by the Order of the director of FTM Brokers OOO of October 17, 2019

The procedure for submitting, processing, and executing client orders to fix the price of the underlying asset when performing transactions with non-deliverable OTC financial instruments

- 1. The process consists of two parts: opening and closing of position.
- 2. In order to open a position, the Client has to order the fix of price of basic asset (Order), using the Trading Terminal. The order fixing price asset (Order) indicates all parameters which are important to proceed the operation with the financial instrument chosen by the Client.
- 3. The important parameters of Order are:
 - Financial Instrument;
- Operation type (BUY), (SELL) of the Financial Instrument or close of the current position (CLOSE);
- Volume of Operation (it must be multiple to the minimal possible value of agreed Financial Instrument). The information regarding the minimal volume of operation is available on the Forex website, as well it is programmed at the Forex server. In case of difference in values, the information indicated on the Forex server should be taken as the priority one;
 - Price of Operation (if it can be applied for the chosen Order).
- 4. Order for opening/closing of the position on the Client's Account can be placed in these ways:
 - By placing Market order according to the current price, shown in the Trading Terminal.
 - By placing Limit Order in order to proceed with Operation (buylimit, selllimit, takeprofit «t/p»).
 - By placing Stop Order in order to proceed with Operation (buystop, sellstop, stoploss «s/l»).

5. Order Types:

5.1. Market Order — Client's order to open/close the position exactly after the Forex company receives such order according to the current market price (Actual price) at the moment when Forex company gets such order. With this Order type, the Client shows his desire to complete the Transaction, providing in advance his agreement that the Transaction will be executed at a price relevant for the Forex Company Server. To open a position using a Market Order, the Client needs to click the Buy or Sell button in the Trading Terminal at the moment when the Client agrees with the current prices of the Forex company.

5.2. Pending Order:

The Client's order to perform the Operation in future upon reaching the conditions specified it in accordance with the type of the Pending Order.

Types of Pending Orders:

- Limit Order (BuyLimit, SellLimit, TakeProfit «t/p») the Order type assigned to the Pending Order if such a Pending Order is put up for sale at a price (rate) higher the current market level price or for a purchase at a price (rate) below the current market level.
 - Stop Order (BuyStop, SellStop, StopLoss «s/l») the Order type assigned to the Pending Order of the Client in the event that such a Pending Order is put up for sale at prices (rate) below the current market level or for purchase at prices (rate) above the current market level.
- 6. Execution Type: Market Execution is a type of Transactions, when the Client expresses his desire to complete the Transaction, agreeing in advance that the Transaction will be executed at a price that is current on the Company's Server (without offering new quotes).
- 7. The order to fix the price of the basic asset (Order) is accepted for execution by the Forex company only if there is a sufficient margin security on the Client's Account.
- 8. The order is considered as accepted for execution, and the position is considered as opened after the Client confirms all the essential parameters of the Order and after the corresponding entry appears in the Log File of the Forex Company Server. In the Trading Terminal, a Ticket is assigned to each of Open Positions.
- 9. Orders are executed by the Forex company, whenever it is possible, at an affordable price at the time the order is processed.
- 10. Orders are not executed during the time when the Forex company doesn't operate in the relevant market. Therefore, if the order is accepted during the non-operational time of the Forex company, the price at which the Order can be executed may differ significantly from the price indicated in the Order.
- 11. The Forex company has the right to execute an Order in respect of basic assets transferred outside the Operating Time of the basic asset at the price considered to be appropriate.
- 12. The price at which the Order is executed may significantly differ from the Price specified in the Order, if there is volatility in the price of the basic asset or at the beginning of the operating time of the basic asset. The Forex company has the right to execute the Order at an affordable Price if at the time of execution the Price indicated in the Order will significantly differ from the Price of the basic asset (gap, price gap).
- 13. Any pending Order may be placed, changed, or canceled by the Client during the Operating Time of this Financial Instrument, if the price indicated in the Order differs from the current Market Price by at least the Minimum Level for setting Pending Orders. The size of the Minimum installation levels of Pending Orders is set on the Server of the Forex company, you can study them in the Trading Terminal.
- 14. Pending Orders submitted for execution, but not meeting the requirements of margin deposit, are immediately and necessarily canceled without the Client's acceptance.
- 15. Most of the time, trading is carried out with spreads, minimum levels for setting pending orders and margin requirements indicated on the website of the Forex company. When there may be a unexpected price change of the Financial Instrument, spreads, the minimum installation levels of Pending Orders and margin requirements can be increased, but no more than 10 times compared to those indicated on the website of the Forex Company (levels of placing pending orders on FTM.STANDARD and FTM.PRO accounts can be increased similarly to the values on FTM.COMFORT accounts taking into account the bit depth of quotes).

- 16. Type of Client's Accounts:
 - 16.1. Account FTM.COMFORT:
 - 16.1.1. Execution of Orders in the Market Execution mode.
 - 16.1.2. A Fixed Spread is provided for all Financial Instruments, excluding securities.
 - 16.1.3. Minimum installation level of Pending orders presents constantly.
 - 16.2. Account FTM.STANDARD:
 - 16.2.1. Execution of Orders in the Market Execution mode.
 - 16.2.2. A flexible spread is provided.
 - 16.2.3. The minimum level of installation of the Pending Orders in the main time is not applied.
 - 16.3. Account FTM.PRO:
 - 16.3.1. Execution of Orders in the Market Execution mode.
 - 16.3.2. A flexible spread is provided.
 - 16.3.3. The minimum level of installation of the Pending Orders in the main time is not applied.
 - 16.3.4. Commissions for conducting trading operations are provided for all financial instruments.
- 17. Special rules for the execution of Orders with Financial Instruments, where securities and stock indices act as the basic asset. Based on the characteristics of the Instruments, their rules and conditions of circulation on stock exchanges, the execution of orders with Financial Instruments for securities, may differ in some aspects from the standard rules for conducting Transactions where foreign currency, precious metals, futures contracts act as the basic asset, and also other Underlying Assets, as described above.
- 17.1. For open positions on Financial Instruments, which are based on stock indices and securities, payment of dividends on the Client's Account is not provided.
- 17.2. In some cases, the Forex company may block the amount of the required margin on the Client's Account when placing a pending Order, to open a limit or stop order, on Financial Instruments for securities. Market Orders are not re-quoted. This means that by specifying "Sell on Market" or "Buy on Market", the Client wishes to open a position for sale or purchase on a Financial Instrument for securities at the first available market price of the selected Underlying Asset. If the Client wants to execute a Transaction with a Financial Instrument for securities, and the corresponding Underlying Asset is suspended at that time for Transactions (frozen) on the basic exchange, then the Client's order will be canceled or will remain active in accordance with the rules for performing transactions.
- 17.3. Open positions on Financial Instruments, which are based on securities for which corporations pay dividends, must be closed by the Client no later than on the day preceding the day the register of securities issuing company is fixed (Ex-dividend Date). If the delivery of the these securities underlying the Financial Instrument occurs two operation days after the transaction is concluded (for example, the Instruments based on the securities which are used in trade on the Moscow Stock Exchange), then the transaction must be closed two business days before the fixation day of the register of the issuing company. Positions that have not been closed by the Client may be closed by the Forex company without prior notice to the Client, at the closing price of the day preceding the fixation day of the register of the issuing company.
 - 17.4. Open positions on Financial Instruments, which are based on securities, for which the corporation

has announced the procedure for consolidation or splitting, must be closed by the Client no later than on the day preceding the day the price level changes. Positions that have not been closed can be liquidated by the Company without prior notice to the Client, or in accordance with the changes, the Forex company has the right to recalculate the financial result of such positions.

18. On the above mentioned points, exceptions are possible if they have been agreed individually with the client.