

## 1. Execution Risks

### 1.1 HIGH RISK INVESTMENT

Trading foreign exchange on margin carries a high level of risk and may not be suitable for all investors. Before deciding to trade these products offered by Rakuten Securities Hong Kong Limited (“Rakuten Securities HK”), you should carefully consider your investment objectives, financial situation, needs and level of experience. Rakuten Securities HK may provide general commentary without regard to your objectives, financial situation or needs. General advice given, or the content of this website are not intended to be personal advice and should not be construed as such. Certain risks are listed below and it is not an exhaustive list. The possibility exists that you could sustain a loss in excess of your deposited funds. You should be aware of all the risks associated with trading on margin and assess your ability to bear the potential losses of the trading in the leverage foreign exchange trading. Rakuten Securities HK recommends you seek advice from an independent financial advisor.

### 1.2 TRADING OVER THE COUNTER

Foreign exchange contracts are traded Over the Counter (OTC) and not traded on the centralized exchanges. During certain circumstances, it may be difficult to trade or quote prices for foreign exchange contracts compare to products traded on the centralized exchanges. Due to non-centralized nature, there are no market prices which are publicly disclosed by the exchanges and facilitate to close open positions. The quoted prices displayed on the trading platform are determined by the counterparty, therefore, the clients are subjected to counterparty risk such as the counterparty will be unable or will refuse to perform with respect to such contracts. Before you start trading foreign exchange, you need to understand various market practices, trading mechanisms, and associated risks.

### 1.3 COUNTERPARTY RISK

Since foreign exchange contracts are traded OTC, the transactions are not guaranteed by any exchanges or clearing houses. There is a risk of the counterparties fail to meet their obligations of executing the foreign exchange contracts. Rakuten Securities HK and its affiliate are acting as a counterparty of client’s foreign exchange contracts, therefore, acts as the buyer when you sell and the seller when you buy. As a result, the interest of Rakuten Securities HK and its affiliate may conflict with the clients’ interest.

### 1.4 LEVERAGE RISK

Leverage foreign exchange trading (OTC margin trading) involves high degree risk due to leverage. The clients could open large amount currency positions with invested small amount of money according to the leverage rate. The small price changes in the underlying currencies could result in substantial losses to the clients which may in some circumstances exceed the amount of client’s initial deposit funds. If the market fluctuates more than a certain percentage against the client’s open positions, the clients can reduce the leverage impact by closing some or all open positions, or by depositing additional money to the trading accounts. In addition, if the market fluctuates sharply and significantly against the client’s open positions, there is the

possibility of all open positions may be forcibly settled according to Rakuten Securities HK's Margin Call Policy. The clients of Rakuten Securities HK should not participate in leverage trading unless they understand, are willing to assume the risks associated with such transactions and are financially able to absorb such losses.

### 1.5 CREDIT RISK

Credit risk refers to a possibility that the outstanding currency positions may not be repaid as agreed, due to a voluntary or involuntary action by a counterparty. Rakuten Securities HK and its affiliate act as counterparty of the client's foreign exchange contract. For this reason, there is the risk of Rakuten Securities HK, and its affiliate fail to make payment or perform on a transaction prior to or upon settlement due to their defaults.

### 1.6 EXCHANGE RATE RISK

The exchange rate risk refers to the losses that foreign exchange trading transactions may incur due to currency fluctuations negatively against position of the client. For foreign exchange trading, the clients select a currency pair to buy a currency and sell another currency. Therefore, the clients may suffer the loss due to "risk of price decreasing of bought currency" and "risk of price increasing of sold currency".

### 1.7 LIQUIDITY RISK

Depending on the market conditions, it may be difficult for the client to close and/or open positions. In Forex market, there are no limitations on price movement unlike the investment products traded on the exchanges. Although major currencies including Japanese Yen are not subject to the special currency controls, they are in general high liquidity. However, there are chances of unable or difficult to offer prices during national holidays or during illiquid market conditions for specific currency. The liquidity may also be impacted by political and economic policies (both domestic and overseas), political instability, wars, natural disaster, exchange control policy and alliance. Rakuten Securities HK and its affiliate are providing all liquidity for all currency prices to its clients while dealing as counterparty.

### 1.8 CANCEL ORDER BY CLIENTS

The clients can cancel the buy/sell orders until it is filled, but the clients cannot cancel the buy/sell orders once it has been filled. When the clients start trading the foreign exchange contracts, the clients are requested to fully understand the trading mechanism and familiar with the trading platform.

### 1.9 WIDENED SPREADS

There may be instances when spreads widen beyond the typical spread. Spreads are a function of market liquidity and in periods of limited liquidity, at market open, or during rollover time, spreads may widen in response to uncertainty in the direction of prices or to an uptick in market volatility, or lack of market liquidity. It is common to see spreads widen particularly around rollover. Rollover is typically a very quiet period in the market, since the business day in New York has just ended, and there are still a few hours before the new business day begins in Tokyo. Being cognizant of these patterns and taking them into consideration while trading with open orders or placing new trades around these times are important to the client. This may occur during news events and spreads may widen substantially in order to compensate for the tremendous amount of volatility in the market. Rakuten Securities HK strongly encourages

traders to utilize caution when trading around news events and always be aware of their account equity, usable margin and market exposure. Widened spreads can adversely affect all positions in an account including hedged positions. When all positions are hedged in an account, although the overall net position may be flat, the account can still sustain losses due to the widen spread that occurs at the time rollover occurs.

Please be aware that during the first few hours after the open, the market tends to be thinner than usual until the Tokyo and London market sessions begin. These thinner markets may result in wider spreads, as there are fewer buyers and sellers. This is largely due to the fact that for the first few hours after the open, it is still the weekend in most of the world. In illiquid markets, traders may find it difficult to enter or exit positions at their requested price, experience delays in execution, and receive a price at execution that is a significant number of pips away from your requested rate.

### 1.10 ROLLOVER COSTS

If the clients carry the open position(s) overnight, the rollover cost(s) occur. The Rollover is the simultaneous closing and opening of a position at a particular point of time during the day in order to avoid the settlement and delivery of the purchased currency. Upon the closing and opening the positions, the interest rate difference related to the currency pairs is settled and the swap points are paid or received. This also refers to the interest either charged or applied to a trader's account for positions held "overnight" on trading platform. The time at which positions are closed and reopened, and the rollover fee is debited or credited, is commonly referred to as Trade Roll Over (TRO). It is important to note that rollover charges will be higher than rollover accruals. When all positions are hedged in an account, although the total profit/loss were locked at the moment of hedge, both positions (original position and hedge position) are subjected to rollover charges, therefore, may lead to the loss in overall.

### 1.11 MARKET OPINIONS

Any opinions, news, research, analyses, prices, or other information contained on this website are provided as general market commentary and does not constitute investment advice. Rakuten Securities HK will not accept liability for any loss or damage, including without limitation to, any loss of profit, which may arise directly or indirectly from use of or reliance on such information.

### 1.12 INTERNET TRADING RISK

There are risks associated with utilizing an internet-based deal-execution trading system including, but not limited to, the failure of hardware, software, and internet connection. Since Rakuten Securities HK does not control signal power, its reception or routing via the internet, configuration of your equipment or reliability of its connection, we cannot be responsible for communication failures, distortions or delays when trading via internet. Rakuten Securities HK employs backup systems and contingency plans to minimize the possibility of system failure, which includes allowing clients to trade via dealing service. In addition, when the trades are placed by using the electronic trading system, there are no human interventions required to accept orders. Therefore, if the clients make mistakes in entering an order, the order may not be fulfilled, on the other hand, the unintended order may be fulfilled. There is a possibility the prices displayed on the trading platform are not real time and may not always represent the actual market. The electronic transaction system may be temporarily unavailable for a certain period of time due to various reasons such as failure of the customer's own communication device, connection failure, distribution failure of information vendor, or failure of the electronic transaction system itself. If the market fluctuates suddenly or the price to be delayed by various reasons, there may be a discrepancy between the price on the electronic trading system and

the actual market price. If the user ID and password used to log into electronic transaction system are leaked due to theft or eavesdropping etc., there is a possibility that a third party misuses the trading account and causes the losses to the client.

### 1.13 SLIPPAGE

Rakuten Securities HK aims to provide clients with the best execution available and to get all orders filled at the requested rate. However, there are times when, due to an increase in volatility, orders may be subject to slippage. Slippage most commonly occurs during fundamental news events or periods of high volatility. Due to limited liquidity at market open, there are high possibility of slippage occurs. The order type and quantity demanded have an impact on overall execution with slippage.

The volatility in the market may create conditions where orders are difficult to execute. For instance, the price you receive in the execution of your order might be many pips away from the selected or quoted price due to market movement. In this scenario, the trader is looking to execute at a certain price but in a split.

Additionally, when triggered, stop orders become a market order available for execution at the next available market price. Stop orders guarantee execution but do not guarantee a particular price. Certain ordering methods offered on the trading platform intend to stop losses (e.g. stop orders, etc.). It may be effective for limiting client's losses in normal market conditions but may not work in some circumstances. For example, if the market prices fluctuate in one direction sharply, a stop order may be executed at a price that is significantly less favorable than the intended price and may incur unintended losses.

### 1.14 DELAYS IN EXECUTION

A delay in execution may occur for various reasons, such as technical issues with the trader's internet connection to Rakuten Securities HK or by a lack of available liquidity for the currency pair that trader is attempting to trade. Due to inherent volatility in the markets, it is imperative that traders have a working and reliable internet connection. There are circumstances when the trader's personal internet connection may not be maintaining a constant connection with the Rakuten Securities HK servers due to a lack of signal strength from a wireless or dialup connection. A disturbance in the connection path can sometimes interrupt the signal and disable the Rakuten FX trading platforms, causing delays in the transmission of data between the Rakuten FX trading platforms and the Rakuten Securities HK server. The orders may not be placed, executed, confirmed, or cancelled due to improper operation of trading system or the communication line (network) which connecting between client and company.

### 1.15 EXCHANGE RATE FLUCTUATIONS (PIP COSTS)

The price movement of any currency pair the client held and the dominant currency for the client's account will impact the client profit and loss of the trade.

The profit and loss related to the transactions dominated by the foreign currency need to be converted to local currency and may be impacted exchange rate fluctuations. In addition, when deposit different currency other than the dominant currency for the account, there is also a risk due to fluctuation in the exchange rate.

### 1.16 ORDER EXECUTION

Limit orders are often filled at the requested price or better. If the price requested (or a better price) is not available in the market, the order will not be filled. If the requested price of a Stop order is reached at the open of the market, the order will become a Market order. Limit Entry orders (entry order set better price than current price) are filled the same way as Limit orders. Stop Entry orders (entry order set worse price than current price) are filled the same way as Stops.

#### 1.17 MOBILE TRADING PLATFORMS

There are a series of inherent risks with the use of the mobile trading technology such as the duplication of order instructions, latency in the prices provided, and other issues that are a result of mobile connectivity. Prices displayed on the mobile platform are solely an indication of the executable rates and may not reflect the actual executed price of the order.

iSPEED FX (mobile platform) utilizes public communication network circuits for the transmission of messages. Rakuten Securities HK shall not be liable for any and all circumstances in which you experience a delay in price quotation or an inability to trade caused by network circuit transmission problems or any other problems outside the direct control of Rakuten Securities HK. Transmission problems include but are not limited to the strength of the mobile signal, cellular latency, or any other issues that may arise between you and any internet service provider, phone service provider, (or any other service provider) and so forth.

It is strongly recommended that clients familiarize themselves with the functionality of the iSPEED FX prior to managing a live account via portable device.

#### 1.18 PRICES UPDATING BEFORE THE OPEN

Shortly prior to the open, the rates of the trading platform are refreshed to reflect current market pricing in preparation for the open. At this time, trades and orders held over the weekend are subject to execution. Quotes during this time are not executable for new market orders. After the open, traders may place new trades, and cancel or modify existing orders.

#### 1.19 INHENT TRADING PLATFORM RISK

Rakuten Securities HK offer two trading platforms for the clients in Hong Kong to trade Leveraged Foreign Exchange, Rakuten FX platform and Trading Station through its partner FXCM.

There are unique functions offered on both Trading Platforms, clients should consider many factors when deciding on which platform best suits their needs (e.g., trading cost, trading style, or strategy etc.). Clients shall trade on both platforms after they are completely confident of having fully knowledge of the trading platform.

Rakuten Securities HK offers Trading Station platform through its partner FXCM, therefore, there is the risk Rakuten Securities HK may cease to provide Trading Stations platform in Hong Kong. Please read through the trading risk associated to each trading platform before you start trading.

## RAKUTEN FX ACCOUNT

#### 1.20 CANCEL ORDERS ON RAKUTEN FX

Trading through Rakuten FX trading platform, the execution rate is extremely high in normal market condition. Only small amount of order will be rejected or cancelled due to the actual slippage is out of Slippage Range set when placing the order or not enough equity for the initial margin.

### 1.21 HEDGING

The ability to hedge allows a trader to hold both buy and sell positions in the same currency pair simultaneously. Traders have the ability to enter the market without choosing a particular direction for a currency pair. Although hedging may mitigate or limit future losses it does not prevent the account from being subjected to further losses altogether. In the forex market a trader is able to fully hedge by quantity but not by price. This is because of the difference between the spread. Traders are required to put up margin for one side (the large side) of a hedged position. Margin requirements can be monitored at all times in the Account Info window. While the ability to hedge is an appealing feature, traders should be aware of the using AS Streaming function on Rakuten FX that may affect hedged positions. The hedging is not available when you place the opposite direction trade with AS Streaming order, which means the AS Streaming would close any open position in the opposite direction.

### 1.22 HOLIDAY/WEEKEND EXECUTION TRADING HOURS

Please refer to the website of the trading hours for Rakuten FX. Please trade with caution during market close and factor all necessary information of trading hours into any trading decision.

### 1.23 GAPPING

Monday's opening prices may or may not be the same as closing prices on Friday in New York. At times, the prices on the Monday open are near where the prices were on close. At other times, there may be a significant difference between close and Monday's open. The market may open with gap if there is a significant news announcement or an economic event (changing how the market views the value of a currency). Traders holding positions or orders over the weekend should be fully comfortable with the potential risk for the market to gap.

For all order types except "As streaming orders and Streaming orders" due to the difference between the closing price and the opening price on Monday, or the difference between the price before the start of our system maintenance and the price after the end of our system maintenance, the clients may get unfavorable execution prices, moreover the clients may incur losses and the loss may exceed the deposit margin as well.

Traders who fear that the markets may be extremely volatile over the weekend, that gapping may occur, or that the potential for weekend risk is not appropriate for their trading style, may simply close out orders and positions ahead of the weekend. It is imperative that traders who hold open positions over the weekend understand that the potential exists for major economic events and news announcements to affect the value of your underlying positions. Given the volatility expressed in the markets it is not uncommon for prices to be a number of pips away on market open from market close. We encourage all traders to take this into consideration before making a trading decision.

### 1.24 MARGIN CALLS AND CLOSE OUTS

Margin calls are triggered when the equity in the account falls below maintenance margin requirement (3% of gross principle value of the contract or 60% margin status on Rakuten FX

platforms). This occurs when your floating losses reduce your account equity to a level that is less than your maintenance margin requirement.

The idea of margin trading is that your margin acts as a good faith deposit to secure the larger notional value of your position. Margin trading allows traders to hold a position much larger than the actual funds the client held in the account. If account equity falls below liquidation margin requirements (2% of gross principle value of the contract or 40% margin status on Rakuten FX platforms), the Rakuten FX trading platform will trigger an order to close all open positions. This occurs when positions have been over-leveraged or trading losses are incurred to the point that insufficient equity exists to maintain current open positions and the account equity falls below liquidation margin level, as a result, all open positions will be closed out (liquidated). The liquidation process is designed to be entirely electronic.

Although the forced liquidation is designed to close positions when the equity in an account falls below the liquidation margin requirements, there may be instances when liquidity does not exist at the exact rate when liquidation is triggered. As a result, equity in an account can fall below liquidation margin requirements at the time orders are filled, even to the point where account equity becomes negative. Rakuten Securities HK recommends that traders use Stop orders to limit downside risk in lieu of using a liquidation as a final stop.

It is strongly advised that clients always maintain the appropriate amount of margin in their accounts. Please refer to Margin Call Policy for more details.

#### 1.25 CHART PRICING VS. TRADABLE PRICES DISPLAYED ON THE PLATFORM

The price displayed on the chart of Rakuten FX trading platform are tradable prices. It is important to make a distinction between prices displayed on charts and execution prices. Price quotes displayed on the charts are determined by the Liquidity Provider by following its price methodology. These prices are derived from a host of contributors such as banks and clearing firms. Any prices displayed by a third-party charting provider, which does not employ the market maker's price feed, will reflect "indicative" prices and not necessarily actual "dealing" prices where trades can be executed.

## TRADING STATION ACCOUNT

#### 1.26 RESET ORDERS

Market volatility creates conditions that make it difficult to execute orders at the given price due to an extremely high volume of orders. By the time orders are able to be executed, the bid/ask price at which a counterparty is willing to take a position may be several pips away.

In cases where the liquidity pool is not large enough to fill a Market Range order, the order will not be executed. For Limit Entry (entry order set with better price than current price) or Limit orders, if the order could not be executed after triggered, it will be reset until the order can be filled. Both Limit Entry (entry order set with better price than current price) and Limit orders are guaranteed by the price but not the execution. Depending on the underlying trading strategy and the underlying market conditions traders may be more concerned with execution versus the price received.

#### 1.27 HEDGING

The ability to hedge allows a trader to hold both buy and sell positions in the same currency pair simultaneously. Traders have the ability to enter the market without choosing a particular direction for a currency pair. Although hedging may mitigate or limit future losses it does not prevent the account from being subjected to further losses altogether. In the forex market a trader is able to fully hedge by quantity but not by price. This is because of the difference between the buy and sell prices, or the spread. Traders are required to put up margin for one side (the larger side) of a hedged position. Margin requirements can be monitored at all times in the simple dealing rates window. While the ability to hedge is an appealing feature, traders should be aware of the following factors that may affect hedged positions.

### 1.28 INVERTED SPREADS

When you trade forex with Trading Station, you are trading on direct price feeds that are being provided by multiple liquidity providers. In rare cases, these feeds can be disrupted. This may only last for a moment, but when it does, spreads become inverted. During these rare occasions, Rakuten Securities HK advises that clients avoid placing At Market orders. While it may be tempting to place a order with inverted spread, keep in mind that the prices are not real, and your actual fill may be many pips away from the displayed price. In the event that trades are executed at rates not actually offered by Rakuten Securities HK's liquidity providers, Rakuten Securities HK reserves the right to reverse such trades, as they are not considered valid trades. By placing Market Range orders or not trading during these moments, traders can avoid the risk associated with the above scenarios.

### 1.29 HOLIDAY/WEEKEND EXECUTION TRADING DESK HOURS

Please refer to the website of the trading hours. Please note that orders placed prior may be filled until the market open and that traders placing trades non trading hours may be unable to cancel orders pending execution. In the event that a Market GTC Order is submitted right at market close, the possibility exists that it may not be executed until Sunday at market open. Please use caution when trading around market close and factor all the information described above into any trading decision.

The open or close times may be altered by the Trading Desk because it relies on prices being offered by liquidity providers to Rakuten Securities HK. Outside of these hours, most of the major world banks and financial centers are closed. The lack of liquidity and volume during the closed impedes execution and price delivery.

### 1.30 GAPPING

The opening prices may or may not be the same as the closing prices. At times, the open prices are near where the close prices . At other times, there may be a significant difference between close price and open price. The market may gap if there is a significant news announcement or an economic event changing how the market views the value of a currency. Traders holding positions or orders over the weekend should be fully comfortable with the potential of the market to gap.

Traders who fear that the markets may be extremely volatile over the weekend, that gapping may occur, or that the potential for weekend risk is not appropriate for their trading style, may simply close out orders and positions ahead of the weekend. It is imperative that traders who hold open positions over the weekend understand that the potential exists for major economic events and news announcements to affect the value of your underlying positions. Given the volatility expressed in the markets it is not uncommon for prices to be a number of pips away on market open from market close. We encourage all traders to take this into consideration before making a trading decision.



### 1.31 MARGIN CALLS AND CLOSE OUTS

Margin calls are triggered when your usable margin falls below zero. This occurs when your floating losses reduce your account equity to a level that is less than your margin requirement. Therefore, the result of any margin call is subsequent liquidation unless otherwise specified.

The idea of margin trading is that your margin acts as a good faith deposit to secure the larger notional value of your position. Margin trading allows traders to hold a position much larger than the actual account value. Trading Station has margin management capabilities, which allow for the use of leverage. Of course, trading on margin comes with risk as leverage may work against you as much as it works for you. If account equity falls below liquidation margin requirements, the Trading Station will trigger an order to close all open positions. When positions have been over-leveraged or trading losses are incurred to the point that insufficient equity exists to maintain current open positions and the account's usable margin falls below zero, a margin call will result and all open positions will be closed out (liquidated).

Please keep in mind that when the account's usable margin falls below zero, all open positions are triggered to close. The liquidation process is designed to be entirely electronic.

Although the forced liquidation is designed to close positions when account equity falls below the liquidation requirements, there may be instances when liquidity does not exist at the exact margin call rate. As a result, account equity can fall below margin requirements at the time orders are filled, even to the point where account equity becomes negative. This is especially true during market gaps or volatile periods. Rakuten Securities HK recommends that traders use Stop orders to limit downside risk in lieu of using a margin call as a final stop.

It is strongly advised that clients maintain the appropriate amount of margin in their accounts at all times. Margin requirements may be changed based on account size, simultaneous open positions, trading style, market conditions, and at the discretion of Rakuten Securities HK.

Please refer to Margin Call Policy for details.

### 1.32 CHART PRICING VS. PRICES DISPLAYED ON THE PLATFORM

The price displayed on the chart is for reference only. It is important to make a distinction between prices displayed on charts and execution prices displayed on the Trading Station. Price quotes are those that offer an indication of the prices in the market, and the rate at which they are changing. These prices are derived from a host of contributors such as banks and clearing firms, which may or may not reflect where Rakuten Securities HK's liquidity providers are making prices. The prices quotes are usually very close to dealing prices, but they only give an indication of where the market is. Executable quotes ensure finer execution and thus a reduced transaction cost. Because the spot forex market lacks a single central exchange where all transactions are conducted, each forex dealer may quote slightly different prices. Therefore, any prices displayed by a third-party charting provider, which does not employ the market maker's price feed, will reflect "indicative" prices and not necessarily actual "dealing" prices where trades can be executed. . In extreme market condition, the execution prices on the TS platform may not show or include in the range of prices quotes displayed on the charts.

### 1.33 HANGING ORDERS

During periods of high volume, hanging orders may occur. This is a condition where an order is in the process of executing but execution has not yet been confirmed.

During periods of heavy trading volume, it is possible that a queue of orders will form. That increase in incoming orders may sometimes create conditions where there is a delay from the liquidity providers in confirming certain orders.

#### 1.34 GREYED OUT PRICING

Greyed out pricing is a condition that occurs when liquidity is not sufficient enough. Rakuten Securities HK does not intentionally “grey out” prices; however, at times, a severe increase in the difference of the spread may occur due to an announcement that has a dramatic effect on the market that limits liquidity. Such greying out of prices or increased spreads may result in margin calls on a traders account. When an order is placed on a currency pair affected by greyed out prices, the P/L may temporarily flash to zero until the pair has a tradable price and the system can calculate the P/L balance.

#### 1.35 DIMINISHING MARGIN

A margin call may occur even when an account is fully hedged, since spreads may widen, causing the remaining margin in the account to diminish. Should the remaining margin be insufficient to maintain any open positions, the account may sustain a margin call, closing out any open positions in the account. Although maintaining a long and short position may give the trader the impression that his exposure to the market’s movement is limited, if insufficient available margin exists and spreads widen for any period of time, it may certainly result in a margin call on all positions.