

NEGATIVE BALANCE PROTECTION POLICY

Enters into force on 1 May 2019

1. Scope

The policy is applicable to BenchMark Finance professional clients who have a trading account in MetaTrader 4 and 5 platforms. The policy does not apply to non-professional clients, as all non-professional clients have full and unconditional protection against a negative balance in accordance with the instructions of the European Securities and Markets Authority (ESMA).

2. Objectives

The purpose of this policy is to clarify the framework, conditions and circumstances under which BenchMark Finance will be able to recover on its own account the accumulated negative balance on professional client accounts.

3. Description of the Policy

As the financial products in the MetaTrader 4 and 5 platforms are offered on a margin, it is possible for the client's trading account to go on a negative balance in certain circumstances. When a customer has accumulated a negative balance on his/her account and wishes to be compensated, he/she must notify BenchMark Finance. BenchMark Finance will evaluate the request and at its sole discretion may offset partially or wholly the negative balance, as well as place additional conditions for the client for a minimum deposit or deferred coverage of the negative balance, through generating trading commissions. If the customer has more than one trading account, the balances on those accounts may be offset.

The maximum negative balance threshold which BenchMark Finance can cover is 10,000 currency units, EUR or USD, depending on the currency of the client's trading account.

4. Exceptions to the Policy

Clients may be excluded from this policy under the following circumstances:

4.1. The negative balance occurred in abnormal market conditions or as a result of extraordinary market movements (volatility) or the negative balance was due to a market gap (for example: the difference between the closing price of the financial instrument on Friday and the opening price of the financial instrument on Monday).

4.2. The negative balance is related to or is a result of a direct or indirect breach by the client of any provision of BenchMark Finance's Terms and Conditions, Rules applicable to international financial markets trading contracts through the platforms offered by BenchMark Finance or by breach of market rules or practices, including, but not limited to, applicable

regulations and regulations, the laws of the country of origin of the customer, the country of residence of the client or any country in the European Economic Area;

4.3. Negative balance is associated with or is a results from the usage of trading methods such as scalping, arbitrage or other techniques whereby the client seeks to benefit from errors and/or delays in quotations, and/or other weaknesses in the electronic trading platforms. If at the time of the conclusion of a transaction there was an error and/or delay in quotations and/or other weakness in the electronic platforms and there is a reasonable assumption that the client has taken advantage of or made an attempt to take advantage of them;

4.4. BenchMark Finance considers that the client has abused the protection provided under this policy to the detriment of the company. This includes, without limitation, situations in which the client acted in bad faith by pursuing strategies to benefit from the protection against the negative balance alone or in cooperation with another client;

4.5. BenchMark Finance has already informed the client that he/she is excluded from this Policy;

4.6. The negative result on the client's trading account is due to circumstances in which no trades can be made, no quotes or transactions deviate from market quotes, or there were temporary technical difficulties in a certain multilateral trading system, organized trading system, regulated market or liquidity provider;

4.7. The negative balance is related to force majeure, such as natural disasters, war, terrorism, willful damage, civil unrest, industrial acts, extraordinary market events or actions and regulations of governmental or supranational bodies or authorities that impede the regulated market in connection with the client's orders.

5. Others

This policy is relevant and is considered by BenchMark Finance to be in a good commercial practice applied in dealing with loyal customers. In case of disputes related to the negative balance of a client, they are settled according to the terms in the contract of trading with financial instruments, BenchMark Finance General Terms and Conditions, Rules applicable to international financial markets trading contracts, through the platforms offered by BenchMark Finance, the Client's Order Execution Policy and other documents applicable to the client's relations with which the client agreed when concluding a trading agreement with BenchMark Finance.

BenchMark Finance reserves the right to change or discontinue this policy at any time without notice.