has no maturity. You may open or close a position during the trading hours.

Performance scenarios

The scenarios shown illustrate how your investment could perform. You can compare them with the scenarios of other products.

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.

The following assumptions have been used to create the scenarios in Table 1:

CFD on an underlying asset (held intraday)	
Share opening price:	100
Trade size (per CFD):	1
Margin %:	20%
Leverage:	1 : 5
Margin Requirement (EUR):	20 €
National value of the trade (EUR):	100 €

Table 1

Performance scenario for BUY position	Closing price (including spread)	Price change	Profit/Loss	Performance scenario for SELL position	Closing price (including spread)	Price change	Profit/Loss
Favourable	103	3%	3 €	Favourable	97	-3%	3 €
Moderate	101	1%	1 €	Moderate	99	-1%	1 €
Unfavourable	99	-1%	-1 €	Unfavourable	101	1%	-1 €
Stress	95	-5%	-5 €	Stress	105	5%	-5 €

** In this example for all scenarios the position is opened and closed intra-daily, overnight holding fee was not charged.*

What are the risks and what could I get in return?



Lower risk Higher risk

 There is no recommended or minimum holding period for this product. You must maintain sufficient margin in your account to keep your positions open. Trading on margin means you could quickly lose the amount invested.

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. There is a high chance you could lose up to 100% of your trading account balance (subject to our negative balance protection).

We have classified this product as 7 out of 7, which is the highest risk class. This rates the potential

losses from future performance of the product at a high level, and poor market conditions are very likely to impact our capacity to pay you.

Be aware of the currency risk. You may receive payments in a different currency, so the final return you will get depends on the exchange rate between the two currencies. This risk is not considered in the indicator shown above.

Values may fluctuate significantly in times of high volatility or market/economic uncertainty; such swings are even more significant if your positions are leveraged and may also adversely affect your position. As a result, margin calls may be made quickly or frequently. In the event of default, Up Trend Ltd. shall seek to immediately terminate, cancel and close-out all of part of any outstanding positions, and any shortfall will be borne by you.

Trade only after you have acknowledged and accepted the risks. You should carefully consider whether trading in leveraged products is appropriate for you.

What happens if Up Trend is unable to pay out?

Up Trend Ltd. is a member of the Investor Compensation Fund - an institution established by the Bulgarian parliament. The fund is supervised by the Ministry of Finance in Bulgaria. In the unlikely event that Up Trend Ltd. is declared bankrupt, the compensation scheme of the fund covers 90% of eligible investor's claim up to 40,000 BGN, equivalent to 20,451 EUR.

For more information you can visit the Investor Compensation Fund website: www.sfund-bg.com

What are the costs?

One-off costs	Spread	The spread is the difference between the buy (offer) and sell (bid) price that we quote. This cost is realised each time you open and close a trade. For example, if the underlying asset is trading at 100, our offer price (the price at which you can buy) might be 101 and our bid price (the price at which you can sell) might be 99.
Ongoing costs	Overnight holding costs ("Premium")	An overnight fee, called a "Premium", is either added or subtracted to/from your account whenever a position is left open after a certain cut-off time (the "Premium Time"). The formula used to calculate the daily premium fee of a position is: Trade size x Opening Rate x Daily (Buy or Sell) Premium % For example Trade size is 10,000, Opening Rate is 1.1500, Daily Buy Premium % is 0.017% then the fee will be $10,000 * 1.1500 * 0.017\% = 1.955$.
	Inactivity Fee	A fee of up to \$5 (or equivalent as applicable to the client chosen currency) will be levied, should you not use the trading platform for a period of three months. This is to offset the cost incurred in making the service available, even though it has not been used. However, please note that the fee is only collected from the Real Money account and only when there are sufficient available funds in the account. In order to avoid this fee, simply log into your trading account from time to time, as this is deemed sufficient activity to prevent a fee from being charged. *A Dormant Account Maintenance Fee of up to \$40 USD per month is assessed to Ainvesting accounts that are inactive for one year or more. An account is considered inactive if there has been no trading activity for a period of 3 months.

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

There is no recommended holding period and it is down to the discretion of each individual investor to determine the most appropriate holding period based on their own individual trading strategy and objectives. Provided that Up Trend Ltd. is open for trading you can enter and exit positions at any time.

How can I complain?

Investors have the possibility to lodge a complaint with Up Trend Ltd. in relation to this product in one of the following ways:

- By e-mail at complaints@ainvesting.eu or complaints@uptrend.bg;
- By phone: +359 2 815 56 60;
- Fax: +359 2 815 56 66;
- In person in the office located at: 1st floor, 51A Nicola Vaptsarov Blvd., Sofia 1407, Bulgaria, Up Trend Compliance Department;
- By post at 1st floor, 51A Nicola Vaptsarov Blvd., Sofia 1407, Bulgaria, for the attention of Up Trend Compliance Department.

Investors can lodge a complaint concerning this Product with the Financial Supervision Commission in Bulgaria by e-mail at: delovodstvo@fsc.bg

You should know that not always the opinion of an individual official from that investment firm, stated for instance in a personal conversation or over the phone, reflects the actual position of the firm's management. That is why it is best to address your complaint in written form to the director or some other representative of the high management, describing in detail your case. Insist on receiving a written reply. Often the firm will offer a solution of the problem, but even if they reject your complaint as unfounded, it is good to have an official position. Thus, after examining the firm's motives, you will be able to judge more concretely whether their rejection is justified or not and respectively, whether to undertake any further actions. Financial Supervision Commission could establish if in your case the investment firm acted in accordance with the legal requirements and if the relevant administrative actions have to be undertaken. You must know that FSC has definite legal powers and cannot take up a position or offer solutions on cases which are outside of its legal competence. Most generally, against your warning or complaint the Commission conducts an inspection whether the firm whose financial product or service you use, has complied with the normative and legal requirements, timelines and procedures. In case that a violation is found out, FSC can impose administrative sanctions.

Other relevant information

Up Trend Ltd. as a PRIIP manufacturer shall indicate any additional information documents that may be provided, and whether such additional information documents are made available based on a legal requirement or only at the request of the retail investor. The information may be provided in summary format, including a link to the website where further details other than the documents referred to are made available.