LEAD CAPITAL MARKETS
leading with experience

KEY INFORMATION DOCUMENT – CFDS ON ETFS

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.

Leadcapital Markets Ltd, which offers CFDs, is authorized and regulated by the Cyprus Securities and Exchange Commission, license number 227/14 - Office Address: Strovolos, 128 – 130 Limassol Avenue, Office 301, Nicosia 2015, Cyprus – Tel. Number: +357 22 030446

YOU ARE ABOUT TO PURCHASE A COMPLEX PRODUCT WHICH MAY BE DIFFICULT TO UNDERSTAND.

***What is this product?* CFDs on ETFs**

A contract for difference (CFD) is a popular form of derivative trading. CFD trading enables you to speculate on the rising or falling prices of fast-moving global financial markets (or instruments), such as in this case an ETF. Some of the benefits of CFD trading are that you can trade on margin, and you can go short (sell) if you think prices will go down or go long (buy) if you think prices will rise. With CFD trading, you don't buy or sell the underlying asset (for example a physical share, currency pair or commodity). You buy or sell a number of units for a particular instrument depending on whether you think prices will go up or down. For every point the price of the instrument moves in your favour, you gain multiples of the number of CFD units you have bought or sold. For every point the price moves against you, you will make a loss. Therefore, your return depends on the size of the performance (or movement) of the underlying instrument and the size of your position. Please remember that you may lose up to your entire capital invested. Visit our website for further information in relation to the CFDs on ETFs.

Objectives and means for achieving them

CFDs are leveraged products, which means that you only need to deposit a small percentage of the full value of the trade in order to open a position. This is called 'trading on margin' (or margin requirement). Please note that margin trading requires extra caution; while trading on margin allows you to magnify your returns, your losses will also be magnified as they are based on the full value of the CFD position, meaning you could lose up to the entire capital deposited.

Spread: When trading CFDs you must pay the spread, which is the difference between the buying and selling price. You enter a buy trade using the buying price quoted and exit using the selling price. The narrower the spread, the less the price needs to move in your favour before you start to make a profit, or if the price moves against you, a loss.

For example, if you expect that the price of a particular ETF such as SPY is going to go up, then you could place a buy trade of 3 CFDs at the price of 270 USD. If the market rose 5 points to 275 USD and you closed out your position, you would make a 15 USD profit, 5 times the 3 contracts that you bought. However, if the market moves against you and the price of oil falls 5 points to 265 then you would lose 15 USD.

Unlike traditional share long-only dealing, if you believe a market will fall in value, with trading on margin via CFDs you can sell a market – known as going short – and make a potential profit from falling prices.

Example: The ETF SPY is trading at 270 USD. You believe that based on the not so promising investments that the ETF has conducted, that the price will fall. You open a sell position of 5 SPY CFDs at 270. SPY falls by 70 points to 200 and you decide to close your trade.

Hedging: As CFDs allow you to short sell and therefore make a potential profit from falling market prices, they can be used as a tool by investors to counterbalance losses made in their physical portfolios. For example, if you hold 270 USD worth of SPY and you are concerned that they are due for an imminent sell-off, you can help protect your portfolio by short selling 270 USD of SPY CFDs.

Should SPY prices fall by 5% in the underlying market, the loss in value of your share portfolio would be offset by a gain in your short sell CFD trade. In this way, you can protect yourself without going through the expense and inconvenience of liquidating your ETF holdings.

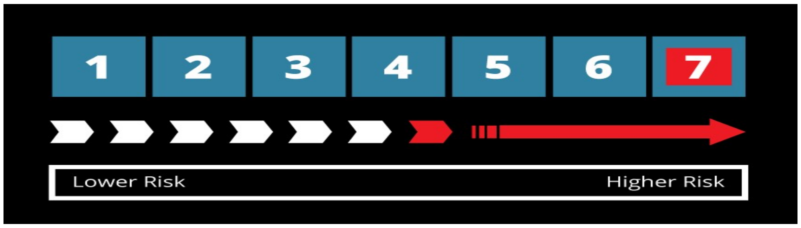
Description of the type of intended retail investor: Trading in this product will not be appropriate for all investors and would most commonly be utilized by persons who wish in general to gain short-term exposure to financial instruments and markets and they are trading by using money that they can afford to lose.

In order to trade in CFDs, investors should have knowledge and experience in leveraged products and understand the impact and risks associated with margin trading. It is also expected from investors to understand how the prices of CFDs are derived, the key concepts of margin and leverage and the fact that losses may result in the loss of the entire capital invested. Indeed, they will understand the risk/reward profile of the product compared to traditional shares dealing. Investors will also have appropriate financial means and the ability to bear losses of up to their entire amount invested.

TERM **:** CFDs on ETFs are execution only products and therefore in general have no fixed or suggested maturity date. It is up to you when to open and close a position, however your position will only be kept open subject to availability of sufficient funds to cover the margin requirements of the specific position. Specific information on each underlying investment option may be found here.

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

Risk Indicator



The risk indicator assumes that the actual risk can vary significantly if you cash in at an early stage and you may get back less, considering also whether it is illiquid or not and whether it is necessary to pay significant extra costs to cash in early. When considered to have a materially relevant liquidity risk you may not be able to sell your product easily or you may have to sell at a price that significantly impacts on how much you get back. This product is classified as 7 out of 7, which is the highest risk class. These rates classify the potential losses from future performance of the product at a very high level.

CFDs are leveraged products that, due to underlying market movement, can generate losses rapidly. The capital protection against market risk, credit risk or liquidity risk is not available. You need to be careful with the currency risk.

The platform gives you the possibility to buy or sell CFDs in a different currency than the one of your account and the return you can get depends on the exchange rate between the two currencies. This risk is not considered in the indicator shown above. Due to specific market conditions we can close your trades at a less favorable price, which could significantly impact how much you get back in case if you do not maintain the minimum margin that is required or if you contravene market regulations.

This product does not include any protection from future market performance, so you could lose some or your entire invested capital. If we are not able to pay you what is owed, you could lose your entire investment. However, you may benefit from a consumer protection scheme (see the section "what happens if we are unable to pay you"). The indicator shown above does not consider this protection.

Performance scenarios: There are a number of factors that may affect the performance of an instrument, which you should be aware of before you begin to trade, such as:

- Leverage risk / Margin risk
- Risk of loss of entire capital invested
- Foreign exchange risk
- Market risk / Unregulated market risk
- Market disruption risk
- Counterparty risk
- Online trading platform and IT risk
- Conflicts of interest

Below you can find examples of trading scenarios for both long and short positions, for SPY, that is held intraday, has the following specifications: Price at Position Opening: 270 USD

Trade Size of CFD: 10

Nominal Value of the Trade: 2,700 USD

Scenario – Long Position		**Profit / (Loss)**	**Price Movement**
Stress Scenario	Price at Position Closing: 170 USD	(1,000) USD	-37.04%
Unfavourable scenario	Price at Position Closing: 220 USD	(500) USD	-18.52%
Moderate scenario	Price at Position Closing: 320 USD	500 USD	18.52%
Favourable scenario	Price at Position Closing: 370 USD	1,000 USD	37.04%

Scenario – Short Position		**Profit / (Loss)**	**Price Movement**
Stress Scenario	Price at Position Closing: 370 USD	(1,000) USD	37.04%
Unfavourable scenario	Price at Position Closing: 320 USD	(500) USD	18.52%
Moderate scenario	Price at Position Closing: 220 USD	500 USD	-18.52%
Favourable scenario	Price at Position Closing: 170 USD	1,000 USD	-37.04%

What happens if the Company is unable to pay out? Leadcapital Markets Ltd ("the Company") is a member of the Investor Compensation Fund (the "Fund") for Customers of Cyprus Investment Firms (CIFs) and other Investment Firms (IFs) which are not credit institutions, which was established under the Investment Firms Law 2002 as amended and replaced by Law 144(I)/2007 (the "Law") and the Establishment and Operation of an Investor Compensation Fund for Customers of CIFs Regulations of 2001 which were issued under the Law. Failure by a Company to fulfil its obligations the fund compensation hall be up to a maximum amount of twenty thousand Euro (€20.000).

What are the costs? Before you begin to trade CFDs on ETFs, you should familiarize yourself with all one-off and on-going costs for which you may be liable. These charges will reduce any net profit or increase your potential losses. The impact of the different types of costs on the return you might get from your investment are shown below. Please refer to the Fees and Charges section on the website for more information.

Spread: The definition of Spread is the difference between the bid (sell) and the ask (buy) price. For more information on the spreads per stock CFD instrument please click here.

The "spread charge" is calculated on the WebTrader platform as follows: **Volume * Instrument's Spread**

On the MT4 platform, the spread charge is calculated as follows: **Volume * Contract Size * Instrument's Spread**

***Swaps*:** A Swap is an overnight interest that a client is charged, for holding a position overnight. If the swap amount is negative, then the client is charged and if the swap amount is positive then the client is credited.

The "swap charge" on the WebTrader platform is calculated as follows:

Volume * Instrument's Closing Price * Instrument's Overnight Swap Charge * Days Held

On the MT4 platform, the swap charge is calculated as follows:

Volume * Contract Size * Instrument's Overnight Swap Charge * Tick Size * Days Held

Exchange Rate: In the case where a client has an account that is denominated in a currency that is not of the same currency as the instrument where a position has been opened, any profits or losses will be credited or charged to the client's account, at the currency at which the client's account is denominated, after a conversion has occurred from the asset's denominated currency, at the current exchange rate at the time of the transaction.

Tax: the tax legislation in your country of residence may have an impact on the actual payout of your investment

What are the new ESMA requirements and from when do they take effect? The following restrictions (The Product Intervention Measures adopted by ESMA under Article 40 of the Markets in Financial Instruments Regulation (hereafter the "MiFIR")) on the marketing, distribution or sale of CFDs to Retail Investors take effect from 1 August 2018:

i. They impose a leverage limit of 5:1 for CFDs on individual equities and other reference values offered to retail clients;*
ii. They impose margin close out rule on a per account basis and standardization of the percentage at which CFDs providers are required to close-out one or more investor's open CFDs, at the level of 50%;
iii. They offer negative balance protection implementation on a per account basis;
iv. They impose a restriction on the incentivization of CFD trading;
v. They impose a standardized risk warning, including the percentage of losses on a CFD provider's retail investor accounts.

*For currently available leverage limits for specific CFDs on ETFs, please click here.

How long should I hold it and can I take money out early? CFDs on ETFs have no recommended holding period. Provided that the Company is open for trading, you can enter and exit positions at any time. It is essential to be aware of the implications of trading with margin and the associated costs, if you intend to use a buy and hold strategy when trading in CFDs

How can I complain? You may file a complaint by submitting the attached Complaints Form via post or by hand at: Strovolos, 128 – 130 Limassol Avenue, Office 301, Nicosia 2015, Cyprus, or via email at: compliance@leadcapitalmarkets.com. All complaints will be treated strictly confidential. If you believe that your Complaint has not been handled in a fair and equitable manner by the Company you have the right to refer the matter to the Financial Ombudsman of the Republic of Cyprus (complaints@financialombudsman.gov.cy), ADR Mechanism, or the relevant Courts.

Other relevant information Leveraged trading in foreign currency contracts, contracts for difference or other off-exchange products carries a high level of risk and may not be suitable for everyone. Before trading, you are strongly advised to read and ensure that you understand the relevant risk disclosures and warnings here: Risk Disclosure Statement and our Terms & Conditions.

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