

# Key Information Document

## 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

### Modern Surfaces Trade & Development Sub-Fund III, a Sub-Fund of Modern Surfaces Trade & Development RAIF V.C.I.C. LTD (the “Sub-Fund”)

Accurate as of:  
December 2025

Distributing share class EUR (the “Shares”)

AIFM: Guardo Assets Management Ltd (the “Manager”)

Contact details: ☎ +357 22 318 187 ✉ [info@guardoinvest.com](mailto:info@guardoinvest.com)

Guardo Assets Management Ltd, is authorised in Cyprus and regulated by the Cyprus Securities Exchange Commission

## What is this product?

### Type

This product is the participating share class issued by the investment fund in the form of a Registered Alternative Investment Fund in Cyprus (Registration no.: RAIF196\_3) and in the legal form of a Variable Capital Investment Company (V.C.I.C.).

### Objectives

**Investment objective:** The aim of the Sub-Fund is to achieve long-term capital appreciation and income by investing in private equity opportunities within the building materials industry and related sectors. It seeks to capitalise on the growing demand for innovative and durable materials in both residential and commercial construction, driven by trends in sustainability and technology.

**Investment policy:** The Sub-Fund will primarily invest in private, non-listed companies, involved in the distribution and import of building materials. The focus will be on established market leaders with strong distribution networks and proven operational efficiency, whilst also taking into consideration innovative growth companies that demonstrate significant potential.

The Sub-Fund aims to acquire a controlling stake or, where possible, a 100% stake in its target investments, to allow for greater influence over the company's operations and to ensure that investments align with the Sub-Fund's goals.

The Sub-Fund's primary target market focus shall be Kazakhstan. To manage concentration risk, the Sub-Fund will apply a rigorous selection process within its target sectors to mitigate exposure to individual companies or sector-specific risks.

The Sub-Fund will not utilise, either directly or indirectly through its subsidiaries, leverage and borrowings as part of its acquisition program or otherwise.

**Benchmark:** The Sub-Fund is actively managed, meaning the Manager actively selects and invests the securities in which the Sub-Fund invests with the aim of meeting the investment objective of the Sub-Fund and is not managed with reference to a benchmark nor tracks an index.

**Redemption and Dealing:** Following the expiration of the Initial Offer Period, Subscriptions, & Redemptions subject to a 2-year lock-up period, to the Sub-Fund are permissible on the first business day of each calendar semester or any other such period as determined by the AIFM. Subscriptions & Redemptions to the Sub-Fund are subject to a five (5) and sixty (60) day Notice Period, respectively.

The price for the Sub-Fund, reflecting the actual value of the product, is set on a semi-annual basis for the duration of the Sub-Fund, any Subscription or Redemption Date, and the Termination Date as well as the dates mentioned in the Sub-Fund's annual and half-yearly reports.

**Distribution policy:** This is the only investment participating share class of the Sub-Fund. The Shares carry the right to dividends and/or other distributions from the profits of the Sub-Fund, at the discretion of the Manager.

**Conversion of shares:** The Shares are not exchangeable with shares of other Sub-Funds by option of the Investor. The Sub-Fund has not issued any other share class other than the Shares.

**Launch:** The Sub-Fund came into existence in 2025.

### Intended retail investor

The product is intended to be marketed and only suitable to professional and/or well-informed investors that qualify as having sufficient experience and theoretical knowledge of financial and business matters in general, can bear the loss of their entire investment and who fully understand and are willing to assume the risks involved in such an investment program. **This product is not simple and may be difficult to understand.**

This product is intended for investors who plan to stay invested for at least 5 years and are prepared to take on a high level of risk of loss to their original capital in order to get a higher potential return. It is designed to form part of a portfolio of investments.

### Term

This product is an open-ended fund with no defined term nor maturity date, subject to a two (2) year lock-up period. Subject to the liquidation, dissolution and termination rights of the board of the Fund, as set forth in the Fund's Prospectus, the Sub-Fund cannot be automatically terminated. The manufacturer is not entitled to terminate the product unilaterally.

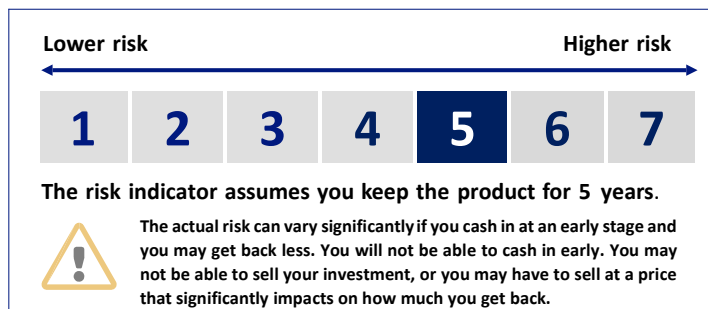
### Practical information

**Depository:** The Sub-Fund's depository is Eurivex Ltd.

**Further information:** Further information about the Sub-Fund, copies of its prospectus, annual and half-yearly reports, and latest share prices are available and may be obtained free of charge in English at the registered office of the Manager. Write to the Fund's Manager, Manager's head offices at Makariou III, 66, Cronos Court, 5th Floor, Office 54, 1077 Nicosia, Cyprus or by email at [info@guardoinvest.com](mailto:info@guardoinvest.com).

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

### Risks



This indicator relies on historical data and cannot be used for a prediction of future developments. The categorization of the Sub-Fund may change in the future and is not a guarantee. Even a fund in category 1 is not an entirely risk-free investment.

We have classified this product as 5 out of 7, which is a medium-high 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 it is not able to pay you.

This rates the potential losses from future performance at a high level, and poor market conditions are very likely to impact the amount you could get back. Changes to tax laws/treaties may adversely affect returns on the Investor's investment.

**Market developments in the future cannot be accurately predicted. The scenarios shown are only an indication of some of the possible outcomes based on proxy index returns. Actual returns could be lower.**

Be aware of currency risk. The price of the underlying assets may be in different currencies, so the final return you will get depends on the exchange rate between multiple currencies. This risk is not considered in the indicator shown above.

The product is contractually illiquid due to the nature of its investment strategy, and investors are expected to participate for a minimum period of 5 years. Thereafter, it is exposed to material liquidity risk due to the illiquid nature of its investments and the significant costs and conditions around an early exit for the investors.

### Performance Scenarios

The figures shown include all the costs of the product itself and include the costs of 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 unfavourable, moderate, and favourable scenarios shown are illustrations using the worst, average, and best performance of a suitable proxy over the last 10 years. Markets could develop very differently in the future.**

This table shows the money you could get back in 5 years, under different scenarios, assuming you invest €10,000. The scenarios shown illustrate how your investment could perform. You can compare them with the scenarios of other products.

The stress scenario shows what you might get back in extreme market circumstances.

Nominal amount – example investment of €10,000		If you exit after 5 years (Recommended Holding Period)
Scenarios		
Minimum	There is no minimum guaranteed return. You could lose some or all of your investment.	
Stress	What you might get back after costs	€ 3,295
	Average return each year	-19.91%
Unfavourable	What you might get back after costs	€ 6,505
	Average return each year	-8.24%
Moderate	What you might get back after costs	€ 11,314
	Average return each year	2.50%
Favourable	What you might get back after costs	€ 22,617
	Average return each year	17.73%

### Past Performance

The Sub-Fund does not yet have performance data for one complete calendar year and therefore there is insufficient data to provide a useful indication of past performance.

**Past performance is not a reliable indicator of future performance. Markets could develop very differently in the future. It can help you to assess how the Sub-Fund has been managed in the past.**

### What happens if the Sub-Fund is unable to pay out?

You may face a financial loss in case of default on our obligation. Losses are not covered by an investor compensation or guarantee scheme. If the Sub-Fund is unable to pay out, the Investor may not recover the sums invested and the Investor may therefore face a financial loss and will not be able to make a claim to any investor compensation fund nor to CySEC.

## 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.

### Costs over time

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, how long you hold the product and how well the product does. The amounts shown here are illustrations based on an example investment amount and a 5-year holding period. For the recommended holding period we have assumed the product performs as shown in the moderate scenario and that EUR 10,000 is invested.

Nominal amount – example investment of €10,000	5 years (Recommended Holding Period)
<b>Total Costs</b>	<b>€ 295</b>
<b>Annual cost impact</b>	<b>-0.59% each year</b>

This illustrates how costs reduce your return each year over the holding period. For example, it shows that if you exit at the recommended holding period your average return per year is projected to be 3.09% before costs and 2.50% after costs.

### Composition of costs

The table below shows the impact each year of the different types of costs on the performance of the product at the end of the recommended holding period and the meaning of the different cost categories.

One-off costs upon entry or exit		Annual cost impact if you exit after 5 years
<b>Entry costs</b>	<b>0.00%</b> - The impact of the costs you pay when entering your investment. This is the most you will pay, and you could pay less. This includes the costs of distribution of your product.	€ 0
<b>Exit costs</b>	<b>0.00%</b> - The impact of the costs you pay when exiting or redeeming your investment. This is the most you will pay, and you could pay less.	€ 0
Ongoing costs taken each year		Annual cost impact if you exit after 5 years
<b>Management fees and other administrative or operating costs</b>	<b>0.44%</b> of the value of your investment per year. This includes the fees of the AIFM, the investment advisor, the fund administration, and the fund directors of the Sub-Fund. This is an estimate based on simulated costs.	€ 44
<b>Transaction costs</b>	<b>0.03%</b> of the value of your investment per year. The impact of the costs of us buying and selling underlying investments for the product.	€ 3
<b>Depositary Fees</b>	<b>0.12%</b> of the value of your investment per year. The impact of the costs of the Depositary's annual fees related to the product.	€ 12
Incidental costs taken under specific conditions		Annual cost impact if you exit after 5 years
<b>Performance fees</b>	<b>0%</b> The Sub-Fund does not have a performance fee.	€ 0

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

### Recommended Holding Period: 5 years

This product is designed for longer-term investments; you should be prepared to stay invested for at least 5 years or hold the investment longer. You can redeem your investment, unless otherwise stated in the Subscription Agreement, on a semi-annual basis, unless otherwise determined by the Manager.

The price for the Sub-Fund, reflecting the actual value of the product, is set on a semi-annual basis following the expiration of the Initial Offer Period, any Subscription or Redemption Date, and the Termination Date as well as the dates mentioned in the Sub-Fund's annual and half-yearly reports.

## How can I complain?

If you ever need to complain about the service you have received, please contact the Fund's AIFM by telephone at +357 22 318 187, by post at Makariou III, 66, Cronos Court, 5th Floor, Office 54, 1077, Nicosia, Cyprus or by email at [info@guardoinvest.com](mailto:info@guardoinvest.com).

If you have a complaint about the person that advised you about this product, or who sold it to you, they will tell you where to complain.

## Other relevant information

**Cost, performance and risk:** The cost, performance and risk calculations included in this key information document follow the methodology prescribed by Packaged Retail and Insurance-based Investment Products (PRIIPs) Regulatory Standards issued by the EU Commission.

Details of the External Manager's remuneration policy, including but not limited to, a description of how the remuneration and benefits are calculated, the identity of persons responsible for awarding the remuneration and benefits, including the composition of the remuneration committee if applicable, are available and a paper copy will be available free of charge on request.

This Fund is subject to tax laws and regulations of Cyprus. Depending on your home country of residence, this might have an impact on your investment. For further details, please speak to your adviser.