



# Key Information Document

## CFD on an ETF (US Markets)

### 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.

CFDs are manufactured and provided by XNT Ltd. ("XNT", "we"), a limited liability company incorporated under the laws of Malta with registration number C 52182. XNT is authorised to provide investment services by the Malta Financial Services Authority (MFSA) under the Investment Services Act, Cap. 370 of the Laws of Malta, Licence No. IS/52182, and is subject to MiFID II. Registered address: Portomaso Tower, Annex Level 18, Vjal Portomaso, St. Julian's, STJ 4011, Malta. For more information visit [xnt.mt](http://xnt.mt), e-mail [info@xnt.mt](mailto:info@xnt.mt) or call +356 2015 0000.

XNT acts as the manufacturer of this product and does not provide investment services to retail clients directly. The product may be made available to retail investors in the European Union through investment firms authorised in the EU acting as distributors. This document has been prepared for retail investors who may be offered the product through such a distributor. If you received this product through a distributor or adviser, please contact them in the first instance with any questions about your account; any charges of the distributor are not included in the cost figures shown in this document.

**Competent authority: Malta Financial Services Authority (MFSA). This document was created on 01 March 2026.**

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

### What is this product?

**Type:** A CFD on an ETF is a leveraged contract entered into with XNT on a bilateral, over-the-counter basis. It allows an investor to speculate on rising or falling prices of an underlying exchange-traded fund listed on a US trading venue (for example NYSE Arca, NASDAQ or Cboe BZX), without buying or selling units of the fund itself. US-listed ETFs are not UCITS funds and are not subject to the EU PRIIPs regime at fund level; the protections of the UCITS framework do not apply to the underlying fund or to the CFD, which is a separate bilateral contract with XNT. An investor may buy ('go long') the CFD to benefit from a rising ETF price, or sell ('go short') to benefit from a falling ETF price. At close-out, one party pays the other the difference between the closing value and the opening value of the contract. Positions are adjusted for fund distributions. The leverage embedded in the CFD magnifies both profits and losses.

**Objectives:** The objective of the CFD is to allow an investor to gain leveraged exposure to the movement in the value of the underlying US-listed exchange-traded fund (ETF) (whether up or down), without buying or selling the underlying instrument. The exposure is leveraged because the CFD only requires a small proportion of the notional value of the contract to be put down as initial margin. XNT applies the leverage limits, margin close-out rule, negative balance protection and risk-warning requirements introduced by the ESMA product intervention measures and adopted by the MFSA for retail clients. For this product class the initial margin requirement for retail clients is 20% of the notional value of the position (maximum leverage 5:1).

As an example, if an investor buys a CFD on SPY (SPDR S&P 500 ETF Trust, NYSE Arca, ISIN US78462F1030) covering 20 units at a price of USD 650.00 (rounded market price level as at 1 March 2026, used for illustration), the notional value of the position is USD 13,000.00 and the initial margin required is USD 2,600.00. For each 1% change in the price of the underlying, the value of the position changes by USD 130.00, i.e. 5.0% of the initial margin. Additional funds may need to be deposited if the price moves against the position; failure to maintain the required margin may result in the position being closed automatically.

The CFD has no fixed maturity date and no recommended holding period; it is generally used for intraday or short-term trading. The position remains open until you close it, or until it is closed by XNT in accordance with the margin close-out rule or the Terms of Business. It is at the discretion of each investor to determine the appropriate holding period based on their individual trading strategy and objectives.

**Intended retail investor:** CFDs are intended for investors who have knowledge of, or experience with, leveraged products; who understand how CFD prices are derived, the key concepts of margin and leverage, and the risk/reward profile of the product compared with traditional dealing in the underlying US-listed exchange-traded fund (ETF); who have appropriate financial means and the ability to bear a loss of the entire amount invested; and who pursue short-term, typically speculative, trading objectives.



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

Risk Indicator						
← Lower risk			Higher risk →			
1	2	3	4	5	6	7

The risk indicator assumes that you may not be able to buy or sell your CFD at the price you wanted to due to volatility of the market, or you may have to buy or sell your CFD at a price that significantly impacts how much you get back.

We have classified this product as 7 out of 7, which is the highest risk class. 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. CFDs are leveraged products that, due to underlying market movement, can generate losses rapidly. It is possible to lose the entire amount invested in a given position, and you may be required to deposit additional funds to maintain your positions.

Negative balance protection applies to retail client accounts: your aggregate losses are limited to the total funds on your trading account, and you cannot lose more than this amount. If the total margin posted on your account falls to 50% of the minimum required margin for your open CFD positions, XNT is required to close one or more of those positions. Market conditions may mean that positions are closed at a less favourable price, which could significantly impact how much you get back. There is no capital protection against market risk, credit risk or liquidity risk.

Be aware of currency risk: where you trade a CFD denominated in a currency other than the base currency of your account, your final return also depends on the exchange rate between the two currencies. This risk is not considered in the indicator shown above. The CFD can only be traded during US market hours; for investors in other time zones this may limit the ability to react to news. Returns are exposed to USD exchange-rate movements where your account is denominated in another currency. ETF prices may deviate from the net asset value of the fund in stressed markets.

### Performance scenarios

The scenarios shown illustrate how your investment could perform; they are not an exact indicator and are not based on a guaranteed outcome. 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 does not take into account the situation where we are not able to pay you. The following assumptions have been used (position assumed to be opened and closed within the same day; figures are net of opening and closing commissions, before any rollover fees and currency conversion):

Underlying instrument	SPY (SPDR S&P 500 ETF Trust, NYSE Arca, ISIN US78462FI030)
Opening price (rounded level as at 1 March 2026)	USD 650.00
Contract size	20 units
Notional value of the trade	USD 13,000.00
Initial margin requirement (20%)	USD 2,600.00
Commission per trade (charged on both opening and closing; opening trade shown)	USD 1.00

Performance scenario	Price change	Profit/loss – LONG position	Profit/loss – SHORT position
Stress	±15%	–USD 1,952.00 (at –15%)	–USD 1,952.00 (at +15%)
Unfavourable	±7.5%	–USD 977.00 (at –7.5%)	–USD 977.00 (at +7.5%)
Moderate	±1.5%	+USD 193.00 (at +1.5%)	+USD 193.00 (at –1.5%)
Favourable	±7.5%	+USD 973.00 (at +7.5%)	+USD 973.00 (at –7.5%)



The figures shown include the costs of the product itself (trading commissions) but exclude rollover fees for positions held overnight and any currency conversion costs. If you have been sold this product by someone else, or have a third party advising you, these figures do not include any cost you pay to them. The figures do not take into account your personal tax situation, which may also affect how much you get back.

### What happens if XNT LTD. is unable to pay out?

If XNT is unable to meet its financial obligations to you, you may lose the value of your investment. Client money and client assets are segregated from XNT's own assets in accordance with MFSA rules. In addition, XNT participates in the Investor Compensation Scheme established in Malta under the Investor Compensation Scheme Regulations. Where a claim is eligible, compensation is limited to 90% of your net eligible loss, up to a maximum of EUR 20,000 per investor. The deposit of cash and the purchase of CFDs remain exposed to market risk, which is not covered by the Scheme. See [compensationschemes.org.mt](http://compensationschemes.org.mt) for further information.

### What are the costs?

Trading this CFD incurs the following costs. Commissions and rollover rates differ from instrument to instrument and may change over time: you must always consult your Client's Area for the commission and rollover rate applicable to the specific instrument before trading. The figures below apply to the representative instrument used in this document.

Cost category	Cost item	Description
One-off entry/exit costs	Commission	A commission is charged on each trade when you open and when you close a position. For the representative instrument: USD 0.02 per unit, minimum USD 1.00 per trade (US markets). Charged in your statement under the operation type COMMISSION.
	Currency conversion	Any cash, realised profit and loss, adjustments, fees and charges denominated in a currency other than the base currency of your account are converted to the base currency at the prevailing rate with an auto-conversion spread starting from 2 pips; no additional conversion fee is charged.
Ongoing costs	Rollover (daily holding cost)	A rollover fee is charged for every night a position is held open, calculated daily on the notional value of the position on an Actual/360 basis and shown in your statement under the operation type ROLLOVER. The longer you hold a position, the more it costs. For the representative instrument the current annualised rates are: long positions 7.00% p.a.; short positions 12.00% p.a. (SPY (NYSE Arca)).
Incidental costs	Account-level fees	Certain account-level fees may apply irrespective of this product. These are described in the Commissions/Terms section of the website and in your Client's Area.

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

CFDs are intended for short-term trading, in many cases intraday, and are generally not suitable for long-term investment. There is no recommended holding period, no cancellation period and no cancellation fee. You can open and close a CFD on a US-listed exchange-traded fund (ETF) at any time during the trading hours of the relevant market. Holding a position overnight incurs rollover fees, which over longer periods can materially erode returns.

### How can I complain?

If you wish to make a complaint, you should first address it to the local distributor with which you have a trading agreement, in accordance with that distributor's complaints procedure. If your complaint concerns XNT as the manufacturer of this product, or has not been resolved by your distributor, contact XNT's client services team on +356 2015 0000 or submit your complaint in writing by e-mail to [complaints@xnt.mt](mailto:complaints@xnt.mt). XNT will acknowledge and investigate your complaint in accordance with its Complaints Handling Procedure, available in the Document Centre at [xnt.mt](http://xnt.mt). If you are not satisfied with XNT's final response, you may refer the matter to the Office of the Arbitrator for Financial Services in Malta ([financialarbitrator.org.mt](http://financialarbitrator.org.mt)).

### Other relevant information

As this product is made available to you through a distributor, your contractual relationship is with that distributor and not with XNT directly. You should therefore consult the agreements and Terms of Business of your local distributor, which govern your account and your trading in this product. If there is a time lag between order placement and execution, your order may not be executed at the price you expected.