

**APPROVED**

By order of the director of  
CJSC «FinTech Solutions»  
From 22nd of November  
2022, No.71-OD

**REGULATIONS**

on Submitting, Processing and Executing the Orders of Clients to Fix the Price of  
the Underlying Asset while conducting operations  
involving non-deliverable OTC financial instruments

These Regulations on submitting, processing and executing the orders of clients to fix the price of the underlying asset while conducting operations involving non-deliverable OTC financial instruments (hereinafter – the «Regulations») are created on the basis of the Edict of the President of the Republic of Belarus No. 231 «On Carrying Out Activities in the Over-the-counter Forex Market» dated June 4, 2015, the Charter and other local laws and regulations of CJSC «FinTech Solutions» (hereinafter – the «Forex Company») and outlines the general terms of submitting, processing and executing the orders of clients to fix the price of the underlying asset while conducting operations involving non-deliverable OTC financial instruments, placed via the Platform.

**1. General Provisions**

1.1. Operations involving non-deliverable OTC financial instruments (hereinafter – the «Operations») shall be conducted by the Forex Company on the basis of the Terms and Conditions concluded with the Client. In accordance with the Terms and Conditions, the Forex Company undertakes to conduct on its own behalf and at its own expense the operations initiated by the Client. Unless otherwise stated, the terms and definitions used in these Regulations shall have the meanings given to them in the Rules of conducting operations involving non-deliverable OTC financial instruments at CJSC «FinTech Solutions» (hereinafter – the Rules).

1.2. The Client and the Forex Company shall interact via the Platform (an online platform or a mobile app). A complete list of financial instruments and the terms of conducting operations thereon (the information regarding the schedules, spreads, swaps, margin security requirements, minimum and maximum trade sizes, etc.) are presented in the Platform.

## **2. Types of Orders to Fix the Price of the Underlying Asset**

2.1. An order to fix the price of the underlying asset when the Client is conducting operations in the Platform is called an Order.

2.2. There are two types of Orders used on the Platform to fix the price of the underlying asset: a market order and a pending order.

2.3. A Market Order is an order from the Client to immediately fix the price of the underlying asset at the best available market price for the selected volume. A Market Order can be executed by a Forex Company at a price worse than the price quoted by the Forex Company at the moment of its placement.

2.4. A Pending order is an order to fix the price of the underlying asset in the future according to specified conditions, given by a Client to a Forex company.

2.5. Any order (market or pending) is always an instruction to Buy or Sell.

2.6 Buying is always conducted at an Ask price, and Selling is always conducted at a Bid price, corresponding to a current market price.

2.7 Market and pending orders are accepted and executed in accordance with the trading schedule for the selected financial instrument (indicated under the «Schedule» Section of the Platform).

## **3. Pending Orders**

3.1. Stop Market Order is a type of Pending order, which is a Client's order to open a position at a price lower than the current market price. The price indicated in the order is a Stop level. When the market price reaches a Stop level specified in the order, the Stop Order will be triggered and sent for execution. The execution price may be better or worse than the Stop Level set by the Client, depending on the liquidity available on the market. Stop orders can be placed only during the session of this financial instrument. Stop orders can be canceled at any time, even when the market is closed. To change a market stop order, the Client must cancel the existing one and place a new Stop Order, if market conditions allow it. Stop orders can be valid during the operating day (Good For Day (GFD) or can be valid until canceled (Good Til Canceled (GTC). A stop order can be partially executed if there is not enough liquidity to cover the entire order at the time of triggering the stop order.

3.2. Limit order is a type of pending order that represents a Client's order to Buy a financial instrument at a price not exceeding a certain level or to Sell it at no less than a certain price (the so-called «or better» for any direction). This gives the Client control over the price at which the Limit Order is executed, however, such a Limit Order may never be executed. Limit order will be executed when the market price reaches the level specified within the order and will be executed at the specified

price or better, provided there is sufficient liquidity. If there is insufficient liquidity, the limit order will be partially executed, and the remaining amount will remain in the order book until it is fully executed or cancelled. Limit orders can have Take Profit and Stop Loss orders attached.

3.3. Stop Loss order – a Client’s order for the purpose of fixing losses, to close a certain open position in the event of an unfavourable change in the price of the underlying asset when the current price of the underlying asset reaches the set price level (the «Stop Loss» level). For long positions, the order is executed at the Bid price, for Short positions – at the Ask price. When the Stop Loss level is reached, the Stop Loss order is executed as a market order at the best price available for the volume that the Client wants to buy or sell. The Forex company does not guarantee the execution of the Stop Loss order at the price specified within it.

3.4. «Guaranteed Stop Loss» order - a Client’s order for the purpose of fixing losses, to close a certain open position in the event of an unfavourable change in the price of the underlying asset, when the current price of the underlying asset reaches the set price level (the guaranteed Stop Loss level). By accepting the «Guaranteed Stop Loss» order, the Forex Company guarantees that it will close the Client's position exactly at a price specified within the order. An open position can be closed by the Client until the guaranteed stop loss level of the order is reached. Since it is guaranteed for the Client that the position will be closed exactly at a price set by him within the «Guaranteed Stop Loss» order, the Forex Company charges a commission fee in case of order execution. The «Guaranteed Stop Loss» order can be added to market orders, already opened positions, or to pending orders (Stop and Limit Orders). The client can add/set a «Guaranteed Stop Loss» order only when the trading mode is set to «normal» on his account. If the position is opened by the Client, when the trading mode is set to «hedging mode», it is impossible to add a «Guaranteed Stop Loss» order to such a position in the future, even if the trading mode is changed to «Normal». The Client chooses the Trading mode at his/her own discretion under the «Settings» menu of the Platform.

3.5. Take Profit order is a Client’s for the purpose of profit-taking, to close a certain open position in the event of a favourable price change of the underlying asset when the current price of the underlying asset reaches the set price level (the «Take Profit» level). For Long positions, the order is executed at a Bid, for Short positions – at the Ask price. When the «Take Profit» level is reached, the «Take Profit» order is executed as a market order at the best price available for the volume that the Client wants to buy or sell.

3.6. A Trailing Stop order is a special type of Stop Loss order that automatically follows the Client's positions if the market price changes in favour of the Client. If the market price changes against the Client, then the «Stop Loss» level does not move. The «Trailing Stop» order sets the stop level not at a certain price, but

at a certain distance from the current market price. It will be placed below the current market price if the Client opens a Long position on the underlying asset, and above the current market price if the Client opens a Short position. The «Trailing Stop» order is placed at a certain distance from the market price, measured as a percentage or in points. This distance is called the trailing step and it remains unchanged when the market price moves. If the client's position moves in favour of the Client, the «Trailing Stop» order is moved automatically.

#### **4. Trading modes**

4.1. The Forex Company Platform offers two modes which the Client can use to open the positions: «Hedging mode» and «Normal mode».

4.2. Opening the positions in a «Normal mode» means that positions may be opened only in one direction at any given point in time on a single financial instrument:

If there is an open position on a financial instrument and the Client places an order in the opposite direction, either the size of the existing position decreases or it closes (if an Operation is made for the amount equal to the size of the current position), or it reverses (if the amount of the opposite Operation is greater than the current position);

If there is an open position on a financial instrument and the Client places an order in the same direction, another position is opened, i.e. there may be several unidirectional positions.

In such a case it does not matter whether the position was opened as the result of a market order or a pending order.

4.3. «Hedging mode» allows the Client to have open multiple positions on the same financial instrument, including oppositely directed positions. If there is an open position on a financial instrument and the Client makes a new Operation (or a pending order is triggered), a new position is opened. The existing position does not change.

In «Hedging mode», «Guaranteed Stop Loss» orders cannot be added to the Market orders. If the Client opened a position when the account was set to «Hedging mode», and then, without closing the position, transferred the account to «Normal mode», it is still impossible to add a «Guaranteed Stop Loss» order to such a position.

4.4. The Client chooses the Trading mode at his/her own discretion under the «Settings» menu of the Platform.

#### **5. Placing Orders**

5.1. The Client may place a market order to open a position in the Platform by doing the following:

Go to the «Markets» Section of the Platform;

Select a financial instrument;

Select a direction for the position – Short (Sell) or Long (Buy);

Specify the desired size of the position (position size is indicated in the units in which the underlying asset is measured (for currency pairs – in currency units of the base currency, for securities – in the number of shares, for futures contracts – in the number of contracts, for oil – in barrels, etc.);

Confirm his/her intention by pressing the «Sell» (red button) or «Buy» button (blue button) when the streaming or market prices of the Forex Company suit the Client.

In addition, the Client may set the optional parameters, such as the «Stop loss», «Guaranteed Stop Loss» and/or «Take profit» levels.

5.2. To place a Limit order or Stop order in the Platform, the Client should do the following:

Go to the «Markets» Section;

Select a financial instrument;

Select a direction for the position – Short (Sell) or Long (Buy);

Specify the desired size of the position (position size is indicated in the units in which the underlying asset is measured (for currency pairs – in currency units of the base currency, for securities – in the number of shares, for futures contracts – in the number of contracts, for oil – in barrels, etc.);

Put the relevant mark opposite the words «Sell (Buy) when the price is» and specify the desired price at which the order should be executed.

The Client may also fill in the «date of order cancellation» field and set the desired date when the order should be cancelled.

If the Client selects the Buy direction and sets the price above the current price value, a Buy Stop order is placed by pressing the «Place Stop Order» button.

If the Client selects the Buy direction and sets the price below the current price value, a Buy Limit order is placed by pressing the «Place Limit Order» button.

If the Client selects the Sell direction and sets the price below the current price value, a Sell Limit order is placed by pressing the «Place Limit Order» button.

If the Client selects the Sell direction and sets the price above the current price value, a Sell Stop order is placed by pressing the «Place Stop Order» button.

5.3. To place a «Stop loss», «Take profit», «Guaranty Stop loss» or «Trailing Stop» the Client should do the following:

Select an open position (either immediately upon opening a position with a market order or placing a pending order to open) and put the relevant mark (check)

opposite the words «Stop loss», «Take profit», «Guaranty Stop loss» or «Trailing Stop»;

In the opened menu, select the parameter that he/she wishes to fill in order to close the position – the amount of loss/profit, distance in points to the desired price or the price limit;

Set the selected parameter;

Confirm his/her intention by pressing the relevant button («Update Order», «Buy», «Sell», «Place Stop Order», «Place Limit Order»).

5.4. The quantity of orders sent by the Client within a specific time frame may be limited by the technical capabilities of the Platform.

## **6. Reporting Environment**

6.1. All actions of the Client in the Platform are recorded and displayed in the form of reports under the specialized «Portfolio» and «Reports» Sections of the Platform.

6.2. There are two tabs in the «Portfolio» Section – «Positions» and «Orders».

6.2.1. In the «Positions» tab, you can view all the open positions in the account at the current moment broken down into the following parameters:

Financial instrument;

Number of units of the underlying asset;

Opening price;

Current price;

Stop Loss and Take Profit levels;

Margin required to keep the trade opened (Margin)

Floating financial result.

In the «Positions» tab, by selecting the relevant options it is also possible to modify/set the Stop Loss and Take Profit levels or close an open position.

6.2.2. In the «Orders» tab, it is possible to view all the pending orders placed at the current moment broken down into the following parameters:

Financial instrument;

Number of units of the underlying asset;

Order type (stop or limit), Stop Loss and Take Profit levels;

Order trigger price;

Current price;

Date and time to which the pending order is valid.

Here, you can also delete the previously placed pending order by selecting the «Delete» option.

6.3. There are two tabs in the «Reports» Section – «Transactions» and «Activity». Any report generated in this Section can be sent by the Client to the email address he/she used during the registration process.

6.3.1. Within the «Transactions» tab, it is possible to view all operations on the account, which resulted in balance changes. The following information is displayed::

date;

time;

transaction type (deposits, withdrawals, position closure, overnight commission, dividend commission, etc.);

financial instrument;

status (processed, in process, cancelled, transaction deleted, etc.); result (amount debited/credited to/from the account);

balance (deposited amount in the Client's account after the transaction);

transaction ID.

This information may also be filtered by several parameters, such as transaction type and status.

6.3.2. Within the «Activity» tab, it is possible to view all the actions with the open positions and orders broken down into the following parameters:

date;

time;

type (of a position or an order);

number of units of the underlying asset;

price (opening/closing price, underlying asset price at the time of calculating the overnight commission, price of the pending order, etc.);

financial instrument; status; additional information;

Position/Order ID.

Filters by certain parameters, such as «type» or «status» can be added. For example, when there is a «position» filter added for the «type» parameter, the report will only display the activity related to positions, and the «status» parameter may have the following values – position opened, position closed, overnight commission, etc. When there is an «order» filter for the «type» parameter, the report displays the information about all the changes made to the pending orders, and the «status» parameter may have the following values – order created, order modified, order executed, order cancelled, order expired, etc.

## **7. Amendments**

7.1. Changes and amendments to these Regulations shall be made by the Forex Company at its sole discretion. To stay up to date with the changes and amendments, it is recommended to the Client to visit the official website of the Forex Company on a regular basis. The Forex Company is entitled to introduce amendments or changes to these Regulations at any time, including any and all annexes hereto, as well as to change the terms and conditions and the operating procedure by posting such amendments or changes on its official website. The Client agrees that these amendments or changes shall enter into force and become binding upon their posting on the official website of the Forex Company, as well as on the Platform.