

PURPOSE

This document provides you with key information about this investment product. It is not marketing or legally binding material. The information is required by law to help you understand the nature, risks, costs, potential gains and losses of investing in this product and to help you compare it with other products. Before deciding to open an account, we suggest that you read the whole document together with our Terms and Conditions, Order Execution Policy, Risk Disclosure Notice, Conflict of Interest Policy and Privacy Policy available on our website.

⚠ You are about to trade on a market that is not simple and may be difficult to understand.

PRODUCT: Contract for Differences “CFDs” on Currency Pairs (“Foreign Exchange” or “FOREX”)

This CFDs on currency pairs are offered by BrightFX Capital Ltd, (“BrightFX”, “we” or “us”), which is authorised and regulated by the Cyprus Securities and Exchange Commission (the “CySEC”), with CIF license number 342/17 (the “Company”), having its registered office at 24 Piraeus Str., 4th floor, Office 401, 2023 Strovolos, Nicosia. For more information please call +357 22 007 187 or visit www.tradefred.com/eu.

This document was last updated on 20th December 2019.

1. WHAT IS THIS PRODUCT?

The product enables you to have exposure to price fluctuations related to the underlying currency pair without physically owning it. A Forex contract is a type of Contract for Differences (CFD) which is an agreement between a buyer and a seller to exchange the difference in value of a particular underlying instrument for the period between when the contract is opened and when it is closed. The difference to be exchanged is determined daily by the change in the closing reference price of the underlying instrument. Thus, if the underlying instrument rises in price, the buyer receives cash from the seller and vice versa.

The objective of trading CFDs on currency pairs is to allow the trader to speculate on rising or falling prices in the underlying currency pair, by gaining exposure to the underlying currency pair.

Forex trading is the simultaneous buying and selling of two different currencies. When you trade in the Forex market, you buy or sell in currency pairs (e.g. EUR/ USD). The first currency in a currency pair (in our example EUR) is known as the base currency and the second (in our example USD) is known as the quote or counter currency. When you click buy or sell, you are buying or selling the first currency in the pair. The price of the CFD is derived from the price of the underlying currency pair.

Forex traders buy the EUR/USD pair if they believe that the Euro would increase in value relative to the US Dollar (i.e. “going long” on the pair) or sell the EUR/USD pair (i.e. “going short” on the pair), if they believe the value of the Euro will go down relative to the US Dollar. In both circumstances, if the instruments price moves in the opposite direction and your position is closed, your account would be debited for the loss of the trade (plus any relevant costs).

Forex contracts are not listed instruments, but are traded as 'over-the-counter' contracts between the client and the Company. Investors are required to pay an initial deposit, or margin, upfront when the position is opened. Trading on margin can enhance any losses or gains you make. At the end of the day any open positions are rolled over and charged daily a swap fee. Please note that margin trading requires extra caution.

WHO IS THIS ACCOUNT MOST SUITABLE FOR?

- Clients who have a high-risk tolerance;
- Clients who want to generally gain short term exposures to financial instruments/ markets, and have a diversified investment and savings portfolio;
- Clients who are trading with money which they can afford to lose;
- Clients who have experience with, and are comfortable trading on, financial markets and understand the impact of and risks associated with margin trading.

WHO IS THIS ACCOUNT NOT SUITABLE FOR?

- Clients who do not want to be subjected to volatile markets;
- Clients who want capital protection.

WHAT CAN I TRADE?

With your BrightFX account you can trade CFDs in the currency pairs indicated on our [Trading Conditions](#) page.

2. WHAT ARE THE RISKS AND WHAT COULD I GET IN RETURN?

The primary advantage of CFDs is to allow an investor to gain leveraged exposure to the movement of the underlying asset either up or down without owning the physical product. You can expect the following benefits:

- CFDs are a cost-effective way to gain exposure to equity markets
- CFDs are characteristically liquid and easily traded
- CFDs provide a highly capital efficient way to participate in shares
- You can sell (short) CFDs and benefit from a downward price movement or buy (long) CFDs, and benefit from an upward price movement
- The pricing of CFDs is transparent
- Access to live prices
- Set up alerts to new opportunities that match your trading strategy
- The ability to manage risk by setting up a 'price watch' and 'stop loss' facility

There are a number of risks which you should be aware of before trading. Factors which affect the product's performance include but are not limited to:

- Leverage risk
- Margin risk
- Foreign exchange risk
- Market risk
- Unregulated market risk
- Market disruption risk
- Counterparty risk
- Online trading platform and IT risk
- Conflicts of interest
- Currency risk

The above list of risks is non-exhaustive. Regarding currency risk, it is possible to receive payments in a currency which is different to the base currency of your account, so the final return you will receive depends on the exchange rate between the two currencies. This risk is not considered in the indicator mentioned above. Trading risks are magnified by leverage. In times of high volatility or market/economic uncertainty, values may fluctuate significantly. Such fluctuations are even more significant in the case of leveraged positions and may adversely affect your positions. In the event of a default, your positions may be closed out. You should carefully consider whether trading in leveraged products, such as CFDs, is appropriate for you. For more information on leverage and the Company's [Risk Disclosure Policy](#) please visit the Company's website.

Please ensure you fully understand the risks and take care to

manage your exposure. It is important to ensure that you are comfortable with the level of risk your chosen instruments carry. If you are unsure of how to invest, a financial adviser may help you to make appropriate choices.

The primary risks of CFDs is the market risk and counterparty risk. CFDs are complex financial instruments and are traded Over the Counter ("OTC"). You can only exit a position by trading with us, during the trading hours of the underlying instrument as stated on our Website. Through your trade with us, we provide you with exposure to the performance of the underlying asset, but you do not receive any ownership or other rights to such underlying asset.

CFDs are leveraged products. Leverage can magnify both your profits as well as your losses. Statistically, because of leverage, a significant proportion of clients lose because leverage amplifies losses, leading to margin calls and closures of clients' open positions. We operate a Negative Balance Protection, i.e. you cannot lose more than the Equity of your trading account, however you risk losing the capital invested with us. Since CFDs can employ a high degree of leverage, investors can lose and/or win money quickly should the price of the underlying security move in the undesired/desired direction. As such, investors should be careful when using CFDs.

CFD trading is undertaken on electronic platforms. There may be times that system or other breakdowns arise. This may affect your ability to trade, or our ability to offer continuous prices or create a need for subsequent adjustment of prices to reflect underlying exchange prices.

Prices of CFDs as well as their commercial terms like the spreads and overnight fees maybe varied to reflect periods of actual or expected heightened market volatility. Depending on the currency your trading account is denominated and the currency of the underlying instrument you trade, your final return maybe exposed to the exchange rate risk between the two currencies.

RISK INDICATOR

The summary risk indicator (SRI) is a guide to the level of risk of this product compared to other products. It shows how likely it is that the product will lose money because of movements in the markets or because we are not able to pay you. We have classified this product as 7 out of 7, which is the highest risk class. This rates the potential losses from future performance at a very high level.

◀ **Lower risk** **Higher risk** ▶
Typically lower rewards Typically higher rewards

1	2	3	4	5	6	7
---	---	---	---	---	---	---

1= lowest / 2= low / 3= medium-low / 4= medium / 5= medium-high / 6= second-highest / 7= highest risk class.

The risk indicator is set at 7 (i.e. the highest risk class) due to the fact that:

- It is volatile and is subject to unforeseeable swings.
- Spread may widen with reduced liquidity.
- Your entire investment may be at risk.
- Trading FX requires regular monitoring.

PERFORMANCE SCENARIOS

The below tables illustrate how your investment could perform (i.e. potential profit and loss) under different scenarios.*

These scenarios assume that:

Asset traded	EUR/GBP
Investment Amount:	€1,000

Contract Size:	€100,000
Holding Period:	1 day
Notional Value (Required Margin * Leverage):	€30,000
Leverage:	30
Margin %:	3.33%
Required Margin (Notional Value / Leverage):	€1,000
Open Price:	0.85079
Spread (Bid/Ask):	3.592 pips
Overnight Swap Rate per Lot in points (Long Position):	-5.2000
Overnight Swap Rate per Lot in points (Short Position):	-0.8600

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

Scenarios Long position	Close Price	Price Change %	Profit / Loss	Swap Charge	Spread Charge	Total Profit / Loss	ROI%
Favourable:	0.85268	0.22%	€ 66.63	-€ 1.83	-€ 12.66	€ 64.80	6.48%
Moderate:	0.85067	-0.01%	-€ 4.18	-€ 1.83	-€ 12.66	-€ 6.01	-0.60%
Unfavourable:	0.84920	-0.19%	-€ 56.01	-€ 1.83	-€ 12.66	-€ 57.84	-5.78%
Stress**:	0.82203	-3.38%	-€ 1,014.26	-€ 1.83	-€ 12.66	-€ 1,016.10	-100.00%

Scenarios Short position	Close Price	Price Change %	Profit / Loss	Swap Charge	Spread Charge	Total Profit / Loss	ROI%
Favourable:	0.84751	-0.39%	€ 115.72	-€ 0.30	-€ 12.66	€ 115.41	11.54%
Moderate:	0.85051	-0.03%	€ 9.71	-€ 0.30	-€ 12.66	€ 9.41	0.94%
Unfavourable:	0.85369	0.34%	-€ 102.38	-€ 0.30	-€ 12.66	-€ 102.68	-10.27%
Stress**:	0.88334	3.83%	-€ 1,147.66	-€ 0.30	-€ 12.66	-€ 1,147.96	-100.00%

* Maximum losses are limited to the total invested amount (€1,000 in the above scenario), as per the Negative Balance Protection applicable for retail clients.

**In the above Stress scenarios, the loss exceeds the invested amount just to indicate what losses could be suffered by the client if the Negative Balance Protection was not in force. However as mentioned above losses cannot exceed the amount invested.

TAX CONSIDERATIONS

As a Forex trader, all profits are deemed as taxable income. You are then taxed on profits at your marginal tax rate. BrightFX Capital Ltd does not provide yearly tax statements or any information about tax. For further tax considerations, please consult your financial adviser or tax consultant.

3. HOW LONG SHOULD I KEEP MY POSITION OPEN AND CAN I TAKE MONEY OUT EARLY?

CFDs are generally not suitable for long term investments and are intended for short term trading. There is no minimum and/or recommended holding period for CFDs. As such, you can open and close a CFD at any time during market hours. Note that BrightFX Capital Ltd may close your position without asking your prior consent if there is insufficient margin in your account. You can request a withdrawal of available funds on your account at any time.

MINIMUM INVESTMENT

Please be informed that for Retail Clients any Forex position you wish to open on our website is subject to minimum initial margin requirement, as follows:

- (1) 3,33% of the notional value of the CFD when the underlying currency pair is composed of any two of the following currencies: US Dollar, Euro, Japanese Yen, Pound Sterling, Canadian Dollar or Swiss Franc;
- (2) 5% of the notional value of the CFD when the underlying currency pair is composed of at least one currency that is not listed in point (1) above;

Regarding each new Forex position, its minimum exposure value, the initial deposit percentage and initial margin requirements you may refer to the Company's [Leverage Policy](#).

Margin requirement: *Any open positions you have on your account may be automatically closed if your available funds fall below 50% of the required margin to have those positions open.*

4. WHAT ARE THE COSTS?

BrightFX charges its clients two types of costs – one-off costs and recurring costs.

Information about both types of costs is summarised below:

One-off costs

Spread (% of cost on investment)	0.007%	The difference between the bid and the ask price at the time of the conclusion of the transaction. The spread cost can be different depending on market conditions and order size.
Commission	N/A	The fee to be charged at the opening and closing of the transaction. BrightFX is charging commission fees only on CFDs on equities /shares. There is no commission fee charged on CFDs on currency pairs.
Slippage		The slippage is the difference between the price at which a trade was approved and the price at which it was executed. The slippage can be either positive or negative. Positive slippage occurs when the trade is executed at a better price than the one requested, and negative slippage occurs when the trade is executed at a worse price than the one requested.

Recurring Costs

Swap (financing cost) (% of cost on investment)	0.320%	The financing cost represents the cost for keeping your position open over the night. The swap cost can be negative or positive, depending on your position (long or short) as well on the underlying financial instrument. The swap cost could vary, depending on the night of the week the rollover takes place and the length of the investment holding period.
---	---------------	--

The above costs may vary, depending on the specific investment options and prevailing market conditions. Currency conversion costs may apply for converting fees/charges as well as realized profit or loss denominated in a currency other than the base currency of your trading account.

For more information about our fees, please visit our Trading Conditions Page at <https://www.tradefred.com/eu/trading/trading-conditions>.

ACCESS TO YOUR INVESTMENT

- You can view your account online anytime by logging onto our secure website.
- You can buy and sell Forex 24/5. Market hours can be found online on our [Trading Conditions](#) page.

5. WHAT HAPPENS IF THE COMPANY IS UNABLE TO PAY OUT?

If BrightFX Capital Ltd is unable to meet its financial obligations to you, you may lose the value of your investment with BrightFX Capital Ltd. However, BrightFX Capital Ltd is a member of the Investor Compensation Fund (ICF) for the Clients of Cyprus Investment Firms (CIFs), which secures the claims of the covered Clients against CIFs, members of the ICF, through the payment of compensation which may not exceed €20.000 in total to each covered client, irrespective of the number of accounts held, currency and place of offering the investment service. For more information, please read the [Investor Compensation Fund Policy](#).

6. HOW CAN I COMPLAIN?

If you have a complaint, then you should contact the Compliance Department at BrightFX Capital Ltd by email at complaints.eu@tradefred.com or in writing as shown on the [File a complaint](#) section on our website. Please follow the instructions as per our [Complaints Handling Procedure](#). If you are not satisfied with our final response to your complaint, then you can contact the [Financial Ombudsman of the Republic of Cyprus](#).

7. OTHER RELEVANT INFORMATION

Further information with regards to this product can be found on our website. You should ensure that you read all our legal information displayed in the legal section of [our Website](#).