

Client Account Letter
开户协议

This is a legal contract between MMIG NZ, its successors and assigns, and the party (or parties) executing this document.
本文件为具有法律效力的合同，由MMIG NZ、其承继人或受让人与签署本文件的一方（或多方）共同订立。

To create an account to buy and/or sell Contracts For Difference (hereinafter referred to as "CFD s"), futures, in dices, foreign exchange, and/or Straight Through Processing system - STP (hereinafter referred to as "STP") /Electronic Communications Network - ECN(hereinafter referred to as "ECN") with MMIG NZ, Client acknowledges that Client has been advised and understands the following factors concerning trading in leveraged Over-The-Counter(hereinafter referred to as "OTC"), in addition to those contained in the following Risk Disclosure Statement and the Bankruptcy Statement which have been provided to Client.

客户为通过直通式处理模式系统（以下简称“STP”）/电子网络交易模式（以下简称“ECN”）购买或出售差价合约（以下简称“CFD s”）、期货、股指、外汇和/或股票，请在MMIG NZ开立账户，应确认已获得建议，并理解下述有关杠杆场外交易（以下简称“OTC”）的条款以及向客户提供的风险披露声明和破产声明。

1. STP is not traded on a regulated exchange market. There are no guarantees to the credit worthiness of the counter party of your Currency position. Every attempt has been made to deal with reputable credit worthy banks/clearing houses. Also, there may be certain cases in which trading liquidity decreases causing trading in a certain currency to cease, thereby preventing the liquidation of an adverse position which may result in a substantial financial loss

STP场外交易不在固定的交易所内进行，不能保证货币头寸交易对手的资信。我们尽最大努力与信誉良好的银行或交易所进行交易。不过，可能出现如下情况：交易流动性降低，导致某种货币的交易停止，从而妨碍不利头寸的收盘，进而造成巨大经济损失。

2. Trading in STP is suitable only for those sophisticated institutions or individuals able to withstand financial losses which may substantially exceed the value of margins or deposits. STP/ECN/OTC accounts are not available through MMIG NZ to non-sophisticated participants.

STP/ECN/OTC等交易可能遭受的损失可能远高于保证金，因此仅适合经验丰富、财力雄厚、可承受这种损失的机构或参与者。MMIG NZ不会为经验不足的参与者开立STP/ECN/OTC账户。

3. The market recommendations of MMIG NZ are based upon information believed to be reliable, but MMIG NZ cannot and does not guarantee the accuracy or completeness of those information or represent that following such recommendations will eliminate the inherent market risk. Any recommendations of, or information provided by, MMIG NZ do not constitute an offer to buy or sell, or the solicitation of an offer to buy or sell, any STP/ECN/OTC transaction.

MMIG NZ根据其认为可靠的信息发布市场建议，但MMIG NZ不能也无法保证这种信息的准确性和完整性，不能也无法声明遵循这些建议就能免受外汇交易固有的市场风险。MMIG NZ提供的任何市场建议或信息均不构成对购买或出售任何STP/ECN/OTC交易的要约或要约邀请。

4. Client understands that MMIG NZ does not permit its Account Manager to either exercise discretion or manage an STP account, or hold a power of attorney over an STP account, unless approved by an executive officer of MMIG NZ and only after proper documentation has been submitted and approved by MMIG NZ. If Client's account is not being traded with Client's authorization, Client must notify a MMIG NZ Compliance Officer immediately.

MMIG NZ不允许其客户专员自行判断或管理STP账户或对STP账户行使委托书中规定的权利，除非该专员向MMIG NZ提交了相应文件并获得MMIG NZ执行官批准。如果未经客户授权而客户账户发生了交易，客户必须立即通知MMIG NZ的合规专员。

5. MMIG NZ's margin policies and/or the policies of those banks/clearing houses through which trades are executed may require that additional funds be provided to properly margin Client's account and that Client is obligated to immediately meet such margin requirements. Failure to meet margin calls may result in the liquidation of any open positions with a resultant loss. MMIG NZ also reserves the right to refuse to accept any order in such condition.

根据MMIG NZ、银行或者结算公司的保证金政策，进行交易需要客户提供额外资金以确保其账户上的保证金数额合适，客户有义务立即满足这些要求。未能满足保证金要求可能导致对任何敞口头寸进行收盘，进而造成损失，在这种情况下，MMIG NZ保留拒绝接受任何订单的权利。

6. Client must carefully review the reports relating to Client's trading provided to Client by MMIG NZ. Pursuant to the Client Agreement, all reports of execution will be deemed final within twenty-four (24) hours and all statements of account will be deemed final within one (1) day unless the Client makes a written objection to these reports within this 24 hour period of time to an executive officer of MMIG NZ, at its principal place of business.

客户必须仔细核对MMIG NZ提供的交易报告。根据客户协议书，所有签署的报告在二十四（24）小时内是不可更改的，所有会计报表在（1）天内是不可更改的，除非客户在这二十四（24）小时内向MMIG NZ的主要营业地向MMIG NZ的执行官以书面形式对这些报告提出异议。

7. The Client has read and understood the Client's obligations and rights under the following Client Agreement and agrees and acknowledges that the following Client Agreement will control the Client's relationship with MMIG NZ. The Client agrees that Client is fully responsible for making all final decisions as to transactions effected for Client's account. Client has considered the foregoing factors and in view of Client's present and anticipated financial resources, Client is willing and able to assume the substantial financial risks of STP/ECN/OTC trading.

客户已经阅读并理解其在交易协议书下的义务和权利，同意并确认客户协议书约束客户与MMIG NZ的关系。客户同意对其账户所发生交易的最终决定承担全部责任。客户已考虑上述因素，鉴于客户目前和预期的财力，客户愿意并且能够承担STC/ECN/OTC交易的巨大财务风险。

8. Definition and processing method of abnormal transaction

The Company reiterates its consistent position: In order to ensure the fairness of online transactions and the legitimate rights and interests of the vast majority of customers, the Company does not accept any use of operating platform vulnerabilities or failures to conduct transactions under the order, but also resolutely combat with plug-in software (Non-company issued third-party auxiliary software) to conduct a violation of the transaction. When 30% of the trading hours are less than 2 minutes, or 10% of the trading hours in the trading orders are less than 1 minute, or the use of highly leveraged short-term high-frequency transactions that the company prohibits or by other means (such as lock-up transactions) to avoid the provisions of the transaction, and the account is defined as abnormal transactions.

In view of emerging the irregular trading practices protecting the fairness of online transactions, the company will be suspected of abnormal transactions account for two working days of the freeze process. During the freezing period, the technical department will check and process the account transactions in detail. The frozen account holder will receive an account freeze notification message from the company. During the period of freezing of the account, the company will suspend any business of the account and will not be able to carry out any transaction until the freezing period is completed and the company will carry out the operation of thawing or abnormal transaction in accordance with the examination results.

8.异常交易的定义与处理方法

本公司重申一贯立场：为切实保障网络交易的公平性和绝大多数客户的正当权益，本公司不接受任何利用操作平台漏洞或故障进行下单交易的行为，也坚决打击借助外挂软件（即任何非本公司发布的第三方辅助软件）进行违规下单交易的行为。交易单中有30%交易量的持仓时间低于2分钟时，或者交易单中有10%交易量的持仓时间低于1分钟时，或存在本公司禁止的使用高杠杆进行重仓短线高频交易或通过其他手段（例如锁仓交易）等以逃避上述之规定的交易行为时，此账户即被定义为异常交易。

鉴于异常交易的手法层出不穷，公司为保障网络交易的公平性，会对疑似异常交易的账户作出2个工作日的冻结处理，在冻结期间会由技术部门对账户内的交易单进行详细核对审查并处理。被冻结的账户持有人将会收到公司发出的账户冻结通知邮件。账户冻结期间，公司将暂停受理该账户之任何业务、亦不可进行任何交易，直至冻结期完结，公司将会按照审查结果进行解冻或异常交易的处理。

Risk Disclosure Statement

风险披露声明

This brief statement (even though not required for STP /ECN/OTC Trading but applicable to Fore x Trading) does not disclose all of the risks and

other significant aspects of trading in leveraged investments. In light of the risks, you should undertake such transactions only if you understand the nature of the contracts (and contractual relationships) into which you are entering and the extent of your exposure to risk. You should carefully consider whether trading is appropriate for you in light of your experience, objectives, financial resources and other circumstances.

本声明（尽管对STP/ECN/场外交易等交易并无规定，但适用于外汇交易）并未披露杠杆投资交易的所有风险和其他重大方面。鉴于这些风险，客户必须在理解所签署合同的性质（契约关系）并了解风险程度之后，才可进行交易。客户必须根据自身经验、目标、财力和其他情况，仔细衡量是否适合进行交易。

1. Effect of 'Leverage' or 'Gearing' “杠杆”效应

Transactions in STP/ECN/OTC accounts carry a high degree of risk. The amount of initial margin is small relative to the value of the STP/ECN/OTC contract so that transactions are 'leveraged' or 'geared'. A relatively small market movement will have a proportionately larger impact on the funds you have deposited or will have to deposit; this for the customer may be favorable or unfavorable. You may sustain a total loss of initial margin funds and any additional funds deposited with the firm to maintain your position. If the market moves against your position or margin levels are increased, you may be called upon to maintain your position. If the market moves against your position or margin levels are increased, you may be called upon to pay substantial additional funds on short notice to maintain your position. If you fail to comply with a request for additional funds within the time prescribed, your position may be liquidated at a loss and you will be liable for any resulting deficit.

STP/ECN/OTC的风险较高。相对于STP/ECN/OTC合同金额而言，初始保证金的数额较小，因此交易是“杠杆化”的。因此，即使市场上出现的变动较小，但也会对客户已经或将要存入的保证金产生较大影响，这对客户也许有利或不利。为了维持头寸，客户存入清盘结算公司的初始保证金及任何追加资金可能全部面临损失的危险。如果市场变动对客户不利或者提高了保证金水平，可能要求客户在得到通知后立即另外支付大量资金，以维持头寸。如果客户未能在规定时间内支付所需的额外资金，客户的头寸可能遭到清盘，此种情形下客户的损失应由客户自行承担。

2. Risk-reducing orders or strategies 降低风险的指令或策略

The placing of certain orders (e.g. 'stop-loss' order, where permitted under local law, or 'stop-limit' orders) which are intended to limit losses to certain amounts may not be effective because market conditions may make it impossible to execute such orders. Strategies using combinations of positions, such as 'spread' and 'straddle' positions may be as risky as taking simple 'long' or 'short' positions. 受市场情况限制，可能无法执行旨在降低损失的某些指令（例如地方法律所允许的“止损”指令或者“止损限价”指令）。在使用组合头寸交易策略时，例如“差价”交易、“骑墙”式交易策略，其风险可能与仅持有“多头”或“空头”头寸一样高。

3. Terms and conditions of contracts

合同的条款和规定

You should ask the firm with which you deal about the terms and conditions of the specific currencies which you are trading and associated obligations (e.g. the circumstances under which you may become obligated to make or take delivery of the full currency value).

客户应询问与其交易的结算公司，了解交易特定货币的条款、规定及其相应义务（比如：在哪些情况下，客户有义务支付和提取全部货币金额）。

4. Suspension or restriction of trading and pricing relationships

暂停或限制交易与量价关系

Market conditions (e.g. illiquidity) and/or the operation of the rules of certain markets (e.g. suspension of trading in any currency because of price limits, government intervention or "circuit breakers") may increase the risk of loss by making it difficult or impossible to effect transactions or liquidate/offset positions.

市场状况（例如非流动性）和/或某些市场的规则运作（如由于价格限制、政府介入或退市造成的任何暂停交易），可能增大出现损失的风险，因为这样会很难甚至不可能进行交易、清盘或对冲头寸。

5. Deposited cash and property

缴存的现金与资产

You should familiarize yourself with the protections accorded money or other property you deposit for domestic and foreign transactions, particularly in the event of a firm insolvency or bankruptcy. The extent to which you may recover your money or property may be

Governed by specific legislation or local rules. In some jurisdictions, property which had been specifically identifiable as your own will be pro-rated in the same manner as cash for purposes of distribution in the event of a shortfall.

对于进行国内和国际交易所缴存的现金或其他资产，客户应了解相关的保护措施，尤其是在公司资不抵债或破产的时候。客户可收回现金与资产的程度受特定法例或当地法规约束。在有些司法辖区，将如现金一样按比例划分已可认定归客户自己所有的资产，以便在出现亏空时进行分配。

6. Commission and other charges

佣金及其他收费

Before you begin to trade, you should obtain a clear explanation of all commission, fees, markups, markdowns, rollovers, interest rate Differ rental and other charges for which you will be liable. These charges will affect your net profit (if any) or increase your loss.

客户必须在交易前了解清楚自己所承担的佣金、费用、加价、降价、过夜利息、利率差额及其他收费。上述费用将影响客户的净利润（如有）或增加客户的损失。

7. Transactions in other jurisdictions

在其他司法辖区的交易MMIG NZ

Transactions on currencies of other countries in other jurisdictions, MMIG NZ ding markets formally linked to a domestic market, may expose you to additional risk. Such markets may be subject to regulation which may offer different or diminished investor protection.

Before you trade you should inquire about any rules relevant to your particular transactions. Your local regulatory authority will be unable to compel the enforcement your transactions have been effected. You should ask the firm with which you deal for details about the types of redress available in both your home jurisdiction and other relevant jurisdictions before you start to trade.

在其他司法辖区（包括与国内市场建立正式联系的市场）进行其他国家的货币交易，可能使客户面临额外风险。这些市场可能受如下规定约束：投资者受到的保障可能不同或减少。客户在交易前应咨询与其特定交易相关的任何规则。客户的当地监管机构不能强迫执行交易发生地的其它司法辖区内管理机构或市场的规定。客户应在开始交易前向与其交易的公司了解在自身所处辖区和其他司法辖区所能获得赔偿类型的详细情况。

8. Currency risks

汇价风险

The profit and loss in transactions in foreign currency-denominated contracts (whether they are traded in your own or another jurisdiction) will be affected by fluctuations in currency rates where there is a need to convert from the currency denomination of the contract to another currency.

以外国货币计价的交易（无论是发生在客户辖区还是其他辖区）产生的利润和损失，将受到汇率波动的影响，因为需将合同的计价货币兑换成另一种货币。

9. Trading facilities

交易设施

STP/ECN/OTC business is not traded on a regulated market and therefore does not require open-outcry. Even though quotations or prices are afforded by many computer-based component systems, the quotations and prices may vary due to market liquidity. Many electronic trading facilities are supported by computer-based component systems for the order-routing, execution or matching of trades. As with all facilities and systems, they are vulnerable to temporary disruption or failure. Your ability to recover certain losses may be subject to limits on liability imposed by the system provider, the market, the bank and/or financial institution. Such limits may vary; you should ask the firm with which you deal for details in this respect.

STP/ECN/OTC等交易无固定市场，因此无需公开喊价。尽管报价和价格都由以计算机为基础的系统进行，但报价和价格可能随市场流动性而变化。许多电子交易设施由以计算机为基础的系统支撑，来传输订单、执行和匹配交易。几乎所有的设备和系统都容易出现临时中断或故障的情况。客户挽回某些损失的能力可能受到系统提供者、市场、银行和/或金融机构所施加责任限制的影响。这些限制不尽相同，客户应向经纪公司咨询详细情况。

10. Electronic trading

电子交易

Trading on an electronic trading system may differ from trading not only in the interbank market but also on other electronic trading systems. If you undertake transactions on an electronic trading system, you will be exposed to risks associated with the system including the failure of hardware and software. The result of any system failure may be that your order is either not executed according to your instructions or is not executed at all.

在一个电子交易系统上交易，不仅与银行间市场上的交易不同，而且与其它电子交易系统上的交易不同。如果客户在一个电子交易系统上进行交易，客户可能面临与系统有关的风险，比如硬件和软件故障。任何系统故障的结果是，客户的订单未能按照其指示执行，或未全部被执行。

Disclaimers 免责声明

Internet and System failures:
网络和系统故障

Since MMIG NZ does not control signal power, its reception or routing via Internet, configuration of your equipment or reliability of its Connection, we cannot be responsible for communication failures, distortions, delays, when you trade on-line (via Internet). Furthermore, any losses or foregone profits in Client's account are the responsibility of the Client and not MMIG NZ, even if software, hardware, or other System failures or errors contributed to such losses or foregone profits.

由于MMIG NZ不能控制信号功率、通过互联网进行的信号接收和路径、客户设备的配置及其连接的可靠性，MMIG NZ不对网上交易中出现的通讯故障、失真或延迟负责。此外，客户账户上的任何损失或未得利润均为客户的责任，而非MMIG NZ的责任，即便该损失或未得利润是由硬件、软件或其他系统故障或失灵导致的。

Market risks and on-line trading:
市场风险和网上交易

Trading currencies involves substantial risk that is not be suitable for everyone. See Client Agreement for more detailed description of risks. Trading on-line, no matter how convenient or efficient, does not necessarily reduce risks associated with currency trading. 外汇交易涉及的风险很大，并非对每个人都适合。欲查看风险的详细介绍，请参阅客户协议书。无论网上交易多么方便或高效，网上交易也不能降低外汇交易的风险。

Quoting errors:
报价错误

Should quoting errors occur due to a dealer's mistype of a quote, errors in an automatic price feed, or an erroneous price quote from a Client, such as but not limited to a wrong big figure quote, MMIG NZ will not be liable for the resulting errors in account balances. MMIG NZ reserves the right to make the necessary corrections or adjustments on the account involved. Any dispute arising from such quoting errors will be resolved on a basis of a fair market value of a currency at the time such an error occurred.

如果由于交易者打错报价、自动买入价错误、或客户报价错误，比如但不限于较大数字的报价错误，MMIG NZ不对产生的账户余额错误负责。MMIG NZ保留对所涉及账户进行必要纠正或调整的权利。解决与报价错误有关的任何争议时，均应以这种错误发生时货市的公允市场价值为基础。

Exchange trading patterns and natures:
交易所交易模式及性质

In STP / ECN / OTC and other trading market, companies STP / ECN / OTC trading is not restricted. A transaction for the customer is the customer's company may counterparties. Liquidation of existing positions, assess the value, to determine the fair price or to assess the risks, which are difficult or even impossible. For these reasons, these transactions may be more risk. STP / ECN / OTC and other transactions may be less regulated or subject to another regulatory system constraints. You begin to trade; you should familiarize yourself with applicable rules and attendant risks.

在STP/ECN/OTC等交易市场，公司进行STP/ECN/OTC交易不受限制。为客户进行交易的公司可能是客户的交易对手。对现有头寸进行清盘、评估价值、确定公允价格或评估面临的风险，这些都难以甚至不可能做到。由于这些原因，这些交易面临的风险可能更多。STP/ECN/OTC等交易可能受到较少的监管或受另一个监管体系约束。客户在开始交易前，应了解适用的规则和伴随的风险。

Anti money laundering agreement
反洗钱协议

Policy statements and principles

MMIG NZ ("MMIG NZ") 的规定，已通过了反洗钱 (AML) 的合规政策 ("政策") 为载于董事会会议记录。

As regulations of MMIG NZ, it has passed the policy of AML as contained in the records of the Board meeting.

政策声明和原则

在与2002年金融情报和反洗钱法 (FIAMLA 2002)，2002年防止腐败法 (POCA 2002) 和2002年防止恐怖主义法 (POTA 2002)，

Policy scope

This policy applies to all the personnel, employees, appointed producers, products and services provided by MMIG NZ. All the MMIG NZ business units will strive to cooperate in combating money laundering. The business units implement reasonable expectations based procedures to prevent, detect, and lead to reports of transaction risks required by the FIAMLA. All the efforts to be produced will be recorded and retained in accordance with FIAMLA. Opening the suspicious activity reports ("SARs") or other required reports will be given to the appropriate law enforcement or regulatory agencies who are responsible for the anti money laundering compliance committee. Any contact with the relevant policy of the law enforcement or regulatory authorities shall be reported to the anti

money laundering compliance commission.

政策范围

本政策适用于所有 MMIG NZ 人员、雇员、任命生产者和 MMIG NZ 所提供的产品和服务内，MMIG NZ 所有业务单位将努力合作打击洗钱。各业务单位实施合理预期为基础的程序，以防止，检测，并导致报告根据FIAMLA所需的交易风险。产生的一切努力将被记录，并按照FIAMLA保留。启动可疑活动报告（“SARs”）或其他所需的报告，以适当的执法或监管机构负责反洗钱合规委员会。由执法部门或监管机构相关政策的任何接触应报告给反洗钱合规委员会。

Policy

MMIG NZ 's policy is to prohibit and prevent money laundering and money laundering, or to support terrorist activities or criminal activities, which is conducive to be active pursued. MMIG NZ is committed to anti money laundering compliance, in accordance with the applicable law, and requires its employees, and appointed producers to comply with these standards in the prevention of the use of their products and services for money laundering purposes. For the purpose of the policy, money laundering is usually defined as engaging in the design of concealing or disguising the proceeds of crime, and the illegal income, which seem to have been legitimate behaviour from legitimate sources or the real origin of legitimate assets.

Generally, money laundering occurs in three stages. Cash first enters the financial system during the "arrangement" phase, and proceeds from criminal activities into cash instruments, such as money orders or traveler's checks, or accounts deposited in financial institutions. In the "stratified" phase, funds are transferred or moved to other accounts or other financial institutions to further separate the money from their sources of crime. In the "integration" stage, the funds re-enter the economy and for the purchase of legitimate assets or funds, such as criminal activities or legitimate enterprises. Terrorist financing activities shall not involve proceeds from criminal acts, but are intended to be withheld from the country of origin or intended to be used, and will later be used for criminal purposes.

政策

MMIG NZ 的政策是禁止和预防洗钱和洗钱或资助恐怖活动或犯罪活动的任何活动，有利于积极追求。MMIG NZ 是致力于反洗钱合规，按照适用的法律，并要求其职员，雇员，并任命生产者遵守这些标准，在防止使用其产品和服务为洗钱目的。对于该政策的目的，洗钱通常被定义为从事设计隐瞒或掩饰犯罪所得收益，使违法所得的，似乎已经从合法来源的，或构成合法资产的真实起源的行为。

一般情况下，洗钱发生在三个阶段。现金首先在“安排”阶段进入金融体系，从犯罪活动产生的现金转换成货币工具，如汇票或旅行支票，或存放到金融机构的账户。在“分层”的阶段，资金转移或移动到其他账户或其他金融机构进一步分离其犯罪来源的金钱。在“整合”阶段，资金重新进入经济和用于购买合法的资产或资金等违法犯罪活动或合法企业。恐怖分子筹资活动不得涉及犯罪行为的收益，而是企图隐瞒的原产地或打算使用的资金，稍后将被用于犯罪目的。

Anti money laundering compliance committee

The anti money laundering compliance committee, is fully responsible for the policy, and should be headed by the general counsel, the chief compliance officer, the deputy inspector general of the MMIG NZ, the assistant vice president of MMIG NZ, the internal audit and corporate counsel. The chief compliance officer should also hold the title of executive director of anti money laundering and should sign such authority. With the policy of anti money laundering compliance committee's responsibilities include, but not limited to the design and implementation, and policy update required; dissemination of information management, staff training and appointment of MMIG NZ producers, managers, employees, and appointed producer; monitoring MMIG NZ business units, and the appointment of producers, maintain the necessary and appropriate records of the Special Administrative Region to submit; and the operation of the policy independent test. Each MMIG NZ business unit shall appoint a liaison, direct interaction and anti money laundering compliance committee to assist in the investigation, monitoring and other requirements of the committee.

反洗钱合规委员会

反洗钱合规委员会，为政策的全部责任，应当由总法律顾问，首席合规官，MMIG NZ 副监察主任，MMIG NZ 助理副总裁，内部审计和公司律师。首席合规官还应当持有标题反洗钱行政主任，并应签署这样的权威。与政策方面的反洗钱合规委员会的职责包括，但不仅限于设计和实施，以及更新所需的政策；信息传播的管理人员，员工和 MMIG NZ 任命生产者，培训管理人员，雇员，并任命生产者；监测 MMIG NZ 经营单位的情况，并任命生产者，保持必要和适当的记录，需要时提交的特别行政区；和政策的运作独立的测试。每个 MMIG NZ 业务单位应指派一名联络人直接互动与反洗钱合规委员会，以协助调查，监测和另有要求委员会。

Customer identification program

MMIG NZ has adopted the customer identification program (CIP). MMIG NZ will provide notice that they will collect a minimum of customer identity information, records, etc. from each customer, seek identification information, and verify customer identity information with OFAC.

客户识别程序

MMIG NZ 采取了客户识别计划（CIP）。MMIG NZ 将提供通知，他们将从每个客户收取一定的最低的客户身份信息，记录等寻求识别信息，并与OFAC核查客户身份信息结果。

Customer instructions

MMIG NZ will provide notifications to customers and ask them to provide information to verify their identity as

required by applicable law.

客户须知

MMIG NZ 将提供通知给客户，要求他们提供信息，以验证他们的身份，作为适用法律的规定。

Verify information

Depending on the risk which is reasonable or feasible, MMIG NZ will ensure that it has reasonable grounds to believe its client's true identity. In verifying the identity of the client, the executor shall examine the identity of the photo. MMIG NZ shall not attempt to determine whether or not the client has provided valid documents for identification. In order to verify the purpose, MMIG NZ should rely on government issued identity cards to establish customer identity. However, MMIG NZ will analyze the information provided to determine whether there is any logical inconsistency in the information obtained. Documents that MMIG NZ will verify include all the information provided by the customer, the methods used and the results of the verification, including, but not limited to, the identification of the identity of the photo by appointment of the executor.

核实信息

根据风险的程度上是合理和可行的，MMIG NZ 将确保它有合理理由相信其客户的真实身份。在核实客户身份，委任执行者应当审查照片的身份证明。MMIG NZ 不得企图以确定是否客户提供用于识别的文件已有效发出。为了核实目的，MMIG NZ 应依靠政府颁发的身份证，以确立顾客的身份。然而，MMIG NZ 将分析提供的信息，以确定是否有在所获得的信息中有任何逻辑上不一致。MMIG NZ 将核查的文件包括所有确定由客户提供的信息，使用的方法及核查结果，包括但不限于签署通过任命执行者匹配照片的身份证明。

Customers who refuse to give information

If the customer refuses to provide the information request referred to above or appears to have intentionally provided misleading information, the appointed agent shall notify his new business team. MMIG NZ 's new business team will reject the application and notify the anti money laundering compliance commission.

那些拒绝提供信息的客户

如果客户拒绝提供上文所述的信息请求时，或出现故意提供误导性信息，获委任的代理人应当通知其新的业务团队。MMIG NZ 新的业务团队将拒绝该申请，并通知反洗钱合规委员会。

List of Foreign Assets Control Office (OFAC)

For all (1) Received and continued new things (2) Payment (3) Newly appointed manager, (4) New employees, MMIG NZ will check to ensure that a person or entity does not appear in the Ministry of Finance's foreign asset management office, specifically designated national and blockade list (SDN list), or engaged in transactions with people or entities, is not on the list of foreign asset management offices in an embargoed country on the website. MMIG NZ should work with World - Check to ensure the speed and accuracy of the inspection. MMIG NZ will also regularly review the existing policy holders, producers and employees on these lists. The frequency of comments will be recorded and saved. The business unit will compare the SDN list or other OFAC lists if the found list will be reviewed. If the comparison can not be confirmed after the illegal, the anti-money laundering committee will receive a notice.

检查的外国资产控制办公室 (OFAC) 名单

对于所有的 (1) 收到和持续进行的新事情，(2) 付款，(3) 新任命的管理者，(4) 新员工，MMIG NZ 将检查确保，一个人或实体并没有出现在财政部的外国资产管理处，专门指定国民和封锁的人的名单 (SDN 名单)，或从事与人或实体的交易，是不是禁运的国家和地区的外国资产管理处的网站上列出。MMIG NZ 应与 World - Check 一起确保在检查的速度和准确性。MMIG NZ 也将定期审查对这些名单上现有保单持有人，生产商和员工。评论的频率会被记录和保存。业务单位将对 SDN 名单或其他 OFAC 名单进行对比，如果发现符合的名单将被审查。如果对比后无法确认非法，反洗钱委员会收到通知。

Monitoring and reporting

Transaction based monitoring will occur in MMIG NZ 's appropriate business unit. The monitoring of specific transactions, including but not limited to the suspicious activity gathered \$ MMIG NZ has a reason to doubt the 5000 or more, and those who report all transactions will be recorded and retained in accordance with the requirements of FIAMLA.

监测和报告

基于事务的监控将出现在 MMIG NZ 合适的业务单位的。具体交易的监测，包括但不仅限于 MMIG NZ 有一个理由来怀疑的可疑活动的聚集 \$ 5,000 或以上，而那些交易所有报告都将记录在案，并按照 FIAMLA 要求保留。

Investigation

Notice OFAC SDN list or suspicious activities after receiving notice of anti money laundering compliance committee will begin to investigate to determine if a report should be made to law enforcement or regulatory investigations, including, but are not necessarily limited to, all of the available information, such as payment records, date of birth, address, to review if it ensures the results of the survey, suggestions on anti money laundering Compliance Committee documents and relevant law enforcement agencies or regulators blocked assets and / or special zone. The anti money laundering compliance committee, which is responsible for any notification or filing of investigations with law enforcement authorities or regulatory authorities, will not be revealed or discussed more than those who are legally required to know someone else. In any case, any officer, employee or agent appointment investigation disclose or discuss any anti money laundering concern, notice or submitted by the SAR government or for such special people, or any other person, including members of the officers, employees or agents of the specified family.

调查

OFAC SDN 名单或可疑活动可能匹配的反洗钱合规委员会的通知后，将展开调查，以确定是否一个报告应作出相应的执法部门或监管机构调查将包括，但不一定限于，所有可用的信息，如付款记录，出生日期，地址，审查如果保证调查的结果，建议将反洗钱合规委员会的文件与相应的执法部门或监管机构封锁的资产和/或特区。反洗钱合规委员会，负责与执法部门或监管机构的任何

通知或备案调查结果将不会被透露或讨论比那些有合法需要知道其他人。在任何情况下，任何高级人员，雇员或委任代理人披露或讨论任何反洗钱的关注，调查，通知或特区政府提交的人或对此类专题的人，或任何其他人员，包括有关人员的成员，雇员或指定代理人的家庭。

Record keeping

The anti money laundering compliance committee will be responsible for ensuring that the anti money laundering records remain properly SARS and the provisions of the blocked property report are submitted. MMIG NZ will maintain records of anti money laundering for at least five years.

记录保存

反洗钱合规委员会将负责，以确保反洗钱纪录保持正确SARS和阻止的财产报告的规定提交。MMIG NZ 将维持至少五年的反洗钱记录。

Train

MMIG NZ should provide its staff, employees, and appoint producers of general anti money laundering training to ensure awareness of the requirements in the FIAMLA. The training includes at least: how to identify red flags and signs of money laundering; what kind of role the management personnel, employees, and the appointment of managers to comply with, and how to perform these duties and responsibilities; how to do a red marker or suspicious activity; MMIG NZ records retention policy; the policy of "law and disciplinary consequences. In addition, each of the affected area will be in accordance with the development in every field and staff, is expected to handle money reasonable request, or that they may be exposed to the specified information program provides intensive training. The training course will be conducted on an annual basis. The MMIG NZ anti money laundering compliance committee will identify ongoing training requirements and ensure that written procedures are updated to reflect any changes required for such training. MMIG NZ will keep documents that have been trained.

培训

MMIG NZ 应当提供其职员，雇员，并任命生产者一般反洗钱培训，以确保在FIAMLA要求的认识。培训至少将包括：如何识别红旗和洗钱的迹象；什么样角色的管理人员，雇员，并任命的管理者遵守，以及如何履行这些职责和责任；怎样做一次红色检测标志或可疑活动；MMIG NZ 记录保留政策；法“和本政策不遵守纪律的后果。此外，每个受影响的地区将按照在每个领域的开发人员和员工，合理的预期处理钱的请求，或处理可能使他们接触到上述指定的信息程序提供强化培训。训练课程将在每年的基础上进行。MMIG NZ 反洗钱合规委员会将确定持续的培训要求，并确保书面程序更新，以反映这种培训所需的任何更改。MMIG NZ 将保留已发生培训的文档。

Testing strategy

Testing policies will be conducted annually by third independent parties. Any results will be submitted to the anti money laundering compliance committee, the SFG audit committee and senior management for appropriate action.

测试策略

由外部独立的第三方，每年将进行测试政策。任何结果将上报反洗钱合规委员会，SFG审计委员会和高级管理人员，以便采取适当行动。

Government affairs

The anti money laundering compliance committee is responsible for the management, revision, interpretation and application of this policy. The policy will be reviewed and revised each year as required.

政务

反洗钱合规委员会负责管理，修订，解释和应用本政策。该政策将根据需要每年检讨和修订。

风险提示：

Risk disclosure:

Customer should keep the account and password secret to ensure that third parties can't access to trading system Customer will be reliable to MMIG NZ for trades executed by means of the Client's password even if such use may be illegal Account managers or agencies are not authorized to execute trade for customer, which is explicitly forbidden by MMIG NZ It is personal behavior that investor is willing to turn his or her account and password to others for trading. MMIG NZ will not be reasonable for all the adverse consequences caused in such condition, which customer does.

客户务必妥善保管好自己的交易账户及密码，确保第三者无法使用交易系统。对于使用客户密码进行的交易，即便这种使用属非法行为，客户仍应对MMIG NZ负责。MMIG NZ内部员工及经纪人是无权代理客户操作。本公司也是明令禁止的。如果投资者本人愿意将其交易账号及密码转交他人委托操作属于个人行为。对其所造成的一切不良后果由客户本人负责，与MMIG NZ无任何联系。

Client

Notice

客户须知

Foreign Currency and Precious Metal Rollover

Notice

外汇和贵金属过夜利息确认书

Rollover is the interest paid or earned for holding a position overnight. Each currency has an interest rate associated with it, and because Forex is traded in pairs, every trade involves not only two different currencies, but two different interest rates. If the interest rate on the currency you buy is higher than the interest rate of the currency you sold, then you will earn rollover (positive roll). If the interest rate on the currency you bought is lower than the interest rate on the currency you sold, then you will pay rollover (negative roll). Rollover can add a significant extra cost or profit to your trade.

过夜利息指持仓过夜支付或者获得的利息。每种货币都有其自身利率，因为外汇交易是成对进行的，每项交易均涉及两种货币，所以同时涉及两个不同的利率。如果买入货币的利率高于卖出货币的利率，客户就可以赚取过夜利息（「过夜利息为正」）。若买入货币的利率低于卖出货币的利率，客户就需要支付过夜利息（「过夜利息为负」）。过夜利息可能会显著增加交易的成本或利润。

Rollover Example: When you buy the EUR/USD pair, you are buying the Euro, and selling the US Dollar to pay for it. If the Euro interest rate is 4.00%, and the US rate is 2.25%, you are buying the currency with the higher interest rate, and you will earn rollover -- about 1.75% on an annual basis. If you sell the EUR/USD pair, you are selling the currency with the lower interest rate, and you will pay rollover -- about 1.75% on an annual basis, since you are paying the Euro interest rate and earning the US interest rate
过夜利息示例：买卖欧元/美元时，其实客户是卖出美元来买入欧元。假如欧元的利率是4.00%而美元的利率是2.25%，客户就是买入利率较高的货币，因此将赚取过夜利息—年利率约1.75%。若客户卖出欧元/美元，客户就是卖出利率较低的货币，因此需要支付过夜利息——年利率约1.75%，因为客户支付的是欧元利息，赚取的是美元利息。

Precious Metal means you are short US dollars. To determine the rollover paid or earn for precious metal. It will strongly depend on the interest rate of US Dollars. Rollover can add a significant extra cost or profit to your trade. Since interest for US dollars is very low (less than 0.5%). The rollover for trading both directions may have a certain charge. This charge is used to cover the clearing transaction between bank to bank and the administration cost.
当客户做多任何的贵金属，客户就是做空美元。贵金属过夜利息的支付或获得，在很大程度上取决于美元的利率。过夜利息可能会显著增加交易的成本或利润。由于美元的利率非常低（少于0.5%），做多和做空两个方向的交易都可能需要缴纳一些费用，用于支付银行间的交易结算和管理费用。

As part of the rollover, position are subject to a swap charge or credit based on the LIBOR/LIBID interest rates of the two traded currencies with added a mark-up of +/- 0.25% (for private accounts) plus an interest component for any unrealized profit/loss on the position
作为过夜利息的一部分，头寸会产生与掉汇交易有关的补偿或收益。该补偿或收益是按两种交易货币的伦敦银行同业拆借利率/伦敦银行间存款利率+/-0.25%（就私人账户而言）计算所得的利息，再加上头寸里任何未实现利润/损失的利息。

Weekends and Holiday 周末及假日

Most banks across the globe are closed on Saturdays and Sundays, so there is no rollover on these days, but most banks still apply interest for those two days. To account for that, the market books 3 days of rollover on Wednesdays, that's what we call "Value Date" 世界各地的大多数银行在星期六及星期日停止营业，因此这两天没有持仓过夜利息，但大部分银行仍然计算这两天的利息。基于这个原因，外汇市场上将对星期三过夜的仓位计算三天的利息，这就是我们所说的起息日。

Spread Notice

The Spread is the difference between the Bid price at which you can sell the trading instrument and the Ask price at which you can buy the trading instrument. Market fluctuating is always happen when the Economic Index & Rollover Index announce. The Spread may also become wider when the marketing fluctuating, since the market liquidity of certain instruments is floating fast. The price of certain currency and Precious Metals may have a gap up or gap down during the fluctuation. In order to prevent the loss during fluctuating, most Clearing Banks or Market Makers will widen the spread to make sure the trading instrument can be clear. Additionally, these gaps may occur after market closure due to weekends and holidays. If an order is placed in these gaps, the order will be executed at the first price after the gap.

点差确认书

点差是指卖出金融产品的卖价和买入金融产品的买价之间的差额。在公布经济指数和隔夜利率指数时，市场总会发生波动。由于某些金融产品的市场流动性较大，因此市场波动时差价可能会扩大。在市场波动期间，某些货币和贵金属的价格可能出现向上和向下的价格缺口。为了防止波动造成的损失，大多数结算银行或做市商会扩大差价从而确保所交易的金融产品能够完成收盘。周末和假期关闭市场之后，这些缺口可能也会出现。如在缺口期下单，系统将以缺口后的第一个价格执行订单。