

A fully licensed global Forex and CFD broker



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Chapter 1: A Background Analysis of the Global Market

1.1 Forex Market Overview

Forex trading is the exchange of the currency of one country with the currency of another. Unlike other financial markets, the foreign exchange market does not have a specific location or central exchange. Instead, transactions are conducted through an electronic network of banks, businesses and individuals. Forex is traded in currency pairs, such as the euro /US Dollar (EUR/USD) or the US dollar/Japanese Yen (USD/JPY), where a trader buys one currency in a pair and sells the other.

The Foreign exchange market, also known as the "Foreign exchange" or "FOREX" market, is the largest financial market in the world, with an average of more than \$6.6 trillion moving through it every day -- more than a hundred times the amount traded on all U.S. securities markets combined.

Led by the international trend of economic globalization and liberalization of financial transactions, the penetration and competitiveness of foreign exchange are constantly increasing. Although large financial institutions and banks, as the main market makers, account for half of the foreign exchange market, the development of modern technology has made foreign exchange widely accepted by the public. Forex brokers have developed easy-to-use online trading platforms, simplifying the trading process and making it possible to trade almost anywhere in the world.

There are 3.8 billion Internet users worldwide, 1 online trader for every 396 Internet users, and statistics show that there are 9.6 million online traders worldwide. While the United States and the United Kingdom remain by far the largest foreign exchange trading centers, a third of online traders are based in Asia and the Middle East. Asia is home to 1.9bn Internet users and 3.2m people trading online. According to the triennial survey report of the Bank for International Settlements (BIS), the daily turnover of the global foreign exchange market exceeds \$6.6 trillion, and the average daily trading volume of foreign exchange is more than 53 times that of the New York Stock Exchange. The trading volume of the foreign exchange market is four times the global GDP. As the world's largest financial



market, foreign exchange market investment has always been favored by investors.

More than 85% of global forex market trading takes place in seven major currency pairs: EUR/USD; USD/JPY; GBP/USD; AUD/USD; NZD/USD; USD/CAD; USD/CFH.

At present, in the context of financial globalization, the rationality of small currencies in small economies is gradually losing. The Asian financial crisis exposed the weakness of developing countries in adhering to the fixed exchange rate system. As a result, the world is moving from a fixed exchange rate system to a floating exchange rate system. According to economic theory, under a floating exchange rate system, the intervention of monetary authorities in the foreign exchange market will be greatly reduced, and there is no need to keep a large amount of international reserves. However, after abandoning the fixed exchange rate system on a large scale, the foreign exchange reserves of developing countries and countries in transition increased rapidly. Now, nearly two thirds of the world's trillion-dollar foreign exchange reserves are in Asia, while the dollar bloc and the euro group are massively reducing their domestic reserves. At the same time, developing countries and countries with economies in transition are intervening more heavily in exchange rates than in the past. LkLee sees this as an opportunity.

As an international capital market, the forex market has a better history than stocks, and is much shorter than gold, futures, and interest markets, but it has developed at an amazing speed. Today, the daily turnover of the forex market has exceeded \$6.6 trillion, far surpassing the stock and other financial commodity markets, such as futures, and has become the largest market in the world. Stocks on the New York Stock Exchange are only a few tens of billions of dollars a day, which shows that the forex market is not only the world's largest financial market, but also the world's largest commodity market.

1.2 Advantages of Forex

The main advantage of forex is that it is open 24 hours a day, 5 days a week, allowing traders to buy and sell from Sunday night to Friday night and speculate on events from global currency flows and news with leverage. Forex is also the largest and most liquid market in the world, making it the last true arena where fair market competition and real price discovery exist.



Some of the advantages of Forex trading are listed below to illustrate why Forex is the fastest growing market in the world.

1) The 24 hour market

The Forex market is open 24 hours a day, 5 days a week. Trading begins when the world's major financial centers are open. Markets open in New Zealand on Sunday evening and close after the close of New York on Friday. The greatest liquidity occurs when multiple time zones overlap.

2) Mobility

One of the main advantages of the forex market is its superior liquidity. The Forex market is the most liquid market in the world, which is one of the main distinguishing factors between the forex market and other financial markets. More than \$5 trillion is traded daily in the forex market, and this high liquidity means that investors' assets can be quickly converted into cash without any price discounts, easily converting large sums into foreign currencies with little impact on prices.

3) Ancillary features

The amount required to trade forex is usually lower than the amount required to trade other financial markets. In addition to this, multiple desktop and mobile trading platforms give investors easy access to the forex market at any time.

4) Leverage

Forex can be traded with leverage. Leverage means that a lower initial payout is needed to open a larger position. For example, if an investor has \$1,000 in his trading account and uses leverage of 1:100, the investor will be able to open a position worth \$100,000 (100 times the amount in the investor's account). However, it is important to note that although leverage enables a trader to take a larger position to maximize potential profits, the potential losses are just as great.

5) Trade rising and falling markets

The Forex market has no limits on which direction an investor can trade. This means that investors can buy or "go long" if they think the value of a currency pair will increase. Similarly, if the investor believes the value of the currency pair will decrease, the investor can sell it or "go short."



6) Low trading costs

Each Forex trade costs less than a tenth of the cost of ordinary stock trading. This represents a huge savings. It also means that the amount of investment required to start trading forex is lower.

7) Transparency

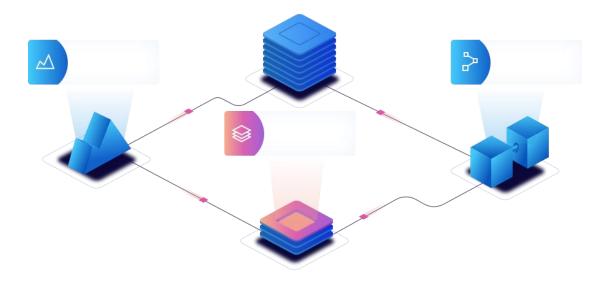
In some exchange-based markets, larger players have been known to move stocks or commodities to gain an unfair advantage. Given the depth of liquidity in the forex market, it is almost impossible to intervene with general market forces. This creates a fair and transparent market for all participants.

8) Volatility

Volatility is always present in the forex market due to the huge daily volume. Increased volatility means access to more trading opportunities. Investors can choose a currency pair that suits the investor's trading style. For example, AUD/NZD is a good currency for beginners to start trading because it has a low daily range and low spread, while EUR/USD is more suitable for advanced traders because of its wide daily range and fast trading speed.

9) Non-standard contract size

Unlike the stock and futures markets, forex is an over-the-counter market. This means that Forex traders have the flexibility to adjust the size of their positions and can trade any amount between 0.01 lots (1 micro lot) and 200 lots. This allows the trader to better manage risk.





1.3 Analysis of the current situation of the Forex industry

The foreign exchange market is operating day and night, and the major trading centers around the world continue to buy and sell foreign exchange. As an international capital speculation market, the foreign exchange market has developed at an amazing speed. Today, the daily turnover of the foreign exchange market has reached more than 6 trillion US dollars, its scale has far exceeded the stock, futures and other financial commodity markets, has become the world's largest investment trading market, countless banks, institutions, individuals and speculators here to chase wealth and dreams.

1) The implementation of the new regulatory system

From 2018, major global regulatory systems began to tighten regulatory rectification, but some measures were implemented in early 2019. For example, the UK, Cyprus, Germany and other 27 EU member states are waiting for the "Revised EU Market Guidance on Financial Instruments" (MiFID II) to be implemented on January 3, 2018, which is a new "mother law" for national retail foreign exchange, contracts for difference and other financial derivatives supervision. Therefore, the beginning of 2021 will be a major test for the European retail forex and CFDS industry. The UK will also be the focus of attention under the new regulatory regime. Nearly 40% of the world's foreign exchange trading volume comes from London, Britain, as the world's largest broker gathering town, London from the end of 2020, the UK Financial Conduct Authority (FCA) published the new regulation advisory opinion, 1:50 leverage ratio, the ban on bonuses have become a topic of discussion in the industry.

Finally, Australia in the southern hemisphere is also in focus. In the first quarter of 2019, brokers regulated by the Australian Securities and Exchange Commission (ASIC) appear to have gained more favor and trust from investors after the Australian government passed regulations requiring retail Forex client funds to be segregated. The new regulatory regime is not new to the industry and has given brokers and investors a lot of time to adjust. However, starting from 2021, the real implementation and implementation of a series of measures will cause a chain reaction in the industry, or the focus of attention of all parties.



2) Trading volume changes

Major global retail forex trading volumes have changed since 2017. This is the inevitable result of a combination of factors, including instability in the forex industry and markets and tighter regulation. On a larger regional basis, the data we have collected shows that there has been a significant uptick in trading volumes at retail forex brokers in Australia, with varying degrees of decline in the US and UK.

In addition, the UK is in the eye of a regulatory storm, which has severely affected the growth of trading volumes, and further declines are still expected in the future. It seems inevitable that retail forex brokers are likely to gradually shift market share away from the UK as new regulations in EU countries such as the UK come into force. As for the US market, we know that since the 2008 financial crisis, US regulators have been very strict in regulating the retail forex industry, which has also led to a number of brokers being forced to exit the US market, including FXCM in early 2019. This is a landmark event and a turning point for the retail forex industry in the US.

3) Industry mergers and acquisitions

In the current highly competitive and highly regulated environment, every broker faces multiple operating pressures. For smaller brokers, the pressure to compete with financially strong brokers is enormous. Many small brokers may end up being forced to sell assets or find a "leg up" route to keep their business afloat.

According to statistics, since the beginning of 2017, there have been no less than 20 cases of inter-industry acquisitions and mergers in the global retail foreign exchange industry and the surrounding industry chain. Obviously, this trend of mergers and acquisitions will continue, and there may be more mergers and acquisitions in 2024, because the regulatory environment has severely squeezed the living space of small brokers.

4) Open up customer channels

Developing new customer channels will be a major challenge for every regulated broker following the implementation of new global regulations. In a restricted market environment such as the ban on bonuses, reduced trading leverage and transparency of the IB regime, the ability of brokers to find different types of clients will be a key determinant of success or failure in 2024. Although the

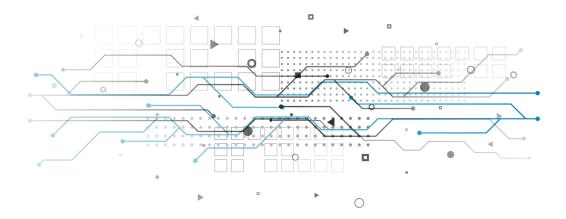


market space is broad, the market share is also limited. When the traditional way of attracting customers cannot be used, the rapid development of new customer channels to seize the market will be the strategic focus of these brokers in 2024.

5) Deal with regulatory changes

Unfortunately, as regulatory details vary from country to country, there is no one good solution available to all brokers worldwide. But we can take the initiative to look at how the big retail Forex brokers are handling these changes in terms of legal, operational, and more. In addition, brokers may adjust their business in response to regulatory changes, and this should be taken into account.

The development of the forex industry needs to break through the shackles, and the comprehensive application of current new technologies has a lot to offer.



1.4 Continuous application of new technologies in the industry

Fintech has penetrated a large area in the financial fields such as banking and stock market financial supervision. The LkLee team believes that the increasingly deep integration of technology and finance has transformed and reshaped the traditional financial industry and built many new financial ecosystems, thus improving the entire financial level and promoting financial innovation, and greatly enhancing the ability of financial services to serve the real economy.



The so-called fintech refers to the financial innovation driven by cutting-edge information technologies such as big data, cloud computing, artificial intelligence, biometrics and blockchain to provide customers with more economical, convenient and efficient quality financial service experience. New business models, new technology applications, new operational processes, new products and services and new risk control solutions that have a significant impact on financial markets, financial institutions and the supply of financial services.

Fintech includes both front-end industry and back-end technology. At present, it is mainly used to transform the operation mode of traditional finance, innovate the products and services provided by traditional finance, fill the gaps left by traditional finance, improve efficiency and effectively reduce operating costs, improve and innovate payment transactions (the electronic substitution rate of financial payment is getting higher and higher), and improve security.

At present, the superposition and integration of these cutting-edge technologies with traditional financial services and scenarios Big data finance (focusing on the acquisition, storage, processing, analysis and visualization of financial big data), artificial intelligence finance (using artificial intelligence technology to deal with problems in the financial field), blockchain finance (decentralization, forming a closed loop of ecological business, greatly reducing financial transaction costs, and a new form of finance driven by algorithms), and quantitative finance (high-end capital and wisdom of the financial industry Forces-intensive areas) and other new financial tuyere, and constantly innovate financial services methods, greatly improve the availability of financial services, improve the efficiency and innovation ability of finance, reduce financial risks, on the financial industry, financial markets, financial institutions, etc., have a wide and far-reaching impact, has become the commanding heights of financial development.

For the financial industry, in the context of the rapid development of the digital era, the financial digital transformation has become very urgent, which is not only an opportunity to establish a digital financial system compatible with the information society and the digital economy, but also a severe challenge in terms of concepts, mechanisms, talents and other aspects.

For the financial market, the cutting-edge technology of fintech has taken root in the financial market which naturally has massive standardized big data. It makes the collection, integration, analysis and judgment of financial market data easier,

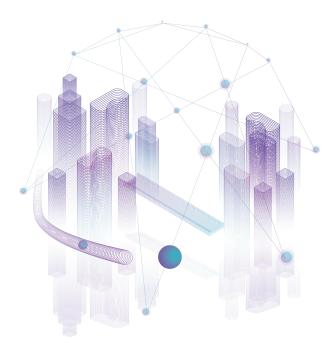


can redefine the price discovery mechanism of the financial market, promote the liquidity of the financial market, and improve the efficiency and stability of the financial market. Improve the ability and level of risk prevention and control in the financial market, and further promote the segmentation of the financial market.

For financial institutions, the greatest value of fintech is to enhance users' experience of financial products. Fintech has formed a solution that integrates advanced technology, financial scenario, customer insight and product operation, and promotes financial institutions to adapt to the new changes in users' financial consumption habits. The new credit reporting, credit granting and risk control systems can realize precise marketing, mass customer acquisition, significantly reduce customer acquisition costs, more effectively reduce risks, and significantly improve business efficiency.

The foreign exchange market has an increasing proportion in the financial field, and as the largest market, it is crucial to the application of science and technology. Introducing the latest achievements in the field of financial technology to the foreign exchange field will help the rapid development of the industry.

Based on the above background, LkLee has achieved significant growth and continues to deepen its target market in order to bring more value to users worldwide.





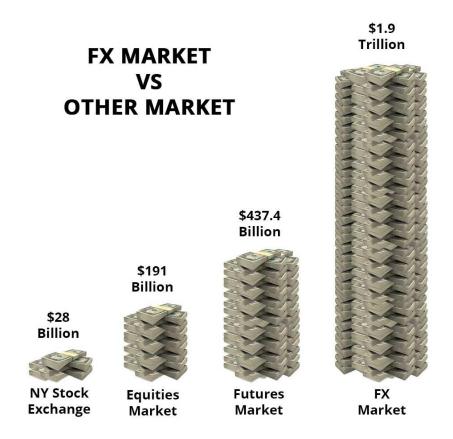
Chapter 2: LkLee Platform overview

2.1 Introduction to LkLee

LKLEE is a fully licensed global Forex and CFD broker. Founded by a dedicated team of senior online finance professionals with extensive experience, the company offers innovative trading products and exceptional service and support.

Combining technical ingenuity and dedicated personal service, LKLEE provides traders with an exceptional trading experience on a platform called LKLEE 5. Our cross-device capabilities mean you can trade in the office, at home or via desktop, laptop, mobile device or tablet. In addition, our highly trained and dedicated account managers provide you with professional language guidance 24 hours a day.

Through our training materials, we help investors at all levels with forex training, chart analysis and basic analysis to meet their needs. With our significant resources in education, we support videos and ebooks that investors lack.





LkLee aims to provide more investors with comprehensive Forex and CFD solutions to help investors achieve their investment goals and achieve wealth happiness. The investment process is a distillation of this experience, discarding the traditional pitfalls of asset management, taking advantage of mature and persistent market inefficiencies, and making all investment decisions based on evidence rather than opinion. For example, ego and operational inefficiencies in favour of a clear, repeatable and systematic approach to investing.

LkLee knows how to trade. With the scale of global fintech and the agility of a start-up, Lklee is dedicated to providing clients with everything they need to trade in global markets, with pricing only available to investment banks and high net worth individuals.

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

Since its inception, LkLee 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 adjustments and sub-platform operations. In addition, LkLee is entrusted not only to individual and corporate investors, but also to a wider range of institutional investors such as pension funds, sovereign wealth funds, insurance, banks and non-profit organizations.





2.2 Top team co-construction

Strong talent backing is the solid force for LkLee's innovation and development. LkLee has talents in various fields, including senior executives and core management team with more than 10 years of experience in Forex and CFDS, commercial factoring, supply chain finance and trade finance.

1) Core investment advisory team

Travis - Leads LkLee's venture capital and new crypto investments. His responsibilities include sourcing, analyzing and executing investments, as well as helping raise additional capital for LkLee portfolio companies. Prior to joining LkLee, Travis was a mergers and acquisitions lawyer 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 LkLee, subsidiaries, investors and the broader network. She is both the primary point of contact for all post-investment support as well as LkLee'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) Advisory team

Blythe Masters - Spent 27 years at jpmorgan Chase 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, a world-renowned expert in computer technology application development, received his Bachelor's degree 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.



2.3 Vision and Values of the Platform

LkLee's goal is to build a world of Forex and CFD trading with advanced technology at its core, where passionate traders can face the challenges and opportunities presented by global markets, while at the same time being committed to innovation, continuous improvement and utilising previously unavailable cutting-edge technology. In addition, staffed by experts from the financial services industry, the management team has extensive experience in the Forex, CFDS and equity markets in Asia, Europe and North America, and it is this experience that allows us to select the best technology solutions and hand-pick some of the best pricing providers in the market.

1) The LkLee Vision

LkLee's vision is to create the best and most transparent trading experience for retail and institutional clients, offering superior spreads, execution and service that allows traders to focus more on their trades and get a steady stream of high returns. In seeking to bridge the gap between retail and institutional clients, LkLee offers trading solutions 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

2) LkLee Core values

LkLee is committed to being one of the global leaders in Forex, futures and CFD trading, 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.

LkLee creates a fair and ideal environment for investors to invest, trade and manage digital assets. As such, our core values are to ensure fairness and



transparency in the global process of trading, and to address security, audit, reporting, analytics and other regulatory compliance needs in the safest and most effective way.

- Adhere to fiduciary responsibility: LkLee puts the interests of investors and clients first, and provides professional and objective investment advice to investors and clients to help more people build a better future.
- Focus on performance: Since its establishment, LkLee has focused on innovation, constantly learning, continuously optimizing and improving itself, and is committed to providing better investment solutions for investors and customers.
- Responsibility and passion: Everything LkLee does, from investment performance to technology development, is about the future of its clients, LkLee itself and every employee. LkLee is deeply committed to excellence.
- The pursuit of a better tomorrow: LkLee is committed to the long term, sustainable development and responsible business philosophy, and is constantly exploring ways to help more people achieve wealth and happiness.

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





2.4 Platform core advantages

1) Liquidity providers

At the heart of LKLEE's business is our commitment to providing clients with competitive spreads and execution of major currency pairs.

2) Specialise in trading

The LKLEE trading platform is designed for trading Forex, futures and CFDS. With LKLEE, investors can analyze financial markets, execute advanced trades, use trading machines and stay one step ahead of other investors.



3) The spread in the ECN account is close to 0.0

True ECN pricing coupled with additional liquidity and dark pool liquidity sources from over 50 different banks means a much tighter spread of 60 against FX 24/5.

4) Trade more on LKLEE

Fifteen major index contracts, including the FTSE100 and DowJonesIndex, trade 24 hours a day at a 1 point spread.

5) Fast order execution

New York and London Equinix's trade servers mean unrivalled trade execution speeds. Take advantage of ultra-low latency fiber cross-connect to various VPS providers.

6) High security

LkLee has advanced multi-layer, multi-cluster system architecture, multi-layer architecture and microservice development mode greatly improve the performance, security, stability and scalability of the system; Function deployment, version update without downtime, to maximize the end user's operating experience.

In addition to the security and stability support at the technical level, at the operational level, the platform has a number of financial product experts and technical security experts, and is equipped with an international level of risk control team to provide due diligence, project rating, smart contract audit, risk assessment and other services for digital assets, providing multi-dimensional security and risk control guarantee.

7) Multi-system support

Based on LkLee's strong system ecosystem and the need to serve different types of clients around the world, the platform will provide support including trading products, high performance, security and stability, liquidity, multi-language, multi-client and derivatives. LkLee will give full play to the advantages of the team in technology, operation and resources, and make multi-dimensional efforts to provide sufficient liquidity for the platform and bring users a good trading experience. The main measures are as follows:



- LkLee has rich resources and numerous partners in the industry, and actively links and cooperates with outstanding exchanges, investment funds, financial teams, and large trading houses around the world to provide liquidity support.
- LkLee achieves commercial fission through diversified business models, as well as rich and diverse financial technology and other means, to increase the number of users and activity of the platform, and fundamentally improve the liquidity of the platform.
- Through innovative trading strategies, LkLee develops its own site in the
 compliance market on the one hand, and provides technical support for
 teams with global resources, traffic and capital advantages to set up trading
 platforms on the other hand. This multi-centralized trading alliance model
 can realize deep sharing of transactions, and outstanding orders between
 different countries and different sites can be completed. It can provide
 sufficient liquidity support for each site.
- LkLee not only provides API (Application Programming Interface) externally for high-frequency trading programs, DApps and other third parties to call, but also shares trading with other platforms through technical means to provide more liquidity.

8) Multi-language support

The initial version of LkLee supports English, Simplified Chinese, and Traditional Chinese, and subsequent versions will be supported in languages including Japanese, Korean, German, French, Russian, Arabic, French, Spanish, Portuguese, and more. In the future, it will support commonly used languages in more than 100 countries and regions, clearing the language barrier for building a world-class trading platform for forex, futures and CFDS.





Chapter 3 LkLee Trading Products

3.1 Forex Trading

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

1) Trade products

- Forex CFDS: The Forex market offers traders the opportunity to trade 24 hours a day, 5 days a week in the world's most liquid financial markets.
 Traders can take advantage of some of the 52 currency pairs with extremely small spreads, superior execution and deep liquidity. Leverage 1:400 with a sliding spread.
- Index CFDS: Gain access to the world's largest equity markets through Global index CFDS offered by LkLee. With spreads starting from 0.4 points across 120 global indices, traders can gain wider access to the market while enjoying commission-free and 24/7 trading in major markets. Leverage 1:400 with a sliding spread.
- Commodity CFDS: Trade energy, agricultural, oil and metal products such as gold and silver, such as currency pairs against the US dollar or as futures CFDS. We combine strict pricing and flexible lots, starting at 10 cents per point, to provide investors with a powerful product. Leverage 1:400 with a sliding spread.
- Trading stocks: Forex can include conflicting opinions among investors. One investor sells a par that he thinks will reduce the value, while another investor buys the same par because he predicts the value will increase. Leverage 1:400 to trade 12 currency pairs.

2) Handicap

The LkLee has the lowest spread of all major and minor currency pairs. In particular, our average EUR/USD spread of 0.1 point * is one of the lowest in the world.



LkLee offers variable spreads on the Forex trading platform. Our pricing is made up of over 25 different liquidity providers, ensuring that our spreads and liquidity depth remain tight. On the platform, spreads can be as low as 0.0 points.

3) Foreign exchange trading

- Forex account type: LkLee offers standard accounts with no commissions 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 our demo trading accounts have the same features as live trading accounts.
- Forex trading: LkLee accounts allow investors to trade more than 60 currency pairs, including major ones. Trade with flexible leverage ranging from 1:1 to 1:500 without intervention.
- Commodity CFD trading: LkLee offers gold and silver trading against the US dollar and euro (XAU/USD, XAG/USD, XAU/EUR and XAG/EUR). Traders can trade metals at extremely fast execution speeds without the need for re-quotes. Trade gold and silver with 1:500 leverage without a trading desk.
- Index CFDS trading: LkLee offers a wide range of index CFDS covering 15
 major markets as well as indices for Brent, WTI and natural gas. Our index
 CFDS can be traded directly from an investor's account.

3.2 CFDS Solutions

LkLee offers flexible trading conditions for a wide range of CFDS, covering indices, energy, metals, commodities and more.

CFDS, which stand for "Contracts for Difference," 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 changes in the instrument's price. 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.





3.3 Commodity Trading

Trade the most popular commodities around the world, including energy, agricultural products, and metals. LkLee combines strict pricing with flexible conditions to provide users with a powerful product.

LkLee offers a flexible and easy way to access some of the world's most sought-after commodities, including energy and metals, from the trading platform. Commodity markets are attractive to speculators because they are susceptible to wild changes in supply and demand.

1) Energy

LkLee allows trading of spot energy contracts, including crude, Brent and natural gas, from an investor's MetaTrader 5 platform. For investors interested only in price speculation, trading energy contracts as spot instruments has a number of advantages.

2) Precious metals

LkLee allows a leverage ratio of 1:400 to trade metal spot prices, including gold or silver against the US dollar or euro and platinum or palladium against the US dollar as currency pairs.

3) Soft commodities

In addition to energy and metals contracts, at LkLee we offer a range of soft commodity products to trade, including corn, soyabeans, sugar, cocoa, coffee and wheat CFDS - all with very low spreads and leverage of up to 1:400.

4) How does commodity trading work?

- Commodities cover energy, agricultural and metal products. These products are traded on futures markets and derive value from the characteristics of supply and demand.
- Supply characteristics include weather in agriculture and extraction costs in mining and energy.



- Demand for goods tends to be characterized by broader conditions such as economic cycles and population growth. Commodities can be traded as standalone products or in pairs.
- Metals and energy are traded against major currencies, while agricultural futures contracts are traded as standalone contracts.

3.4 Stock trading

You can open a position in multiple stocks around the world, including 1,000 ETFs. We offer CFD trading on many popular stocks such as Apple, BP, Lloyds Banking Group, Tesco, Rio Tinto, etc.

- Share CFDS are a great way to hedge other positions and also reduce capital exposure through leverage.
- CFDS on shares are an easy way to sell stocks short. Combined with leveraged trading, it provides investors and traders with the opportunity to trade when the share price falls.
- Commissions on equity CFDS: Trading equity CFDS means that investors and traders can trade directly on the price of the underlying exchange without paying an additional markup on the bid/ask spread. However, investors and traders will pay a small commission on each trade.

LkLee's "Next Generation" trading platform offers a variety of flexible and easy-to-use order types, allowing you to better manage trade opening, closing and trading risk. We also offer a wide range of advanced order features, including limit orders, guaranteed stop-loss pending orders, tracking stop-loss orders and price ladder.



1) Technical indicators and charting tools

With more than 80 technical indicators, chart types, and drawing tools built into LkLee's award-winning charts, users get all the functionality they need to analyze price movements and conduct detailed technical analysis.

2) Price estimator tools

Using LkLee's Charting Toolkit, search for common technical chart patterns and open chart candle patterns over short - and long-term time intervals. LkLee's Pattern Recognition tool helps users automatically identify obvious patterns, obtain price estimates, and highlight potential trading opportunities.

3) Module correlation

Easily and efficiently navigate platform functions. Correlate different modules together, and if you change a product in one module, all the other associated modules will automatically update, showing new products that the user needs to analyze.

4) Trade directly from the chart

More precise control over trade execution. Open and close positions directly on charts, edit stop loss and profit levels. This easy-to-use feature allows users to leverage historical price movements to better judge open position prices and make risk management decisions.





3.5 Index Trading

Access to the basket of instruments that make up the index with just one trade. The LkLee trading platforms all offer the most popular indexes in the world.

Indices are the most popular form of CFDS. LkLee has a large selection of indices from around the world, including Australia's S&P 200 Index, UK's FTSE 100 Index, US E-Mini S&P 500 Index and US Dow Jones.

Stock indices are a good indicator of market performance. Indices such as the FTSE 100 and DJIA are baskets of blue-chip stocks listed on exchanges and are often a good gauge of current market sentiment. A change in the performance of any constituent stock in the index is reflected in a change in the overall value of the index.

The advantage of an index is that it allows traders to look more broadly at a basket of stocks, rather than focusing on just one stock. The LkLee platform both offers online CFDS and futures based indices.

1) (spot) stock index spreads

LkLee offers competitive spreads for all of our spot indices, for example, E-mini S&P 500 from 0.4 point, FTSE 100 from 1 point, Xetra DAX from 1 point and S&P 200 from 1 point.

2) Futures index

In addition to stock indices, LkLee also offers futures indices: the ICE Dollar Index and the VIX Index.

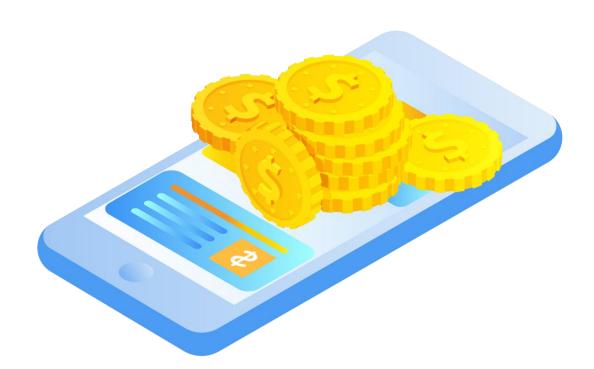
How do I determine if a client is entitled to dividends on the AUS200 index?

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. LkLee 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 our blog ex-dividend Adjustment.





Chapter 4 : Funding and Security Guarantees

4.1 Standard Account

LkLee's standard accounts offer unrivalled speed of execution. Combine this with an all-inclusive spread starting at 1:00, an Equinix NY4 server in New York, a set of up to 25 pricing providers, and investors can see why our standard accounts can provide investors with an unmatched trading experience all day, every day.

- Fast order execution: The LkLee server is located in the Equinix NY4 data center in New York. The NY4 data center, known as the financial ecosystem, houses more than 600 buyer-seller companies, exchanges, market data and service providers. Servers are cross-connected to our network to ensure low latency and fast execution of investors' trades.
- No trading restrictions Scalping allowed: LkLee has no trading restrictions. Having some of the best scalping and high-frequency trading conditions worldwide, LKlee allows traders to place orders between spreads as there is no minimum order distance and a freeze level of 0. This means that orders, including stop-loss orders, can be placed as close to the market price as possible. Traders can also hedge positions, as LkLee does not have a first-in-first-out (FIFO) rule. Traders do not have to pay margin for hedging trades and enjoy the benefits of margin netting.
- Secondary pricing Market depth: Market depth shows the full executable price directly from the pricing provider. Market depth provides full transparency of liquidity for each currency pair by showing the available volume of trading at each price level at any given time. High liquidity, asynchronous spot prices, and low latency guarantee the smallest possible spread.
- Flexible funding and withdrawal options: Once an investor has opened an investor's account, investors can provide funds using any of our funding options including: credit/debit card, Skrill, wire transfer, Neteller, FasaPay, UnionPay, Bpay and broker-to-broker transfers, deposits.



• Flexible trading volume: There is no limit or limit on the size of transactions, and investors can make transactions as small as a microlot (0.01). Our flexible lot size allows investors to try out the platform with minimal risk and manage the investor's trade size based on the investor's account balance.

Overall, LkLee offers Forex, commodities and global indices with leverage up to 1:400 and support for all major account currencies. Trading 52 currency pairs, a wide range of commodities including gold and silver oils, and 120 major indices including the FTSE 100, S&P/ASX Indices and Dow Jones indices, among others, 24 hours a day. At the platform, traders can use higher leverage to adapt their trading style and take full advantage of their manual and automated trading strategies. Some traders prefer to trade in the local currency. We offer traders the option to open an account in one of dozens of supported base currencies: USD, AUD, EUR, GBP, SGD, NZD, JPY, CHF, HKD, CAD.

4.2 Making Deposits

LkLee offers over 10 flexible funding options in dozens of different base currencies. Use a variety of methods to deposit instantly for free.

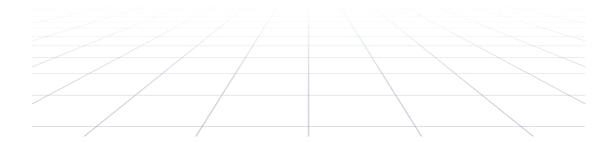
Note:

- Valid for all countries except Algeria, Democratic People's Republic of Korea (DPRK), Ecuador, Iran, Myanmar (Myanmar), Uganda.
- Finance Department working hours 1-2 hours. The maximum processing time is extended to bank working days.
- Valid for all countries except Iran, Liberia, Pakistan, Rwanda, Sudan, Syria, Yemen, Zimbabwe, Afghanistan. Due to special regulations of the Reserve Bank of India, applications for prepaid cards from Indian citizens cannot be accepted.
- Please check the actual commission on the Payment agent website.
- When creating a deposit request in the background, you need to select the US dollar as the deposit currency.



The deposit process:

- Payment process: To speed up processing, we recommend that all account holders deposit funds from their secure client areas into their trading accounts.
- Fund security: Electronic payments are processed using SSL (Secure Socket Layer) technology and are encrypted to ensure security. All payment information is kept confidential and used only to fund investors' LkLee trading accounts.
- Bank fees: LkLee does not charge any additional deposit or withdrawal fees.
 However, investors should be aware that investors may incur fees for payments made with certain international banking institutions. LkLee assumes no liability for any such banking charges.
- Third Party Payments: LkLee does not accept payments from third parties.
 Please ensure that all deposits in the investor's trading account are from a bank account in the investor's name. If the trading account holder is one of the parties to the bank account/credit card, payment can be made using a joint bank account/credit card.



4.3 Withdrawal

LkLee supports a variety of withdrawal methods.

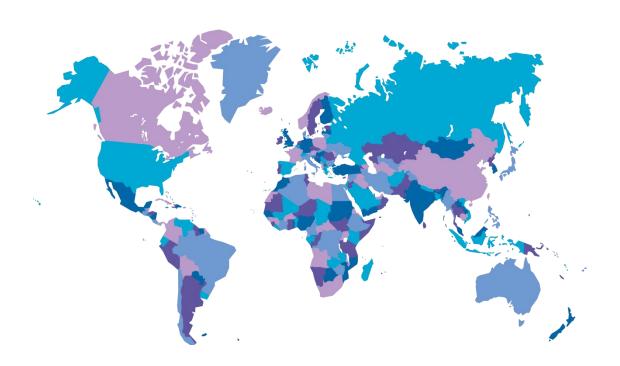


VISA mastercard 2	USD 欧元	20 USD	2 000 USD	2.5%+7.5 USD 2.5%+6 欧元	1-2 小时 3
<i>₹asa</i> pay	USD IDR	1 USD 10 000 IDR	-	0.5%	1-2 小时 3
UnicaPay 中国程联 China UnionPay	CNY(RMB)	10 USD	35 000 USD	1% (最小值 6 CNY)	1-2 小时 3
Perfect Money®	USD 欧元	1 USD	-	0.5%	1-2 小时 3
[®] bitcoin	USD	1 USD	-	0%	1-2 小时 3
@ litecoin	USD	1 USD	2	0%	1—2 小时 3
♦ ETHEREUM	USD	1 USD	=	0%	1-2 小时 3
Bitcoin CASH	USD	1 USD	-	0%	1-2 小时 3
o dogecoin	USD	1 USD	-	0%	1—2 小时 3
Ше ШевМопеу	USD 欧元 RUB	1 USD	-	$0.8\%^{1}$	1-2 小时 3
— payments [™] 7	USD 欧元	1 USD	-	0%	1-2 小时 3
		其他方法			
★ 中国□行 BANKWIRE	CNY	5 USD	10 000 USD	0%	1-2 小时 3
INDONESIA BANKWIRE	IDR	5 USD	10 000 USD	0%	1-2 小时 3
Malaysia BANKWIRE	MYR	5 USD	10 000 USD	0%	1-2 小时 3
ประเทศไทย BANKWIRE	ТНВ	5 USD	10 000 USD	0%	1-2 小时 3
Vietnam BANKWIRE	VND	5 USD	10 000 USD	0%	1-2 小时 3
QIWI	全部由Qiwi 钱包接受 6	1 USD	-	0.5%	1-2 小时 3
Prepaid Card	USD 欧元	1 USD	-	0%	1-2 小时 3
WireTransfer	欧元	100 欧元	-	50 欧元	1-2 小时 3
€K PAY	USD	10 USD	50 000 USD	2% 5	1 小时 4
Яндекс. Деньги <mark>€</mark> Via Payment Agent	RUB	200 RUB	7	2.5% 5	1-8 小时

- Minimum 0.01 USD, maximum 50 USD; Minimum \in 0.01, maximum \in 50; Minimum 0.01 rubles, maximum 1,500 rubles.
- Valid for all countries except Algeria, Democratic People's Republic of Korea (DPRK), Ecuador, Iran, Myanmar (Myanmar), Uganda.
- Treasury Department operating hours are 1-2 hours. The maximum processing time is one banking business day at most. For withdrawals made by wire transfer, the maximum period for funds to reach the bank account is 7 banking working days.



- It may take up to 1 hour
- Please check the actual commission on the payment agent's website.
- Choose US dollars as the withdrawal currency.
- Valid for all countries except Iran, Liberia, Pakistan, Rwanda, Sudan, Syria, Yemen, Zimbabwe, Afghanistan. Due to special regulations of the Reserve Bank of India, applications for prepaid cards from Indian citizens cannot be accepted.



4.4 Security of Funds

1) Fund supervision

The financial services sector is increasingly monitored and requires a safe, healthy and financially sustainable environment where customers can focus on maximizing returns without having to worry about whether their capital/profits are



being maintained in any way.

LkLee maintains a strict capital structure segregated, with client funds held by dedicated third party entities that only manage 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 the industry's leading online trading broker, we accept strict supervision from multiple financial regulators on five continents and separate client funds from the company's working capital in one of the world's top Tier 1 bank segregated accounts to ensure that segregated client bank accounts have sufficient funds to maximize the security of client funds. In addition, we understand the importance of withdrawing funds to our customers and are always committed to providing you with a safe, fast and high-quality withdrawal experience.

- Convenient withdrawal methods: We offer a variety of withdrawal methods. Both principal and profit can be withdrawn through online application.
- Efficient automated process: Automated withdrawal application submission and processing, improving 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.

2) Compliance supervision

LkLee is strictly regulated by a number of financial regulators including ASIC, SCB, CMA, CySEC, FCA, BaFin and DFSA. We also hold our clients' funds in a Tier 1 segregated bank account and offer many free deposit methods to meet compliance and regulatory requirements. LkLee recognises the importance of complying with all relevant laws, rules, regulations, policies and standards. Committed to having strict management discipline and best-in-class controls in our compliance environment. As a regulated entity, we will meet 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.

- 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 is highly sought after by 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.
- On 7 April 2021, the UK government formally announced the creation of a 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. The CySEC assumes 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.
- DFSA: The Dubai Financial Services Authority 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.



Chapter 5: Global Diversified Customer Service

5.1 Sovereign Wealth clients

For a long time, LkLee has been entrusted with the services of major sovereign wealth management institutional clients, and has accumulated rich experience in the investment and management of sovereign funds. With its excellent performance, perfect investment management system and strict risk control system, LkLee has won the favor of sovereign wealth clients from different countries and regions around the world.

LkLee is diligent and responsible in the investment management of sovereign funds, and has achieved excellent investment performance, which is highly recognized by clients. At present, sovereign wealth mainly consists of fiscal surplus, foreign exchange surplus and public funds such as pension funds. For a long time, LkLee has a deep understanding of the capital characteristics and investment needs of sovereign wealth funds, such as large volume, long investment period, wide investment scope and diversified strategic allocation, and provides customized product strategy solutions to help clients continuously improve investment performance and optimize investment layout. At the same time, relying on the overall comprehensive strength of LkLee, LKLEE 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, LkLee provides financial institutions with personalized and customized products and outsourcing services, including one-to-one (multiple) special accounts, investment advisors, 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, risk tolerance and so on, LkLee accurately describes the characteristics of customers' risk and return needs. Combined with LkLee's years of experience in serving various industrial clients, it accurately matches a variety of investment strategies to meet customers' investment needs and objectives. In addition, LkLee also relies on strong investment research capabilities and rich service capabilities for industrial clients, and constantly introduces more innovative and valuable investment strategies.

2) Public offering fund products

LkLee 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, LkLee also uses LKLEE'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 LkLee products.

4) Other services

LkLee 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

LkLee's corporate finance business aims to deeply understand and explore the financial service needs of corporate clients, and provide comprehensive financial solutions to corporate clients by leveraging LkLee's full asset management license, professional investment and research capabilities, and a wide range of partners. LkLee has served more than 500 well-known enterprises and has received consistent 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. LkLee has a wealth of 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 the annuity investment management, LkLee adopts the management model of enterprise annuity and occupational annuity portfolio. Through forward-looking research, LKLEE 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. LkLee has the strategic perspective of merger and



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

5.4 International Clients

With more than 20 offices in China, Southeast Asia, Europe, North America and other regions, LkLee serves more than 100 million individual and institutional clients worldwide. Since its inception, LkLee 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 investment under management, including sovereign funds, central banks, pensions, insurance and other professional institutional clients. At the same time, LkLee 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, LkLee is competitive in the following aspects:

- Technical team: LkLee has a very mature and strong technical support, has
 accumulated rich industry and technical experience in foreign exchange,
 finance, trading, investment and other fields, and has made industry-leading
 breakthroughs in the development and application of underlying
 technologies. The LkLee team is a perfect gathering of senior people with
 many years of practical operating experience in the forex industry and
 profound insights into the development of the industry.
- Industry resources: LkLee signed strategic cooperation agreements with top projects in target industries to provide strong support for LkLee to enter the forex scene, so as to truly promote the actual landing of LkLee applications.
 Industry Partners include: Goldman Sachs, IDG Capital, Accel Partners, Fidelity Investment Group, IBM, etc.
- Liquidity support: LkLee 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. LkLee 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. Introduction of market maker system.
- Powerful trading tools: With the maturity of the market, the complexity of trading demand has become larger, and the simple trading and trading function in the past has been difficult to meet the appetite of professional



investors. LkLee, with its senior experience in securities investment and artificial intelligence deep learning technology, provides a richer suite of trading tools for professional investors, including automatic investment tools, quantitative trading tools, strategies, etc. At the same time, it also enables ordinary investors to easily access professional foreign exchange tools, lowering the threshold of foreign exchange investment, and making foreign exchange trading more popular.

- Business governance: Unlike ordinary projects, LkLee has a clear and defined strategic plan for the target industry and continues to enable free, fair and high-value ecological prosperity through the model of an autonomous community. LkLee is more focused and professional with the distributed decentralized, immutable and cryptographic security of distributed technology and the characteristics of peer-to-peer transfer of value to penetrate target industries and quickly gain market share.
- Fund management: Led by the Investor Protection Fund, LkLee's fund management strictly adheres to the principles of fairness, justice and openness, and takes 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 of LkLee's use of the funds will be disclosed to all investors on a regular basis to ensure that the use of the funds is made public.
- Room for growth: LkLee's target industry is the trillion-dollar foreign exchange 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, LkLee's commercialization logic is clear, and 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

LkLee has signed strategic cooperation agreements with top projects to provide strong support for cutting into target scenarios, so as to truly drive the global development of LkLee'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 LkLee's core capital backers.

1) Morgan Stanley

Morgan Stanley 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 Anti-money laundering and compliance measures

LkLee has more than 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 officers 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.

LkLee 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 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.

LkLee 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.

6.4 Sustainability

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

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



1) Governance structure

LkLee'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 LkLee's management and operating conditions, business risks, and the overall ability to hold the management team accountable.

2) Contribute to the long-term benefits of our clients

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

3) Promote employee development and operational excellence

LkLee actively manages the environmental impact of its own 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.





Chapter 7 Policies and Statements

7.1 KYC and AML Policies

We ensure that we comply with Know Your customer and anti-money laundering laws and regulations and do not knowingly violate Know Your Customer and anti-money laundering policies.

1) Preface

We ensure compliance with Know Your customer and anti-money laundering laws and regulations and do not knowingly violate Know Your Customer and anti-money laundering policies. Within our reasonable control, we will take the necessary measures and techniques to provide you with a safe and reliable service in order to protect you against losses caused by money laundering activities to the greatest extent possible.

Our Know Your Customer and Anti-Money Laundering Policy is a comprehensive international policy system that includes the Know your Customer and anti-money laundering policies of the jurisdiction under which you are governed. Our robust compliance framework ensures that we meet regulatory requirements and regulatory standards at both a local and global level, and ensure the operational sustainability of our website.

2) We know your customers and the content of your anti-money laundering policy:

- We issue and update Know your customer and anti-money laundering policies to meet the standards set out in relevant laws and regulations
- We issue and update some of the guidelines and rules related to the operation of this website, and our staff will provide you with full service in accordance with these guidelines and rules
- We have designed and improved internal monitoring and transaction control procedures such as strict identity authentication procedures, and set up a professional team responsible for anti-money laundering



- We conduct due diligence and ongoing supervision of our clients based on risk prevention
- Review and regularly review existing transactions
- Report suspicious transactions to competent authorities
- Identification documents, proof of address, and proof of transaction records will be kept for at least six (6) years; If they are submitted to a regulatory authority, understand that separate notices will not be provided to you
- Credit cards are prohibited throughout the transaction
- Regularly participate in the training organized by relevant departments and train employees regularly

3) Identity information and its verification

O Identity Information

Depending on the laws and regulations of the relevant jurisdiction and the nature of the relevant subject, the content of your information we collect may vary, in principle we will collect the following information about you if you are registered personally:

- Basic Personal Information: your name, address (and permanent address, if
 the two are different), date of birth and nationality and other available
 information. Identification should be based on a document issued by an
 official or other similar authority, such as a passport, ID card, or other
 identification document required to be issued by the relevant jurisdiction.
 The address you provide will be verified in an appropriate manner, such as
 checking fare tickets for the means of transport you use, your interest rate
 slip, or the electoral register;
- Valid photo: A chest photo of yourself holding an ID card is required before registration
- Contact information: phone/mobile number and valid email address

If you are a corporation or any other type of legal entity, we will collect the



following information from you to determine the ultimate beneficiary of your account or your trust account.

Your certificate of incorporation and incorporation of your company; Copies of your articles of incorporation and memorandum; Detailed testimonial materials of the company's ownership structure and ownership description, and the Board's decision to appoint an authorized agent of the company to be responsible for the opening and execution of accounts on the Company's website; The identity documents of the company's directors, major shareholders and authorized signatories of the company's website accounts shall be provided in accordance with relevant regulations; The principal business address of the company, and the mailing address of the company if different from the principal business address of the company.

Other supporting documents, documents issued by the competent authorities and such other documents as we may deem necessary under the laws and regulations of the relevant jurisdiction and depending on the specific nature of your entity.

We will only accept identifying information in both Chinese and English; If your identifying information is not in either of the two languages, you should have your identifying information translated into English and properly notarized.

Confirmation and verification

- You will need to provide both sides of your ID card
- You will need to provide us with a photo of you holding your ID against your chest

Copies of supporting documents should be checked against the originals. Nevertheless, such copies should be deemed acceptable if a trusted and suitable reference can attest that such copies are accurate and comprehensive copies of their originals. Such references include ambassadors, members of the judiciary, magistrates, etc.

The identification of the ultimate beneficiary and controller of the account should be based on determining which individuals ultimately own or control the direct customer and/or determining that the transaction in progress was executed

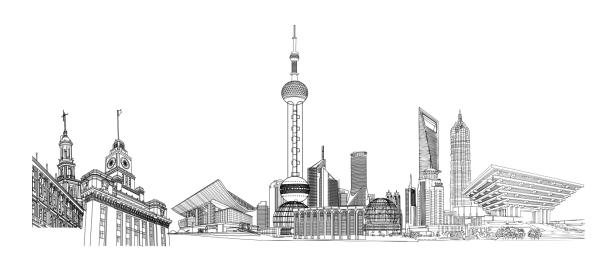


by another person. If you are a business, you should verify the identity of its principal shareholders (e.g., shareholders who hold 10% or more of the voting rights in that business). In general, shareholders who own 25% of the company are at medium risk and need to verify the identity of the shareholder; Shareholders who hold more than 10% of the voting rights or shares are identified as high risk and should verify the identity of shareholders.

4) Transaction supervision

Daily trading and withdrawal limits are constantly set and adjusted according to security requirements and actual trading conditions. If a transaction occurs frequently or beyond reasonable limits in your registered account, our professional team will evaluate and determine if the transaction is suspicious. If we determine that a transaction is suspicious based on our assessment, we may take restrictive measures such as suspending the transaction or refusing the transaction, and may even withdraw the transaction as soon as possible and report it to the competent authorities without informing you.

We reserve the right to refuse registration applications from applicants who do not meet international anti-money laundering standards or who may be considered political and public figures; We reserve the right to suspend or terminate transactions that we have determined to be suspicious based on our own assessment, however, this will not breach any of our obligations and obligations to you.





7.2 Policy required by law

From time to time, LkLee 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 LkLee, law enforcement is generally interested in two types of data: information about a customer's identity and information about their trading activity. When a request for information is received, LkLee 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. LkLee reviews each order and voluntary disclosure request to determine that it has a valid legal basis, and that any response is tightly tailored to ensure that only data is provided that law enforcement is entitled to obtain.

LkLee welcomes enquiries from law enforcement agencies 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.



LkLee also reserves the right to disclose information to the authorities in order to protect itself and its clients.



7.3 Disclaimer

Our products are traded on margin, which means they involve high risk and you may suffer losses in excess of the funds deposited when trading. These products may not be suitable for all investors. Make sure you fully understand the risks involved before trading and carefully consider your financial situation and investment experience. Trading derivatives may not be suitable for all investors, so make sure you fully understand the risks involved and seek independent advice. 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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