



INFORMATION FOR CLIENTS AND POTENTIAL CLIENTS ABOUT FINANCIAL INSTRUMENTS AND RISKS ASSOCIATED WITH FINANCIAL INSTRUMENTS

Article 1

Information for Clients and Potential Clients of CAPITAL MARKETS, o.c.p., a.s., about Financial Instruments

1.1 Provision of investment services, investment activities and ancillary services by CAPITAL MARKETS, o.c.p., a.s. (hereinafter referred to as the “Brokerage Company”) to its clients and potential clients (hereinafter referred to as “Client”) pursuant to section 73d (1) of Act No. 566/2001 Coll. on securities and investment services and on amendments and supplements of certain laws, as amended (hereinafter referred to as the “Securities Act”) in conjunction with Article 48 (1) and (2) of Delegated Regulation (EU) 2017/565, is related to the obligation to provide a general description of the nature of the financial instruments provided. A general description means the provision of information to clarify the nature of each financial instrument and the risks associated with it. The general description will enable the Client to form a sufficient basis for his/her investment decision. The information contained in the following text is intended to provide a basic description of the nature of financial instruments to the Client of the Brokerage Company, which are available to such Clients through the employees of the Brokerage Company’s Account Management and Dealing Departments and the Brokerage Company’s tied agents.

1.2 A detailed description of trading with financial instruments, explanation of related terms, procedures and rules of trading with individual financial instruments is subject to the provisions of the relevant General Terms and Conditions (hereinafter referred to as “GTC”). GTC form part of the contractual documentation governing the execution of transactions with financial instruments between the Client and the Brokerage Company. The GTC are publicly available to Clients and potential clients on the Brokerage Company’s website at www.capitalmarkets.sk.

1.3 General description of the nature of financial instruments

The Brokerage Company provides the Clients with the opportunity to carry out financial operations through the trading platform with financial instruments, in particular with shares and contracts for differences. Investing in financial instruments is characterised as the placement of the Client’s available funds in financial instruments in order to achieve a goal set by the Client at a predetermined level of risk



and investment time horizon. The intentions and goals of each Client are specific, as is each financial instrument. Therefore, it is generally not possible to determine which financial instruments are suitable for which Clients. For this reason, it is necessary to take into account the individual needs of each Client and the specifics of each financial instrument when making investment decisions.

The three criteria forming the basic investment triangle:

Investment risk – the possibility of a decrease in the value of the Client's investment

Liquidity of the investment – the speed of converting the investment back into cash

Return on investment – the amount of appreciation of the Client's funds

This investment triangle states that it is impossible to reach all three vertices of this triangle at the same time. In other words, it is not possible to achieve a high return while keeping the risk low and the liquidity of the investment high. The two investment counterpoints are then an investment that brings a high return with a high level of risk and a low level of liquidity and an investment with a low level of risk, low return and high liquidity. Making a decision on a specific investment therefore requires a compromise between return, risk and liquidity depending on the Client's individual preferences.

1.4 Financial instruments

Securities are monetary instruments in the form and shape prescribed by law, which carry certain rights, in particular the right to claim certain property or to exercise certain rights against persons specified by law.

A **share** is a security which represents part of the share capital of the company which issued the share. Each holder of a share is a shareholder of that company. A shareholder as a partner has the right under the Securities Act and the company's articles of incorporation to participate in the management of the company, its profits, and the liquidation balance upon the dissolution of the company. The management of the company is carried out by individual shareholders through the voting right at the general meeting of the company, the share of the profit is received by the shareholders through the dividend (the dividend payment is not guaranteed and its amount is approved by the general meeting of the company). In addition to dividend income, shareholders can also receive a return through the rising value of the share price. Typically, in cases where a company shows a long-term positive and growing economic result, the value of the shares of such companies increases, thereby providing investors with the opportunity to receive a return if those shares are sold at a price higher than the purchase price of those shares. Similarly, however,



in the event of a negative development in the company's economic results, the values of the shares may decline. The primary motivation for investing in shares, as is clear from the above text, is to acquire a share of the company's assets, to participate in its management and to receive a return on that investment through a dividend. The second motive, which may be linked to the previous one or may be realised independently, is the expectation of positive change in the value of the shares over time. In this case, the investor relies on an increase in the value of the shares on the market, through which he would achieve a positive difference between the sale and purchase price. In the first case, it is clearly a longer-term investment, while in the second case, it is possible to take advantage of short-term changes in the market price to achieve the expected outcome of the investment.

A Contract for Differences (CFD) is a derivative, other than an option, future, swap or forward rate agreement, the purpose of which is to provide the holder with a long or short exposure to fluctuations in the price, level or value of and Underlying Asset, whether or not it is traded on a trading venue, and which is required to be settled in cash, or may be settled in cash at the option of one of the contracting parties for any reason other than insolvency or any other event resulting in the termination of the contract.

Article 2

Risks Associated with Investing in Financial Instruments and Trading through a Trading Platform

2.1 Investing in financial instruments through a trading platform involves various risks which may affect the return on investment to a greater or lesser extent. The purpose of this document is to provide information and general warnings about the risks associated with financial instruments so that the investor can get a general overview of financial instruments, understands how they work and be sufficiently aware of the risks associated with them to make an investment decision.

2.2 It is not correct if an investor makes an investment decision without being familiar with the nature and characteristics of each financial instrument and without understanding the extent of his/her exposure to the risks involved. Any investment or investment decision of the investor should therefore take into account the investor's knowledge of and experience with individual financial instruments, investment intentions, goals and, last but not least, the investor's financial situation.

2.3 The Brokerage Company seeks to explain to the Client the general risks that exist with most financial instruments. The risks described in this document may occur simultaneously for individual financial instruments and may have an unpredictable impact on the value of the investment. Investors must also understand that every financial instrument contains a certain degree of risk, so even investment strategies



with a low risk profile contain a certain degree of uncertainty. The justified risks associated with the investment then depend on various factors, including the way in which the relevant financial instrument was issued or structured.

2.4 All Clients or potential Clients have the right to be provided with information on the general nature of financial instruments and the risks associated with financial instruments, which the Brokerage Company is obliged to provide to the Client in sufficient time prior to the provision of the service so as to form a sufficient basis for the investor to make an investment decision.

2.5 The obligation of the Brokerage Company to inform Clients about individual risks associated with financial instruments depends on the Client's categorisation and takes into account the Client's professional knowledge and experience related to the execution of trades with financial instruments.

2.6 Types of risks

Risk expresses the probability of a loss, damage or threat occurring. Financial risk is generally defined as the potential financial loss of an entity and occurs in financial markets. Potential loss does not represent an existing realised or unrealised financial loss, but a future loss resulting from an investment in a particular financial instrument. These are risks that can be anticipated and their impact on the overall appreciation of the investment can be mitigated. In fact, with the right investment, the financial market risks can be used to achieve higher returns on an investment. The individual risks associated with investing in financial instruments can be risks that can be applied to all types of financial instruments. The purpose of this section of the document is therefore to summarise a description of the main risks associated with financial instruments that can be generally applied to any financial instrument.

Market risk

Market risk exposes the investor to risk from market developments in the form of changes in exchange rates, interest rates, share prices, credit spreads, index values or market volatility. Less sophisticated methods of tracking and monitoring financial markets can lead to low levels of transparency, efficiency, liquidity, and regulation of individual markets. Moreover, these markets are characterised by high volatility, large price movements and the possibility of undue influence on market prices and misuse of information.

Interest rate risk

Interest rate risk is the risk of loss due to changes in the price of instruments that are sensitive to changes in interest rates. This is primarily the risk of changes in interest rates, changes in the shape of the yield



curve, changes in the volatility of interest rates and changes in the relationship or spread of interest rate indices. A change in interest rates may expose the holder of a financial instrument to the risk of loss if the financial asset is sensitive to the changes in interest rates and the investor decides to sell this instrument before the maturity date (a typical example is bonds). The most frequent occurrence of interest rate risk is in connection with debt financial instruments. For equity financial instruments such as shares, the risk related to the interest rate is significantly lower, as it affects the development of share prices from a long-term macroeconomic point of view.

Currency risk

We take this risk when investing in foreign currency. It is the risk that the foreign currency in which the asset is denominated will depreciate against the domestic currency during the investment period and, as a result, the return on the investment denominated in the domestic currency will decline. Exchange rate risk is therefore present where there is a risk of loss arising from changes in the prices of instrument that are sensitive to changes in the value of exchange rates. This is primarily the risk of changes in the spot exchange rate and the risk of changes in the volatility of the exchange rate. An investor may be exposed to exchange rate risk in the following cases:

- a) the purchase of a financial instruments is made in a foreign currency and the investor has purchased the foreign currency funds with his/her domestic or other foreign currency and plans to convert the funds back into his/her domestic or other foreign currency upon completion of the investment,
- b) the investment is made through a financial instrument that allows the return on the investment and, if applicable, the amount originally invested to be paid out in a currency other than the original currency of the investment during or at maturity of the product.

A factor often underestimated by investors is the exchange rate risk and its impact on the overall return on the investment. A loss resulting from a change in the exchange rate may ultimately reduce, completely absorb or even exceed the original return on the investment. Investors therefore need to consider their exposure to exchange rate risk before making an investment decision.

Hedging can limit potential losses and risks arising from local currency operations, but on the other hand, these risks cannot be completely eliminated due to the unpredictability of local markets.

Liquidity risk

The risk where the purchase or sale of a financial instrument cannot be carried out as quickly or within the timeframe required by the investor is called liquidity risk. The market liquidity of a given financial



instrument depends on how the market is organised (regulated market or OTC market), on the number of market participants, but most of all on the characteristics of the financial instrument itself. In general, the shorter a financial instrument is established on the market, the lower its liquidity. The liquidity of individual financial instruments is not a constant quantity and can change over time, for example due to time zone shifts, where global liquidity in markets shifts with time. Investors should inform themselves about the liquidity of the given shares and the possibility of selling them back, especially if they require to execute a Transaction in a share outside the main indices of the individual stock exchange. Due to the impact of natural disasters, or due to the impact of social, economic and political changes on the supply and demand in emerging markets, these facts can cause much more rapid and longer-lasting changes than would be the case in developed markets, and in extreme cases, can lead to a complete lack of liquidity in a given market. This may result in the inability of an investor to sell his/her assets in case he/she wants to terminate or reduce his/her investment in emerging markets.

Liquidity information should also be requested for commonly traded shares if the trader has no experience in investing in the share or if a longer period of time has passed since the last Transaction was executed.

Execution venue risk

Execution venue risk is associated with the market or venue where Transactions in the relevant financial instrument are executed where the execution venue is not the same as the investor's "domestic" execution venue. At the same time, the investor is exposed to currency risk. Any investment in a foreign market or containing a foreign element may involve risks of the relevant foreign market which may differ from domestic market risks. Emerging markets are a specific case, as they often contain risks that do not occur in developed markets. Investments in these markets are often speculative in nature and should be carefully considered taking into account the potential risks associated with these markets.

Inflation risk

Inflation (depreciation of the value of money) reduces our return on investment in real terms. In order to calculate the real return on an investment, we need to subtract the inflation rate. It is also important to remember that when inflation rises more, the purchasing power of the investment decreases.

Relative performance risk

Relative performance risk represents the risk that the performance of a financial instrument will not match the performance of a benchmark (market standard). It occurs when an investor purchases a financial instrument based on a comparison of its performance with another financial instrument considered as a benchmark.



Country risk

New taxes, new regulatory rules, new legislation, or restrictions on the benefits received by an investor at the time of investing in the relevant financial instrument providing these benefits constitute country risk. Only the government or any relevant official authority can be held responsible for this. Closely related to country risk is political risk, primarily associated with a possible change in the political forces or direction of the relevant country, accompanied by a change in the tax, legal, fiscal, or other system affecting the returns on investments related to the country in question. The existence of political risk brings with it the nervousness of individual market participants. This can manifest itself in the form of higher volatility in the prices of financial instruments, which may result in sell-offs in the given markets caused by a change in investors' attitude to risk.

Volatility risk

Volatility measures the variability (inconstancy) of the price of a financial instrument and is high if the price of a financial instrument changes significantly over a period of time (for some instruments it is on a daily basis, for others it is over a longer period). Volatility risk is associated with movement in the price of individual financial instruments. It is determined by comparing the average difference between the lowest and highest price of a financial instrument over a specified period of time and reflects the risk of potential loss due to the degree of variability in the price of a given financial instrument. For each financial instrument, for each market and for each observed time period, volatility is individual. Volatility is a highly unstable quantity in terms of its value over time. Even volatility itself has its own volatility. Therefore, before investing, the Client should inform himself about the current or historical volatility of a given financial instrument and its impact on the profitability of the intended investment decision.

Settlement risk

The risk that a Transaction in a financial instrument is not settled or the financial instrument is not delivered on the agreed date is settlement risk. The risk in this case is equal to the difference between the agreed price of the financial instrument and the actual market price on the settlement date, and this difference may result in a loss in the event that the Transaction is not settled and the trade in the financial instrument would have to be executed at the current market price. Securities transactions have different procedures for settlement and delivery, and some settlement procedures may be affected in terms of volume, which determines the method and procedure for settlement. The inability to settle a Transaction as a result of such procedural limitations may result in an investor being restricted or losing the ability to invest in other alternative investment opportunities.



Risk associated with leverage

The principle of financial leverage is the use of a small amount of the Client's own funds, which is supplemented for the purpose of investment by a higher volume of foreign funds, for example, the funds of the Brokerage Company. This practice can significantly increase profit (but also loss). Financial leverage is usually used to increase the return on a share. The risk associated with the leverage is then the possibility of a greater loss to the Client, compared to the loss on the same investment without the use of borrowed funds.

Sustainability risk

Sustainability risk means an environmental, social or governance event or condition or an event or condition in the field of governance and management which, if it were to occur, could have a material adverse impact on the value of the investment, as defined in the European Union's sectoral legislation. In short, this means that anything (phenomenon, condition, event) in the field of sustainability factors affecting the value of an investment is a risk affecting (threatening) sustainability. In this case, investment does not mean only investment in the sense of trading on the capital market, but any instrument in the hands of the Client in the field of banking, insurance, asset management (mutual funds), pension saving, etc.

Risks of investing in emerging market countries

Currently, investors are increasingly focusing on investing in financial instruments traded in emerging markets, which allow investors to obtain alternative investments with higher returns compared to traditional markets. However, higher returns also come with a higher level of risk, which is often very specific to the market and financial instrument in question. Emerging markets are markets for the trading in financial instruments that are characterised in particular by:

- a) volatile performance of the economy,
- b) a certain degree of political instability,
- c) unpredictable financial markets and economic growth parameters,
- d) financial markets that are still in a developmental stage.

Emerging markets are markets to which one or more of the above characteristics apply.

An investor is exposed to risks if he/she invests in financial instruments on a developed market and the issuer of these instruments is based in an emerging markets environment or the focus of his/her activities is directed primarily to these markets. Before investing in such instruments, an investor should familiarise himself/herself with all the risks associated with investing in these markets. Investing in financial instruments available on emerging markets is often speculative in nature. The following list of risks



provides basic information on the risks that should be considered when investing in emerging market countries.

Economic risk

Market turbulence and price volatility are more likely and of greater magnitude in emerging market economies, which are more sensitive to changes in interest rates and inflation. In addition, the focus of activities and production in such economies is often quite narrow, and therefore, individual events can have several times greater impact on the economy and markets than in the case of developed economies and markets. Adequate regulation and monitoring by national regulators is a major deficiency in emerging markets.

Legal risk

Legal uncertainty may exist in these markets due to the national jurisdiction's inexperience with the operation of financial markets. In addition, the absence or insufficient monitoring system of financial markets can lead to problems and difficulties in exercising investor rights arising from the holding of financial instruments.

Political risk

The risk of fundamental changes in the national economy and political system in the short term is increased by the instability of the political system and the inexperience of the country's policymakers or government. The consequences for investors may include the seizure of investor assets without compensation, the restriction of investor rights in relation to ownership of assets, or a dramatic change in the value of investor assets as a result of government intervention or as a result of the imposition of government control and monitoring mechanism.

Risk of insolvency

Insolvency or failure to comply with obligations of the Brokerage Company or other parties involved in the Transactions executed by the Brokerage Company on behalf of the Client (including, but not limited to, brokers, execution venues and liquidity providers) may lead to the liquidation or closing of positions without the Client's consent, and the Client may suffer losses as a result. In the unlikely event of the insolvency of the Brokerage Company, Clients' funds held separately cannot be used to pay the Brokerage Company's creditors. If the Brokerage Company is unable to settle claims for repayment, eligible claimants are entitled to compensation from the Investment Guarantee Fund.

A Brokerage Company may become temporarily or permanently insolvent, which may lead to the inability



to meet its obligations. Solvency may change as a result of one or more factors, including the financial prospects of the Brokerage Company, its economic sector and/or the political and economic situation of the countries in which this issuer and/or its business is located. The deterioration in the Brokerage Company's solvency will affect the price of the securities it issues.

Risks associated with third parties

It is understood that the Brokerage Company deposits Client money into one or more segregated accounts (referred to as "Client Accounts") held with trusted financial institutions, such as a credit institution or bank in a third country. Despite the fact that the Brokerage Company proceeds with due skill, care and caution in the selection of a financial institution in accordance with applicable regulations, it is understood that there are circumstances beyond the control of the Brokerage Company and therefore the Brokerage Company accepts no liability for any losses suffered by the Client due to the insolvency or other similar event or failure of the financial institution in which the Client's money will be held.

The financial institution to which the Brokerage Company entrusts the Clients' money can hold it in a current account. Therefore, in the event of insolvency or other similar event concerning this financial institution, the Brokerage Company may have only an unsecured claim against the financial institution on behalf of the Client and the Client will be exposed to the risk that the money received by the Brokerage Company from the financial institution will not be sufficient to settle the Client's claims. In general, accounts held at institutions, including feeder accounts, are subject to various risks, including the potential risk of being treated as one (1) account in the event of a default by the financial institution where the funds are held. In these circumstances, any applicable deposit protection scheme may apply without regard to the Clients as the ultimate beneficial owners of the feeder account. In addition, in such a case, measures may be taken to resolve the crisis situation, including writing off the debt of the Client's funds.

The Brokerage Company may deposit the Client's money with a custodian that may have a security right, lien or set-off right in connection with this money.

The Bank or Broker through which the Brokerage Company trades may have interests that conflict with the interests of the Client.

Technical risks

The Client, not the Brokerage Company, is responsible for the risks of financial losses caused by the failure, malfunction, interruption, disconnection or malicious act of information, communication, electrical, electronic or other systems.



In the event that the Client executes Transactions via an electronic system, the Client will be exposed to the risks associated with that system, including the failure of hardware, software, servers, communication lines and the internet. Such failure may result in his/her Orders not being executed as instructed or not being executed at all. The Brokerage Company accepts no liability in the event of such failure.

The Client acknowledges that unencrypted information transmitted by email is not protected from unauthorised access.

At times of increased trade flow, the Client may experience connectivity issues over the phone or the Brokerage Company's platform(s)/system(s), especially in a fast-moving Market (e.g. at times of release of key macroeconomic indicators).

The Client acknowledges that the Internet may be subject to events that may affect its access to the Brokerage Company's website and/or the Brokerage Company's trading platforms/systems, including but not limited to transmission interruptions or outages, software and hardware failures, disconnections from the Internet, failure of the public power grid or hacker attacks. The Brokerage Company shall not be liable for any damages or losses arising from such events beyond its control, or for any other losses, costs, liabilities or expenses (including but not limited to lost profits) that may result from the Client's inability to access the Brokerage Company's website and/or trading platform, or any delay or failure in transmitting orders or Transactions.

In connection with the use of computer technology and data and voice communication networks, the Client bears, among others, the following risks, in respect of which the Brokerage Company is not liable for any loss:

- a) Power failure of equipment on the Client's side or the communication provider or operator (including voice communication) whose services the Client uses;
- b) Physical damage (or destruction) of the communication channels used to connect the Client and the provider (communication operator), the provider and the Client's trading or information server;
- c) Failure (unacceptably poor quality) of communication through the channels used by the Client or the Brokerage Company or the channels used by the communication provider or operator (including voice communication) whose services are used by the Client or the Brokerage Company;
- d) Incorrect setting or setting contrary to the requirements of the trading platform;
- e) Early update of the trading platform;
- f) When executing Transactions by telephone voice communication (via landline or mobile phone),



the Client is exposed to the risk of problematic dialling in an attempt to reach an employee of the Brokerage Company's brokerage services department due to communication quality issues and communication channel load;

- g) The use of communication channels, hardware and software creates a risk of not receiving messages (including text messages) sent to the Client by the Brokerage Company;
- h) Trading over the phone may be made impossible due to connection overload;
- i) Platform malfunction or non-functionality.

2.7 The Client may suffer financial losses caused by the manifestation of the above-mentioned risks, while the Brokerage Company bears no responsibility in the event of the fulfilment of such a risk; The client is responsible for any related losses it may incur.

2.8 Trading platform

When trading on an electronic platform, the Client takes the risk of financial loss, which may result from, among other things:

- a) Failure of Client's devices, software and poor connection quality.
- b) Failure, malfunction or misuse of the Brokerage Company's or Client's hardware or software.
- c) Malfunction of the Client's equipment.
- d) Incorrect platform settings.
- e) Platform update delays.

The Client acknowledges that only one Order can be queued at a time. Once an Order has been submitted, a new Order may be placed by the Brokerage Company.

The Client acknowledges that the only reliable source of quote's feed information is the live server quote's feed. The quotation feed in the Platform is not a reliable source of quotation feed information because the connection between the Platform and the server may be interrupted at some point and some quotes may simply not reach the Platform.

The Client acknowledges that an Order sent to the server will not be cancelled by the Client closing the window used for placing/cancelling Orders or the window used for opening/closing positions.

Orders can only be executed in sequence, one after the other. It is not possible to execute multiple Orders from one Client account at the same time.

The Client acknowledges that if he/she closes the Order, it will not be cancelled.



In the event that the Client did not receive the result of the execution of a previously sent Order but decides to repeat the Order, the Client accepts the risk of executing two Transactions instead of one.

The Client acknowledges that if a pending Order has already been executed but the Client sends an instruction to change its level, the only instruction that will be executed is an instruction to change the level of stop loss and/or take profit on the position that was opened by triggering the pending Order.

2.9 Communication between the Client and the Brokerage Company

The Client accepts the risk of financial losses caused by the fact that the Client received late or no notification at all from the Brokerage Company.

The Client acknowledges that unencrypted information transmitted via email is not protected against unauthorised access.

The Brokerage Company shall not be liable if unauthorised third parties gain access to information, including electronic addresses, electronic communications, personal data and access data, during the transfer of the above between the Brokerage Company and the Client, or when using the Internet or other network communication devices, telephone, or other electronic means, except if this occurs as a direct result of the Brokerage Company's culpable action or inaction.

The Client is fully responsible for the risks associated with non-delivery of internal messages sent to the Brokerage Company's Client via the Brokerage Company's online trading system.

2.10 Unusual market conditions

The Client acknowledges that under unusual market conditions, the time to execute Orders may be longer or it may not be possible to execute Orders at the prices quoted or at all.

Unusual conditions include, but are not limited to, periods of sharp price fluctuations, increases or decreases during a single trading session to the extent that trading is suspended or restricted under the rules of the relevant exchange, or there is insufficient liquidity, or this may occur at the opening of trading sessions.

2.11 Force majeure

In the event of force majeure, the Brokerage Company may not be able to ensure the execution of the Client's Orders or fulfil its obligations in accordance with the agreement with the Client. As a result, the



Client may suffer a financial loss.

The Brokerage Company shall not be liable for any type of loss or damage resulting from failure, interruption or delay in the performance of obligations its arising from the Agreement with the Client, if this failure, interruption or delay is caused as a result of force majeure.

Article 3

General Information on the Risks Associated with Certain Financial Instruments

3.1 Introduction

General risk warnings for complex financial instruments (derivative financial instruments such as CFDs).

Trading CFDs may put the Client's capital at risk, particularly if they are used in a speculative manner. CFDs are classified as high risk complex financial instruments and Clients may lose the amount invested.

Clients' investment decisions and any investment advice provided by the Brokerage Company to Clients are subject to various market, currency, economic, political, business, etc. risks and may not necessarily be profitable.

The Client acknowledges and unreservedly accepts that, regardless of any investment advice or information that the Brokerage Company may have provided to him/her, the value of any investment in financial instruments may fluctuate upwards or downwards. The Client acknowledges and unreservedly accepts that there is a significant risk of loss and damage as a result of the purchase or sale of any financial instrument and confirms his/her willingness to bear such risk.

Below is an overview of the main risks and other important aspects of CFD trading:

CFD trading is highly speculative and high risk and is not suitable for all individuals from the general public, but only for those investors who:

- a) understand and are willing to take economic, legal and other risks,
- b) considering their personal financial situation, financial resources, lifestyle and obligations, are financially able to accept the loss of their entire investment,
- c) have the knowledge to understand CFD trading and the underlying assets and markets.

The Brokerage Company may provide the Client with information and tools from third parties in an "as is" state (i.e. the Brokerage Company does not endorse or approve the information and/or tools), which may indicate the development of trading trends or trading opportunities. The Client accepts and



understands that any actions taken on the basis of information and/or tools provided by third parties may result in losses and/or an overall decrease in the value of the Client's assets. The Brokerage Company shall not be liable for any losses resulting from actions taken by the Client based on information and/or tools provided by third parties.

CFDs are financial derivatives whose value is derived from the price of the underlying assets/markets to which they relate (e.g. currency, stock indices, shares, commodities, indices, etc.). Although the prices at which the Brokerage Company trades are determined by an algorithm developed by the Brokerage Company, the prices are nevertheless derived from the underlying assets/market. It is therefore important that the Client understands the risks associated with trading in the relevant underlying asset/market, as fluctuations in the price of the underlying asset/market will affect the profitability of his/her trade.

Information on the past performance of a financial instrument is not a guarantee of its current and/or future performance. The use of historical data does not constitute a binding or safe prediction as to the future performance of the financial instruments to which the information relates.

3.2 Leverage and gearing

Transactions with foreign exchange and derivative financial instruments involve a high degree of risk. The amount of initial margin may be small compared to the value of the foreign exchange or derivative contract, so that "leverage" or "gearing" is applied to the Transactions.

A relatively small movement in the market will have a proportionally greater impact on the funds that the Client has deposited or will have to deposit; this may work both against the Client and in favour of the Client. The Client may suffer a complete loss of Initial Margin funds and any other funds deposited with the Brokerage Company to maintain his/her position. If the market moves against the Client's position and/or the Margin Requirements increase, the Client may be required to deposit additional funds to maintain their position at short notice. Failure to comply with this request to deposit additional funds may result in the Brokerage Company closing his/her position(s) on his/her behalf and the Client will be liable for any resulting loss or deficit.

3.3 Guidelines or strategies to reduce risk

The placing of certain orders (e.g. stop-loss orders where permitted by local law or stop-limit orders) that are intended to limit losses to certain values may not be appropriate given that market conditions may make it impossible to execute such orders, e.g. due to a lack of liquidity in the market. Strategies using a



combination of positions, such as "spread" and "straddle" positions, can be just as risky as regular "long" or "short" positions. For this reason, stop limit and stop loss orders cannot guarantee loss limitation.

Neither trailing stop nor stop loss orders can guarantee loss limitation.

3.4 Volatility

Some derivative financial instruments are traded over wide intraday ranges with volatile price movements. The Client must therefore carefully consider that there is a high risk of losses as well as profits. The price of Derivative Financial Instruments is derived from the price of the Underlying Asset to which they relate. Derivative Financial Instruments and the related Underlying Markets can be highly volatile. The prices of derivative financial instruments and the Underlying Asset may fluctuate sharply and widely, and may reflect unforeseeable events or changes in conditions beyond the control of the Client or the Brokerage Company. Under certain market conditions, it may not be possible to execute the Client's Order at the prices quoted, which may result in losses. The prices of Derivative Financial Instruments and the Underlying Asset will be affected by, among other things, changing supply and demand relationships, government, agricultural, commercial and business plans and policies, national and international political and economic events and the prevailing psychological characteristics of the given market.

3.5 Margin

The Client acknowledges and accepts that, regardless of the information that the Brokerage Company may provide to the Client, the value of derivative financial instruments may fluctuate downwards or upwards, and it is even likely that the investment may become worthless. This is a consequence of the margin system applied to such trades, which generally involves a relatively modest deposit or margin in terms of the total value of the contract, so that a relatively small movement in the underlying market may have a disproportionately dramatic effect on the Client's trade. If the movement of the underlying market is in favour of the Client, the Client may make a good profit, but an equally small adverse market movement may not only quickly lead to the loss of the Client's entire deposit, but may also expose the Client to a significant further loss.

3.6 Liquidity

Some of the Underlying Assets may not immediately become liquid due to reduced demand for the Underlying Assets and the Client may not be able to obtain information about their value or the extent of the risks involved.



3.7 Contract for Differences

CFDs available for trading with the Brokerage Company are spot Transactions without direct acquisition of an asset that provide an opportunity to profit from changes in the Underlying Asset (cash indices, index futures, bond futures, commodity futures, spot oil, spot gold, spot silver, individual shares, currencies or other assets at the discretion of the Brokerage Company). If the movement of the Underlying Asset is to the Client's advantage, the Client may make a good profit, but an equally small adverse movement in the market may not only quickly result in a loss of the Client's entire deposit, but also in additional fees and expenses incurred. Therefore, the Client must not trade CFDs unless the Client is willing to take the risk of losing all the money, he/she has invested as well as incurring further fees and expenses.

Investing in CFDs carries the same risks as investing in futures or options and the Client should be aware of the above risks. CFD Transactions may also carry a contingent liability and the Client should be aware of the associated consequences, which are set out below under "Contingent Liability Investment Transactions".

3.8 Over-The-Counter Transactions in derivative financial instruments

CFDs offered by the Brokerage Company are Over-the-counter (OTC) Transactions. The trading conditions are set by us (in accordance with the trading conditions adopted by our liquidity providers) and are subject to obligations to ensure the best possible result, to act appropriately and in accordance with the Agreement between the Brokerage company and the Client and the Best Interest and Order Execution Policy. Each CFD opened by the Client through our trading platform results in the placement of a Brokerage Company's Order; such Orders can only be placed by the Brokerage Company and are not transferable to any other person. While some OTC markets are highly liquid, Transactions in OTC or non-transferable derivatives may involve higher risk than investing in exchange-traded derivatives because there is no exchange market on which to close an open position. It may not be possible to liquidate an existing position, assess the value of a position derived from an OTC Transaction or to assess risk exposure. Bid and Ask prices may not be quoted and, even if they are, they will be set by the dealers of those instruments and therefore it may be difficult to determine what is a fair price.

In relation to CFD Transactions, the Brokerage Company uses online trading systems for CFD Transactions that do not fall within the definition of a recognised exchange, as it is not a multilateral trading facility and therefore does not have the same protection.



3.9 Contingent Liability Investment Transactions

Contingent Liability Investment Transactions that are margined require the Client to make a series of payments against the purchase price, rather than paying the full purchase price immediately. The margin requirement will depend on the Underlying Asset of the Financial Instrument. Margin requirements may be set or calculated from the current price of the Underlying Instrument and are available on the Brokerage Company's website.

If the Client trades CFDs, he/she may suffer a total loss of the funds he/she has deposited to open and maintain the position. If the market moves against the Client, the Client may be required to deposit additional funds to maintain his position at short notice. If the Client fails to do so within the required time, his position may be liquidated at a loss and the Client will be liable for the resulting deficit. It should be noted that the Brokerage Company has no obligation to notify the Client of the Margin Call to maintain a losing position.

Even if the Transaction is not margined, it may still, under certain circumstances, carry an obligation to make additional payments beyond the amount paid at the time the Client concluded the contract.

Contingent Liability Investment Transactions that are not traded on a recognised or designated investment exchange or under its rules may expose the Client to significantly higher risk.

3.10 Collateral

If the Client deposits collateral as a guarantee with the Brokerage Company, the manner in which it will be treated will vary depending on the type of Transaction and the venue where it is traded. There may be significant differences in the treatment of collateral depending on whether the Client trades on a recognised or designated investment exchange applying the rules of that exchange (and its associated clearing house) or an off-exchange. Deposited collateral may lose its identity as the Client's property as soon as a trade is executed on his/her behalf. Even if the Client's trading ultimately turns out to be profitable, the Client may not get back the same assets he/she invested and may have to accept payment in cash.

3.11 Suspension of trading

Under certain trading conditions it may be difficult or impossible to liquidate a position. This may occur, for example, in times of sharp price fluctuations if the price rises or falls in a single trading session to the extent that trading is suspended or restricted under the rules of the relevant exchange. Placing a stop loss will not necessarily limit the Client's losses to the specified values as market conditions may make it



impossible to execute such an order at the specified price. In addition, under certain market conditions, a stop loss order may be executed at a price worse than the specified price and the losses incurred may be greater than expected.

3.12 Failure to deliver an asset

It is understood that the Client has no rights or obligations in relation to the Underlying Assets related to the CFDs he/she trades. There is no delivery of the Underlying Asset.

3.13 Slippage

Slippage is the difference between the expected price of a Transaction in Financial Instruments and the price at which the Transaction is actually executed. Slippage often occurs in periods of increased volatility (for example, due to news events) that make it impossible to execute an Order at a certain price when market orders are used, and also when large Orders are executed where there may not be sufficient interest at the desired price level to maintain the expected price of the trade.

3.14 No profit guarantee

When trading in financial instruments, the Brokerage Company does not provide any guarantees of profit or avoidance of losses. The Client did not receive any such guarantee from the Brokerage Company or any of its representatives. The client is aware of the risks associated with trading in financial instruments and is financially able to bear these risks and any losses incurred.

Article 4

Final Provisions

4.1 This document was approved by the Board of Directors of the Brokerage Company on October 27, 2023, with effect from October 27, 2023.