

Description of Changes

Commencement of Implementation as 15th of November 2023

1. Best Interest and Order Execution Policy

The following changes introduced will be effective as of XX.XX.XX:

Legal basis: Sections 25 & 26 of the [Terms and Conditions \(the Client Agreement\)](#)

The change: The Company updated **Section 9.1** of the Best Interest and Order Execution Policy and disclosed its newly onboarded Execution Venue - LMAX Broker Ltd.

The Execution Venue(s) currently used by the Company are:

- Broctagon Prime Ltd regulated by the Cyprus Securities and Exchange Commission under license number CIF320/17; and
- LMAX Broker Ltd regulated by the Financial Conduct Authority with the reference number 783200.

2. The Leverage Policy and its Appendix I -Margin Requirements Table

The Company will commence introducing the following changes as of 6th of November 2023, however it is noted that the implementation period may last until 31st of December 2023. The Company will provide you with a separate specific notice in due time in case any of the changes might have an effect on your trading account.

Legal basis: Sections 25 & 26 of the [Terms and Conditions \(the Client Agreement\)](#)

The change: The Company established the Leverage Policy through which it explains the leverage trading, its applicability and possible impact in dependence on the Client Category as well as the margin requirements respective to the Contracts for Difference in the Company's offer. The Policy is a conjoined to and includes information complementing the Client Agreement. The Policy also considers the overview, applicability and territorial scope of the Product Intervention Measures and/or National Product Intervention Measures. The Policy is accompanied by Appendix I which discloses the margin requirements for updated assets in the Company's offer considering the Client category as Retail or Professional as well as the delisted instruments, also specified below.

Delisted instruments: AUDSGD; EUR50.c; FRA40.c; GER40.c; AS200.c; JP225.c; US500.c; UK100.c; US100.c; US30.c; SPAIN35.c; SWI20.c; US2000.c; UKOil.c; USOil.c; NATGAS.c; XAGEUR; XPDUSD; XPTUSD; XNIUSD

3. The Costs, Fees & Associated Charges Policy and its Appendix I -Commissions on CFDs Table

The Company will commence introducing the following changes as of 6th of November 2023, however it is noted that the implementation period may last until 31st of December 2023. The Company will provide you with a separate specific notice in due time in case any of the changes might have an effect on your trading account.

Legal basis: Sections 25 & 26 of the [Terms and Conditions \(the Client Agreement\)](#)

The change: We have implemented a fully transparent fee structure, and updated the respective definitions of the “Spread” and “Commission” in order to give our clients better understanding of the costs related to their trading activity. These changes do not impact overall trading costs to our clients, but rather provide better clarity about how we earn fees as a broker. Additionally, we added calculation examples of all chargeable fees. The Policy has been also accompanied by the list of assets and their respective Commissions Types and Rates attached as Appendix I. The Company also increased the number of inactivity days after which the account holding funds is recognized as Dormant from 90 to 365 days. Lastly, the Company altered the frequency of provision of information regarding costs to the Client by increasing it from annual to monthly.

4. The Key Information Documents for Currencies, Commodities, Indices and Stocks

The Company will commence introducing the following changes as of 6th of November 2023, however it is noted that the implementation period may last until 31st of December 2023. The Company will provide you with a separate specific notice in due time in case any of the changes might have an effect on your trading account.

Legal basis: Sections 25 & 26 of the [Terms and Conditions \(the Client Agreement\)](#)

The change: Following the update of the Commissions as mentioned in the point (3) above we have updated the “What is the cost?” section with the respective ‘Spread’ and ‘Commission’ definitions as well as the costs calculations examples considering the updated cost structure.