



INGOT BROKER LLC

## Financial Services Guide

### Margin FX and CFD's

October 2021

Enclosed is a document you must read and understand as it forms the basis of INGOT Broker LLC (**INGOT Broker**) dealings with you under the Client Agreement and other Agreements you have entered with INGOT Broker from time to time. You should obtain your own independent financial advice as to whether Margin FX Contracts are appropriate for you





## FINANCIAL SERVICES GUIDE

### 1. ABOUT THIS FINANCIAL SERVICES GUIDE (FSG)

This Financial Services Guide is designed to provide you with important general information regarding our services and is typically issued prior to providing you with any of our financial products or services. The information contained within this guide includes the following:

- Who we are and how you can contact us;
- The services we are authorised to provide to you;
- How you can communicate with us;
- How we are remunerated for these services;
- The disclosure documents and statements you will receive;
- Our internal and external dispute resolution processes; and
- How we deal with your personal information.

This FSG was reviewed in September 2020. All information contained in the FSG has been obtained from sources believed to be accurate and is subject to ongoing reviews.

Please contact us if you would like further information on this FSG or on any of our services.

We, INGOT Broker LLC are authorised to provide the following financial services to retail and wholesale clients:

- deal in foreign exchange contracts and derivatives;
- provide general financial product advice in relation to foreign exchange contracts and derivatives; and
- make a market in foreign exchange contracts and derivatives.

### 3. FINANCIAL PRODUCTS WE OFFER

INGOT Broker LLC offers the following financial products to its Customers:

- Margin FX Contracts in respect of all major currencies and currency crosses;
- CFDs based on the following Underlying Instruments:
  - Shares and other securities (Share CFDs);
  - Share indices (Index CFDs);
  - Gold and silver (Bullion CFDs);
  - Commodities (Commodity CFDs);
  - Equity index futures contracts (Index Futures CFDs);
  - Exchange Traded Funds contracts (ETFs CFDs); and
  - Cryptocurrencies
- Such other products as are notified to you from time to time.





#### **4. OUR ADVICE POLICY**

We will only provide you with general advice about the markets related to our financial products which does not take into account your specific objectives, financial situation or needs. In this instance, you should seek independent professional advice to ascertain whether our advice is appropriate.

INGOT Broker will not provide you with personal advice. In particular, we will not advise you when and if to open, maintain or close a position. Any discussions with INGOT Broker LLC employees about their view of current or future market conditions or prospects for a particular product should not be seen as personal advice as we neither collect, nor take into consideration, information regarding your financial circumstances and needs except to the extent that they are relevant to your transaction requests. In all cases, we recommend that you take every reasonable step to fully understand the outcomes of specific trades and strategies in relation to utilising the advice provided by us.

#### **5. USING OUR SERVICES**

If you wish to utilise INGOT Broker LLC services you may issue instructions in person, in writing, by email, via the telephone or via such other method as may be mutually agreed between us, unless we tell you that instructions can only be given in a particular way. Instructions, given to us whether they confirm or revoke an instruction, commitment or notice of request do not take effect unless actually received by us.

If you wish to deal in one of our financial products you may do so directly via the INGOT Broker LLC Platform or by telephone. You may give us instructions via the INGOT Broker LLC Platform or by telephone during business hours.

Before you log onto the INGOT Broker LLC Platform to deal in one of our financial products or ask us to deal in one of our financial products by telephone, it is important that you understand the risks, costs and benefits of dealing in that financial product. For information on the risks, costs and benefits related to our financial products you should turn to the PDS document.

#### **6. OTHER DOCUMENTS YOU MAY RECEIVE**

##### General transaction documents

We will provide you with the relevant documentation to facilitate the requested transactions. These may include, but not be limited to Client Agreements, Terms and Conditions, Privacy Policy, account opening applications, and deal confirmations.

##### Factual information

We can provide you with written factual information regarding current or historical market rates when required.



## 7. WHO WE ACT FOR

INGOT Broker LLC is responsible for the financial services we provide to you.

INGOT Broker LLC is a market maker, not an agent, when dealing in its financial products, which are off market over-the-counter (OTC) derivatives. Accordingly, INGOT Broker LLC may act as principal in all transactions with you in respect of these financial products offered by us.

## 8. WHAT OUR FINANCIAL PRODUCTS COST YOU

Our Product Disclosure Statements provide details about specific transaction fees and costs associated with our financial products. However, please note that there may be commissions payable on foreign exchange or for trading in financial products, including Margin FX Contracts and Contracts For Difference with INGOT Broker LLC. We generally make our revenue by earning the spread in the rates quoted to you (buy/sell spread) when you seek to transact with us.

The common fees and charges when dealing in such financial products may incorporate any or all of the following:

- payment of margin;
- margin adjustments;
- rollover charges calculated at our rollover rates;
- interest charges applied to debit balances;
- commission in the case of Share CFDs and ETFs; and
- administration fees.

## 9. REMUNERATION OF OTHER BENEFITS RECEIVED BY OUR EMPLOYEES

Employees and Directors of INGOT Broker LLC who provide you with advice and execution services may receive remunerations for the provision of these services by way of salary and other employee benefits.

A discretionary cash bonus may be paid to employees and directors as part of their remuneration, based on their performance or the performance of their business unit. Some INGOT Broker LLC employees earn a performance-based commission and/or other monetary rewards calculated by reference to the financial products they sell and whether they achieve or exceed their sales targets. For example, employees may earn commission for new accounts opened. Such commissions are based on the volume of accounts opened per month and the amount of such commission earned will vary between employees. Amounts of volume-based commission may vary between \$0 and \$250 for a new account and there is a cap on the amount an employee can earn from such commissions.

## 10. REFERRAL BENEFITS FOR OTHER SERVICES PROVIDERS

You may have been referred to us by a service provider who may receive financial or non-financial benefits from us. These should have been disclosed to you by the service provider in question. INGOT Broker LLC may pay all or a portion of the fees, costs and charges charged by INGOT Broker LLC or provide other benefits to introducing advisers and referrers for the introduction or referral of customers to us. We may receive commission from third parties where an INGOT Broker LLC customer utilises the third party's product in connection with their trading with us. We may also pay commission to third parties where a product or service of the third party is used in connection with an account held by a customer with us. Any amount paid to introducing advisers and referrers is negotiated on an individual basis and is typically based on a sliding scale which takes into account:

- the number of customers the introducing adviser or referrer introduces or refers to INGOT Broker LLC; and
- the number of trades made by customers introduced or referred to INGOT Broker LLC

In addition to the above, INGOT Broker LLC may pay a fixed fee to introducing advisers and referrers for each customer they refer.

Please note that such benefits **will not** impact transaction fees or margins payable for transactions undertaken with INGOT Broker LLC. We will provide details of any referral benefits that relate to your transactions on your reasonable request prior to us providing you with any of our financial services.

## 11. DISCLOSURE OF ANY RELEVANT CONFLICTS OF INTEREST

We do not have any relationships or associations which might influence us when providing you with our services.

## 12. MAKING A COMPLAINT

INGOT Broker LLC has an internal dispute resolution process in place to resolve clients' complaints timely and fairly. Clients who wish to file a formal complaint must do so by contacting us through our "Contact Us" page on our website along with any relevant attachments. We will seek to resolve your complaint within prescribed timeframes that may reasonably be required given the nature of the complaint. We will investigate your complaint and provide you with our decision and the reason on which it is based, in writing.

Following the investigation of your complaint, if the issue has not been resolved to your satisfaction after submitting the complaint, you may wish to contact the Saint Vincent and the Grenadines civil courts. INGOT Broker LLC will inform you if there are exceptional circumstances where we require further time to resolve your dispute; however, most disputes should be resolved within 30 days.

## 13. OUR RECORD KEEPING OBLIGATIONS

We will maintain comprehensive and accurate records of your client transactions and advice provided.

#### **14. OUR PRIVACY POLICY**

We are committed to protecting your privacy. The information you provide to us and any other information provided by you in connection with your transactions will primarily be used for the processing of your application and for complying with certain laws and regulations. We have systems and processes in place which safeguard against the unauthorized use or disclosure of your personal information.

Please contact us if you have any concerns or if you would like to see a copy of our privacy policy or visit the INGOT Broker LLC website.

#### **15. OUR CONTACT DETAILS**

You can contact us by

Telephone: +16469719620

Internet: [www.INGOTBrokers.com](http://www.INGOTBrokers.com)

Email: [customerservice@INGOTBrokers.com](mailto:customerservice@INGOTBrokers.com)