

Key Information Document – Spread Bets on Commodity Futures

Purpose

This document provides you with key information about this investment product. It is not marketing material. The information is required by law to help you understand the nature, risks, costs, potential gains and losses of this product and to help you compare it with other products. This Key Information Document (“KID”) was last updated in June 2019.

Product

The manufacturer of this product is TradeTech Alpha Limited (“TTA” or “Company”). TTA is a regulated investment services firm, authorised and regulated by the Financial Conduct Authority (“FCA”) under license number 607305. Further information about TTA and our products can be found at www.tradetechnicalalpha.com.

Alert

You are about to purchase a product that is not simple and may be difficult to understand.

What is this product?

You are about to trade in a spread bet with the underlying instrument being Futures on Commodities.

What is SPREAD BET?

A spread bet is a tradable instrument which represents a bet between two parties speculating on the direction of a financial market. Spread bets are leveraged products, enabling investors to make transactions with only a small margin (deposit). The underlying instrument is never actually owned by you and the profit or loss is determined by the difference between the buying and the selling price of the SPREAD BET, minus any relevant costs (detailed below).

What is the underlying instrument?

TTA may offer SPREAD BETs on different underlying instruments. In this case it is a SPREAD BET linked to Commodities, Indices, etc. The products we currently offer as SPREAD BETs can be found on our website.

What are Futures? - Futures means a future contract which gives the buyer the obligation to purchase a specific asset, and the seller to sell and deliver the asset at a specific future date, unless such contract is terminated prior to such date for any reason. A SPREAD BET that is linked to a financial instrument which is a Future has an expiration date.

So how do SPREAD BETs work?

When you enter into any order to Buy or Sell a SPREAD BET on one of our trading platforms, you trade with us as our counterparty. We are your Principal to each trade that you enter. Therefore, if your trade is profitable, we lose. If your trade is loss making we earn a profit. Our profits or losses may be reduced by the level of hedging we may undertake to contain our trading risk.

As an example – your account is denominated in EUR and if you enter into a Buy trade for 1 SPREAD BET contract on Oil when the underlying price of Oil is USD 60.00, we will ask you to place a margin with us to enable you to trade. If the margin is say 10:1, this means that as a minimum you will need to place 60.00 EUR with us. If the price of Oil goes to USD 60.50, you will profit 50.00 EUR, minus any relevant costs (detailed below). If it reduces to USD 59.50, you will lose 50.00 EUR, plus any relevant costs (detailed below). Depending on whether we apply any notifications when your account is close to margin calls, we may ask you for more money to ensure your trade / position remains open, otherwise we may be forced to close your position. For more information please refer to our Order Execution Policy.

Objectives

By trading a SPREAD BET you gain an indirect exposure to the underlying financial instrument without owning it. Through your trading with us, you receive exposure to the performance of the underlying asset, but you do not receive any ownership or other rights to such underlying asset. This product is appropriate only for speculative investment purposes.

Intended retail investor

Trading in this product will not be appropriate for everyone. The product would most commonly be utilised by persons who want to generally gain short term exposures to financial instruments/markets; are using (trading with) money which they can

afford to lose; have a diversified investment and savings portfolio; have a high risk tolerance; and understand the impact of and risks associated with margin trading.

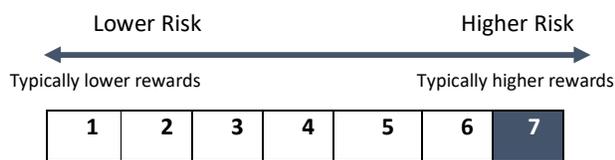
Term

- SPREAD BETs on Futures have an expiration date. Unless the relevant SPREAD BET order is closed by you, the SPREAD BET will be closed at the official settlement price from the exchange on the expiration date of TTA and we will charge you an amount equal to the Spread of the underlying Future. Should a client wish to roll a position to the next contract then it will be their responsibility to contact the trading desk who will be able to roll the positions from the near month to the far month contract at underlying futures price and we will charge you an amount equal to the Spread of the underlying Future being rolled over. This is known as the Expiration Rollover. You should be aware that whenever an Expiration Rollover occurs we will charge you an amount equal to the Spread of the underlying Future being rolled over.

You should be aware that if your margin level reaches or falls below the Margin Close Out Level of 25% or if you are a Retail Client 50%, you will receive a stop out or margin call and all your positions will be liquidated, without notice by us to you.

What are the risks and what could I get in return?

Risk Indicator



Signification of the indicator

This indicator measures the level of risk at which your investment may be exposed.

The risk category is not guaranteed and may shift over time. The lowest category does not mean «risk-free».

The SPREAD BETs on Futures display a grade of 7 on a scale ranking from 1 to 7 (1 being the least risky category). They therefore exhibit (because also of leverage) the highest risk characteristics.

General SPREAD BET risks

- SPREAD BETs are complex financial instruments and are traded Over the Counter (“OTC”). You can only exit a position by trading with us, during the trading hours of the underlying instrument as stated on our website. You cannot transfer your open positions/trades to any other firm.
- You do not own the underlying asset. Through your trade with us, you receive by us exposure to the performance of the underlying asset, but you do not receive any ownership or other rights to such underlying asset.
- SPREAD BETs are leveraged products. You only need a small margin to gain exposure to the underlying asset. Leverage can magnify both your profits as well as your losses.
- Statistically, because of leverage, a significant number of clients lose because leverage amplifies losses, leading to margin calls and closures of clients’ open positions and you risk losing the capital invested with us.
- SPREAD BET trading is undertaken on electronic platforms. There may be times that system or other breakdowns arise. This may affect your ability to trade, or our ability to offer continuous prices or create a need for subsequent adjustment of prices to reflect underlying exchange prices.
- Prices of SPREAD BETs as well as their commercial terms like the spreads and overnight fees maybe varied to reflect periods of actual or expected heightened market volatility.
- Depending on the currency your trading account is denominated in and the currency of the underlying instrument you trade, your final return maybe exposed to the exchange rate risk between the two currencies.
- The tax legislation of your home Member State may have an impact on your return.

Futures specific risks

- SPREAD BETs on Futures have an expiration date. Unless the relevant SPREAD BET order is closed by you, the SPREAD BET will be closed at the official settlement price from the exchange on the expiration date of TTA and we will charge you an amount equal to the Spread of the underlying Future. Should a client wish to roll a position to the next contract then it will be their responsibility to contact the trading desk who will be able to roll the positions from the near month to the far month contract at underlying futures price and we will charge you an amount equal to the Spread of the underlying Future being rolled over. This is known as the Expiration Rollover. You should be aware that whenever an Expiration Rollover occurs we will charge you an amount equal to the Spread of the underlying Future being rolled over.
- Where you have open positions that you do not wish to have rolled over to reflect effectively the new tradable Futures contract, you should close your position(s) and/or cancel Orders before the rollover date. For further information you can refer to our Order Execution Policy available on our website.

- For additional risk on Futures on Cryptocurrencies please also refer to our KID on Cryptocurrencies and our Order Execution Policy both available on our Website.

Performance Scenarios

This is a Key Investor Document for all SPREAD BETs with underlying Futures. You should refer to the performance of the individual underlying instruments such as Commodities, with regard to past performance and performance scenarios as these cannot be presented herein. However, you are cautioned that such products can be very volatile. For more information please refer to our Order Execution Policy.

What happens if the Company is unable to pay out?

If TTA is unable to meet its financial obligations to you, you may lose the value of your investment. However, TTA segregates all retail client funds from its own money in accordance with the UK FCA's Client Asset rules. TTA also participates in the UK's Financial Services Compensation Scheme (FSCS) which covers eligible investments up to £50,000 per person, per firm. See www.fscs.org.uk.

Fees and Charges

- The charges you pay are used to cover the costs of our operational activities, including the costs of obtaining market / price data from the underlying exchanges, the costs of us hedging the trading you undertake with us (if we choose to do so), the staff costs, our regulatory license costs, our funding costs as well as the marketing and distribution costs.
- We may also have trading gains from the trades that you enter with us.
- We do not pay any interest on any clients' money you may have in your account with us.
- Please consult your own advisor to understand the nature of our below costs and charges:

One off costs - At the time of your trade	Spreads	Spread is the difference between the Bid price (selling price) and the Ask price (buying price) and reflects, in part, the spreads of the underlying exchange where the underlying instrument is traded on. Our spreads maybe fixed or variable or may be subject to a minimum. Please refer to our website for more information on the spreads which we charge which may be substantial. You should be aware that whenever an Expiration Rollover occurs we will charge you an amount equal to the Spread of the underlying Future being rolled over.
	Currency conversion rates	Investing in SPREAD BETs with an underlying asset listed in a currency other than your base currency entails a currency risk, due to the fact that when the SPREAD BET is settled in a currency other than your base currency, the value of your return may be affected by its conversion into the base currency.
Ongoing charges	Overnight Rollover Swap	We charge or credit you with overnight fees for facilitating you to maintain an open Buy or Sell position on SPREAD BETs. These are ongoing fees / credits for as long as you have open trades with us. Please refer our Order Execution Policy for more information on these fees.

How long should I hold a trade and can I take money out early?

- You can only exit an open trade by entering into an opposite trade, only with us, during the trading hours of the market of the underlying instrument being made available by us on our website.
- You can request to withdraw your money at any time. We will process withdrawal requests within 24 hours irrespective of payment method. Minimum withdrawal amounts might apply, depending on the mode of remitting funds to you. We do not charge any withdrawal fees, although some banks may charge transaction fees.

How can I file a complaint?

We apply a comprehensive complaints management policy. You are entitled to submit a complaint at any time in your trading experience with us, where you may feel that our service has not met your satisfaction. When you wish to submit a **formal complaint**, you can do so by sending an email to compliance@tradetechalpha.com or in writing to TradeTech Alpha, Broadgate Tower, 20 Primrose Street, London EC2A 2EW.

If upon receipt of our final response on your complaint you are not satisfied or in case no response is received within the 8 week timeframe, you can refer your complaint to the Financial Ombudsman. See www.financial-ombudsman.org.uk for further information.