

## 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.

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

## Product

CFDs on Vanguard S&P Mid-Cap 400 Growth ETF are offered by CMC Markets Germany GmbH ("CMC"), a company registered in Germany, number 114199. CMC Markets Germany GmbH (registration number 154814) is authorised and regulated by Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin). Call +49 (0) 69 22 22 440 00 or go to [cmcmarkets.de](http://cmcmarkets.de) for more information.

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## What is this product?

### Type

A Contract for difference ("CFD") on Vanguard S&P Mid-Cap 400 Growth ETF is a leveraged contract entered into with CMC on a bilateral basis. It allows an investor to speculate on rising or falling price in the underlying market. An investor has the choice to buy (or go "long") the CFD to benefit from rising prices/rates; or to sell (or go "short") the CFD to benefit from falling prices/rates. For instance, if an investor is long and the price of the underlying asset rises, the value of the CFD will increase - at the end of the contract CMC will pay the difference between the closing value of the contract and the opening value of the contract. Conversely, if an investor is long and the price of the underlying asset falls, the value of the CFD will decrease - at the end of the contract they will pay CMC the difference between the closing value of the contract and the opening value of the contract. The price is derived from the price of the underlying asset, which may be either the cash price and/or the future price depending on the CFD. The leverage embedded within all CFDs has the effect of magnifying 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 Vanguard S&P Mid-Cap 400 Growth ETF (whether up or down), without actually needing to buy or sell in the underlying market. The exposure is leveraged since the CFD only requires a small proportion of the notional value of the contract to be paid upfront as initial margin and is one of the key features of trading CFDs. An undated CFD does not have a pre-defined maturity date and is therefore open-ended. Undated contracts incur an overnight holding cost. Forward CFD contracts have a pre-defined expiry date where investors can choose to cash settle their position or roll their existing contract into the next period - i.e., from a January expiry into a February expiry. Rolling is at the discretion of the investor but failure to do so will result in the CFD either being auto-closed at the expiry date or automatically rolled over to the next period, depending on the investor's Forwards Settlement Behaviour account setting. There is no recommended holding period and it is down to the investor to determine the most appropriate holding period based on their own individual trading strategy and objectives. Failure to deposit additional funds in the case of negative price movement may result in the CFD being automatically closed. This will occur when there is not enough money in the account to cover the margin requirement. CMC also retains the ability to unilaterally terminate any CFD contract where it deems that the terms of the contract have been breached.

### Intended Retail Investor

CFDs are intended for investors who have knowledge of, or experience with, leveraged products. Likely investors will understand how the prices of CFDs are derived, the key concepts of margin and leverage. They will understand the risk/reward profile of the product compared to trading other products, and desire short-term, high-risk exposure to an underlying asset. Investors will also have appropriate financial means, hold other investment types and have the ability to bear losses of the total amount invested.

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

### Risk indicator



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. 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 very high level.

CFDs are complex instruments and come with a high risk of losing money rapidly due to leverage. 73% of retail investor accounts lose money when trading CFDs with this provider. You should consider whether you understand how CFDs work and whether you can afford to take the high risk of losing your money. There is no capital protection against market risk, credit risk or liquidity risk.

### Beware of currency risk

It is possible to buy or sell CFDs on Vanguard S&P Mid-Cap 400 Growth ETF in a currency that is different to the base currency of your account. The final return you may get depends on the exchange rate between the two currencies. This risk is not considered in the indicator shown above. Market conditions may mean that your CFD trade is closed at a less favourable price, which could significantly impact how much you get back. We may close your open CFD contract if you do not maintain the minimum margin that is required, or if you contravene market regulations. This process may be automated. This product does not include any protection from future market performance so you could lose some or all of your investment. If we are not able to pay you what is owed, you could lose your entire investment. However, you may benefit from a consumer protection scheme (see "what happens if CMC Markets Germany GmbH is unable to pay you"). The indicator shown above does not consider this protection.

### Performance scenarios

The figures shown include all the costs of the product itself, but may not include all the costs that you pay to your advisor or distributor. The figures do not take into account your personal tax situation, which may also affect how much you get back. 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 scenarios shown are illustrations based on results from the past and on certain assumptions. Markets could develop very differently in the future.

This table shows the money you could get back or pay over a one (1) day holding period, under different scenarios, assuming a Notional Amount of 10,000€:

LONG Performance scenario	Price change	Profit/Loss	SHORT Performance scenario	Price change	Profit/Loss
Minimum	There is no minimum guaranteed return. You could lose some or all of your investment				
Favourable	1.3927%	€139.27	Favourable	-1.4438%	€144.38
Moderate	-0.1316%	-€13.16	Moderate	0.1702%	-€17.02
Unfavourable*	-1.7456%	-€174.56	Unfavourable*	1.6945%	-€169.45
Stress*	-14.5860%	-€1,458.60	Stress*	12.9804%	-€1,298.04

\*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. (\*) Losses will be limited to your account balance. The return is calculated as a percentage over the notional amount.

## What happens if CMC Markets Germany GmbH is unable to pay out?

If CMC is unable to meet its financial obligations to you, you may lose the value of your investment. However CMC segregates all retail client funds from its own money in accordance with section 84 of the German Securities Trading Act (WpHG) on client assets. CMC is also a member of the "Compensation Facility for Securities Trading Companies" (EdW), which covers legitimate claims of up to EUR 20,000 per person per company. See [www.e-d-w.de/](http://www.e-d-w.de/).

## What are the costs?

The person advising on or selling you this product may charge you other costs. If so, this person will provide you with information about these costs and how they affect your investment. 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 the notional amount and different possible investment periods.

We have assumed: In the first year you would get back the amount that you invested (0 % annual return). For the other holding periods we have assumed the product performs as shown in the moderate scenario. €10,000.00 notional amount is invested with the assumption of the price at the close of business from the previous trading day was bid (SHORT) \$116.5 and ask (LONG) \$116.66:

	If you Exit after 1D SHORT / LONG	If you Exit After 1M SHORT / LONG	If you Exit After 1Y SHORT / LONG
Total Cost	€15.16 / €15.02	€58.95 / €54.75	€564.80 / €513.70
Annual cost impact*	0.1516% / 0.1502%	0.5895% / 0.5475%	5.6480% / 5.1370%

\*This illustrates how costs reduce your return each year over the holding period. For example it shows that if you exit at the assumed holding period your average return per year is projected to be 0% before costs and (SHORT/LONG) -5.6480%/-5.1370% after costs.

One-off costs upon entry or exit		1D Holding Short/ Long	1D Holding Short/ Long (%)*
Entry or Exit	Spread: The difference between the buy price and the sell price is called the spread. This cost is realised each time you open and close a trade. *The percentage of the amount you pay in when entering this investment or of your investment before it is paid out to you at exit.	€13.64	0.1364%
	Currency Conversion: Any cash, realised profit and losses, adjustments, fees and charges that are denominated in a currency other than the base currency of your account, will be converted to the base currency of your account and a currency conversion fee will be charged to your account. *The percentage of the amount you pay in when entering this investment or of your investment before it is paid out to you at exit.	€0.01 / €0.01	0.0001% / 0.0001%
<b>Ongoing</b>			
Management fees and other administrative or operating costs	Daily Holding Cost: A holding cost is charged to your account for every night that you hold a position. The amount could be positive or negative depending on the instrument you are holding and whether you are long or short. The longer you hold a position, the more it costs. *The percentage of the value of your investment per day.	€1.51 / €1.37	0.0151% / 0.0137%
<b>Other Costs</b>			
Different costs apply depending on the type/amount	Corporate Actions: Where a Corporate Action event occurs for the underlying asset of a Product you hold a Position in, this may result in a debit or credit to your Account ("Price Adjustment") and/or an amendment to your existing Trades or Orders to reflect the effect of that Corporate Action.	Upon Market Movement	
	Market Data: Australian Shares are currently chargeable, but each other region is currently free (subject to change), or there may be a fee associated with each subscription plan that is activated or if a fee is applicable for activating a subscription plan this will require your acceptance before any fee is charged.	When Applicable	

One-off costs upon entry or exit		1D Holding Short/ Long	1D Holding Short/ Long (%)*
	Payments: Transaction or handling fees may be deducted from the gross payment or withdrawal amounts sent to or from CMC Markets by any intermediary bank or third-party provider who process payments or withdrawals on your behalf.		Upon third party rates
This is the most you will be charged			

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

CFDs are intended for short-term trading, in some cases intraday, and are generally not suitable for long-term investments. There is no recommended holding period, no cancellation period and therefore no cancellation fees. You can open and close a CFD trade at any time during market hours.

### How can I complain?

### Other relevant information

If there is a time lag between the time you place your order and the moment it is executed, your order may not be executed at the price you expected. Ensure your internet signal strength is sufficient before trading. The Legal Documents section of our website contains important information regarding your account. You should ensure that you are familiar with all the terms and policies that apply to your account. The Product Overview on our platform contains additional information on trading a CFD on Vanguard S&P Mid-Cap 400 Growth ETF. Additional information on costs can be found on our website.