

# **ENFOGROWTH**

The world's leading multi-asset Contract for Difference (CFD) broker





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# **Chapter 1: EnFogrowth, An Overview**

## 1.1 EnFogrowth Limited Introduction

EnFogrowth Limited (hereinafter referred to as EnFogrowth) is a global multi-asset Contract for Difference (CFD) broker based in the United States, dedicated to providing clients with a wide range of financial instruments to trade, including currency pairs, energy, commodities and indices. EnFogrowth's mission is to build a platform with a superior trading environment for every trader in the world. EnFogrowth provides convenient services to fully meet the trading and investment needs of its clients. In view of this, EnFogrowth's business model takes customer needs as the core, and continuously optimizes the quality of EnFogrowth's services according to the changes of customer needs.

As a globally regulated multi-asset broker, EnFogrowth has deep passion and expertise in the financial sector. Presenting itself as a leader by providing unique services and solutions, EnFogrowth promotes the success of each client in their financial journey. EnFogrowth's founding team consists of a group of experienced and highly professional financial experts who are determined to create a platform that provides fair, transparent and efficient financial solutions. Therefore, EnFogrowth's core goal is to provide quality financial services and to be a facilitator and supporter of our clients on their journey to financial freedom.

- Integrity and fairness: Regulated by the Australian Securities and Investments Commission (ASIC), Licence No. 296805; Vanuatu Financial Services Commission (VFSC), license No. 700455; Customer funds segregated account with National Australia Bank (NAB).
- Ultra-fast execution: EnFogrowth has built a dedicated fibre optic cross link
  in its NY4 data centre in New York to ensure our clients receive the lowest
  latency and fastest transaction execution. This highly specialized
  infrastructure ensures that our clients are able to capture market
  opportunities with maximum efficiency and precision.
- 24-hour online customer service: EnFogrowth adheres to the concept of customer-centric service, in order to ensure timely resolution of customer problems, we have a professional customer service team to



provide efficient service all year round. We always regard the provision of excellent customer support as one of our important tasks and aim to provide our customers with an outstanding trading experience.

As a truly global organization, EnFogrowth combines global scale with locally-rooted service capabilities to drive steady business growth in key markets around the world and serves clients in 150 countries, including North America, Europe, Asia Pacific and the Middle East. EnFogrowth also has offices in Tokyo, Hong Kong, New York, London, Dusseldorf, Dubai, Sao Paulo and many other cities around the world.

EnFogrowth knows how to trade and is dedicated to providing our clients with everything they need to trade in the global market. Since its inception, EnFogrowth has been anticipating and responding to the changing needs of the market, providing investors and traders with a comprehensive selection of product and service tools through continuous and superior operational strategy adjustment and sub-platform operation.

EnFogrowth is entrusted not only to individual and corporate investors, but also to institutional investors such as pension funds, sovereign wealth funds, insurance, banks and non-profit organizations.





## 1.2 EnFogrowth Platform

EnFogrowth is a popular type of trading platform in the retail trading space. The platform is highly customizable and users can customize the charting method according to their trading needs. The power and flexibility of the SA7 platform has made it one of the tools of choice for financial market participants.

At the EnFogrowth platform, we are committed to providing our clients with easy access to trading services whenever and wherever they are. Our trading platform supports multiple devices, and you can use any of them to keep track of the latest developments in the global financial markets anytime, anywhere.

#### 1) Desktop version

The EnFogrowth trading platform is favored and respected by investors worldwide for its intuitive user interface and highly customizable features. The platform offers a flexible strategy program customization feature that allows you to easily customize a strategy program that matches your investment style and preferences to achieve your investment goals more efficiently.

- · More than 250 trading instruments
- · Super fast execution speed
- Support for Intelligent Trading Systems (EA) to automatically place orders and execute trading strategies
- Built-in indicators provide rich market research resources
- · Multiple types of charts and time boxes switch at any time
- Simplified layout for easier operation

#### 2) Mobile apps

The EnFogrowth mobile app is available on all mobile platforms including iOS and Android. You can trade from your mobile device anytime, anywhere. The mobile app version of Priectw platform has market order, pending order, stop loss, stop profit and powerful charting features. Provides you with an efficient



reliable, secure and flexible trading platform that enables you to easily manage your forex trading account on your mobile device.

- View live quotes
- · Trade anytime, anywhere
- Multiple order types and execution modes
- View transaction history
- · Nine kinds of schedule
- The 30 most popular indicators of technical analysis
- 24 analytical charting tools

#### 3) Trading flow

#### Start your trading journey with EnFogrowth in just 4 steps:

- Open an account: About 2 minutes for quick registration
- Authentication: Verify your identity information
- Deposit funds: You can choose from a variety of deposit methods
- Start trading: Start trading seven products immediately





## 1.3 Platform Vision and values

The goal of the EnFogrowth platform is to build a world of multi-asset contracts for Difference (CFD) trading with advanced technology at its core, enabling passionate traders to face the challenges and opportunities presented by global markets, while at the same time, focusing on innovation, continuous improvement and leveraging previously unavailable cutting-edge technology. In addition, staffed by experts from the financial services industry, management team has extensive experience in the Forex, CFD and equity markets in Asia, Europe and North America, and it is this experience that enables the EnFogrowth platform to select the best technology solutions and hand-pick some of the best pricing providers in the market.

#### 1) EnFogrowth Vision

The vision of the EnFogrowth platform is to create the best and most transparent trading experience for retail and institutional clients, providing superior spreads, execution and service to allow traders to focus more on their trades and reap a steady stream of high returns. In seeking to bridge the gap between retail and institutional clients, the EnFogrowth platform offers trading solutions that were previously only available to investment banks and high net worth individuals, and has revolutionized the trading market model and landscape:

- Trading with a high performance trading platform
- Access global markets through multi-asset trading platforms
- · Trade anytime, anywhere, on any device

#### 2) EnFogrowth Core values

The EnFogrowth platform strives to be the global leader in multi-asset Contract for Difference (CFD) brokerage, creating an autonomous, efficient and transparent asset trading environment where traders and investors can trade any size with confidence, Without having to worry about the fairness and transparency of the platform, the reliability of data security and privacy protection, or the integrity and robustness of its order management system.



The EnFogrowth platform creates a fair and ideal environment for investors to invest, trade and manage digital assets. Therefore, EnFogrowth's core values are to ensure the fairness and transparency of the global process of trading, and to meet the regulatory compliance needs of security, audit, reporting, analysis and other aspects in the safest and most efficient way.

With a professional investment team and the trading philosophy of "robust, standardized and professional", EnFogrowth platform has accumulated rich long -term asset management experience, solid investment performance, and investment returns have exceeded the industry average for many years. Unique in diversified asset allocation, professional asset management, innovative asset driving and other fields, EnFogrowth has been recognized by many institutional investors and customers, forming its unique brand influence.

## 1.4 EnFogrowth's core advantages

EnFogrowth offers clients a wide range of CFDS trading products such as forex, metals and commodities, stock indexes, etc. Is a low spread platform worthy of trust from traders and investors.



#### 1) 6 reasons to join EnFogrowth

Multiple secure deposit methods, funds will be securely segregated in top bank accounts are regulated.

- · As low as 0 spread
- · Execute speed quickly
- · A trusted regulatory platform
- · Provide market expertise



- Free Forex courses
- 24/7 customer service

#### 2) Trade anytime, anywhere

You can use it on all your favorite platforms and devices, trade anytime, anywhere, stay connected to your account and call market trends anytime, anywhere.

EnFogrowth provides the optimal trading environment to meet the trading needs of all types of users:

- Servers are connected to the Equinix NY4 data center in New York
- Connect to top liquidity quotes via OneZero bridge
- · Orders close quickly in milliseconds

#### 3) A fast and transparent trading experience

EnFogrowth offers a wide range of trading tools and fully transparent order execution conditions.

- · Orders close quickly in milliseconds
- No trader intervention
- Extremely deep liquidity quotes
- · Low latency data server









#### 4) Easy access to money

At present, our deposit methods include:

- Quick payment method
- US: Zelle/PayPal/Wise/Venmo
- Canada: Interac e-Transfer

#### Wire Transfer method

- Local wire transfer: applicable to interbank fund transfer within the same country/region, the transfer speed is fast, usually within 1 working day. Lower handling fees.
- International wire transfers: For funds transferred between banks across borders, the transfer may take slightly longer and usually takes 3-5 business days to arrive. The fee is relatively high, but still within the reasonable range of the industry.
- Cryptocurrencies support ETH/BTC/USDT, please consult customer service for other currencies

#### 5) Fund security guarantee

EnFogrowth is a trusted and reliable broker and your funds will be fully protected.

- Corporate regulatory practices
- · Custody with financial services institutions such as major banks
- Separation of customer funds accounts



# **Chapter 2: Global Top Teams**

Strong talent backing is a solid force for the innovation and development of EnFogrowth. EnFogrowth has a wide range of talents, including senior executives and core management team with more than 10 years of experience in Forex and CFDS, precious metals and commodities, index trading, commercial factoring, supply chain finance, trade finance.

## 2.1 Core investment advisory team

Travis -- Leads EnFogrowth's venture capital and new crypto investments. His responsibilities include sourcing, analyzing and executing investments, as well as helping EnFogrowth portfolio companies raise additional capital. Prior to joining EnFogrowth, Travis was a mergers and acquisitions attorney at Skadden Arps. He graduated from the University of Michigan Law School with a Juris Doctor degree and holds a bachelor of Science degree in finance from Emory University's Goizueta School of Business.

Jigar Shah - Responsible for day-to-day functions in financial accounting and reporting. He also supports the finance function of the subsidiary. With a career in financial services, most recently at Brookfield Asset Management, and previously at SS&C Technologies, as well as Lightfoot Capital Partners and Ernst&Young, LLP, Jigar brings fantastic experience to this role. He holds degrees from New York University and Pace University.

Casey - works to connect and facilitate collaborations between EnFogrowth, subsidiaries, investors and a broader network. She is both the primary contact for all post-investment support as well as EnFogrowth's strategic initiatives and partnerships. With a career in venture capital and nonprofit technology advocacy, Casey brings valuable experience to teams that use data, research and community organizing to support emerging technologies.



Jeff Smith - A data analyst and data modeler who develops and maintains financial data models and algorithms, including market data, transaction data, risk data, etc., to support foundation decisions using statistical analysis and machine learning techniques to build predictive models and risk models, identify market trends, predict risk, and optimize portfolios. Analyze large amounts of financial data to uncover underlying patterns and trends in the data and advise business units on data-driven decision making. Work with cross-functional teams, including risk management, investment strategy and technology teams, to implement the integration and application of data models and algorithms.

## 2.2 Technology development team

Goddard -- an internationally renowned data engineer, Goddard has served as a key position in a number of world-renowned Internet big data research centers, is responsible for the application research and development of basic Internet technologies, participates in many internationally renowned projects, and is a pioneer in the field of foreign exchange technology.

Harvey -- Graduated from the Department of Computer Science at Yale University, and obtained a doctorate degree in computer and big data. As an architect and database expert, he has been engaged in database application, data warehouse and big data development in the commodity trading industry for a long time, and has rich project development experience.

Lambert is a world-renowned index trading expert and a global leader in the commercial application of index trading technology. He is a former member of the American Business Council, a PhD in sociology at Columbia University, and a researcher at the Center for Financial Research. He is an authority in the application of intelligent financial technology in the world.

Meredith -- With 15 years of experience in technology development and authoritative influence in the development of underlying technologies in the financial system, Meredith has been a research scholar, engineer and leader in both academia and business during her career. She has held various engineering management positions at Google and Amazon.



Roice Morrison -- Financial systems developer, started working in the Forex industry in 2013 and has worked on several CFD projects.

Wolf Carr -- holds a Master's degree in Mathematics and a PhD in Computer Science from the University of California, USA, with a focus on applied cryptography. He was an architect at RSA Security, a leading provider of information security and encryption solutions in the world, and a core developer of RSA Go ICOFM products.



## 2.3 Consulting Team

Blythe Masters - Worked at jpmorgan Chase for 27 years and made outstanding contributions to the bank's derivatives business. Once the "first sister" of Wall Street's commodities trading world, Blythe became a managing director at age 28, making her the youngest female executive in jpmorgan's history. She has held several senior positions at jpmorgan Chase, including chief financial officer. As the mother of Credit Default swaps (CDS), she conceived the \$58 trillion derivatives market, which is also credited with helping to fuel the 2008 financial crisis. Blythe Masters came to global attention again in 2014 when she joined Digital Asset Holdings (DAH).

Michael Minkevich, one of the world's leading computer technology application developers, graduated summa cum laude from the Department of Computer Science and Economics at the University of Minnesota in 1995. He



received his Ph.D. in Computer Science from the University of Washington in 1996. He held senior positions at several IT companies including Apple, SGI, Microsoft, and Google, where he was responsible for the development of key technologies in Google's Artificial Intelligence division. With more than 15 years of global IT services operations, he focuses on complex application development powered by numerous digital technologies.

David Megway -- has earned industry recognition for his career in Financial services, previously at Goldman Sachs, as well as Morgan Financial Group and Ernst&Young, LLP, Jigar. He was involved in the merger of Chase Manhattan Bank and J.P. Morgan Investment Bank.

Chris Weston -- 19 years of industry experience. A highly respected expert in the financial services sector, Chris has advised retail and institutional clients at IG, Merrill Lynch, Credit Suisse and Morgan Stanley in strategic research as well as sales and trading roles. Chris' extensive research in the Forex, securities and fixed income markets enables him to provide in-depth market insights, strategic research, opinion analysis, and risk management.





# **Chapter 3: EnFogrowth Trading Markets**

As the world's fastest growing financial services provider, EnFogrowth offers its customers a wide range of financial products and superior online trading services.

### 3.1 Forex

Foreign exchange, also known as the "Forex market" or "Forex trading market." According to statistics, the average total turnover of the forex market is more than \$7.5 trillion per day. The Forex market is a decentralized global market (OTC market) that is used for exchange between national currencies. Market participants use foreign exchange for a variety of purposes such as hedging international currency and interest rate risk, speculating on geopolitical events and diversifying their investment portfolios. Most trades made in tradable financial markets, including stock and bond markets, have a traceable impact on the forex market.

#### Why choose to trade Forex?

- Trade both ways, up and down
- · Zero commission and low trading fees
- Leverage up to 500x
- Flexible trading hours 24 hours, 5 days a week
- Top liquidity Protection quote transparency

EnFogrowth's carefully selected product range gives investors 24/7 access to the world's most popular and liquid markets for the best trading opportunities.

 Forex CFDS: EnFogrowth gives traders the opportunity to trade in the world's most liquid financial markets 24 hours a day, five days a week.
 Traders can take advantage of some extremely small spreads, superior



execution and deep liquidity in multiple currency pairs.

- Handicap: EnFogrowth offers variable spreads on Forex trading. Pricing is made up of over 25 different liquidity providers, ensuring that our spreads and liquidity depth remain tight.
- Forex Standard Accounts: EnFogrowth offers standard accounts with no commission and a minimum spread of 0.0 points.
- Forex Demo Account: Demo accounts allow traders to practice their trading strategies online and familiarize themselves with our Forex trading platform in a risk-free environment. All of EnFogrowth's demo trading accounts have the same features as real trading accounts.





## 3.2 Precious Metals & Commodities

Ever wonder why some traders like to trade commodities? One reason is that commodities make up a big part of our lives, from cotton to coffee to oil to gas, and that trend is here to stay. At EnFogrowth, we offer all our clients the most competitive trading environment and trading costs for the world's major commodities.

What are Precious Metals and Commodities?

Precious metals are precious metals that are widely recognized in the market and used as monetary reserves or industrial raw materials, such as gold, silver, platinum and palladium. These metals usually have a high investment value due to their unique characteristics in terms of limited supply, high scarcity, having stable market demand and relatively high price volatility.

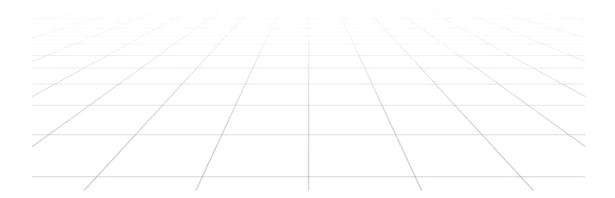
Commodities refer to raw materials and commodities that are traded on global markets, such as oil, natural gas, iron ore, soybeans, cotton, coffee, corn, and so on. These commodities are usually used for production and consumption, and their prices are affected by a variety of factors, such as market supply and demand, political factors, and natural disasters. Precious metals and commodities are often important choices for investors seeking to diversify their portfolios, as they can provide a store of value and a hedge against risk in times of market volatility.





#### Why trade in precious metals and commodities?

- Stay on top of the market
- Attract investors with lots of trading opportunities
- Open and transparent prices with no hidden fees
- Top liquidity Protection quote transparency
- Equinix NY4 server executes orders quickly



## 3.3 Stock Indexes

Trading indices on the Priectw platform allows you to participate in indices from major markets around the world.

What is Index trading?

Stock index trading refers to stock price index trading, referred to as stock index, also known as index trading. It is to select a group of representative stocks and measure their performance or value in the whole stock exchange or a certain category of the stock exchange. The value of a stock index is calculated by taking a weighted average of the prices of the constituent stocks of the index on that exchange.



Index CFD trading can help traders take advantage of the opportunities presented by the changing market conditions of the economic sector. Index CFDS cover all major global indexes, which allows traders in one country to participate in global markets.

#### Why choose stock index trading?

- Minimum 0.01 lot flexible trading lot
- · Stay on top of market trends
- Trading leverage of up to 1:500x
- Top liquidity Protection quote transparency
- No stamp duty and low transaction costs
- Equinix NY4 server executes orders quickly

EnFogrowth has a large selection of indices from around the world, including Australia's S&P 200, UK's FTSE 100, US E-Mini S&P 500 and US Dow Jones. Indices have the advantage of allowing traders to look more broadly at a basket of stocks, rather than focusing on just one stock. On trading products, the EnFogrowth platform offers online CFDS and futures based indices.

- (Spot) Stock index spreads: EnFogrowth offers competitive spreads for all spot indices, for example, E-mini S&P 500 Index from 0.4, FTSE 100 index from 1, Xetra DAX index from 1 and S&P 200 index from 1.
- Futures indices: In addition to equity indices, EnFogrowth also offers futures indices: such as the ICE Dollar Index and the VIX index.

How do I determine if a client is entitled to dividends on the AUS200 index?

From the example above, we assume that the ex-dividend date of the AUS200 index is August 18, 2024. Therefore, the client must hold an open position in the AUS200 index until Aug 18, 2024, and must remain open until Aug 18, 2024, for the dividend adjustment of \$2.44 per lot. Determining whether the dividend adjustment is added to or deducted from the client's account will depend on whether it is a sell or buy on AUS200.



If the client holds 1 lot of AUS200 to buy, the client will be entitled to \$2.44 per lot. However, if it is a sell of AUS200, the customer will be deducted \$2.44 per lot. The amount of \$2.44 per lot will be converted into the customer's base currency before the deduction.

As this is from the AUS200 index, the dividend is adjusted to A \$2.44 per lot. Alternatively, if the index is \$500, the dividend is adjusted to \$2.44 per lot. EnFogrowth displays in chart form the expected indices that will adjust their index points in a given week, and the actual amount of ex-dividend adjustment for each index will be updated regularly on EnFogrowth's blog ex-dividend adjustment.

## 3.4 CFDS Solution

Priectw offers flexible trading conditions for a wide range of CFDS, covering indexes (stock indexes, term indexes), energy, precious metals, commodities, and more.

CFDS stand for "Contracts for Difference" and are contracts where two parties agree to exchange the difference in value of a security, instrument or other asset between the opening and closing times of a CFD.

CFDS are an extremely versatile product that is growing in popularity as a short-term investment tool. They provide an efficient way to maximize an investor's capital expenditure, and can help diversify an investor's existing portfolio or hedge positions. Some of the advantages of trading CFDS are listed below.

#### 1) Speculate in rising and falling markets

CFDS are derivatives based on the underlying instrument. There is no ownership of the underlying asset, but they allow investors to participate in the price movements of the asset. This means that investors can profit from both rising and falling markets.

In a rising market, an investor may want to buy a CFD and sell it at a later date. This is called "going long." In a falling market, an investor may want to sell a CFD position first and then buy it back at a later date when the position is closed. This is called "shorting."



#### 2) Use capital efficiently

CFDS are leveraged products that enable traders to increase their exposure to the underlying asset with a small initial outlay. When an investor opens a trade, the investor deposits only a small percentage of the value of the position, which is called margin. The investor's margin will vary based on the value of the investor's CFD position. Leverage can bring additional gains if the market is in the investor's favor, but it also carries risks that can lead to increased losses if the investor's position is unfavorable to the investor.

#### 3) Hedge against other investments

The ability of CFDS to go "long" and "short" means they are an excellent tool to hedge an existing portfolio. They are a cost-effective alternative to selling a portfolio too early and can be used to provide "insurance" against adverse price movements.

For example, if an investor has a long-term portfolio that they wish to keep, but the investor believes there is some short-term risk to the value of that portfolio, an investor can use CFDS to "hedge" the investor's position. If the value of the portfolio falls, the profit the investor makes on the CFDS will offset the investor's loss on the portfolio.

#### 4) Flexible contract sizes

The contract size of CFDS is usually smaller than the typical contract size of the underlying instrument, which means that investors do not need to make a large deposit to gain exposure to the price movements of the instrument. The flexible size allows the investor to tailor the investor's trade to the investor's risk management criteria.

#### 5) Access to global financial markets

CFDS allow traders access to a wide range of global markets that would otherwise be difficult to access. CFDS make it easy to trade commodities such as gold, silver, and oil as well as various global indices without having to trade the futures contract itself.



# **Chapter 4: EnFogrowth Account system**

## **4.1 Account Overview**

EnFogrowth offers both standard and ECN accounts for you to choose the one that suits your needs.

EnFogrowth is committed to providing traders with a safe, transparent and efficient trading environment, ensuring that every trade is executed quickly. EnFogrowth's standard accounts provide you with low spreads and no commissions while enabling ultra-fast trade execution. While EnFogrowth's ECN account provides you with zero spreads and low commissions, guaranteeing a safe and secure trading environment.



- EnFogrowth Standard accounts have low spreads, zero commissions and rich features, while EnFogrowth has established partnerships with various top liquidity partners and dark pools to ensure that EnFogrowth's trading quotes have the highest liquidity and the best quotes.
- ECN accounts enjoy ECN trading conditions exclusively for



institutions/securities firms, offering convenient trading with high transparency and enjoying highly competitive trading costs. As a must-have account for professional traders, ECN accounts are the best option to enjoy the best trading conditions.

## 4.2 Standard Account

For professional traders, EnFogrowth standard accounts offer excellent stable trading conditions and are indispensable trading accounts.

#### 1) What is a standard account?

EnFogrowth's standard account is a must-have account for professional traders, offering excellent stable trading conditions without paying any fees for trading.

EnFogrowth works with various top liquidity partners and dark pools to provide you with quotes from multiple sources to ensure liquidity and quote accuracy.

#### 2) Reasons to choose a standard account?

EnFogrowth's standard account offers traders ultra-fast trade execution with low spreads and no commissions. EnFogrowth's trading system operates over the Equi nix fiber network to maximize trade speed and execution efficiency. If you are new to trading, EnFogrowth's standard accounts will be ideal for you.

- 0 Fees: Standard accounts do not require any fees
- Stable trading environment: Cooperate with various financial institutions for in-depth quotation and stable trading
- No trader intervention: Your trades will be automatically executed directly in the market



### 4.3 ECN accounts

An ECN account is a must-have account for professional traders, offering low spreads and low commission trading conditions, an account that meets the needs of experienced traders.

#### 1) What is an ECN account?

ECN accounts are the best choice for trading specialists who are looking for the best trading conditions, trading with a no trader intervention mode, traders are able to enjoy the advantages of low spreads, high-speed trading and precise quotes.

#### 2) Why choose an ECN account?

EnFogrowth ECN accounts offer low spreads and low commissions, as well as a safe and stable trading environment, making them a must-have account for professional traders.

- 0 Fees: Standard accounts do not require any fees
- Stable trading environment: Cooperate with various financial institutions for in-depth quotation and stable trading
- No trader intervention: Your trades will be automatically executed directly in the market

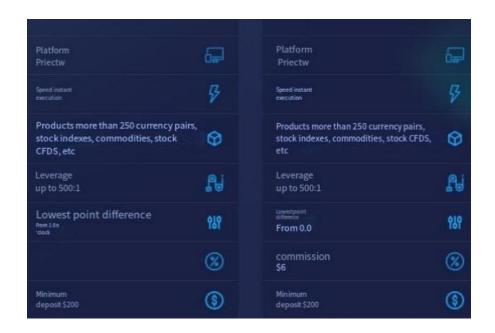


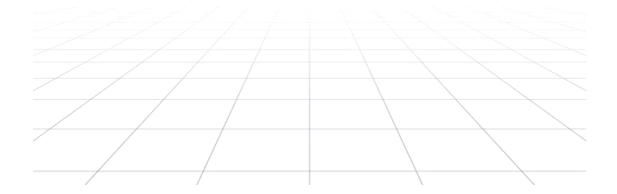


# 4.4 Comparison of account types

EnFogrowth is committed to providing traders with a safe, transparent and efficient trading environment that ensures that every trade is executed quickly.

EnFogrowth's standard accounts provide you with low spreads and no commissions while enabling ultra-fast trade execution. While EnFogrowth's ECN account provides you with zero spreads and low commissions, guaranteeing a safe and secure trading environment.







## 4.5 Account Protection

#### 1) The account funds are guaranteed

EnFogrowth provides full protection for your account funds when you trade on the EnFogrowth market.

- Separate protection measures for client funds from the company's own funds
- Have an outstanding industry reputation
- Trust and commitment as core values

#### 2) EnFogrowth's servers

EnFogrowth's main servers are located in the most reliable data center in the world - Equi nix NY4 in New York. This is a standalone physical server that connects to different top banks and quote providers via the OneZero bridge. This allows EnFogrowth to provide you with a superior trading experience and the best quality quote services.





# **Chapter 5: Global Client Diversification Services**

# 5.1 Sovereign wealth clients

For a long time, EnFogrowth has been entrusted by important sovereign wealth management institutional clients to carry out services, and has accumulated rich experience in sovereign fund investment management. With excellent performance, perfect investment management system and strict risk control system, EnFogrowth has won the favor of sovereign wealth clients from different countries and regions all over the world.

EnFogrowth is diliaent and responsible in sovereign capital investment management, and has achieved excellent investment performance, which has been highly recognized by customers. At present, sovereign wealth mainly consists of fiscal surplus, foreign exchange surplus and public funds such as pension funds. For a long time, EnFogrowth has deeply grasped the capital characteristics and investment needs of sovereign wealth funds, such as large volume, long investment period, wide investment scope strategic allocation, and provided customized product strategy solutions to help customers continuously improve investment performance and optimize investment layout. At the same time, relying on EnFogrowth's overall comprehensive strength, EnFogrowth provides customers with a full range of comprehensive financial services.

#### 1) Asset class

The asset class allocation is carried out by the client, and the solution is designed and the specified asset direction is invested according to the client's exclusive allocation needs.

#### 2) Risk appetite

According to the customer's risk preference, we will design investment solutions for different income requirements of customers, and provide diversified income strategies for different capital types of customers.



#### 3) Allocate requirements

Based on customer asset allocation requirements, we provide investment solutions for multi-asset allocation, such as major assets/precious metals/overseas assets.

#### 4) Other services

Customized design strategies according to customers' special needs or designated investment intentions.

## 5.2 Clients in the financial industry

With strong investment and research capabilities, EnFogrowth provides financial institutions with personalized and customized products and outsourcing services, including one-to-one (multiple) special accounts, investment consultants, etc., with full coverage of market strategies, and the investment scope covers the primary market, primary half market and secondary market, in order to meet customers' differentiated risk-return demands.

#### 1) Special account products

According to the needs of customers in different dimensions such as capital attributes, use plans, investment objectives and risk tolerance, EnFogrowth accurately describes the characteristics of customers' risk and return needs. Combined with EnFogrowth's years of experience in serving various industrial customers, it accurately matches a variety of investment strategies to meet customers' investment needs and objectives. In addition, EnFogrowth also relies on strong investment research capabilities and rich service capabilities to industrial customers, and constantly introduces more innovative and investment value strategy methods.

### 2) Public offering fund products

EnFogrowth has a relatively rich product line of public and private funds in the industry, covering assets of different risk levels around the world, and can provide customers with a comprehensive and rich choice. At the same time,



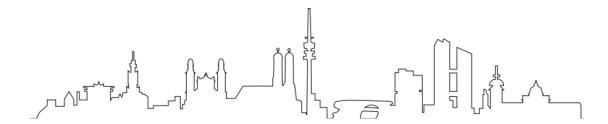
EnFogrowth also uses EnFogrowth's leading asset allocation solutions and FOF investment solutions to provide professional institutional clients with personalized solutions for investing in public fund products.

#### 3) Investment advisory services

In addition to acting as manager in specific products, the company can also act as investment consultant for products issued or managed by industrial institutional clients. Relying on advanced investment management system and perfect risk control process, customers can obtain investment research capability output and customer service experience consistent with direct investment in EnFogrowth products.

#### 4) Other services

EnFogrowth can give full play to its advantages in industrial research and industrial resource integration, and cooperate with customers at all levels to form a win-win situation.



## **5.3 Corporate Clients**

EnFogrowth's corporate finance business aims to deeply understand and explore the financial service needs of corporate customers, and provide comprehensive financial solutions to corporate customers by leveraging EnFogrowth's full asset management license, professional investment and research capabilities, and a wide range of partners. Priectw has served more than 500 well-known enterprises and achieved consistency recognition.

#### 1) Corporate finance



Cash management: As a commonly used cash management tool, money funds have many advantages such as low risk and good liquidity. Since the first product was issued in 2005, the company has 17 years of experience in monetary fund investment management. At present, the company has established an independent 7-member cash investment team, which has won six awards, forming an investment management style of "seeking progress while maintaining stability".

 Special account management: According to the different risk preferences of the enterprise investment, the financial investment can be tailored for the enterprise's special account investment program. EnFogrowth has rich experience in special account management, relying on the company's investment research system can provide a rich portfolio for corporate customers to choose.

#### 2) Enterprise annuity

Has been selected as an annuity investment manager by nearly 500 companies. In terms of annuity investment management, EnFogrowth adopts the management model of integrating enterprise annuity and occupational annuity portfolio. Through forward-looking research, EnFogrowth guides various types of investment from the asset allocation level, and combines the in -depth exploration of various types of asset alpha to find sustainable income sources.

#### 3) Debt investment and financing

Provide debt financing services for corporate clients covering standardized and non-standardized financing methods, and can act as investors, managers, investment advisers and other roles. Among them, the asset securitization business has always maintained the leading edge of the industry. In addition to the continuous growth of the scale and number of products, it has also developed a number of products with innovative influence.

#### 4) Equity investment and financing

The team has long paid attention to the upstream and downstream of the industrial chain, has rich project resources, and is committed to providing customers with services such as mergers and acquisitions, strategic restructuring and private equity financing. EnFogrowth has the strategic perspective of merger



and integration and extensive resource network to support the rapid growth of corporate customers. The team accumulates professional financial skills and keen industry insight, and tailor-made corporate financial solutions for customers.

## 5.4 International Clients

With more than 20 offices in Southeast Asia, Europe, North America and other regions, EnFogrowth serves more than 100 million individual and institutional clients worldwide. Since its inception, EnFogrowth has been a trusted partner for institutional clients, serving more than 2,000 institutional clients in 22 countries and regions on 5 continents with over US \$50 billion in client investments under management, including sovereign funds, central banks, pensions, insurance and other professional institutional clients. At the same time, EnFogrowth is widely recognized by the industry and has won several important international awards.





# Chapter 6: Resource advantage and sustainable development

## 6.1 Integration of core resources

Thanks to the advantages of continuous development and innovative technology, extensive commercial application of foreign exchange and refined governance, EnFogrowth is competitive in the following aspects:

- Technical team: EnFogrowth has a very mature and strong technical support, has accumulated rich industry and technical experience in CFD, foreign exchange, finance, trading, investment and other fields, and has made industry-leading breakthroughs in the development and application of underlying technologies. The EnFogrowth team perfectly brings together senior people with many years of practical operating experience in the CFD industry and profound insights into the development of the industry.
- Industry resources: EnFogrowth signs strategic cooperation agreements
  with top projects in target industries to provide strong support for
  EnFogrowth to enter the forex scene, so as to truly promote the
  actual landing of EnFogrowth applications. Industry Partners include:
  Goldman Sachs, IDG Capital, Accel Partners, Fidelity Investment Group,
  IBM, etc.
- Liquidity support: EnFogrowth has rich resources and numerous partners
  in the industry, and has cooperated with a number of banks, active
  communities, investment funds, and professional investment institutions
  to provide sufficient liquidity for the platform. EnFogrowth has a
  professional quantitative team to connect with the market depth of the
  world's leading exchanges, provide aggregate fragmented liquidity
  solutions, support high-frequency quantitative trading, and adapt to the
  API interface set of fast programmatic trading.
- Powerful trading tools: With the maturity of the market, the complexity of trading demand becomes larger, and the simple trading and trading function can no longer satisfy the appetite of professional investors. EnFogrowth, with its senior experience in securities investment and combined with artificial



intelligence deep learning technology, provides professional investors with a richer suite of trading tools, including automatic investment tools, quantitative trading tools, strategies, etc. At the same time, it also enables ordinary investors to easily access professional multi-asset CFD tools, lowering the investment threshold and making trading more popular.

- Business governance: Unlike other projects, EnFogrowth has a clear and defined strategic plan for the target sector and continues to enable free, fair and high-value ecological prosperity through the model of an autonomous community. EnFogrowth is more focused and professional with decentralized, immutable and encrypted security and the characteristics of peer-to-peer transfer of value to penetrate the target industry and quickly gain market share.
- Fund management: EnFogrowth's fund management is guided by the Investor Protection Fund, strictly adhering to the principles of fairness, impartiality and openness, and taking the development of the platform as the primary purpose. The Investor Protection Fund is dedicated to keeping and ensuring the safety and sustainability of the funds. All use of the funds will be disclosed to all investors on a regular basis to ensure that the use of the funds is open.
- Room for growth: EnFogrowth's target industry is the trillion-dollar financial and derivatives market. The development team has developed a sound governance structure to effectively manage matters such as general procedures, code management, financial management, compensation management and privileged operating scope to ensure sustainable development.

With the support of core competitiveness, EnFogrowth's commercialization logic is clear, each technical link and organization has a strong target and logic gene, and on this basis, many modular and reformed technical solutions or mechanisms are proposed.



## **6.2 Capital Support**

EnFogrowth signs strategic cooperation agreements with top projects to provide strong support for cutting into target scenarios, in order to truly promote the global development of EnFogrowth's business. Partners include Goldman Sachs, IDG Capital, Accel Partners, Fidelity Investment Group, IBM and others. In addition, Digital Currency Group, RRE Ventures, Distributed Capital, Andreessen Horowitz and others are EnFogrowth's core capital backers.

#### 1) Morgan Stanley

It is one of the world's leading international financial services companies, covering investment banking, securities, investment management and wealth management. The company has more than 1,200 offices in 37 countries around the world, and its employees are dedicated to serving enterprises, governments, institutions and individual investors.

Morgan Stanley was one of the first international investment banks to enter China and has achieved excellent performance over the years. It ranked 261st on the 2012 Fortune Global 500 list. Morgan Stanley has nine divisions, including Equity Research, Investment Banking, Private Wealth Management, Foreign Exchange/Bonds, Commodity Trading, Fixed Income Research, Investment Management, Direct Investment and Institutional Equities. The financial sectors involved in Morgan Stanley include stocks, bonds, foreign exchange, funds, futures, investment banking, securities underwriting, corporate financial consulting, institutional corporate marketing, real estate, private wealth management, direct investment, institutional investment management, etc.

#### 2) Merrill Lynch

Founded in 1885, Merrill Lynch is one of the world's largest financial management consulting firms, as well as the world's largest global integrated investment bank, it has a place in the financial world's Jingling name, Merrill Lynch provides a range of financial services to meet the needs of individual and institutional investment clients. Today, The company has branches and representative offices in 37 countries and regions on six continents, with more than 700 offices and 15,700 financial advisers worldwide, making it one of the largest



wealth management companies in the world.

#### 3) Goldman Sachs Group Inc

Goldman Sachs Group is an international investment bank founded in 1869 in New York, USA. It is also one of the oldest and largest investment banks in the world. Since its establishment, Goldman Sachs Group has been committed to providing a range of financial services to a wide range of clients in various fields such as enterprises, financial institutions, governments and individuals. Goldman Sachs ranked 57th on the Fortune 500 List in the United States in 2022, and 96th on the Hurun Global 500 List in 2022 with RMB 805 billion.

#### 4) Bear Stearns Co

Bear Stearns is a financial services company founded in 1923 and headquartered in New York, USA. The company's business mainly covers corporate financing and mergers and acquisitions, sales and trading of institutional equities and fixed income products, securities research, private client services, derivatives and other fields. Now it has become one of the global top 500 enterprises. Is one of the world's leading financial services companies.

## 6.3 Sustainability

As a long-term value investor with a global perspective, EnFogrowth is increasingly integrating environmental, social and corporate governance considerations into its investment evaluation decisions, in addition to financial returns. Focusing on the "Sustainable Value Investment Strategy", EnFogrowth provides investors with multi-asset CFD trading solutions covering the whole life cycle in the fields of technological innovation, green environment, financial capital and corporate services, helping clients to maximize their potential and create outstanding projects with high quality and sustainability.

 In terms of sustainable value investment strategy, EnFogrowth empowers investors comprehensively and deeply through various means such as capital, talent, operation, resources and technology, optimizes resource allocation, injects solid growth momentum into the market, cultivates and supports more sustainable business development models



in the social and economic fields, achieves sustainable growth and promotes economic and social development.

In terms of sustainable value investment creation, EnFogrowth applies
innovation from basic science and basic technology to traditional trading
market in a comprehensive and deeply integrated way, and integrates
black technology, hard technology and original technology with traditional
trading to empower the industry, transform traditional operating model,
empower multi-asset CFD, and support global recovery.

#### 1) Governance structure

EnFogrowth's Board of directors maintains close communication with the management team, employees and customers, and the diverse backgrounds of the Board members ensure that the Board assesses EnFogrowth's management and operating conditions, business risks, and the overall ability to hold the management team accountable.

#### 2) Support the long-term benefits of our clients

EnFogrowth's investment steering team works closely with companies around the world to gain insight into issues that may affect long-term financial sustainability and help investors fully assess the quality of management.

#### 3) Promote staff development and improve management level

EnFogrowth actively manages the environmental impact of its operations and is committed to developing talent internally in a variety of ways, promoting diversity and inclusion, helping employees plan financially for themselves and their families, and encouraging employees to give back to the community.



# 6.4 Anti-money laundering measures

EnFogrowth has over 50 security staff, including veterans who assess peripheral risks and PHDS in cryptography who work on crypto attack analysis. There are also nearly a hundred compliance people who comb through money laundering by examining transactions. In addition, we also do a lot of work with law enforcement. Follow strict identity verification procedures to comply with regulations such as AML(anti-money laundering), and track and monitor transactional assets sent to and from its website.

EnFogrowth has also set up a project review committee made up of renowned institutions and professionals. The committee consists of several functional departments. At the same time, an authoritative third-party rating agency is introduced to independently review the compliance risks existing in the project. Third-party authorities participate in the review to ensure that the review results are true, objective, reasonable and credible. In this way, the compliance of the platform and the security of users' investment and income are guaranteed.

EnFogrowth has also appointed an independent external auditor to complement our operational processes and ensure compliance. We maintain appropriate controls and monitor the transfer of confidential and sensitive customer information inside and outside the company on a need-to-know basis. We do not knowingly disclose customer information unless requested by a customer or required by law to do so.

## 6.5 Regulation of Funds

The financial services sector is increasingly monitored and requires a safe, healthy and financially sustainable environment where clients can focus on maximising returns without having to worry about whether their capital/profits are being maintained in any way.

EnFogrowth maintains a strict capital structure segregated, with client funds held by a dedicated third party entity that only manages client funds. These



funds are managed completely independently of any and all of the company's internal capital. As such, all movements in the client funds account are based on the trading activity of the client funds.

As a leading online trading broker, EnFogrowth is subject to strict oversight from a number of financial regulators and segreates client funds from the platform's working capital in a Client Funds Segregated Account at the National Australia Bank (NAB) to ensure sufficient funds are kept in segregated client bank accounts. To maximise the security of client funds. In addition, EnFogrowth understands the importance of withdrawing funds to its customers and is always committed to providing you with a safe, fast and high-quality withdrawal experience.

- Convenient withdrawal methods: EnFogrowth offers a variety of withdrawal methods, both principal and profit can be withdrawn through online application.
- Efficient automated process: Automated withdrawal application submission and processing, which improves the speed and accuracy of withdrawal.
- Specially-assigned follow-up system: During work and trading days, online customer service will answer all the questions feedbacks from customers in a timely manner.

## 6.6 Compliance

EnFogrowth is currently licensed by ASIC and VFSC and continues to build compliance recognising the importance of complying with all relevant laws, rules, regulations, policies and standards. As a regulated entity, EnFogrowth meets strict financial standards, including capital adequacy and audit requirements.

 ASIC: The statutory regulator for financial services and markets in Australia, simply the regulator and the Regulatory Authority, the Australian Securities and Investments Commission was established in 2001 under the Australian Securities and Investments Commission Act. Asic is an independent regulator of companies, investment practices, financial products and services. The Australian Securities and Investments Commission (ASIC) is the regulator of



the retail forex industry in Australia and the Australian Securities and Investments Commission (ASIC) is the regulator of financial services and markets in Australia. EnFogrowth has been granted regulation by the Australian Securities and Investments Commission (ASIC) under licence No. 296805.

• VFSC: The Vanuatu Financial Licence, a financial institution operating permit, is the official document that authorizes a financial institution to conduct business. The licence is issued by and regulated by the Vanuatu Financial Services Commission (VFSC). The VFSC Financial license is a new trend in the regulation of the global forex industry. At present, as one of the few developed offshore financial regions in the world, Vanuatu's financial industry is receiving strong support from the government. Support a variety of transaction services, such as: remittance business, payment industry, foreign exchange trading, commodities, securities trading, financial consulting, etc. EnFogrowth has been licensed by Vanuatu Financial Services Commission (VFSC) under license number 700455.

In the future, EnFogrowth will continue to increase the construction of compliance and apply for regulatory licenses from many countries and economic entities, such as SCB, CMA, CySEC, FCA, BaFin and DFSA.

- SCB: The Securities Commission of The Bahamas (Securities and Exchange Commission of the Bahamas), is an important national financial regulator in the Bahamas. In recent years, its regulatory authority has been highly recognized by the global market and investors, and has attracted much attention and pursuit in the industry. Its important function is to supervise the conduct of funds, securities and other financial services companies, and is responsible for the formulation of industry-related laws and regulations to ensure that the market operates in a fair, healthy and orderly environment.
- CMA: The UK Competition and Markets Authority. On 7 April 2021, the UK government formally announced the creation of the Digital Market Unit to prevent digital tech giants from using their market dominance to stifle competition and innovation. The new unit will be set up within the UK's Competition and Markets Authority (CMA). The CMA Principles are designed to guide the continued development and use of financial management services to help people, businesses and the economy fully benefit from innovation and growth.



- CySEC: The Cyprus Securities and Exchange Commission is the financial regulator of Cyprus. As a member of the European Union, CySEC's financial regulation and operations are aligned with the EU MiFID financial system. A large number of overseas Forex retail brokers and binary options brokers are registered with CySEC. CySEC undertakes responsibilities including: regulation and control of the Cyprus Stock Exchange and its trading, its listed companies, brokers and brokers. Regulation and control of licensed investment service companies, private equity funds, investment advisers and public fund management companies. Licensing to investment companies, including investment advisers, brokerage firms and brokers. Regulate the market and penalize brokers, brokerages and investment firms for violations. It also penalizes individuals or legal entities that violate regulations.
- FCA: Financial Conduct Authority, the Financial Conduct Authority. It regulates banking, insurance and investment businesses, including securities. The UK has one of the best and most robust financial services in the world and, through the Financial Conduct Authority (FCA), strictly regulates all financial institutions domiciled within its borders. The FCA will be less tolerant of risk than the FSA, and will be more inclined to take a precautionary approach rather than sit back and let damage happen. Such an approach would also mean greater use of judgement, that is expertise, to judge whether harm to consumers is likely to occur and intervene accordingly based on this forward-looking analysis.
- BaFin: BaFin, created on 1 May 2002, represents a fully integrated supervisory model by bringing together the Federal Banking Supervisory Authority (BAKred), the Federal Insurance Supervisory Authority (BAV) and the Federal Securities Supervisory Authority (BAWe). It consolidates the former offices of BAKred, BAV and BAWe into a single financial supervisory authority and brings together the functions of banking, financial services and insurance services. BaFin is a federal agency administered by public law by the Minister of the Federal Ministry of Finance. It has the character of law. The two offices, in Bonn and Frankfurt, oversee 2,700 banks, 800 financial services institutions and more than 700 insurance institutions.



• DFSA: Dubai Financial Services Authority, which is the independent financial services regulator for the Dubai Financial Centre. It oversees 580 entities, 445 authorised companies, 117 DNFBPs, 16 registered auditors and 2 authorised market bodies. The DFSA's regulatory mandates include asset management, banking and credit services, securities, collective investment funds, custody and fiduciary services, commodity futures trading, Islamic finance, insurance, international stock exchanges and international commodity derivatives exchanges. In addition to regulating financial and ancillary services, as the sole independent financial services regulator of the Dubai International Financial Centre (DIFC), the DFSA is also responsible for overseeing and enforcing anti-money laundering (AML) and anti-terrorist financing (CTF) requirements applicable to the DIFC. The DFSA has also received authorisation from the DIFC Companies Registry (RoC) to investigate the affairs of DIFC companies and partnerships involved in DIFC Companies Law and major offences and to provide enforcement remedies to registrars.





# **Chapter 7 Policies & Statements**

## 7.1 Terms of Use

#### 1) Your use of the EnFogrowth Website

We want your visit to the EnFogrowth website to be enjoyable and worthwhile. We also hope you come back often and use it to provide a variety of services. EnFogrowth Limited (together with its subsidiaries and affiliates, "EnFogrowth") makes all reasonable efforts to ensure that the information contained on the EnFogrowth Website is accurate and reliable; However, from time to time errors may occur. You should note that the material on the EnFogrowth website is provided "as is" without warranties of any kind, express or implied. EnFogrowth does not warrant that the features contained in the materials will be uninterrupted or error-free, that defects will be corrected, or that the EnFogrowth Website or the servers that host the EnFogrowth Website are free of viruses or other harmful components. EnFogrowth does not warrant or represent that the materials on the EnFogrowth Website are correct, accurate or reliable. You (and not EnFogrowth) bear the full cost of all necessary services, repairs or corrections made to your property or operations as a result of the use of the EnFogrowth Website.

To the fullest extent permitted by law, EnFogrowth and its affiliates disclaim all express and implied warranties of merchantability, fitness for a particular purpose and non-infringement. If you live in a state that does not allow disclaimers of implied warranties, our disclaimers may not apply to you. By using the EnFogrowth Website, you assume the following risk at your own discretion: despite the efforts of EnFogrowth, your Internet service provider and you, the Internet and online communication mediums may not function as expected.

You have no right to post on or transmit to the EnFogrowth website any illegal, threatening, defamatory, libelous, obscene, defamatory, inflammatory, pornographic or profane material, or any other content that may give rise to civil or criminal liability. References to funds or securities anywhere on the Website are not intended to constitute research and should not be construed as a recommendation to buy, sell, or hold the Fund or any other securities unless an express offer is permitted. For example, we provide the most recent prospectuses and application forms for mutual funds that you can use to invest.



Security prices are for your information only. They are based on information that we believe to be reliable, but we do not represent them as accurate or complete and therefore they should not be relied upon. The prices reflect EnFogrowth's good faith efforts to determine a fair valuation. These valuation levels do not necessarily assume an immediate liquidation of the position and may not be realized after liquidation. There is no indication that actual trades can be made at these levels. Market conditions, trade size, and other factors may affect the price that Strong usually receives.

#### 2) Hyperlinks to other websites

We may sometimes provide "hyperlinks," also known as "links," to other companies' websites. We will provide these links when we believe there are other websites that may be of interest or helpful to you.

This is done as a convenience to you and should not be taken as an endorsement by EnFogrowth of any website, company, product or service. The following links from or to third party websites are at your own risk. While we make every effort to provide links only to sites that we believe to be valuable and accurate, we cannot be responsible for the content or accuracy of the information provided on such sites, and we specifically disclaim any liability for any loss or damage you may suffer directly or indirectly as a result of your use of them. We reserve the right to discontinue links to third party websites at any time.

You may not create links from third party websites to EnFogrowth websites without EnFogrowth's prior written permission. Links from other websites to EnFogrowth websites must be resolved into the top-level home page of the EnFogrowth domain with EnFogrowth's prior written permission. To avoid confusion, if you link to the EnFogrowth Top-level home page from another website, your website, as well as the link itself, may not indicate that EnFogrowth endorses, sponsors, or is affiliated with any non-EnFogrowth website, entity, service, or product, And may not use any EnFogrowth trademark or service mark other than the trademark or service mark contained in the linked text.

#### 3) Copyrights and trademarks

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EnFogrowth, the EnFogrowth logo, and all related names, logos, product and service names, designs, and slogans are trademarks of EnFogrowth or its affiliates or licensors (" EnFogrowth Marks "), except that third party trademarks and service marks are the property of their respective owners. You may not use any such marks without the prior written permission of EnFogrowth or the respective owners.

Any use of the EnFogrowth mark by third parties must first obtain EnFogrowth's Written permission and must be used in the specified form and registered service mark name.

#### 4) Forward-looking statements

Forward-looking statements made on our website and in other materials in the Company's information area are forward-looking statements. You can identify these forward-looking statements by the use of words such as "outlook," "believe," "expect," "potential," "continue," "may," "should," "seek," "approximately." "Predicts," "intends," "will," "plans," "estimates," "anticipates," or negative forms of these words or other similar words. Forward-looking statements are subject to a variety of risks and uncertainties.

Such risks and uncertainties include, but are not limited to, the adverse effects of declines in the securities markets or declines in the performance of EnFogrowth's products, the general economic downturn, competition from other companies, changes in government policy or regulation, the inability of EnFogrowth to attract or retain key employees, the inability of EnFogrowth to implement its operating strategy and acquisition strategy, and the inability of EnFogrowth to manage Manage rapid expansion and unforeseen costs and other impacts related to legal proceedings or investigations by governments and self-regulatory organizations. Opinions on the EnFogrowth website have been prepared based on information available at the time of writing such opinions. Changes or additional information may cause such opinions to change.



#### 5) Miscellaneous provisions

A portfolio manager's view may differ from that of other portfolio managers, as well as EnFogrowth. In general, EnFogrowth accounts are managed according to the needs and goals of each client. Because investment goals, tax considerations, and other factors vary from account to account, individual account holdings and characteristics may vary. Portfolio characteristics are subject to change without notice.

The past performance of any account or fund managed by EnFogrowth is not indicative of its future performance. At the time of sale, your investment may be worth more or less than the original cost.

The material contained on the EnFogrowth website should not be considered legal, tax, investment, financial or other professional advice. In preparing the information contained on the EnFogrowth website, EnFogrowth does not take into account the investment needs and objectives of any particular investor. You are advised not to rely on any information contained on the EnFogrowth website in making an informed decision. Decisions based on the information contained on the EnFogrowth website are your sole responsibility, and before making any decisions based on that information, with or without the assistance of a securities advisor or other advisor, you consider whether the information is appropriate for: your specific investment needs, goals, and financial situation.

The information presented herein is not directed to any investor or any class of investor and is provided only as general information about our products and services and otherwise to provide general investment education.

None of the information contained herein should be construed as a recommendation to participate or not participate in any investment-related course of action, as EnFogrowth Limited (and its affiliates, "EnFogrowth") does not undertake to provide unbiased investment advice, to act as an unbiased adviser, or in a fiduciary capacity in relation to the material provided herein. If you are an individual retirement investor, please contact your financial advisor or other non-EnFogrowth trustee to find out whether any particular investment philosophy, strategy, product or service described herein is appropriate for your situation.

EnFogrowth data, including employee and asset under management data, reflects the collective data of the individual affiliated investment advisers of



EnFogrowth's subsidiaries. EnFogrowth's history and timeline includes the history and business expansion of all EnFogrowth subsidiaries, including predecessor entities and acquired entities. Investment professionals mentioned include portfolio managers, research analysts/associates, traders, product specialists, and team-specific economists/strategists.

#### 6) Your acceptance of these terms

These Terms of Use apply regardless of the channel through which you access the EnFogrowth website. Your use of the EnFogrowth Website constitutes your acceptance of the terms contained herein, and you may not use the EnFogrowth Website unless you agree to these Terms of Use. You may reject these Terms at any time by leaving the Site.

## 7.2 Scams and fraud Alerts

EnFogrowth is aware of certain fraudulent and illegal activities whose name, logo, and identity have been exploited by unknown perpetrators involved in various investment scams. These perpetrators employ a range of methods to target individuals, such as fake social media accounts, fraudulent websites/domains, emails, text messages, phone calls, mobile apps, dating apps, comparison sites and social messaging platforms. In order to appear legitimate, they may even use the names, titles, or photos of real EnFogrowth employees. Always exercise caution when dealing with unsolicited investment advice, requests for personal information, and sales calls or emails, as Lubomay does not engage in investment solicitation in this manner. Before making any investment decision, please contact your EnFogrowth contact person or investment advisor via a verified phone number or email address

and initiated by you. It is very important to be alert and to stay alert for potential scams.

#### Specifically, be aware of the following:

- Unsolicited investment advice or requests for personal information received by unverified persons.
- · Requests to make payments to a bank account in the name of an individual, a



third party, an unknown company name, or through a payment intermediary.

- Any changes to the domain (email/website) that occur during the course of the communication.
- Offering unrealistically enticing returns that are too good to be true.
- Expresses urgency to complete an investment or payment.
- Request additional payments to release investments that have already been made.
- Spelling and grammar errors in communications or documentation.
- Requests to send money through social media messaging apps and/or platforms.

If you suspect that you have been a victim of fraud, it is important to contact your bank immediately, as the bank may be able to assist in recovering the funds. In addition, it is critical to report the incident to law enforcement in your jurisdiction immediately.

If you notice any suspicious activity or scams allegedly involved, contact us immediately. Thank you for your cooperation in helping us fight fraud programs.

## 7.3 Policies Required by law

From time to time, EnFogrowth receives requests for information about its clients from law enforcement agencies around the world. We aim to provide you and law enforcement with information on how to handle these requests.

When contacting EnFogrowth, law enforcement is generally interested in two types of data: information about the identity of the customer and information about their trading activity. When a request for information is received, EnFogrowth requires that it be accompanied by the appropriate legal process. This may vary from location to



location. For example, production warrants, search warrants and subpoenas, and requests for voluntary data disclosure may all constitute legal proceedings. EnFogrowth reviews each order and voluntary disclosure request to determine that it has a valid legal basis, and that any response is strictly tailored to ensure that only data is provided that law enforcement is entitled to obtain.

EnFogrowth welcomes law enforcement agencies to inquire about its policies and procedures. To help expedite the review of information requests, law enforcement requests should provide the following information:

- Name of law enforcement agency;
- proof of the officer's authority to request information (certificate of authorization) and current position in the law enforcement agency;
- Proof of the identity of the law enforcement officer (such as ID number);
- a letter of investigation issued by a law enforcement agency;
- · email address from a government domain;
- the name of the specific legal entity from which you are requesting information;
- the specific content of the request for customer information;
- other details, including 1) stating reasonable deadlines and 2) mutual legal assistance treaty requests for international law enforcement.

EnFogrowth also reserves the right to disclose information to authorities in order to protect itself and its customers.



### 7.4 Disclaimer

EnFogrowth, operating under the name "EnFogrowth", is a financial services company regulated by the Vanuatu Financial Services Commission. The information provided on EnFogrowth's website is of a general nature only and does not constitute personal financial advice. Before acting on any information on this website, you should consider whether the information is appropriate to your goals, financial situation and needs. Investing in CFDS and margin forex contracts carries significant risks and may not be suitable for all investors. You may lose more than your initial deposit. You do not own any interest in the underlying assets. We recommend that you seek independent advice and ensure that you fully understand the associated risks before trading. Always read and consider the disclosure documents before purchasing any product listed on the website. The information and advertising provided on the EnFogrowth website is not directed to any person in any country or jurisdiction that may violate local laws and regulations. The products and services offered on the EnFogrowth Website are not directed to residents of the United States, Iran and North Korea.

EnFogrowth is a member of the Finance Committee. The Financial Commission is an international dispute resolution body established specifically for financial services in the foreign exchange market. The FSC provides an independent dispute resolution mechanism for traders who are unable to resolve disputes directly with their own financial service providers who are also members of the FSC. The compensation Fund established by the FSC also provides traders with additional protection.

Nothing in this White paper constitutes legal, financial, commercial or tax advice and you should consult your own legal, financial, commercial or other professional advisers before engaging in any activity in relation to this. The staff of the Platform, members of the project research and development team, third party research and development organizations and service providers shall not be liable for direct or indirect damages and losses that may result from the use of this white paper.

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