COSTS AND CHARGES DISCLOSURE

Ex-Ante Disclosure pursuant to Article 24(4) MiFID II

smarter-investments.com

operated by Van Sterling Capital Limited

MFSA Investment Firm Licence No. VANS-IF-9616

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> *This document is provided to you before you subscribe to any investment strategy on the smarter-investments.com platform. It sets out all costs and charges applicable to the portfolio management service in accordance with Article 24(4) MiFID II and Articles 50 to 53 of Commission Delegated Regulation (EU) 2017/565. Please read it carefully before proceeding.*

1. INTRODUCTION AND SCOPE

1.1. Van Sterling Capital Limited, (hereinafter "the Company", "VSC", or "we") is an investment firm licensed and regulated by the Malta Financial Services Authority (MFSA) under licence number VANS-IF-9616. The Company provides discretionary portfolio management services through the smarter-investments.com platform, through which clients subscribe to investment strategies managed by qualified Trading Mentors.

1.2. This Costs and Charges Disclosure is provided to each client on an ex-ante basis — that is, before the client enters into any portfolio management agreement or subscribes to any Strategy on the platform. Its purpose is to ensure that the client is able to understand and compare the total costs and charges associated with the services offered, as required by Article 24(4) of Directive 2014/65/EU (MiFID II) and the implementing provisions of Commission Delegated Regulation (EU) 2017/565.

1.3. The cost structure of smarter-investments.com is deliberately transparent and straightforward. The Company charges clients two types of fees only: a Management Fee and, where applicable, a Performance Fee. Both fees are inclusive of any applicable Value Added Tax. No other fees, charges, or deductions are levied by the Company on the client. The Company does not receive commissions, trailer fees, kickbacks, or any other form of remuneration from Approved Brokers, custodians, or financial product providers in connection with client accounts.

1.4. The specific fee rates applicable to each Strategy are set out in the Strategy Factsheet for that Strategy, which forms an integral part of the portfolio management agreement concluded between

the client and the Company. This Costs and Charges Disclosure sets out the framework and principles applicable to all Strategies; the Strategy Factsheet provides the specific rates. Clients should read both documents before subscribing.

2. LEGAL AND REGULATORY BASIS

2.1. This disclosure is made pursuant to the following regulatory provisions: Article 24(4) MiFID II, which requires investment firms to provide clients with appropriate information in good time about costs and associated charges before providing investment services; Articles 50 to 53 of Commission Delegated Regulation (EU) 2017/565, which specify the content and format of the costs and charges disclosure for portfolio management services; ESMA Guidelines on certain aspects of the MiFID II suitability requirements (ESMA35-43-869), to the extent they bear on the cost transparency obligations arising from the assessment and selection of investment strategies; and the MFSA Investment Services Rules for Investment Services Providers implementing the foregoing provisions in Maltese law.

2.2. Pursuant to Article 50(2)(a) of Delegated Regulation 2017/565, the costs disclosed in this document are categorised as: (a) investment service costs, comprising fees charged by the Company for the provision of portfolio management services; and (b) third-party costs, comprising charges levied directly by the Approved Broker on the client's account in connection with trade execution, which are entirely separate from the Company's fees and are not influenced or shared by the Company in any way. There are no ancillary service costs charged by the Company.

3. MANAGEMENT FEE

3.1. The Management Fee is a periodic charge levied by the Company as consideration for the ongoing provision of the portfolio management service. It covers the Company's costs and remuneration in respect of: Trading Mentor qualification and ongoing due diligence; signal transmission infrastructure and operational management; continuous monitoring of Strategy performance and risk parameters; client account administration, regulatory compliance, and reporting; and platform development and maintenance.

3.2. The Management Fee is calculated as a percentage of the net asset value of the client's Strategy positions ("Strategy AUM") at the relevant Approved Broker at month-end. It is charged monthly in arrears. The applicable rate for each Strategy is stated on the Strategy Factsheet and confirmed at the time of subscription. Rates differ between Strategies and reflect the operational complexity, instrument type, and ongoing management intensity of each Strategy.

3.3. The Management Fee is charged regardless of Strategy performance. It accrues and becomes payable irrespective of whether the Strategy has generated gains or losses during the relevant period. The Client's consent to the deduction of the Management Fee from the Client Account is given as part of the Limited Power of Attorney granted to the Company upon subscription.

3.4. The Management Fee and the Performance Fee are inclusive of Maltese Value Added Tax at the rate applicable at the time of the charge. The VAT rate currently applicable to these fees is twelve percent (12%). In the event of any change to the applicable VAT rate, the Company will notify clients in accordance with the amendment procedure set out in the Terms and Conditions.

> *Illustrative example: If a client has EUR 50,000 deployed under a Strategy with a Management Fee of 2.0% per annum (inclusive of 12% VAT), the monthly Management Fee charge will be approximately EUR 83.33. This amount is deducted from the client's account at the Approved Broker at the end of each calendar month. The applicable rate for your chosen Strategy is confirmed in the relevant Strategy Factsheet.*

4. PERFORMANCE FEE AND HIGH WATERMARK

4.1. Where specified in the Strategy Factsheet, the Company also charges a Performance Fee. The Performance Fee is levied on net profits generated by the Strategy above the High Watermark. The applicable rate for each Strategy is set out in the relevant Strategy Factsheet.

4.2. The High Watermark is the highest cumulative net asset value of the client's Strategy positions at which a Performance Fee has previously been calculated and charged. Where no Performance Fee has yet been charged since the client's initial subscription, the High Watermark is the net asset value of the Strategy positions at the time of the client's initial subscription to that Strategy. The High Watermark principle ensures that the Company only benefits from net new profits: where the Strategy has previously generated losses, no Performance Fee is charged on any subsequent gains until those losses have been fully recovered and the net asset value of the Strategy positions exceeds the previous High Watermark.

4.3. The Performance Fee is calculated and charged monthly in arrears. It is calculated on the net positive difference between the Strategy AUM at month-end and the High Watermark at that date. The Performance Fee is inclusive of all applicable Value Added Tax at the prevailing rate.

4.4. The High Watermark resets exclusively upon full withdrawal by the client from the relevant Strategy. Partial withdrawals do not affect the High Watermark. Upon resubscription to a Strategy following a complete withdrawal, a new High Watermark is established at the Strategy AUM at the date of resubscription.

> *Illustrative example: A client subscribes to a Strategy with an initial Strategy AUM of EUR 50,000. The High Watermark is set at EUR 50,000. At the end of month 1, the Strategy AUM is EUR 52,000 — a net profit of EUR 2,000 above the High Watermark. If the Performance Fee rate is 20% (inclusive of VAT), the charge for month 1 is EUR 400. The new High Watermark becomes EUR 52,000. If in month 2 the Strategy AUM falls to*

> *EUR 51,500, no Performance Fee is charged. In month 3, if the Strategy AUM rises to EUR 53,000, the Performance Fee applies only to the EUR 1,000 gain above the EUR 52,000 High Watermark — not to the full month-3 gain of EUR 1,500.*

5. NO COMMISSIONS OR PAYMENTS RECEIVED FROM THIRD PARTIES

5.1. The Company confirms that it does not receive, and has not arranged to receive, any form of commission, fee, trail payment, referral fee, soft commission, volume rebate, or other monetary or non-monetary benefit from any Approved Broker, custodian, financial product manufacturer, exchange, or other third party in connection with the portfolio management services provided through smarter-investments.com. Where a person opens an account with Freedom Finance Europe Ltd as a self-directed trader, without portfolio management by the Company, the Company may receive a commission from Freedom Finance Europe Ltd. Such self-directed accounts are not part of the portfolio management service and are not covered by this disclosure; the arrangement is disclosed in the Company's Conflicts of Interest Policy. The commission is a share of the fees Freedom Finance Europe Ltd itself charges and is not an additional charge to the account holder. As soon as such a person enters into an agreement with the Company, the Company no longer receives any commission from Freedom Finance Europe Ltd in respect of that person.

5.2. The Company's sole sources of revenue in connection with the Portfolio Management Service are the Management Fee and Performance Fee charged directly to clients as described in Sections 3 and 4 of this document. This structure is consistent with the Company's obligation under Article 24(7) MiFID II to act in the client's best interests and to avoid conflicts of interest arising from third-party inducements.

5.3. Clients should be aware that Approved Brokers operate their own independent fee schedules, which may include execution commissions, spreads, financing charges, and account maintenance fees. These broker charges are levied directly by the Broker on the client's account and are entirely separate from the Company's fees. The Company has no influence over Broker fee structures, does not share in any Broker charges, and does not receive any form of payment from Brokers in connection with client accounts. Details of Broker charges are provided in the Broker's own terms and conditions, which the client should review before opening a Broker account.

6. FEE SHARING WITH TRADING MENTORS AND REFERRERS

6.1. The Management Fee and Performance Fee collected from clients by the Company represent the total gross fee income received by the Company in respect of each Strategy. A portion of these fees is

shared by the Company with the Trading Mentor responsible for managing the relevant Strategy, and, where applicable, with duly registered referrers who have introduced the client to the Platform.

6.2. Fee-sharing arrangements with Trading Mentors are entered into pursuant to separate commercial agreements between the Company and each Trading Mentor. These arrangements are designed to align the Trading Mentor's incentives with the interests of clients: the Trading Mentor's remuneration is directly linked to the performance and quality of the Strategies they manage.

6.3. Where a client has been introduced to the Platform by a registered referrer, the Company may share a portion of the fees received from that client with the referrer, in accordance with a separate referral agreement. Such fee-sharing does not result in any additional charge to the client: the total fees payable by the client are those set out in the relevant Strategy Factsheet and are not increased by the existence of a referral arrangement.

6.4. The existence of fee-sharing arrangements with Trading Mentors and referrers is disclosed to clients in VSC's Conflicts of Interest Policy, which forms part of the client's agreement with the Company. In accordance with Article 24(8) MiFID II and Article 11 of Commission Delegated Directive 2017/593, these arrangements are designed to enhance the quality of service to the client and do not impair the Company's ability to act in the client's best interests. The Company retains sole responsibility for the selection and ongoing monitoring of Trading Mentors and does not allow commercial considerations to override the Company's professional judgement on strategy quality or client suitability.

7. THIRD-PARTY COSTS — BROKER CHARGES

7.1. In addition to the Company's fees, the client will incur costs levied directly by the Approved Broker on the client's account. These are third-party costs over which the Company exercises no control and in which the Company does not participate. For the purposes of the costs and charges disclosure required under Article 50(2)(c) of Delegated Regulation 2017/565, clients are advised of the following categories of Broker charges.

7.2. Execution costs: the Approved Broker charges transaction costs on the execution of individual Trades. These may take the form of commissions per lot or per transaction, or may be embedded in the bid-ask spread applied at execution. The structure and level of execution costs varies between Brokers and between instrument types, and is set out in the Broker's published tariff schedule.

7.3. Overnight financing charges (swap rates): where a Strategy involves instruments held on margin overnight — including contracts for difference (CFDs) — the Approved Broker will charge or credit overnight swap rates reflecting the cost of financing the position. Swap rates are market-determined and fluctuate daily. Their cumulative impact on Strategy performance depends on the holding period of individual positions and the direction of financing differentials.

7.4. Currency conversion costs: where a Strategy involves instruments denominated in a currency other than the client's account base currency, the Approved Broker will apply a currency conversion rate at the time of execution or settlement. This rate may include a markup over the interbank rate. Details are available in the Broker's terms.

7.5. Account maintenance and other Broker charges: certain Brokers charge periodic account maintenance fees, inactivity fees, withdrawal fees, or other charges as set out in their respective fee schedules. The client should consult the relevant Broker's documentation for a complete schedule of applicable charges.

7.6. The Company is not in a position to provide a precise aggregate figure for third-party Broker costs applicable to any individual client, as these depend on the trading frequency and position-holding patterns of the chosen Strategy, the Broker selected by the client, the client's account size, and prevailing market conditions. Clients are encouraged to request a personalised cost estimate from their Broker prior to subscribing to a Strategy.

7.7. Tax reports of Swissquote Bank SA (Switzerland): clients holding an account with Swissquote Bank SA should obtain information from their competent tax authority on which reports and statements must be submitted with their tax return. Swissquote Bank SA charges the client directly for tax reports; these are third-party costs and are not charged by the Company. As at November 2026 the fees are CHF 200 plus Swiss VAT for 1 to 39 transactions, CHF 325 plus Swiss VAT for 40 to 99 transactions and CHF 540 plus Swiss VAT for more than 99 transactions per reporting period; Swissquote's current tariff applies. Because these are fixed amounts, they weigh more heavily on smaller accounts: for example, a fee of CHF 325 plus Swiss VAT (8.1%) on an account of CHF 25,000 corresponds to around 1.4% of the amount invested. Clients should consider these costs carefully in relation to the amount invested and the expected number of transactions of the chosen Strategy.

> *The Company's view is that the most material third-party cost for most clients will be overnight financing charges where leveraged instruments (CFDs) are held within a Strategy. Clients subscribing to CFD-based Strategies should pay particular attention to the swap rate schedules published by their Approved Broker and ensure they understand the potential cumulative effect of these charges over the expected holding period of Strategy positions.*

8. TOTAL COST ILLUSTRATION — EX-ANTE AGGREGATE

8.1. In accordance with Article 50(9) of Delegated Regulation 2017/565, the following table provides an illustrative ex-ante aggregate cost summary for a representative client scenario. This illustration is not a projection of actual returns and does not guarantee any particular outcome.

> *Representative scenario: Client subscribes to a Strategy with EUR 50,000 Strategy AUM. Management Fee: 1.50% per annum (inclusive of VAT). Performance Fee: 20% of net profits above High Watermark (inclusive of VAT). Assumed gross Strategy return: 12.0% per annum (for illustration only — not a guarantee). Broker*

> *execution and financing costs: estimated at approximately 0.5% to 1.0% per annum depending on Strategy, Broker, and market conditions (indicative only — actual costs will vary).*

8.2. Under this representative scenario, the Company's fees for a twelve-month period would be approximately: Management Fee: EUR 750 (1.50% of EUR 50,000, inclusive of VAT). Performance Fee (assuming the 12% gross return and no prior losses): EUR 1,050 (20% of EUR 5,250 net profit above High Watermark, inclusive of VAT after deducting the Management Fee). Total Company fees: approximately EUR 1,800, representing approximately 3.0% of the initial Strategy AUM over twelve months, before accounting for the impact of compounding or intra-year changes in the Strategy AUM level.

8.3. Estimated third-party Broker costs under this scenario: between approximately EUR 250 and EUR 500 per annum (0.5% to 1.0% of initial Strategy AUM), depending on the Strategy's trading frequency, instrument mix, and the client's chosen Broker. These are indicative only.

8.4. Estimated total aggregate costs (Company fees plus indicative Broker costs) under this scenario: approximately EUR 2,050 to EUR 2,300 per annum, representing approximately 4.1% to 4.6% of the initial Strategy AUM. The client's estimated net return after all costs under this scenario would be approximately 7.4% to 7.9% per annum on the initial Strategy AUM. These figures are for illustrative purposes only and should not be interpreted as a return projection or guarantee.

8.5. Clients may request a personalised ex-ante cost illustration specific to their chosen Strategy, anticipated account size, and Broker selection by contacting the Company at onboarding@vansterling.com. The Company is also able to provide an itemised breakdown of the cost components described in this document upon request.

9. EX-POST REPORTING

9.1. Pursuant to Article 50(9) of Delegated Regulation 2017/565 and Article 25(6) MiFID II, the Company will provide each client with an annual ex-post report summarising the actual costs and charges incurred in the preceding twelve-month period in respect of the client's portfolio management account. The ex-post report will be made available through the Platform and, on request, delivered by email.

9.2. The ex-post report will include: (a) the actual Management Fees charged during the period, expressed both in monetary amount and as a percentage of the average Strategy AUM over the period; (b) any Performance Fees charged during the period, expressed in monetary amount and as a percentage of the gains on which they were levied; (c) the total Company fees charged, expressed in aggregate monetary amount and as a percentage of the average Strategy AUM; (d) the aggregate

Strategy return before and after Company fees; and (e) a summary of Broker charges to the extent this information is available to the Company. Where Broker charge data is unavailable, the report will note this and direct the client to their Broker statements.

10. RIGHT TO ITEMISED BREAKDOWN

10.1. You have the right to request a full itemised breakdown of all costs and charges described in this document at any time. To exercise this right, please contact the Company at info@vansterling.com or at +356.27.289 615. The Company will respond to such requests within ten business days.

11. AMENDMENTS

11.1. The Company may revise this Costs and Charges Disclosure from time to time to reflect changes in the applicable fee structure, regulatory requirements, or the range of Strategies offered on the Platform. Any material revision will be communicated to clients by email at least thirty days before taking effect. The current version of this document is available at all times on the Platform. Upon each new Strategy subscription, clients will be asked to confirm acceptance of the version of this Disclosure in force at that time.

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