



KEY INFORMATION GUIDE

This Key Information Guide ("KIG") is effective from 13th October 2026 and shall remain effective until a more recent version is released. Finalto reserves the right to amend the KIG at any time as and when it sees fit. This KIG does not replace our Standard Terms of Business ("Terms") or any other client agreement. Please ensure that you familiarise yourself with our terms and that you fully understand your client trading agreement.

Risk Warning: Trading Rolling Spot Foreign Exchange (Forex) and Contracts for Difference (CFDs) is highly speculative and carries a high level of risk for every investor. Trading in these products is not appropriate for every investor. You may sustain a loss of some or all of your invested capital. You should therefore not speculate with capital that you cannot afford to lose. Please review and ensure that you fully understand our Risk Warning available on our website at www.finalto.com/uk

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Finalto Financial Services Limited

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Registered in England & Wales, no. 06557752.

Authorised and regulated by the Financial Conduct Authority, FRN 481853.

Finalto Trading Limited

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Registered in England & Wales, no. 08663212.

Authorised and regulated by the Financial Conduct Authority, FRN 607305.

1. ABOUT FINALTO

Finalto Financial Services Limited (“FFS”) and Finalto Trading Limited (“FTL”), (together the “Company”, “Finalto”, “we” or “us”) are IFPRU 750K investment firms authorised and regulated by the Financial Conduct Authority (“FCA”) in the United Kingdom (“UK”) under Firm Reference Numbers (“FRN”) 481853 and 607305 respectively. FFS & FTL are subject to the Investment Firms Prudential Regime (IFPR) and falls under the MIFIDPRU framework. Finalto is located at 11th Floor, Broadgate Tower, 20 Primrose Street, London, EC2A 2EW.

2. INTRODUCTION

Finalto is committed to providing the highest standards of service and care by providing clients with clear and transparent information about our products and services, including all applicable fees and charges. This Key Information Guide (“KIG”) is provided in line with the UK Consumer Composite Investments (CCI) Regulation and is provided for informational and transparency purposes in line with FCA disclosure expectations for professional and eligible counterparty clients only (non-retail clients). Finalto does not offer services to retail clients, therefore does not fall under scope of DISC 3 requirements. Clients are classified in accordance with COBS rules on client categorisation. Clients are well aware and are notified of their categorisation.

This document is designed to give clear, concise, and comparable information about the nature, risks, costs, and potential returns of the products and services offered by Finalto. This document is not marketing material and does not constitute investment advice or a recommendation. This document should be read carefully, together with our Terms of Business and Risk Warning, before deciding whether to trade. If anything in this document is unclear, or if there is uncertainty whether the products are suitable, you should seek independent professional advice before proceeding.

3. TREATING CLIENTS FAIRLY

Finalto is committed to treating clients fairly and promoting best practice in the provision of financial services. Treating Customers Fairly (TCF) is central to our corporate culture. We act honestly, fairly, professionally and in the best interests of our clients at all times.

4. OUR SERVICES AND PRODUCTS

Finalto provides services on an execution-only basis to professional clients and eligible counterparties.. We do not provide investment advice or make recommendations. Where required by regulation, we will assess whether a product is appropriate; however, this assessment does not constitute suitability advice. Finalto is an investment firm providing the following investment services:

- Arranging (bringing about) deals in investments
- Dealing in investments as agent
- Dealing in investments as principal
- Making arrangements with a view to transactions in investments

Clients may trade on margin via electronic trading platforms including MT4, MT5, ClearPro, and ClearWeb. Finalto does not provide investment advice, portfolio management, underwriting, custody of client assets, or investment research. Finalto may take proprietary positions and may trade against its own capital rather than hedging every client trade back-to-back with a liquidity provider.

Finalto offers over 800 instruments including:

- Currencies
- Energy products
- Metals
- Indices
- Equities

For a full list of available instruments, please contact Client Services at cs@finalto.com or +44 (0)203 455 8750. A [Product Guide](#) is available on our website.

5. APPLICABLE LAWS AND REGULATIONS

Finalto conducts its UK business in accordance with the Markets in Financial Instruments Directive (MiFID II), the Financial Services and Markets Act 2000, applicable FCA rules, and relevant technical standards. Disputes are governed by the laws of England and Wales.

6. APPLICABLE LANGUAGE

The official language of Finalto is English. In the event of any inconsistency, the English version of all agreements shall prevail.

7. OUR PRICES

7.1 Price formation

The Firm quotes a two-way price for each Product offered. This two-way price consists of a Bid (the lower price which is the price at which a client may “Sell” the Product) and an Ask (higher price which is the price at which the client may “Buy” the Product).

The Firm applies a standardized method of calculation for all Products to ensure that the price it is offering at any given time is always considered fair and the best price it can obtain on the client's behalf. Finalto Financial Services uses Tier 1 liquidity providers like Deutsche, JP Morgan, Goldman Sachs, Barclays, BNP and non-banks such as XTX Markets & Jump Trading. Prior to engaging with any provider, the Firm needs to have a proven track record in competitive pricing, stability, consistent execution quality, reliability and speed. In order to reduce latency Finalto Financial Services requires cross-connection to all providers. A prior check is being done on their FIX connection specifications, to make sure they can fulfil the requirements the Firm has (more specifically, order types, order durations, hours of operation, execution quality). After integration the Firm performs conformance tests and testing in pricing, daily operations, all order types and execution quality. Further information is provided in section 8. As a result of all these factors, prices will be close to but will generally not be the same as the underlying market Bid/Ask prices. The Firm will not quote any price outside the Company's trading hours as indicated on its websites.

As mentioned above, our prices are proprietary prices which are derived from the prevailing market prices of the underlying financial instruments in the relevant markets in which the underlying instruments maybe traded in or from other applicable third-party data providers (such as Prime Brokers or Liquidity Providers). With respect to the below Asset Classes, where there is no organized / regulated market from which prices can be sourced:

- a) Foreign Exchange and other spot contracts (e.g. Gold, Silver) - The Firm uses price feeds from global investment banks and other major price feed providers.
- b) Cash Indices - The price is formed by performing an adjustment called a “fair value” adjustment on the market price of the Underlying future contract which is trading on a regulated stock exchange. This adjustment is done in order to take account of financing costs and dividends anticipated to occur during the period between the present, and the maturity date of the Underlying future. In some instances, the Firm forms the price by performing an adjustment called a “fair value” adjustment on the market price of the underlying future contract which is trading on a regulated exchange. This adjustment is done in order to take account of financing costs and dividends anticipated to occur during the period between the present, and the maturity date of the Underlying future.

The Firm uses an in-house developed trading system and aggregator for its price feed for rolling spot. The trading system aggregates the best bid and offer from multiple banks and non-bank liquidity providers to ensure Finalto Financial Services always distributes the best available price to its clients. The aggregation mechanism takes into account the following factors: 1) price 2) amount 3) time.

The aggregator mechanism always performs batching internally when distributing prices, this means that if one provider sends more than 1 update for an instrument per millisecond, only the latest update will be used. In addition if clients do not consume price updates fast enough, the mechanism will start ignoring any old pending price updates, so that only the latest price update will be consumed by the client.

The difference between the Bid and Ask price is commonly referred to as the “Spread”. The Firm aims to ensure that Spreads contribute towards delivering competitive Bid and Ask prices to clients. The Spread includes our costs (as a mark up) for the services we provide to clients. Spreads are variable. A variable Spread means that the Spread will vary throughout the day, depending on market volatility and available liquidity. They represent the best bid and ask prices that the Firm is able to obtain from its liquidity providers, underlying regulated markets or other data feed providers. Variable Spreads have a minimum value set by the Firm, meaning that the Spread can be as low as certain pre-determined level and can fluctuate above that level according to market conditions. The Firm may decide to change Spreads in order to reflect periods of actual or potential increased market volatility in the prices of underlying financial instruments or other market volatility caused by political or economic events.

Depending on the instrument and/ or client set up, the Firm may charge commissions. Commissions may consist of minimum fees or may be based on the amount of volume traded.

7.2 Client Orders

Finalto has automated the execution of client orders on rolling spot contracts using an aggregation engine with liquidity provided by a carefully selected group of LPs. The considerations used in setting up the aggregation engine to decide which trades get routed to what LPs are complex and take into

consideration factors such as price, cost, speed, likelihood of execution, size, and nature of the order. This process is designed to comply with the Best Execution requirements outlined by the FCA, ensuring that clients receive the best possible result for their orders. All other products are based on exchange traded prices of the underlying instrument as received from the exchanges.

The Firm ensures prompt, fair and expeditious execution of client orders. All orders are promptly and accurately recorded and allocated in sequential order, unless the characteristics of the order or prevailing market conditions make this impractical. All executed trades are immediately viewable on the client's trading statement as well as in the platforms. Unless otherwise requested by the client, the Firm applies market execution when receiving orders. This means that no requotes are issued to the client and that the final price received by the client may be different to the requested time if the market price has moved during the execution time.

In addition to market orders, the following order types may be available:

- Limit
- Stop-if-bid
- Stop-if-offered
- Stop-if-bid Limit
- Stop-if-offered Limit
- Trailing Stop-if-bid
- Trailing Stop-if-offered
- Trailing Stop-if-bid Limit
- Trailing Stop-if-offered Limit

Additional, order types limiting duration are:

- Good till Cancel (GTC)
- Good till Day (GTD)
- Day Order
- Immediate or Cancel (IOC)
- Fill or Kill (FOK)

8. LEVERAGE TRADING

Trading on leverage allows clients to trade positions larger than their initial capital. While leverage can increase potential returns, it also significantly increases potential losses.

Leverage ratios vary by client type and instrument and are communicated individually.

9. INITIAL/REQUIRED MARGIN

Margin requirements may change at short notice, including intraday, particularly during periods of market volatility. Clients are responsible for monitoring margin levels and ensuring sufficient funds are available.

Initial or required margin is the amount required to open and maintain a position, calculated as:

$$(\text{Trade Size} \times \text{Instrument Price}) \div \text{Leverage} + (\text{Trade Size} \times \text{Spread})$$

10. CHARGES AND COMMISSIONS

Depending on the instrument and client setup, Finalto may charge commissions, mark-ups, or minimum fees. Overnight financing charges may apply to positions held overnight.

11. DEPOSITS

All deposits are subject to anti-money laundering and counter-terrorist financing checks. Processing delays may occur where additional verification is required. The minimum deposit is USD 100,000. Deposits are accepted via BACS only and must be made from an account in the client's name. Third-party payments may be accepted in limited circumstances subject to due diligence.

12. TRADING ACCOUNT SECURITY

Clients receive personalised login credentials and are responsible for keeping them secure. Finalto will never request account passwords by phone. Multi-factor authentication (MFA) has also been introduced to enhance the security of client's accounts. MFA adds an extra layer of protection by requiring a second verification step in addition to your password, making it significantly more difficult for unauthorized parties to gain access. This helps safeguard your personal information and financial data against cyber threats.

13. TRADE REPORTS

Clients may access trade reports via the Finalto Online Back Office or MT4 platform. Quarterly email reminders are issued.

14. YOUR CAPITAL

Client money is held in accordance with the FCA Client Assets Sourcebook (CASS) and is subject to the statutory trust under the client money rules. Client funds are held in a bank account in Finalto's name and reconciled daily in accordance with strict accounting controls. A Title Transfer Collateral Arrangement (TTCA) is a way of providing collateral where ownership of the collateral transfers to us for the duration of our trading relationship with the client. When providing collateral under a TTCA, it no longer belongs to the client while it is held by us. Instead, we become the owner and agree to return equivalent value to you once your obligations to us have been met.

Under a TTCA, the collateral provided is:

- Not treated as client money
- Not held in a segregated client account
- Not protected under the FCA's client money rules

Because of this, the protections that normally apply to client money do not apply to collateral provided under a TTCA.

15. WITHDRAWALS

Withdrawal processing times may be impacted by compliance checks or bank processing times outside of Finalto's control. The Payments team will attempt to process withdrawal requests as soon as possible and within the day if possible but processing times once received from the Bank or approved by compliance can still vary depending on volume/traffic and resources on the day.

16. COMPLAINTS PROCEDURE

Complaints will be handled in accordance with FCA rules applicable to professional clients and eligible counterparties. Access to the Financial Ombudsman Service may not be available depending on meeting the eligibility criteria (being an eligible complainant) subject to DISP 2.7.3. Clients may submit complaints at any time to compliance@finalto.com. Complaints are handled in accordance with FCA requirements and responded to within eight weeks. For the full complaints policy please refer to our website.

17. CONFLICTS OF INTEREST

Finalto maintains a Conflicts of Interest Policy to identify, manage, and disclose conflicts where appropriate. A copy is available on our website.

18. HOW YOU CAN HELP US

To help us provide the best possible service, please:

- Review this document carefully
- Keep us informed of any changes to your licence
- Suggest ways we may improve our service