Risk Disclosure Statement

Introduction

This Risk Disclosure Statement provides you with information about the risks associated with financial instruments offered by VestIn Ltd. ("we" or the "Firm") which you (the "Customer", "you") may trade through services provided to you by the Firm, a company authorised and regulated by the Swiss Financial Market Supervisory Authority FINMA, Laupenstrasse 27, 3003 Bern, Switzerland.

This Risk Disclosure Statement forms part of the Agreement between the Firm and the Customer (as defined in the Firm's Terms and Conditions). Defined terms in the Terms and Conditions shall apply in this Risk Disclosure Statement unless otherwise defined.

The Firm provides the following investment services pursuant to the Agreement: (a) Contract for Difference ("**CFD**") trading; (b) Spread Betting services; and (c) Share Dealing services. The Firm's services are provided on an execution only basis. We do not provide any form of advice in relation to our CFDs, Spread Bets or Share Dealing services.

All financial instruments involve an element of risk. The value of your investment may fall as well as rise and you may get back less than your initial investment. Past performance is not an indication of future performance. If you are in any doubt about the risks involved with using the services of the Firm, you should seek professional advice.

CFDs and Spread Bets are complex instruments and come with a high risk of losing money rapidly due to the leverage often available. You should consider whether you understand how CFDs and Spread Bets work, and whether you can afford to take the high risk of losing your money.

This Risk Disclosure Statement is set out in the following sections:

Section 1: CFDs and Spread Bets

CFDs and Spread Bets are complex instruments and come with a high risk of losing money rapidly due to leverage. You should consider whether you understand how CFDs and Spread Bets work, and whether you can afford to take the high risk of losing your money. We publish a risk warning stating the percentage of retail Customers losing money when investing in CFDs or Spread Bets with the Firm and this is available on our Website.

Description of CFDs and Spread Bets

A CFD is a financial contract that pays the difference in the settlement price between the opening and the closing trades without the Customer owning (or having any rights to) the underlying products, for example shares, indices, commodities or fluctuations in foreign exchange (rolling spot foreign exchange products).

Spread Bets are quite similar to trading in CFDs, with the exception of certain pricing and trade size differences. For example, it is typical for a Spread Bet to be executed in an amount 'per point' movement in the market, whereas a CFD can be traded in a number of contracts or shares representing a set value. It is important that you consider these differences before investing in CFDs and/or Spread Bets. Full information is made available through the Firm's Website and Trading Platform.

Trading CFDs and/or Spread Bets is highly speculative and risky

CFDs and Spread Bets are high risk and complex products. Trading in CFDs in Spread Bets is highly speculative, involves a significant risk of loss and is not suitable for all investors. CFDs and Spread Bets are a risky type of investment and can result in large losses since trading in such instruments may involve leverage, which means a relatively small movement in the market can result in a larger movement in the value of the financial instrument. In this respect, such an event may work against you. CFDs and Spread Bets are only suitable for Customers who: (a) understand and are willing to assume the the risks involved; (b) have sufficient experience and knowledge about trading in CFDs, Spread Bets and leveraged products and understand the concept of margin; and (c) are financially able to bear losses, which could be the Customer's entire invested amount.

Please refer to our Key Information Documents (KIDs) on our Website, which provides you with key information about CFDs and Spread Bets offered by the Firm. This information is required by law to help you understand the nature, costs, risks and rewards of the products offered by the Firm and to help you compare them with other products.

Appropriateness

Before the Firm opens an account for you, the Firm is required to make an assessment of whether the products and/or services you have chosen are appropriate for you, and to warn you if, on the basis of the information you have provided, that any product or service is not appropriate.

We may ask you for information about your financial assets and earnings. However, our assessment does not relieve you of the need to carefully consider whether to invest in CFDs and/or Spread Bets. Any decision to invest is entirely at your own risk. We do not monitor on your behalf whether the amount of money that you have sent us or your profits and losses are consistent with that information. It is up to you to assess whether your financial resources are adequate and what level of risk you take.

If we warn you that investing in CFDs and/Spread Bets may not be appropriate for you on the basis of your knowledge and experience, then you should refrain from trading.

The effect of leverage

Investing in CFDs and Spread Bets provides access to leverage (sometimes referred to as 'gearing'), which can magnify both profits and losses. Leverage allows you to trade in positions larger than your own money.

The effect of leverage makes investing in CFDs and/or Spread Bets riskier than investing directly in the underlying asset. This is a result of the margining system applicable to CFDs and Spread Bets, which generally involves a small deposit relative to the size of the transaction, so that a relatively small price movement in the underlying asset can have a disproportionate impact on your trade. A small price movement in your favour can provide a high return, however, a small price movement against you may quickly result in significant losses. If losses occur, you may be required to pay additional funds on short notice to maintain your position open. If you fail to comply with a request for additional funds, your position may be liquidated.

It is important that you monitor all of your positions closely. **It is solely your responsibility to ensure that sufficient funds are available on your account at all times. The Firm shall not be not liable for losses incurred as a result of margin closures. You are solely responsible for all losses up to the equity in your account. Before deciding to trade on margin, you should carefully consider your investment objectives, level of experience, and risk appetite.**

Trading OTC entails risk

When you enter into a CFD or Spread Bet transaction, you will be entering into an off-exchange (sometimes known as an 'over-the-counter' or 'OTC' contract), which is non-transferable. This means that you will enter into trades in CFDs and Spread Bets directly with the Firm, and also that those trades can only be closed with us. OTC transactions involve greater risk than investing in on-exchange transactions because your ability to place orders with us is solely dependent on our Trading platform and/or our Customer Support Team being able to accept orders from you and execute them. In addition, it may be impossible to liquidate an existing position, to assess the value of the position arising from an OTC transaction or to assess the exposure to risk. There is no central clearing and no guarantee by any other party of our payment obligations to you, so you are exposed to credit risk with the Firm.

No rights to the underlying assets

When you enter into a CFD or Spread Bet transaction, you will have no rights or obligations in respect of the underlying instruments or assets relating to your position. For example, in the case of a CFD or Spread Bet where the underlying asset is an equity, you will not receive any voting rights in that equity stock.

Risks related to holding "long" CFD and Spread Bet positions

Going long" in CFDs and Spread Bets means that you are speculating that the market price of the underlying asset will rise between the time of the purchase and sale. You will generally make a profit if the market price of the underlying asset rises whilst your long position is open. You will however suffer a loss if the market price of the underlying asset falls whilst your long position is open. Your loss will be the difference of the market price of the underlying asset at the time of purchase compared with the one at the time of the sale, multiplied by the amount of CFDs and/or Spread Bets involved. Your potential loss may therefore be bigger than the initial margin required and may be your entire deposit. You might also suffer a loss due to the closure of your position by the Firm in the event that you do not have enough cash on your Account to maintain the position open.

Risks related to holding "short" CFD and Spread Bet positions

Going "short" in CFDs and Spread Bets means that you are speculating that the market price of the underlying asset will fall between the time of the purchase and sale. You will generally make a profit if the market price of the underlying asset falls whilst your short position is open. However, you will suffer a loss if the market price of the underlying asset rises whilst your short position is still open. Your loss will be the difference of the market price of the underlying asset at the time of purchase compared with the one at the time of the sale, multiplied by the amount of CFDs and/or Spread Bets involved. Your potential loss may therefore be bigger than the initial margin required. You might also suffer a loss due to the closure of your position by the Firm in the event that you do not have enough cash on your account to maintain your position open.

CFDs and Spread Bets are not suited for long term investors

Holding a CFD or Spread Bet open for a long period of time is likely to lead to associated costs. Therefore, CFDs and Spread Bets are not suitable for "buy and hold" trading. As a result, if a Customer, does not have enough time to monitor such investment on a regular basis, they should not trade in CFDs and/or Spread Bets. Accordingly, It may be more beneficial for a Customer to buy the actual underlying asset instead. Please refer to the KIDs on our Website for more information in regard to the costs associated with CFDs and Spread Bets.

Risks related to market liquidity

Liquidity risks affect your ability to trade. As a result, you may not be able to trade your CFD or Spread Bet at the specific time that you want to place the trade. In setting our prices, spreads and the size limits in which we deal, we take into account the relevant underlying assets' market. Market conditions can change significantly in a very short period of time. Fluctuations in the market may affect the price and profitability of your positions. In addition, under certain trading conditions it may be difficult or impossible to liquidate a position.

Gapping risk

Gapping is a sudden shift in the price of an underlying market from one level to another, which can be caused by various factors, including economic events or market announcements. Gapping can occur both when the underlying market is open and when it is closed. When these factors occur when the underlying market is closed, the price of the underlying market at reopening can be markedly different from the closing price, with there being no opportunity to sell your instruments before the market opens. This is referred to as 'gapping', and regular stop losses do not protect against such events. The Firm may offer the use of guaranteed stop losses where, for a premium, your defined stop loss is guaranteed by the Firm. Please refer to our Website and Trading Platform for more information.

Prices, margins and valuations set by the Firm may differ from elsewhere

The Firm will provide the prices to be used in trading CFDs and/or Spread Bets, the valuation of Customer positions and the determination of margin requirements. The performance of your investment will depend on the prices set by us and the market fluctuations in the underlying asset to which the product relates. Each underlying asset therefore carries specific risks that affect the result of the CFD or Spread Bet concerned.

Only cash settlement is available

CFDs and/or Spread Bets can only be settled in cash. The difference between the buying and selling price partly determines the result of the investment.

Costs and Charges related to trading in CFDs and Spread Bet

The main cost when entering into a CFD or Spread Bet transaction is the "spread", which is the difference between the buy price (known as the 'ask' or 'offer') and the sell price (known as the 'bid'). In addition to spread, If you hold a position open overnight, an overnight funding adjustment, or "swap", will be applied to your Account. The size of the overnight adjustment is specified for each Instrument on our Website and the Mobile App, and can be a credit or a debit depending on the market and the direction of your position.

Full details of our Costs and Charges can be found on our Website. You should be aware of the possibility that other costs and charges may exist that are not paid through or imposed by the Firm. It is your sole responsibility to bear these additional costs.

Section 2: Share Dealing services

All financial investments involve risk. The value of any investment you make through the Firm's Share Dealing service may fall as well as rise, and you may get back less than your initial investment. Past performance is not an indication of future performance. The Firm is not offering you financial advice and any trading through our Share Dealing service is performed on an 'execution-only' basis.

The risks you will be exposed to when using the Firm's Share Dealing service will vary according to the instruments you instruct us to buy and sell on your behalf.

Description of the Firm's Share Dealing service

Shares, often referred to as "equities" represent a portion of a company's share capital. The extent of your ownership in a company depends on the number of shares you own in relation to the total number of shares in issue.

Shares are bought and sold on stock exchanges and their values can go down. All instruments offered through our Share Dealing service are listed on a regulated exchange (e.g. the London Stock Exchange and NASDAQ), which means that the prices are not set by us. We will act on any instruction that you provide us to buy or sell an instrument on your behalf in accordance with our obligation to provide best execution as set out in our Order Execution Policy and in accordance with our Terms and Conditions. As part of our Share Dealing service, we will arrange for the custody of the Shares.

Registration in name of a Nominee

Instruments purchased by the Firm on your behalf will be registered in the name of a nominee company or our name or a sub-custodian for the benefit of you. Accordingly, you may not have voting rights which you would have had if you held the investment in your own name.

Liquidity Risk

Under certain market conditions it may be difficult or impossible to liquidate a position. This may occur, for example, at times of rapid price movement where market prices rise or fall to such an extent that trading is suspended or restricted under the rules of the relevant exchange.

Values of Shares can go up and down

The value of Shares can go up and down and you may get back less than you originally invested. In respect of shares in smaller companies, there can be a big difference between the buying price and their selling price and there is an extra risk of losing money when such shares are bought or sold. If they have to be sold immediately, you may get back much less than you paid for them.

Perception Risk

The price of Shares is based on demand which depends on investors' perception of a company's future prospects, and general sentiments. If others are pessimistic about a company, the share price will fall. If you sell at that point or if the price does not recover, you get back less than your investment.

Insolvency risk

In the event a company becomes Insolvent, the holders of ordinary shares are the last to be paid.

Costs and Charges related to trading in Shares

Fees and charges are payable by you as a Customer of the Firm in respect of the Share Dealing Services as set out on our Website. Some charges are variable and change in response to market conditions such as volatility, liquidity and economic news.

Section 3: General Trading Risks

No advice

The Firm does not provide investment, tax, legal, regulatory or financial advice relating to investments or its services. You are responsible for managing your financial, tax and legal affairs, which includes making any regulatory filings and payments and complying with applicable laws and regulations.

Any information we provide to you is purely factual and does not take into account your personal circumstances. Therefore, you may wish to obtain independent professional advice from a suitably qualified advisor on any investment, financial, legal, regulatory, tax or similar matter before opening an Account with us or entering into any transactions with us.

General Market Commentary

Market information provided by the Firm to its Customers is not intended to be, and does not constitute, investment advice or personal trading recommendations; it is generic and is based solely on the judgement of the Firm's personnel and does not take into account Customers' personal circumstances. Such information is not, and should not be considered as, advice or a recommendation to buy or sell. Furthermore, the market commentary provided by the Firm is based upon information believed to be accurate and reliable, but the Firm cannot and does not guarantee the accuracy or completeness thereof.

Failure to monitor positions entails risks

We do not monitor positions on your behalf. It is therefore important that you monitor all of the open positions in your Account closely. It is solely your responsibility to monitor your positions and, during the period that you have any open positions, you should always have the ability to access your Account.

The need to monitor your positions is of greater importance when you have entered into leveraged investments (e.g. CFDs and Spread Bets). Leverage magnifies the rate at which profits or losses can be incurred and, as a result, it is important that you monitor your positions closely.

Obligation to maintain margin requirements

You must always maintain a minimum margin on the open positions in your Account. It is your responsibility to monitor your Account balance. You may receive a margin call to deposit additional cash if the margin in your Account is too low. You may need to provide us with additional funds to meet your margin requirement on short notice to maintain your positions open. Failure to do so, may result in your positions being liquidated.

Stop Loss Orders cannot always protect you from losses

The Firm offers you the opportunity to choose Stop Loss Orders to limit the potential losses you can incur from an open position. This option automatically closes your position when it reaches the price set by you. We do not guarantee that a Stop Loss Order will be filled at the price specified.

Volatility

Movements in the price of markets can be volatile. This will have a direct impact on your profits and losses. Monitoring the volatility of an underlying market will help guide you as to where any Stop Loss Orders should be placed. It should be noted that volatility can be unexpected and unpredictable.

You may not be able to close open positions

Due to market conditions which may cause any unusual and rapid market price fluctuations, or other circumstances, the Firm may be unable to close out your position at the price specified by you and the risk controls imposed by the Firm might not work. You agree that the Firm will bear no liability for a failure to do so.

Past performance of a financial instrument is not a reliable indicator

Past performance of a financial instrument is not a reliable indicator of its future performance. The value of investments can go down as well as up. There can be no certainty concerning the future performance of any Share or (in the case of CFD and Spread Bets) any underlying market or asset.

Currency risk

If you trade in a market denominated in a currency other than the Base Currency of your Account, currency exchange fluctuations will impact your profits and losses.

Technical and system failure risks

A failure, malfunction or disruption of any transmission, communication system, computer facility or trading software (whether belonging to the Firm or to any other external party) could occur. Such circumstances may prevent or delay us from executing trades, or prevent you from accessing our Trading Platform and/or our Customer Support team, which may pose a risk to the execution of your trades.

Trading Platform risks

Once you enter an order into the Trading Platform (by clicking "Buy/Sell"), this is immediately executed and thereafter you will not be able to cancel or modify the order. This feature may be different from other trading platforms you have used in the past. You should utilise the demo account to become familiar with our Trading Platform before actually trading with the Firm. By using our Trading Platform, even through a demo account, you agree to the one-click system and accept the risks related to the immediate execution feature.

Electronic communication risks

We permit you to place trades and communicate with us via electronic means, for example via our Trading Platform. Although electronic communication is often a reliable way to communicate, no electronic communication is entirely reliable or always available. If you choose to deal with us via electronic communication, you should be aware that electronic communications can fail, can be delayed, may not be secure and/or may not reach the intended destination.

Trades may be taxable

The tax treatment of your trading activities depends on your individual circumstances, and may be subject to change in future. The Firm does not offer tax advice. You are responsible for any taxes and/or any other duty which may accrue in respect of your use of the Firm's services.

Legal and regulatory risk

A change in laws or regulations made by the government or a regulatory body may increase the costs of operating a business, reduce the attractiveness of an investment and/or change the competitive landscape and by such materially alter the overall profit potential of your investment. This risk is unpredictable and may vary depending on the market for the underlying asset of a given CFD and/or Spread Bet.

Client Money

All funds belonging to you ("client money") shall be held by us in a designated client money bank account and are subject to a right of off-set for your liabilities towards us. The designated client money is segregated from the assets of the Firm and is deemed client money for the purposes of the FINMA rules. No interest will be paid in respect of client money.

Section 4: Additional risks applicable to Professional Customers

Appropriateness

If you are categorised as a professional Customer, the Firm is permitted to assume that you have the necessary levels of knowledge and experience to trade CFDs and Spread Bets with the Firm. It is therefore your responsibility to determine whether your financial resources and risk appetite are adequate for the products and services you use. You are also responsible for informing the Firm if you no longer meet the criteria to be considered a professional Customer.

Loss of Negative Balance Protection

It is possible for adverse market movements to result in the loss of more than your Account balance, so that it becomes negative. Professional Customers are responsible for making additional payments should their account fall into a negative balance. Therefore, professional Customers could lose more than the sum they have invested when trading with the Firm.

Cryptocurrencies

CFDs linked to cryptocurrencies are regulated by the FINMA in the Swiss Confederation, but are only available to professional Customers.

Cryptocurrencies, which are generally unregulated in themselves, are high-risk, speculative investments. The value of cryptocurrencies is extremely volatile. They are vulnerable to sharp changes in price due to unexpected events or changes in market sentiment. You should only invest in CFDs linked to cryptocurrency if you consider that you have the knowledge and experience of, and fully understand the risks associated with, both CFDs and cryptocurrencies.

Additional Services

If we have expressly agreed to provide you with an additional service, we will do our best to make the Customer Support team (or other relevant team) available when required by you. However, during periods of high demand and due to other circumstances outside of our control, we are unable to guarantee that you will always be able to access a member of the relevant team. This may prevent you from taking quick actions and increases the risk associated with investing in our products offered by the Firm.