|  |  |
| --- | --- |
| Podaci o investicionom društvu i uslugama | Information about the investment company |
| koje investiciono društvo pruža klijentima i | and investment services that company |
| potencijalnim klijentima | provides to clients and potential clients |

Član 1

Sadržaj informacija za klijenta

Investiciono društvo dužno je da blagovremeno dostavi postojećem ili potencijalnom malom investitoru, prije zaključivanja ugovora o pružanju investicionih ili pomoćnih usluga ili prije pružanja tih usluga ako se sa njihovim pružanjem započne prije zaključivanja ugovora, informacije:

* Informacije o Društvu i njegovim uslugama iz člana 311 Zakona
* Informacije o finansijskim instrumentima i predloženim investicionim strategijama, uključujući odgovarajuće smjernice i upozorenja u vezi sa rizikom ulaganja u pomenute instrumente, odnosno strategije u skladu sa članom 312 Zakona
* informacije o mjestima izvršenja naloga
* informacije o troškovima i naknadama iz člana 314 Zakona.

Član 2

Osnovni podaci o investicionom društvu

Investiciono društvo dužno je da dostavlja postojećim ili potencijalnim malim investitorima sledeće informacije i to: Poslovno ime: Investiciono društvo TEMPLER SECURITIES AD Podgorica

Skraćeni naziv: TEMPLER SECURITIES

Sjedište investicionog društva: Ulica Rimski trg – PC Kruševac, Podgorica

PIB: 03290697

Registarski broj: 40009725

Osnovni kapital: 135.000

Web: www.templer-securities.me

E-mail: info@templer-securities.me

Telefon +382 20262762

Osnovni račun: 520-39965-72

Jezik komunikacije: Jezik komunikacije je engleski. Društvo sa klijentima - stranim pravnim ili fizičkim licima može komunicirati na Engleskom ili drugom stranom jeziku koji je predviđen ugovorom, pod uslovom da se ugovor, nalozi i druga neophodna dokumentacija izrađuje dvojezično.

Način komunikacije: Komunikacija između Društva i klijenta se odvija na najpogodniji način za klijenta u skladu sa relevantnim propisima. Klijent može komunicirati s

Article 1

Content of information for the client

The investment company shall promptly deliver to an existing or potential small investor before concluding a contract for the provision of investment or ancillary services the information:

* Information about the Company and its services under Article 311 of the Law
* Information about financial instruments and proposed investment strategies, including appropriate guidelines and warnings regarding the risk of investments in the said instruments or strategies in accordance with Article 312 of the Law
* information about the places where the order is executed
* information about the costs and benefits referred to in Article 314 of the Act.

Article 2

Basic information about the investment company

The investment company is obliged to submit the following information to existing or potential small investors: Company name: Investment company TEMPLER SECURITIES JSC Podgorica

Abbreviated name: TEMPLER SECURITIES

Head office of the investment company: Street Rimski trg – PC Kruševac, Podgorica

Tax number: 03290697

 Number: 40009725

Share capital: 135.000

Web: www.templer-securities.me

E-mail: info@templer-securities.me

Phone +382 20262762

Basic bank account: 520-39965-72

Language of communication: The language of communication is English. A company can communicate with the clients (foreign legal or natural persons) in English or another foreign language provided for by the contract, provided that the contract, orders and other necessary documentation are made bilingual.

Method of communication: Communication between the Company and the client is done in the most suitable way for

Društvom telefonski (u tom slučaju se razgovori snimaju a zapisi se čuvaju prema propisanim pravilima), putem aplikacije, sistema, i lično. Najpogodniji način komunikacije je određen ugovorom.

Klijent može davati naloge putem telefona, elektronski, odnosno u skladu sa relevantnim propisima, ukoliko je to predviđeno ugovorom sa Klijentom. Dokumenta i druge informacije za Klijenta, u skladu sa relevantnim propisima, Društvo može davati neposredno, putem internet stranice Društva, poštom, elektronski.

Dozvola za rad: Investiciono društvo TEMPLER SECURITIES AD Podgorica ima licencu za obavljanje poslova ovlašćenog učesnika na tržištu hartija od vrijednosti izdatu od strane Komisije za tržište kapitala, broj rješenja:03/2-4/4-19

Usluge društva. Društvo obavlja sledeće finansijske usluge i aktivnosti:

* prijem i prenos naloga koji se odnose na jedan ili više finansijskih instrumenata;
* izvršenje naloga za račun klijenta;

Član 3

Informacije o finansijskim instrumentima

Investiciono društvo postojećim i potencijalnim klijentima dostavlja detaljne informacije o karakteristikama i rizicima finansijskih instrumenata, primjereno kategorizaciji klijenta kao malog ili profesionalnog investitora, koje će omogućiti klijentu da donese odgovarajuću odluku o ulaganju. Informacije o riziku naročito obuhvataju:

1. rizike povezane sa vrstom finansijskog instrumenta, uključujući pojašnjenje finansijske poluge i njenog učinka, kao i rizik od gubitka ulaganja;
2. volatilnost cijene finansijskog instrumenta i eventualna ograničenja na postojećem tržištu za te instrumente;
3. finansijske i druge dodatne obaveze investitora u slučaju transakcije sa tim finansijskim instrumentima;
4. podatke o marži i druge obaveze u vezi finansijskog instrumenta.

Vrste finansijskih instrumenata

U skladu sa Zakonom o tržištu kapitala, finansijski instrumenti su:

1. prenosive hartije od vrijednosti;
2. instrumenti tržišta novca;

the client in accordance with the relevant regulations. The client can communicate with the Company by telephone (in this case, conversations are recorded and records are kept according to the prescribed rules), through the application, the system, and personally. The most appropriate way of communication is determined by the contract.

The client can place orders via telephone, or via electronic trading platform in accordance with the relevant regulations, if this is stipulated by the contract with the Client. Documents and other information for the Client, according with relevant regulations, Company can provide to the Client directly, via the Company's website, by mail, electronically.

Work Permit: Investment company TEMPLER SECURITIES JSC Podgorica has work license for the performance of the affairs of certified securities market participant issued by the the Capital Market Authority, Number of solution: 03/2-4/4-19

Company services. The Company performs the following financial services and activities:

* receiving and transferring orders relating to one or more financial instruments;
* execution of an order for the client account;

Article 3

Information about financial instruments

The investment company provides existing and potential clients with detailed information about the characteristics and risks of financial instruments, appropriate categorization of the client as a small or professional investor, which will enable the client to make the appropriate investment decision.

Risk information includes, in particular:

1. risks associated with the type of financial instrument, including the clarification of the financial leverage and its effect, as well as the risk of loss of investment;
2. volatility of the price of a financial instrument and possible restrictions on the existing market for these instruments;
3. financial and other additional obligations of the investor in the event of a transaction with those financial instruments;
4. information about the margin and other obligations related to the financial instrument.

Types of financial instruments

In accordance with the Law on Capital Market, financial instruments are:

1) transferable securities;

1. investicione jedinice, u smislu zakona kojim se uređuje osnivanje i poslovanje investicionih fondova i društava za upravljanje investicionim fondovima;
2. derivati, odnosno robni derivati, koji obuhvataju:
3. opcije, fjučerse, svopove, kamatne forvarde i druge izvedene finansijske instrumente koji se odnose na hartije od vrijednosti, valute, kamatne stope ili kamatne prinose, jedinice emisije gasa sa efektom staklene bašte, kao i druge izvedene finansijske instrumente, finansijske indekse ili finansijske jedinice koje se mogu saldirati u gotovom novcu ili razmjenom;
4. opcije, fjučerse, svopove, kamatne forvarde i ostale izvedene finansijske instrumente koji se odnose na robu i koji se obavezno saldiraju u gotovom novcu ili mogu biti saldirani u gotovini na zahtjev jedne od ugovornih strana, iz razloga koji nijesu vezani za neizvršenje obaveza ili raskid ugovora;
5. opcije, fjučerse, svopove i druge izvedene finansijske ugovore koji se odnose na robu i mogu biti saldirani fizički, pod uslovom da se tom robom trguje na regulisanom tržištu i/ili MTP-u i/ili OTP-u, osim veleprodajnih energetskih proizvoda kojima se trguje na OTP-u koji moraju biti saldirani razmjenom;
6. opcije, fjučerse, svopove, forvarde i druge izvedene finansijske instrumente koji se odnose na robu i mogu biti saldirani fizički, na način koji nije predviđen u podtački c ove tačke, koji nijesu predviđeni za trgovanje i imaju karakteristike izvedenih finansijskih instrumenata;
7. izvedene finansijske instrumente za prenos kreditnog rizika;
8. finansijske ugovore o razlikama;
9. opcije, fjučerse, svopove, kamatne forvarde i druge izvedene finansijske instrumente koji se odnose na klimatske promjene, troškove prevoza, jedinice emisije gasa sa efektom staklene bašte ili stope inflacije ili drugu zvaničnu ekonomsku statistiku koja mora biti saldirana u gotovom novcu na zahtjev jedne od ugovornih strana iz razloga koji nijesu povezani sa neizvršenjem obaveza ili raskidom ugovora, kao i druge izvedene finansijske ugovore koji se odnose na imovinu, prava, obaveze, indekse i druge jedinice mjere koje imaju karakteristike drugih izvedenih finansijskih instrumenata, kojima se trguje na regulisanom tržištu, MTP-u ili OTP-u; i
10. jedinice emisije gasa sa efektom staklene bašte.
11. money-market instruments;
12. investment units, in terms of the law governing the establishment and operation of investment funds and investment funds management companies;
13. derivatives, i.e. commodity derivatives, including:
14. options, futures, swaps, forward rate agreements and any other derivative contracts relating to securities, currencies, interest rates or yields, emission allowances or other derivatives instruments, financial indices or financial measures which may be settled physically or in cash;
15. options, futures, swaps, forwards and any other derivative contracts relating to commodities that must be settled in cash or may be settled in cash at the option of one of the parties other than by reason of default or other termination event;
16. options, futures, swaps, and any other derivative contract relating to commodities that can be physically settled provided that they are traded on a regulated market and/or MTF and/or OTF except for wholesale energy products traded on an OTF that must be physically settled;
17. options, futures, swaps, forwards and any other derivative contracts relating to commodities, that can be physically settled not otherwise mentioned in sub-item c) of this item, and not being for commercial purposes, which have the characteristics of other derivative financial instruments;
18. derivative instruments for the transfer of credit risk;
19. financial contracts for differences;
20. options, futures, swaps, forward rate agreements and any other derivative contracts relating to climatic variables, freight rates or inflation rates or other official economic statistics that must be settled in cash or may be settled in cash at the option of one of the parties other than by reason of default or other termination event, as well as any other derivative contracts relating to assets, rights, obligations, indices and measures which have the characteristics of other derivative financial instruments, which are traded on a regulated market, OTF, or an MTF; and
21. emission allowances.

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Član 4

Rizici finansijskih instrumenata

Poslovi s finansijskim instrumentima uključujući i kupovinu i prodaju finansijskih instrumenata, nose u sebi određene rizike. Sklapanjem Naloga i/ili Ugovora o obavljanju brokerskih poslova, Klijent potvrđuje da je svjestan rizika povezanih s tržištem kapitala, da mu je Društvo stavilo na raspolaganje podatke i informacije koje je zatražio i da mu je na zadovoljavajući način odgovoreno na sva pitanja koja je postavio u pogledu tržišnih okolnosti i finansijskih instrumenata na koje se odnosi Nalog.

Društvo je u svom poslovanju izloženo naročito sledećim rizicima:

kreditni rizik;

rizik likvidnosti; operativni rizici;

rizici izloženosti prema jednom licu ili grupi povezanih lica,

ostali rizici.

1. Kreditni rizik je rizik gubitka koji nastaje zbog neispunjavanja novčane obaveze nekog lica prema Društvu. Kreditni rizik se ogleda u tome da izdavalac finansijskog instrumenta nije u stanju da plati ugovornu kamatu ili glavnicu na svoje dužničke obaveze. Prilikom procjene kreditnog rizika pojedinih finansijskih instrumenata Društvo će se služiti ocjenama rejting agencija ukoliko je to primjenljivo za konkretnu ocjenu kreditnog rizika. Ukoliko nije primjenljivo, Društvo će se koristiti sopstvenim tehnikama procjene boniteta kako finansijskih instrumenata tako i klijenata, a to su prije svega interno razvijene tehnike fundamentalne analize.
2. Rizik likvidnosti je rizik mogućnosti nastanka negativnih efekata na finansijski rezultat i kapital Društva uslijed nesposobnosti Društva da ispunjava dospjele obaveze. Društvo na dnevnom nivou mjeri likvidnost upoređujući stanje svojih likvidnih sredstava i tekućih obaveza.

Investiciono društvo dužno je da na dnevnoj osnovi obračunava iznos likvidnog kapitala u novcu, rizike, izloženost i kvalifikovano učešće.

1. Operativni rizik je rizik gubitka zbog grešaka, prekida ili šteta koje mogu da nastanu uslijed neadekvatnih internih procedura, postupanja lica, sistema ili spoljnih događaja, uključujući i rizik izmjene pravnog okvira.
2. Izloženost Društva prema jednom licu je ukupan iznos potraživanja koja se odnose na to lice ili grupu povezanih lica (krediti, ulaganja u dužničke hartije od vrijednosti, vlasnički ulozi i učešća, izdate garancije i slično).

Article 4

Risks of financial instruments

Financial instruments, including the purchase and sale of financial instruments, carry certain risks. By assigning the Order and / or the Contract on the performance of brokerage operations, the Client confirms that he is aware of the risks associated with the capital market, that the Company made available to him the data and information he requested and that the company answered in a satisfactory manner to all the questions he asked about the market conditions and financial instruments to which the Order are related.

The Company is exposed in its business especially to the following risks:

credit risk; liquidity risk;

operational risks;

exposure risks to one person or a group of related parties,

other risks.

1. Credit risk is the risk of loss resulting from failure to meet the financial obligation of a person to a Company. Credit risk is reflected in the fact that the issuer of a financial instrument is unable to pay the contractual interest or principal on its debt obligations. In assessing the credit risk of certain financial instruments, the Company will use rating agencies' ratings if applicable for a specific credit risk assessment. If not applicable, the Company will use its own valuation techniques of both financial instruments and clients, which are internally developed techniques of fundamental analysis.
2. Liquidity risk is the risk of the possibility of adverse effects on the Company's financial result and equity due to the Company's inability to meet its due liabilities. On the daily level, the Company measures liquidity by comparing the balance of its liquid assets and current liabilities.

The investment company is obliged to calculate on a daily basis the amount of liquid capital in money, risks, exposure and qualifying holding.

1. Operational risk is the risk of loss due to errors, interruptions or damage that may occur due to inadequate internal procedures, the treatment of persons, systems or external events, including the risk of changing the legal framework.
2. The Company's exposure to a single entity is the total amount of receivables relating to that person or group of related parties (loans, investments in debt securities, equity investments and shares, issued guarantees and etc.).
3. Other risks include: the risks of competition and the financial crisis and the reduction in demand for services

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1. Ostali rizici su: rizici pojave konkurencije i finansijska kriza i smanjenje tražnje za uslugama

Član 5

Informacije u vezi sa zaštitom finansijskih instrumenata ili novčanih sredstava klijenta

Investiciono društvo dužno je da, u svrhu zaštite prava klijenata, u vezi sa finansijskim instrumentima i novčanim sredstvima klijenata:

1. vodi evidencije i račune potrebne da u svakom trenutku bez odlaganja može da razlikuje imovinu pojedinog klijenta od imovine drugog klijenta, kao i od svoje imovine;
2. održava evidencije i račune na način koji obezbjeđuje njihovu tačnost, a posebno one koje se odnose na finansijske instrumente i novčana sredstva koja drže za klijente;
3. redovno vrši usklađivanja između svojih internih računa i evidencija sa računima i evidencijama trećih lica koja drže ta sredstva;
4. preduzme potrebne mjere radi obezbjeđenja da su svi finansijski instrumenti klijenata deponovani kod trećih lica, odvojeni od finansijskih instrumenata investicionog društva i od finansijskih instrumenata tog trećeg lica.
5. preduzme mjere radi obezbjeđenja da se novčana sredstva klijenata drže na računu ili računima na kojima se ne drže novčana sredstva investicionog društva. Društvo je dužno da obezbijedi da se sredstva sa novčanog računa klijenta:

koriste samo za plaćanje obaveza u vezi sa uslugama koje obavlja za klijenta;

ne koriste za plaćanje obaveza drugog klijenta; ne koriste za plaćanje obaveza Društva.

Investiciono društvo dužno je da po prijemu, novčana sredstava klijenta bez odlaganja deponuje na jedan ili više računa otvorenih kod:

Centralne banke;

banke i druge kreditne institucije sa sjedištem u Crnoj Gori ili državi članici;

banke kojoj je izdata dozvola za rad u trećoj državi; ili

kvalifikovanog novčanog fonda.

1. uspostavi odgovarajuću organizacionu strukturu radi smanjenja rizika od gubitka ili smanjenja imovine klijenta ili prava u vezi sa tom imovinom, kao rezultat zloupotrebe imovine, prevare, lošeg upravljanja, neprimjerenog vođenja evidencije ili nemara.

Article 5

Information related to safeguarding clients financial instruments and funds

For the purposes of safeguarding clients’ rights in relation to financial instruments and funds belonging to them, investment firms comply with the following requirements:

1. they must keep such records and accounts as are necessary to enable them at any time and without delay to distinguish assets held for one client from assets held for any other client, and from their own assets;
2. they must maintain their records and accounts in a way that ensures their accuracy, and in particular their correspondence to the financial instruments and funds held for clients;
3. they must conduct, on a regular basis, reconciliations between their internal accounts and records and those of any third parties by whom those assets are held;
4. they must take the necessary steps to ensure that any client financial instruments deposited with a third party are identifiable separately from the financial instruments belonging to the investment firm and from financial instruments belonging to that third party,
5. they must take the necessary steps to ensure that client funds deposited are held in an account or accounts identified separately from any accounts used to hold funds belonging to the investment firm. The Company is obliged to ensure that the funds from the client's cash account:

use only for payment of obligations in connection with the services it performs for the client;

not used to pay for the obligations of another client;

they are not used to pay the Company's obligations.

The investment company shall, upon receipt, deposit the client's funds without delay with one or more accounts opened with:

Central banks;

banks and other credit institutions with a head office in Montenegro or a Member State;

a bank to which a work permit has been issued in a third country; or

a qualified monetary fund.

1. they must introduce adequate organisational arrangements to minimise the risk of the loss or diminution of client assets, or of rights in connection with those assets, as a result of misuse of the assets, fraud, poor administration, inadequate record-keeping or negligence.

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Član 6

Mjesta izvršavanja naloga

Mjesta izvršavanja su subjekti kojima se nalozi dostavljaju ili kojima Društvo šalje naloge na izvršenje. Za potrebe naloga koje je klijent podnio kompaniji, kao što je gore pomenuto, Društvo nastupa kao Agent u CFD ugovoru u ime klijenta I za racun klijenta u svakom trenutku..

Ako se nalog klijenta može izvršiti samo na jednom mjestu trgovanja uključenom u listu mjesta trgovanja na kojima Društvo izvršava naloge, smatraće se da je Društvo izvršavajući takav nalog ostvarilo najpovoljniji ishod za klijenta.

Društvo može nalog izvršiti van uređenog tržišta ili MTP-a uz prethodnu saglasnost klijenta, pri čemu se nalog klijenta može izvršiti spajanjem naloga klijenta s nalogom drugog klijenta, nalogom Društva ili nalogom treće strane.

Član 7

Informacije o troškovima i povezanim izdacima

Investiciono društvo dužno je da dostavi postojećim i potencijalnim malim investitorima informacije o troškovima, a naročito:

1. ukupnu cijenu koju plaća klijent u vezi sa finansijskim instrumentom ili investicionom ili pomoćnom uslugom, uključujući naknade, provizije, troškove i druge izdatke, kao i poreze koji se plaćaju preko investicionog društva, odnosno, osnov za izračunavanje ukupne cijene, na način na koji je klijent može provjeriti, ako nije moguće navesti tačnu cijenu;
2. naznaku valute i važeći kurs za konverziju i troškove, ako iznos cijene treba platiti u stranoj valuti;
3. mogućnost nastanka drugih troškova ili poreskih obaveza povezanih transakcijama u vezi sa finansijskim instrumentom ili investicionom uslugom, koje ne određuje i koji se ne plaćaju preko investicionog društva;
4. način plaćanja ili drugi način izvršavanja obaveza plaćanja troškova iz tač. 1 i 3 ovog stava.

Investiciono društvo dužno je da sačini specifikaciju provizija iz stava 1 ovog člana, koje obračunava po stavkama odvojeno u svakom pojedinom slučaju. Svi podaci o troškovima i naknadama navedeni su u Tarifniku/ Cjenovniku investicionog društva.

Article 6

Execution venues

Execution Venues are the entities with which the orders are placed or to which the Company transmits orders for execution. For the purposes of the orders submitted to the Company by the client, as mentioned above, the Company acts as Principal on the client’s behalf at all times.

If a client order can be made only at one trading venue included in the trading place where the Company executes orders, it will be considered that the Company executing such an order has achieved the most favorable outcome for the client.

The Company may execute the order outside the regulated market or MTP with the prior consent of the client, whereby the client's order can be made by merging the client's order with the order of the other client, the company order or the third party order.

Article 7

Information about the costs and related expenses

The investment company is obliged to provide information about costs to existing and potential small investors, in particular:

1. the total price paid by the client that is connected with a financial instrument or an investment or ancillary service, including fees, commissions, expenses and other expenses, as well as taxes paid by the investment company, that is, the basis for calculating the total price, in the manner in which the client can check if it is not possible to specify the exact price;
2. currency indication and valid conversion rate and costs, if the amount of the price payable in foreign currency;
3. the possibility of incurring other charges or tax liabilities associated with transactions in relation to a financial instrument or investment service that does not determine and which are not paid through the investment company;
4. the method of payment or other means of carrying out the obligation to pay the costs from point. 1 and 3 of this paragraph.

The investment company shall prepare a specification of the commissions referred to in paragraph 1, of this Article,which shall be calculated by items separately in each individual case. All data on costs and fees are listed in the Price List of the investment company.