

## INDUCEMENTS DISCLOSURE

### Introduction

1. iCFD Limited operating under the brand name 'Vestle' (formerly known as 'iFOREX') (the "**Company**") is an Investment Firm regulated by the Cyprus Securities and Exchange Commission (license number 143/11).
2. As per the Law for the Provision of Investment Services and Activities 87(I)/2017 (the "Law") and in accordance with the Markets in Financial Instrument Directive II (MiFID II) of the European Parliament and Council, Investment firms are regarded as not fulfilling their obligations where they pay or are paid any fee or commission, or provide or are provided with any non-monetary benefit in connection with the provision of an investment service or an ancillary service, to or by any party except the client or a person on behalf of the client, other than where the payment or benefit (the "Inducement"):
  - a. is designed to enhance the quality of the relevant service to the client; and
  - b. does not impair compliance with the investment firm's duty to act honestly, fairly and professionally in accordance with the best interest of its clients (the "Inducements Rules").
3. The Company is committed to act honestly, fairly and professionally and in the best interests of its clients and to comply, in particular, with the principles set out in the above legislation when providing investment services and other ancillary services.
4. Inducements procedures are in addition to the rules on Conflicts of Interest, are complementary and are not substitutes or alternatives.

### Scope of This Disclosure

5. The present Inducement Disclosure provides a summary of the Inducement Policy maintained by the Company in order to meet its obligations described above and is provided to you in accordance to the Law and MiFID II, pursuant to which the Company is required to disclose to its clients the existence, nature and amount of the payment or benefit referred to above.
6. The purpose of the present disclosure is for the client to be made aware of the existence of an Inducement, and obtain sufficient information in order to make an informed judgement, in advance of committing to take the Investment Service, as to whether or not to proceed.
7. The Disclosure refers to all interactions with all clients.

### Summary of Company's Inducement Policy

8. For the purposes of identifying any payable Inducements while providing investment and ancillary services, or a combination thereof, whose existence may be in contrast with Inducements Rules and/or the best interests of a client, the Company maintains an Inducement Policy according to which all payments made or to be made or received or to be received from a third party are identified, classified and evaluated as per Inducements Rules. When Inducements are identified Inducements are only permitted where:

- a. the circumstances do not impair the Company's observance of its duty to act in the best interests of the Client; and
- b. the existence, nature and amount of the Inducement (or, if the amount is not known, the method by which it will be calculated) is clearly disclosed to the Client before the Investment Service is provided; and
- c. the payment or receipt of the Inducement is designed to enhance the quality of the relevant Investment Service given to the Client.

### **Disclosure Obligation**

9. The existence, nature and amount, or, where the amount cannot be ascertained, its method of calculation, of any Inducement paid or received by the Company must be disclosed to the client prior to the provision of any services.
10. Such disclosure is being made through the Annex of this Policy, which may be amended from time to time. It shall be noted that in cases where the Company is unable to ascertain on an ex-ante basis the amount of payment to be paid, and instead discloses to the client the method of calculating that amount, the Company will also provide its clients with information of the exact amount of the payment paid on an ex-post basis, at least annually.

### **Miscellaneous**

11. The Company reserves the right to review and/or amend its Inducement Policy and the present Disclosure and arrangements whenever deems appropriate.
12. The Client should direct any question the client may have or request for more information about conflicts of interest to: [cs@vestle.com](mailto:cs@vestle.com).

**Annex**

DESCRIPTION OF INDUCEMENT	METHOD OF CALCULATION
<p>The Company might engage with marketing agencies and/or affiliates and/or other third parties who might be individuals, either directly or through a Service Level Agreement between the Company and Formula Investment House Ltd (the “<b>Master Affiliate</b>”). The Company or its Master Affiliate may pay inducements to or from marketing agencies and/or affiliates on a performance base remuneration model for the referral of new clients.</p>	<p>Such payment is determined taking into consideration the amount and the quality of the clients introduced to the Company by the direct efforts of the marketing agency and/or affiliate and/or third party, and its paid only once for each introduced client. Such payments will only be made where the Company is satisfied that they do not impair Company’s obligation to act in the best interests of the Client. For the year 2018 the Company and/or its Master Affiliate had paid a total amount of €628,221 under such arrangements.</p>
<p>The Company might be engaged with a third party/outsourced service provider (the “<b>Contractor</b>”) in order to provide customer support services within a certain territory.</p>	<p>The Company is paying a flat monthly fee to the Contractor. For the year 2018 the flat fee paid by the Company to its Contractor was €17,500 per month.</p>
<p>The Company is paying a flat monthly fee to its platform provider for the provision of added tools such as trading alerts, trading signals and educational videos.</p>	<p>The flat fee as per the agreement with the Company and its platform provider is €4,000 per month for the provision and maintenance of the platform and any added tools.</p>