



MARGIN
FOREIGN
EXCHANGE &
CONTRACTS FOR
DIFFERENCE

FINANCIAL SERVICES
GUIDE

AxiTrader Limited (trading as
AxiTrader) (**AxiTrader**)
BCN 25417 BC 2019

1. ABOUT THIS FINANCIAL SERVICES GUIDE

This Financial Services Guide (FSG) is designed to provide you with important general information regarding our services and to assist you in deciding whether to use any of our financial services offered in the FSG. This FSG is typically issued prior to providing you with any of our financial products or services. The information contained within this guide includes the following:

- ✦ Who we are and how you can contact us;
- ✦ The services we are authorised to provide to you;
- ✦ How you can communicate with us;
- ✦ How we are remunerated for these services;
- ✦ The disclosure documents and statements you will receive;
- ✦ Our internal and external dispute resolution processes; and
- ✦ How we deal with your personal information.

Please contact us if you would like further information on this FSG or on any of our services.

2. WHO WE ARE

The financial services and products referred to in this FSG are provided by AxiTrader Limited (Business Company Number 25417 BC 2019) (trading as "AxiTrader") registered with the Financial Services Authority (FSA). The FSA does not regulate, monitor, supervise or licence margin FX and contracts for difference issuers. The FSA has not approved this FSG or any other document issued by us.

3. OUR CONTACT DETAILS

Email: service@axitrader.com

The "Contact Us" page of our Website provides our business addresses and international toll-free telephone numbers for clients from a number of countries and an international telephone number for clients from other countries.

Our registered address is: AxiTrader Limited, Suite 305, Griffith, Corporate Centre, PO Box 1510, Beachmont, Kingstown, Saint Vincent and the Grenadines.

4. FINANCIAL SERVICES WE CAN OFFER

We provide the following financial services to retail and wholesale clients:

- ✦ deal in foreign exchange contracts and derivatives;
- ✦ provide financial product advice in relation to foreign exchange contracts and derivatives;

- ✦ make a market in foreign exchange contracts and derivatives.

5. FINANCIAL PRODUCTS WE OFFER

Under this FSG, we offer the following financial products to its Clients:

- ✦ margin foreign exchange in respect of all major currencies and currency crosses ("Margin FX Contracts");
- ✦ contracts for difference ("CFDs") in respect of equity indices, bullion, commodities and cryptocurrencies; and
- ✦ such other products as are notified to you from time to time.

6. OUR ADVICE POLICY

We will provide you with general advice about our products and the financial markets related to our financial products. We do not provide personal advice.

Any financial advice we provide to you therefore does not take into account your personal objectives, financial situation or needs. In this instance, you should seek independent professional advice to ascertain whether our products are appropriate for you.

7. PRODUCT DISCLOSURE STATEMENT

All our financial products are offered under a Product Disclosure Statement ("PDS"). If you wish to acquire a financial product, we will provide you with a PDS relating to that product before you invest in or purchase that product. This will help you make an informed decision about whether to acquire or utilise such products.

Any PDS we give you will provide information about the products which we issue and will identify the risks, terms and conditions, our fees charges and commissions, and any association we have that may influence our advice in respect of the product.

8. USING OUR SERVICES

If you wish to utilise our services, you must make an application either online or on the form provided.

An application will include information about you that we require to meet our legal obligations including making assessment of whether our products are suitable.

Our products are not suitable for all and so the decision whether our products are suitable for your purpose,

financial situation and experience remains yours and we recommend that you seek independent personal advice.

If you wish to deal in one of our financial products, you may do so directly via the appropriate Internet Trading Platform (“ITP”).

Before you log onto the ITP to deal in one of our financial products it is important that you understand the risks, costs and benefits of dealing in that financial product. For information on the risks, costs and benefits related to our financial products you should turn to our PDS document.

9. OTHER DOCUMENTS YOU MAY RECEIVE

We will provide you with the relevant documentation to facilitate the requested transactions. These may include, but not be limited to client agreements, account opening applications, and statements.

The Product Schedule which forms part of the Client Agreement sets out the product specifications, Commissions, Administrative Charges and is available on our website.

It is important that you familiarise yourself with all documents before deciding to acquire or deal in our products.

10. WHO WE ACT FOR

We are responsible for the financial services provided.

We are a market maker, not an agent, when dealing in its financial products, which are off-market over-the-counter (“OTC”) derivatives. We act as principal in all transactions with you in respect of these financial products.

11. WHAT OUR FINANCIAL PRODUCTS COST YOU

The Product Schedule provides details about specific transaction fees and costs associated with our financial products.

The common fees and charges that apply to our services include any or all of the following:

- ✦ Commissions on Pro-Accounts;
- ✦ payment of margin;
- ✦ margin adjustments;
- ✦ rollover or swap charges calculated at our rollover rates;
- ✦ interest charges applied to debit balances; and
- ✦ administration fees.

12. REMUNERATION AND OTHER BENEFITS RECEIVED BY US AND OUR EMPLOYEES

If you acquire or deal in our products we will receive fees and other benefits, these are set out in our PDS.

Employees of ours who provide you with general advice and execution services receive remuneration for the provision of these services. Employees’ remuneration includes salaries, performance-related bonuses and other benefits.

13. BENEFITS FOR OTHER SERVICE PROVIDERS

You may have been referred to us by a service provider who may receive financial benefits from us.

These should have been disclosed to you by the relevant service provider.

We will provide details of any referral benefits that relate to your transactions on your reasonable request.

14. DISCLOSURE OF ANY RELEVANT CONFLICTS OF INTEREST

We do not consider that we have any relationships or associations which might influence us when providing you with our services.

However, due to the nature of our services, we may have “long” or “short” positions in, act as principal in, and buy or sell the financial products in which you deal. We act as market maker and this may result in a conflict between our interests and those of our clients.

15. MAKING A COMPLAINT

We have an internal dispute resolution process in place to resolve any complaints or concerns you may have.

Any initial concerns should be raised with our Client Services Team. They will assess the situation and make every effort to resolve the matter at the first instance. However, some problems require further investigation, so they may ask you for further information and respond to you in writing at a later date.

If your complaint cannot be resolved by our Client Services Team you may request to have the matter escalated internally to our Complaints Officer. The Complaints Officer will review all materials and make an assessment. In general, our internal procedure allows us up to 45 calendar days to resolve a dispute.

If you are dissatisfied with the outcome you may lodge a complaint with the Financial Commission, an alternative

dispute resolution forum external to us using the contact details available on our Website.

Complaints can be made to us by telephone, email or letter.

Our complaints handling procedure is available on our website.

16. COMPENSATION ARRANGEMENTS

We have global professional indemnity insurance in place that complies with regulatory requirements in Australia and elsewhere. The policy will cover work done for us by our representatives and employees after they cease to work for us.

17. OUR RECORD KEEPING OBLIGATIONS

We will maintain comprehensive and accurate records of your client transactions and advice provided.

You are advised that telephone calls are recorded and retained for audit, training and dispute settlement purposes.

18. OUR PRIVACY POLICY

We are committed to protecting your privacy. The information you provide to us and any other information provided by you in connection with your transactions will primarily be used for the processing of your application and for complying with certain laws and regulations. We have systems and processes in place which safeguard against the unauthorised use or disclosure of your personal information.

Our privacy statement is available on our Website.

Please contact us if you have any concerns or if you would like further information.