

KEY INFORMATION DOCUMENT COMMODITIES CFDS

JUNE 2018



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.

Risk alert

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

Product

This is a 'Contract for Differences' ("CFDs") on a Commodity. The range of Commodities we currently offer as CFDs can be found on our website here. This document was last updated on June 2018.

Manufacturer

Finovel Cyprus Ltd, authorised and regulated by the Cyprus Securities and Exchange Commission, CIF License Number 357/18 (the "Company"), registered at Office 103, 24 Piraeus Street, Strovolos 2023, Nicosia, Cyprus. For more information please call please 00357 - 22276710 or visit www.skilling.com.

WHAT IS THIS PRODUCT?

What are CFDs?

CFDs are contracts between two parties, to pay the difference between the opening and closing price of the underlying asset.

Please note that CFDs are leveraged products. The open positions are rolled over and charged a daily swap fee at the end of the day. Margin trading requires you to understand the underlying risk of the asset because you receive exposure to large profits if the price moves in your favor, you risk extensive losses if the price moves against you. When you fail to deposit additional funds to maintain the margin requirement as a result of a negative price movement may cause the CFD position to be auto-closed. This will result when your remaining account equity falls below the maintenance margin requirement.

Type

The product enables you to have exposure to fluctuations related to the underlying Commodity without physically owning it. A CFD on a Commodity 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 underlying Commodity 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, which may be the current spot price or the future's price. Thus, if the underlying instrument rises in price, the buyer receives cash from the seller and vice versa. A commodity is a raw material or primary agricultural product used in commerce, such as Gold or Oil.

How does CFDs on Commodity work?

When you enter into any order to Buy or Sell a CFD on one of our trading platforms, you trade with us as our counterparty. We are your Principal to each trade that you enter. Therefore, if your trade is profitable, we lose. If your trade is loss making we earn a profit. Our profits or losses may be reduced by the level of hedging we may undertake to contain our trading risk. As an example - if you enter into 10 units Buy trade on COCOA when the underlying price of COCOA is USD 2540, we will ask you to place a margin with us to enable you to trade. If the margin is say 10% (10:1 Leverage), this means that as a minimum you will need to place USD 2540.00 with us. If the price of COCOA goes to USD 2550, you will profit USD 100, minus any relevant costs (detailed below). If it reduces to USD 2530, you will lose USD 100, plus any relevant costs (detailed below). Depending on whether we apply any notifications when your account is close to margin calls, we may ask you for more money to ensure your trade / position remains open, otherwise we may be forced to close your position.

Objectives

The objective of trading CFDs on a Commodity allows you to speculate on rising or falling prices in the underlying Commodity, by gaining exposure to the movement in the value of the underlying Commodity.

Term

CFDs on a Commodity 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. This initial margin will be returned when the position is closed.

Retail investors suitable to trade on CFDs?

Trading in this product is highly risky and will not be appropriate for everyone. It is suitable for investor who (i) have a high-risk tolerance; (ii) are trading with money they can afford to lose; (iii) have experience with, and are comfortable trading on, financial markets and, separately, understand the impact of and risks associated with margin trading; and (iv) want to generally gain short term exposures to financial instruments/markets, and have a diversified investment and savings portfolio.

What can I trade?

With your account you can trade CFDs in the Commodities indicated here.

Risk and reward profile

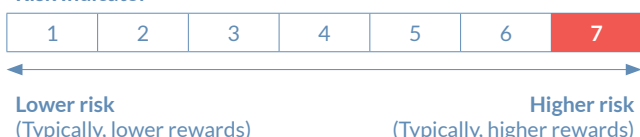
The primary advantage of CFDs over stock options is their pricing simplicity and the range of underlying instruments. For example, option pricing incorporates the time premium that decays as it nears expiration; whereas CFDs only reflect the price of the underlying security. Because CFDs do not have an expiration date, there is no premium to decay. You can expect the following benefits: 1) a cost-effective way to gain exposure to equity market, which is highly liquid and easily traded, 2) a highly capital efficient way to participate in shares, 3) sell (short) CFDs, and benefit from a downward price movement, 4) the pricing of CFDs is transparent, 5) Wholesale interest rates are used in pricing and trading these instruments even for a retail investor, 6) Direct market access (DMA), which means that you can trade directly on the exchange without Finovel Cyprus Ltd adding to the ruling bid/offer spread price; 6) subscribe to live prices; 7) Set up watchlists to track shares; and 8) Set up alerts to new opportunities that match your trading strategy;

The primary risk of CFDs is the risk that the other party in the contract is unable to meet their obligation; this is known as counterparty risk. Investors use margin to trade CFDs, subjecting the investor to margin calls should the value of the portfolio fall below the minimum level. Profit and loss on CFD trades take place when an investor executes a closing trade. Since CFDs can employ a high degree of leverage, investors can lose money quickly should the price of the underlying security move in the undesired direction. As such, investors should be careful when using CFDs.

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

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. Poor market conditions are very likely to impact the capacity of Finovel Cyprus Ltd to pay you.

Risk Indicator



The risk indicator is set at 7 (i.e. very high risk) 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.

Performance scenarios

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

Performance Scenarios:		A Client with \$3000 in their account trading this product with 1% margin requirement: (COCOA, EURUSD Rate 1.25) (Individual Tax liability is the responsibility of the client):
Stress Scenario	Open Price: 2540 Close Price: 2400	A Client Buys 10 units of COCOA at 2540. Price moves down to 2400 so client closed the position and loses $10 \times (\$2540 - \$2400) = -\$1400 = -€1120$. So, the client has made a loss of 37.3%. New equity is €3000-€1120=€1880
Unfavourable Scenario	Open Price: 2540 Close Price: 2480	A Client Buys 10 units of COCOA at 2540. Price moves down to 2480 so client closed the position and loses $10 \times (\$2540 - \$2480) = -\$600 = -€480$. So, the client has made a loss of 16%. New equity is €3000-€480=€2520.
Moderate Scenario	Open Price: 2540 Close Price: 2530	A Client Buys 10 units of COCOA at 2540. Price moves down to 2530 so client closed the position and loses $10 \times (\$2540 - \$2530) = -\$100 = -€80$. So, the client has made a loss of 2.6%. New equity is €3000-€80=€2920.
Favourable Scenario	Open Price: 2540 Close Price: 2600	A Client Buys 10 units of COCOA at 2540. Price moves up to 2600 so client closed the position and profits $10 \times (\$2540 - \$2600) = \$600 = €480$. So, the client has made a profit of 16%. New equity is €3000+€480=€3480.

*Overnight holding costs or commissions are not included

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

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

The above-mentioned risks are 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 case of leveraged positions and may adversely affect your positions. In the event of 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 [here](#).

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.

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

CFDs have no minimum and/or recommended holding period. You can open and close a CFD at any time during market hours. Finovel Cyprus Ltd may close your position without asking your prior consent if there is no sufficient margin in your account. You can make a withdrawal of available funds on your account at any time.

What are the costs?

You are advised to get an understanding of all the one-off costs, ongoing costs and commission regarding CFDs on Commodity which you are about trade. These charges will reduce any net profit or increase your losses.

Please visit our website for more information [here](#).

This table provides the different types of costs for cfd on commodities		
One-off costs	Spreads	Spread is the difference between the Bid price (selling price) and the Ask price (buying price) and reflects, in part, the spreads of the underlying instrument being traded on.
	Commission	The fee charged for the service of facilitating the transaction, subject to the minimum fee on small notional trade sizes.
	Currency conversion rates	The fee charged for converting from the instrument currency to the account currency.
Ongoing costs	Overnight Rollover Swaps	We charge or/ credit you with overnight fees for facilitating you to maintain an open Buy or Sell position on CFDs. Please visit our website for more information here .

Access to your investment

- You can view your account online anytime by logging onto our secure website.
- You can buy and sell CFDs on a Commodity during market hours.
- Depending on your bank, the transfer can take up to two (2) days.

Tax considerations

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

What happens if the company is unable to pay out?

If Finovel Cyprus Ltd is unable to meet its financial obligations to you, you may lose the value of your investment with Finovel Cyprus Ltd. However, Finovel Cyprus Ltd is a member of the Investor Compensation Fund (ICF) for the Clients of CIFs, which secures the claims of the covered Clients against Cyprus Investment Firms, 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 visit our website [here](#).

How can I complain?

If you have complaint, then you should contact the Compliance Department at Finovel Cyprus Ltd by email compliance@skilling.com or in writing as shown at www.skilling.com. If you are not satisfied with our final response to your complaint, then you can contact the Financial Ombudsman of the Republic of Cyprus.

Other relevant information

Further information with regards to this product can be found on our website. You should ensure that you read the Terms of Business, Leverage Policy, Order Execution Policy, Conflicts of Interest Policy, Risk Disclosure Policy and Privacy Policy displayed in the legal section of our website [here](#). Such information is also available on request.