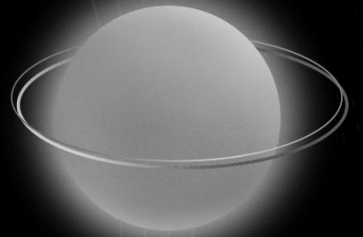
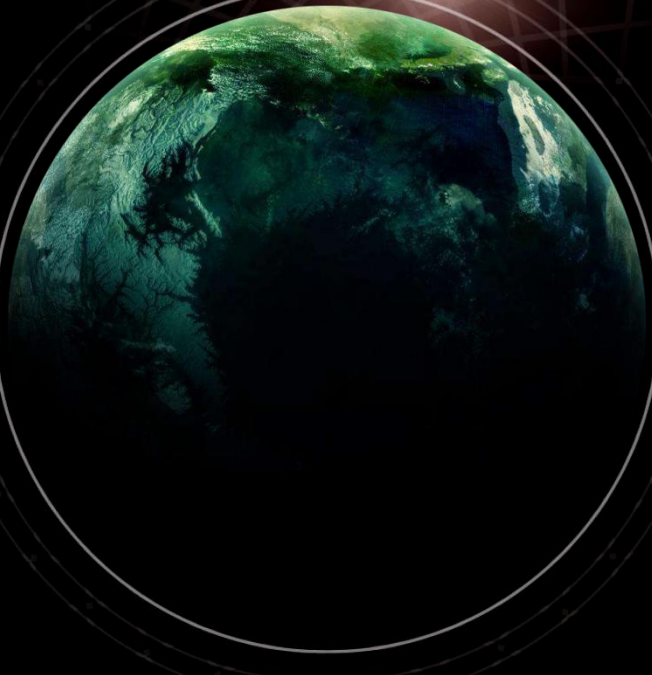




# Capital One Financial Corp (COF)

The world's leading intelligent trading platform and foreign exchange  
contract for difference provider



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# Chapter 1: An Overview of the Market Background

## 1.1 Forex Market Overview

Foreign exchange transaction is the exchange of one country's currency with another. Unlike other financial markets, the foreign exchange market has no specific location and no central exchange, but is traded through an electronic network of banks, companies and individuals. Foreign exchange is traded as a pair of currencies, such as the euro/dollar (EUR/USD) or the dollar/yen (USD/JPY), in which traders buy one currency in a pair and sell the other.

The Foreign exchange market, also known as the "Foreign exchange" or "FOREX" market, is the world's largest financial market, with more than \$6.6 trillion moving through it every day -- more than a hundred times as much as all the securities markets in the United States combined.

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

There are 3.8 billion Internet users in the world, one out of every 396 Internet users is an online trader. Statistics show that there are 9.6 million online traders worldwide. While the US and UK remain by far the biggest FX trading centres, a third of online traders are based in Asia and the Middle East. Asia has 1.9 billion Internet users and 3.2 million people transact online. According to a triennial survey by the Bank for International Settlements (BIS), daily turnover in the global foreign exchange market exceeds \$6.6 trillion, and the average daily volume of foreign exchange trading is more than 53 times that of the New York Stock Exchange. Foreign-exchange trading is four times global GDP. As the world's largest financial market, foreign exchange market investment has been favored by investors.

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

At present, under the background of financial globalization, the rationality of the existence of small currencies in small economies is gradually losing. The Asian financial crisis exposed the weakness of developing countries' adherence to fixed exchange rate regimes. Therefore, the world has formed a trend from fixed exchange rate system to 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 large international reserves. However, after the massive abandonment of fixed exchange rate regimes, foreign exchange reserves in developing and transition countries increased rapidly. Now, nearly two-thirds of the world's trillion-dollar foreign exchange reserves are in Asia, and the dollar and euro groups are massively reducing their domestic reserves. At the same time, developing countries and countries in transition are intervening more heavily in exchange rates than in the past. COF eforex thinks this is an opportunity.

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



## 1.2 The advantage of foreign exchange



The main advantage of foreign exchange (Forex) is that it is open 24 hours a day, allowing traders to buy and sell from Sunday night to Friday night, and using leverage to conduct speculative events from global currency flows and the news. Foreign exchange is also the largest and most liquid market in the world, making it the last real stage for fair market competition and true price discovery.

Below are some of the advantages of forex trading to illustrate why Forex is the fastest growing market in the world.

### **1) 24-hour market**

The foreign exchange market is open 24 hours a day, five days a week. Trading begins when the world's major financial centers open. Markets opened Sunday night in New Zealand and will close after the close of New York on Friday. The greatest mobility occurs when multiple time zones overlap.

### **2) Liquidity**

One of the main advantages of the foreign exchange market is its superior liquidity. The foreign exchange market is the most liquid market in the world, which is one of the main differentiating factors from other financial markets.

With more than \$5 trillion traded daily in the forex market, this high liquidity means 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) Auxiliary functions**

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

### **4) Leverage**

Foreign exchange can be leveraged. Leverage means that a lower initial outlay is needed to take a larger position. For example, if an investor has \$1,000 in his trading account and uses 1:100 leverage, the investor would 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 traders to take larger positions to maximize potential profits, the potential losses are just as great.

### **5) Trading up and down markets**

The foreign exchange market has no restrictions on the directions investors can trade. This means investors can buy or "go long" currency pairs if they think they will increase in value. Similarly, investors can sell or "short" a currency pair if they believe it will decline in value.

### **6) Low transaction costs**

Each currency transaction costs less than a tenth of the cost of ordinary stock transactions. This represents huge savings. This also means that the amount of investment required to start trading foreign exchange is lower.

### **7) Transparency**

In some exchange-based markets, larger participants have been known to move stocks or commodities to gain an unfair advantage. Given the depth of liquidity in foreign exchange markets, 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 large volume of daily trading. More volatility means more trading opportunities. The investor 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 better for advanced traders because of its wide daily range and fast trading speed.

### **9) Non-standard contract size**

Unlike stock and futures markets, foreign exchange 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 microlot) and 200 lots. This allows traders to better manage risk.



## 1.3 Foreign exchange industry status quo analysis

The foreign exchange market operates day and night, and the major trading centers around the world continue the foreign exchange trading transactions in turn. As an international capital speculation market, the foreign exchange market develops rapidly at an amazing speed. Today, the daily trading volume of the foreign exchange market has reached more than 6 trillion US dollars, its scale has far exceeded the market of other financial commodities such as stocks and futures, has become the world's largest investment trading market, countless banks, institutions, individuals and speculators here to pursue wealth and dreams.

### 1) The new regulatory system was implemented

From 2018, the world's major regulatory systems began to tighten regulatory errors, but some of the measures were implemented in early 2019. For example, the revised EU Financial Instruments Market Guidance (MiFID II), which is waiting by the 27 EU member states, including the UK, Cyprus and Germany, was implemented on January 3, 2018. It is a "mother law" for the new regulation of retail foreign exchange, contracts for difference and other financial derivatives. So early 2021 will be a big test for the European retail foreign exchange and CFDS industry. Meanwhile, the UK will also be a focus under the new regulatory regime. Nearly 40% of the world's foreign exchange trading volume comes from London, a major city of the world's large brokers, has been the topic of discussion in the industry since the leverage ratio of 1:50 issued by the UK Financial Market Conduct Authority (FCA) at the end of 2020.

Finally, Australia in the southern hemisphere is also the focus. In the first quarter of 2019, brokers under the Australian Securities and Exchange Commission (ASIC) emerged after the regulation that retail foreign exchange customer funds must be quarantined.

The new regulatory system is not new to the industry and gives brokers and investors a lot of time to adapt. However, from 2021, the real implementation of a series of measures will cause a chain reaction of the industry, or the focus of all parties.





## **2) Changes in trading volume**

Since 2017, major global retail foreign exchange transactions have changed. This is the inevitable result of a series of comprehensive factors such as the instability of the foreign exchange industry and the market and the stricter regulation. On a large scale, the data we collected shows that the trading volume of Australian retail foreign exchange brokers has risen sharply, while the US and the UK have declined to varying degrees.

In addition, the UK is at the centre of a regulatory storm, which has severely affected the growth in trading volume and is expected to decline further in 2018. It seems inevitable that the market share of retail foreign exchange brokers will gradually shift from the UK with the implementation of new rules in EU countries such as the UK. As for the US market, we know that since the 2008 financial crisis, US regulators have strictly regulated the retail foreign exchange industry, which has forced many brokers to exit the US market, including the withdrawal of Fortune Group (FXCM) in early 2019. This is a landmark event and a turning point for the U. S. retail foreign exchange industry.

## **3) Industry mergers and acquisitions**

In the current fierce competition and strict regulatory environment, each broker is facing multiple operating pressures. For small brokers, the pressure is enormous to compete with strong financial brokers. Many small brokers may end up being forced to sell assets or seek a "thigh" path to keep the company going.

According to statistics, since the beginning of 2017, there have been no less than 20 acquisition and merger cases between the same industry in the global retail foreign exchange industry and its surrounding industrial chain. Clearly, this trend of mergers and acquisitions will continue, with more mergers and acquisitions likely in 2018, as the regulatory environment has severely squeezed the survival of small brokers.

## **4) Develop customer channels**

Developing new customer channels will be a major challenge for every regulated broker after the implementation of the new global regulations. In a restricted market environment such as banning grants, reducing trading leverage and transparency of the IB system, whether brokers can find different categories of



clients will be a key factor in success or failure in 2021. Although the market space is broad, the market share is also limited. When the traditional way to attract customers cannot be used, the rapid development of new customer channels to seize the market will be the strategic focus of these brokers in 2021.

#### **5) To deal with regulatory changes**

Unfortunately, with different regulatory details, there is no good solution to offer to all brokers around the world. But we can proactively pay attention to how large retail forex brokers deal with these changes in legal, operational and other aspects. In addition, brokers may adjust their business in response to changes in regulatory measures, which needs to be taken.

The development of foreign exchange industry needs to break the shackles, and the comprehensive application of new technology has great potential.



## **1.4 The application of new technologies in the financial industry**

Fintech has been widely penetrated in banking, stock market financial regulation and other financial fields. The foreign exchange team of COFForex believes that the increasingly in-depth integration of technology and finance has transformed and reshaped the traditional financial industry and built many emerging financial ecosystems, thus improving the entire financial level and promoting financial innovation. The ability of financial services to serve the real



economy has been greatly enhanced.

The so-called fintech refers to 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 business.

Fintech includes both front-end industry and back-end technology. Currently, it is mainly applied in transforming the operation mode of traditional finance, innovating the products and services provided by traditional finance, filling the gaps left by traditional finance, improving efficiency and effectively reducing operating costs, improving and innovating payment transactions (the electronic substitution rate of financial payment is getting higher and higher), and improving security. At present, the superposition and integration of these cutting-edge technologies and traditional financial business and scenes 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 the cost of financial transaction, algorithm-based financial new business form), and quantitative finance (high-end capital and wisdom of the financial industry) And constantly innovate financial service methods, greatly improve the availability of financial services, improve financial efficiency and innovation ability, reduce financial risks, has a wide and far-reaching impact on the financial industry, financial markets, financial institutions, etc., has become the commanding heights of financial development.

For the financial industry, in the context of the rapid development of the digital age, the financial digital transformation has become very urgent, which is not only an opportunity to establish a digital financial system that is compatible with the information society and the digital economy, but also a severe challenge in terms of concept, mechanism, talent and other aspects. The cutting-edge technology of fintech has taken root in the financial market, which has a large amount of standardized big data. It makes the collection, integration, analysis and judgment of financial market data easier. It can redefine the price discovery mechanism of financial market, promote the liquidity of financial market, enhance the efficiency



and stability of financial market, and improve the risk prevention and control ability and level of financial market. Further promote financial market segmentation.

For financial institutions, the greatest value of fintech is to improve users' experience of financial products. Fintech has formed a solution integrating advanced technology, financial scene, customer insight and product operation to promote financial institutions to adapt to the new changes in users' financial consumption habits (for example, through facial recognition, remote interview, online signing and other technical means, so that customers do not need to prepare complicated materials, making the process more simple and convenient, greatly improving customer experience). The brand-new credit investigation, credit granting and risk control system can realize precise marketing and mass customer acquisition, greatly reduce customer acquisition costs, more effectively reduce risks, and significantly improve business efficiency.

The foreign exchange market is taking an increasing proportion in the financial field, and as the largest market, it is of great importance to the application of technology. Introducing the latest achievements in the current fintech field to the foreign exchange field will help the rapid development of the industry.

With all of this in mind, COFForex has seen significant growth and continues to expand into its target markets in order to bring more value to customers around the world.





## Chapter 2: COFForex: An Overview

### 2.1 About the COF

COF is one of the most prominent providers of FX contracts for difference, providing trading solutions to active day traders and scalpers as well as newcomers to the FX market, providing clients with cutting-edge trading platforms, low latency connections and superior liquidity. COF is revolutionizing the online forex market. Traders are now able to access pricing previously available only to investment banks and high net worth individuals through COF.

COF is committed to innovation, continuous improvement, and the utilization of previously unavailable cutting-edge technology. At the same time, a team of experts from the financial services industry, the management team has extensive experience in the foreign exchange, CFD and equity markets in Asia, Europe and North America. 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. COF's mission is to create the best and most transparent trading experience for retail and institutional clients, providing superior spread, execution and service that allows traders to focus more on their trades.

COF will let more investors:

- Use high-performance trading platforms to trade
- Access to global markets through multi-asset trading platforms
- Transact on any device, anytime, anywhere

COF seeks to bridge the gap between retail and institutional clients, offering trading solutions previously reserved for investment banks and high net worth individuals. COFLow Spread Connectivity was born to provide superior execution techniques, lower point spreads, and unmatched mobility.

#### 1) Core values

- Integrity and trust



- Be honest and fair
- Transparency
- Commitment and responsibility
- Reliability
- Flexibility
- Continuous innovation
- Strong corporate governance

## **2) Compliance**

COF acknowledges the importance of complying with all relevant laws, rules, regulations, policies and standards. COF is committed to having strong management discipline and best-in-class controls in our compliance environment. As a regulated entity, COF is required to meet stringent financial standards, including capital adequacy and audit requirements.

COF holds customer funds in customer segregated trust accounts at Westpac and National Australia Bank (NAB). All client funds are managed in accordance with the Client Funds Handling Rules and are held separately from COF's corporate funds. Customer funds are not used for any operating expenses or purposes.

## **3) Audit and confidentiality**

COF has appointed an independent external auditor to supplement our operational processes and ensure compliance.

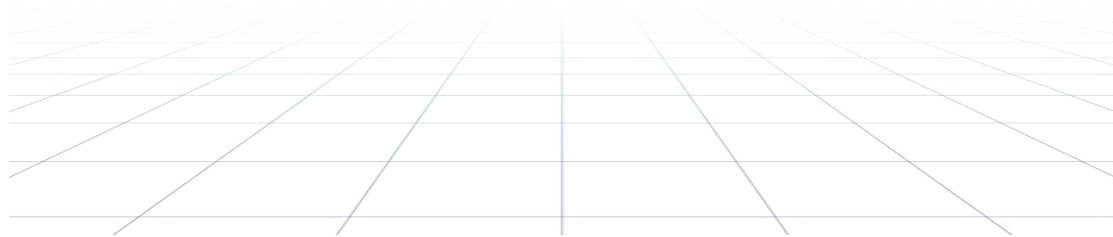
COF maintains appropriate controls and monitors the transmission of confidential and sensitive customer information inside and outside the company on a need-to-know basis. COF does not knowingly disclose customer information unless requested by a customer or required by law to do so.

At present, the head exchange is actively expanding into the derivatives market, and the traditional exchange is also penetrating into the digital asset derivatives



market. Based on the current market environment and the corresponding layout of competitors, COF believes in the core idea of decentralization, and believes that distributed ledger and smart contract technology will build the trust foundation of human beings, eliminate trading barriers, and improve trading efficiency. It has a significant impact on the global foreign exchange economy.

Therefore, COF platform will devote itself to the tide of new technology revolution and strive to build an intelligent forex trading market.



## 2.2 COF Service module

COF The well-selected product range gives investors access to the world's most popular and liquid markets all day long (24 / 7) for the best trading opportunities.

### 1) Trading products

- **Forex contracts for Difference:** 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 61 currency pairs with minimal spread, superior execution and deep liquidity.

- **Indexed CFDS:** Access to the world's largest equity markets through global indexed CFDS offered by COF. The spread of the 25 indexes starts at 0.4 points, giving traders a broader view of the stock market while enjoying commission-free and 24/7 trading in major markets.

- **Commodity CFDS:** Trade energy, agricultural and metal products, such as currency pairs against the dollar or as futures CFDS. We combine strict pricing with flexible hand counts, starting at 10 cents per point, to provide investors with a powerful product.



- Crypto contracts for Difference: Go long or short in our range of the world's largest and most popular cryptocurrencies. Trades with other retail traders 7 days a week, where price movements are driven primarily by fear and greed, news, and general sentiment.

- Futures contracts for Difference (CFD) : Futures are one of the most popular forms of CFD. We will provide a more professional futures CFD market for our global users.

## 2) Handicap

COF's spread is the lowest of all major and minor currency pairs. In particular, our average EUR/USD spread of 0.1 points \* is one of the lowest in the world.

COF offers variable spread on the Meta Trader 5 FX trading platform. Our pricing is made up of over 25 different liquidity providers, ensuring that our spread and liquidity depth remain tight. On the MetaTrader 5 platform, point difference can be as low as 0.0 points.

## 3) Foreign exchange transactions

- Forex Account Type: COF offers standard MetaTrader 5 accounts with no commission and a minimum difference of 0.0 points.

- Forex Simulation Accounts: Simulation 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 mock trading accounts have the same functionality as real trading accounts.

- Forex trading: The COF MetaTrader 5 account allows investors to trade more than 60 currency pairs, including major ones. Trading with flexible leverage ranging from 1:1 to 1:500 without intervention.

- Commodity CFD trading: COF offers gold and silver trading against the U.S. dollar and euro (XAU/USD, XAG/USD, XAU/EUR and XAG/EUR). Traders can trade metals at extremely fast execution rates without the need to re-quote. Trading gold and silver at 1:500 leverage without a trading desk.

- Index-CFDs trading: COF offers a wide range of index-CFDs covering 15





major markets as well as indices for Brent, WTI and natural gas. Our index CFD can be traded directly from an investor's MetaTrader 5 account.

- Cryptocurrency CFD trading: COF offers a variety of cryptocurrencies, including six of the most popular. Traders can go long and short for more opportunities. Start trading cryptocurrencies from a micro (0.01) hand in a regulated environment.



## 2.3 Trading account

### 1) Standard account



forex Trading  
**Standard Account**

- ✓ Raw Pricing
- ✓ Commission Free
- ✓ Fast order execution
- ✓ 1:500 Leverage
- ✓ Deep liquidity
- ✓ Meta Trader 5

[OPEN ACCOUNT](#)



Why choose our standard account? COF's standard account offers unparalleled speed of execution. Combine this with an all-inclusive spread starting at 1 o'clock, the Equinix NY4 server in New York, and a group of up to 25 pricing providers, and investors can see why our standard accounts can provide investors with an unparalleled trading experience all day, every day.

- Fast order execution: COF MetaTrader 5 server is located at the Equinix NY4 data center in New York. Known as the financial ecosystem, NY4 data centers are home to more than 600 buyer and seller companies, exchanges, trading venues, market data and service providers. MetaTrader 5 servers cross-connect to our network to ensure low latency and fast execution of investors' trades. The COF MetaTrader 5 transaction server has an average latency of less than 1 millisecond for major VPS providers located in NY4 data centers or connected to nearby data centers via private lines. This low-latency environment is ideal for automated and high-frequency trading and scalping.

- No trading restrictions -- Scalping is allowed: COF MetaTrader 5 has no trading restrictions. We have some of the best scalping and high-frequency trading conditions worldwide that allow traders to place orders between spreads as there is no minimum order distance and the freeze level is 0. This means that orders, including stop-loss orders, can be placed as close to market prices as possible. Traders can also hedge positions because COF does not have a first-in, first-out (FIFO) rule. Traders do not have to pay margin for hedging trades and enjoy the benefit of margin netting.

- Secondary pricing -- Market depth: Market depth shows the full range of executable prices directly from the pricing provider. Market depth provides full transparency of liquidity for each currency by showing the volume of trading available at each price level at any given time. High liquidity, asynchronous spot prices and low delays ensure the narrowest possible spread.

- Flexible funding and withdrawal options: Once an investor has opened an investor's account, an investor can provide funds using any of our funding options including: credit/debit card, Skrill, wire transfers, Neteller, FasaPay, China UnionPay, Bpay and broker-to-broker transfers, deposits.

- Flexible trading volume: There is no limit or limit on trading size and investors can trade as small as a tiny hand (0.01). Our flexible hand size allows investors to try out the platform with minimal risk and manage investor trade sizes

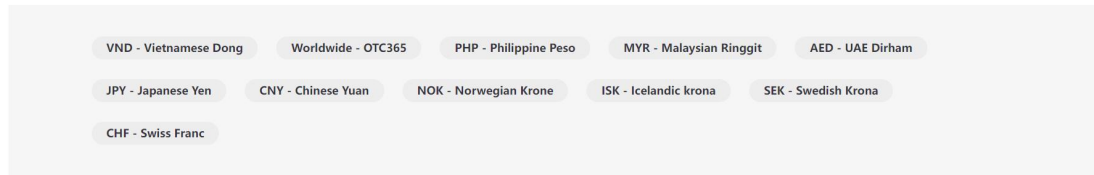


based on their account balances.

Overall, COF offers foreign exchange, commodities, and global indexes, leveraged up to 1:500, and supports all major account currencies. Around the clock, 60 currencies, 16 commodities including metals and 16 major indices, including the FTSE 100, S&P/ASX 200 and Dow Jones, are traded with spreads as low as 0.5 points. On the COF Emetatrader 5 platform, accounts are leveraged up to 1:500. Traders can use higher leverage to suit their trading style and take full advantage of their manual and automated trading strategies. Some traders prefer to trade in local currencies. We offer traders the option to open an account in one of 10 supported base currencies: US dollar, Australian dollar, Euro, British pound, Singapore dollar, New Zealand dollar, Japanese yen, Swiss franc, Hong Kong dollar, Canadian dollar.

## 2) Account into the gold

COF Provide more than 15 flexible funding options in 10 different base currencies. Free deposit deposit using multiple methods.



- Payment process: To speed up processing, we recommend that all account holders deposit funds from their secure client area into their transaction account.
- Money security: Electronic payments are processed using SSL (Secure Socket Layer) technology and encrypted for security. All payment information is confidential and will only be used to fund the investor's COF trading account.
- Banking fees: COF does not charge any additional deposit or withdrawal fees. However, investors should be aware that investors may incur fees in connection with payments made with certain international banking institutions. COF is not liable for any such banking charges.

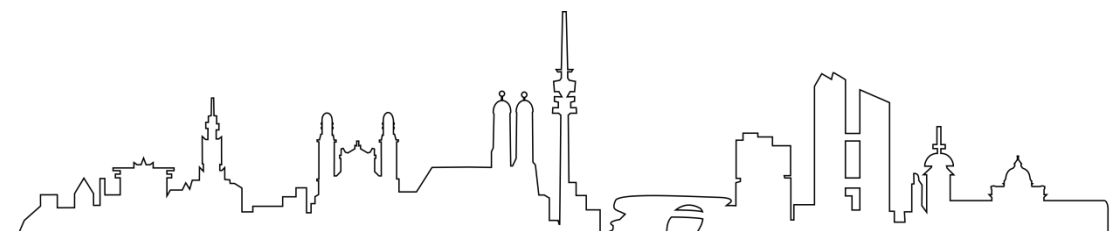


- Third-party payments: COF does not accept payments from third parties. Please ensure that all deposits in the investor's trading account are from the investor's bank account. Payment can be made using a joint bank account/credit card if the transaction account holder is one of the parties to the bank account/credit card.

### 3) Draw money

The time of withdrawal and arrival will vary according to the method of withdrawal. If investors have not made withdrawals in the past, please note:

- Withdrawal requests close at 12:00 AEST/AEDT. If an investor submits a withdrawal before this time, it will be processed on the day it is received. If the investor submits a withdrawal after this time, it will be processed on the next business day.
- COF does not charge any additional deposit or withdrawal fees. However, investors should be aware that investors may incur fees, such as brokerage fees, for payments to or from certain international banking institutions. COF is not liable for any such banking charges.
- Credit/debit card withdrawals \* are processed free of charge. Once processed, credit/debit card withdrawals may take 3-5 business days to reach the investor's card. However, investors should note that in rare cases, this can sometimes take up to 10 working days, depending on the bank side. \* Please note that credit card withdrawals may not be available in all countries
- Safecharge withdrawals can only return the amount deposited. Investors can choose to withdraw money by other deposit methods or bank transfer methods used before.
- Paypal/Neteller/Skrill withdrawals must be made from the same account from which the funds were originally sent. These transactions are processed free of charge and effective immediately upon processing.





## 2.4 Contract for Difference Solutions

COFs Provide flexible trading conditions for a wide range of contracts for price difference, covering indices, energy, metals, commodities, etc.

The CFD represents a "contract for difference", a contract in which the parties agree to exchange values of securities, instruments or other assets at and from the CFD.

CFDS is a widely used product and is increasingly popular as a short-term investment vehicle. They provide an effective way to maximize investor capital spending, and can help investors diversify their existing portfolios or hedge positions. A few 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. That means investors can profit from both rising and falling markets.

In a rising market, investors may want to buy CFD and sell it at a later date. This is called "going long." In a falling market, investors may want to sell CFD positions first and then buy them back later when they are unwound. This is called "shorting."

### 2) Efficient use of capital

CFDS are leveraged products that allow 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 fraction of the value of the position, which is called margin. The investor's margin will vary according to the value of the investor's CFD position. Leverage can provide additional gains if the market is favorable to the investor, but it also carries risks that can lead to increased losses if the investor's position is unfavorable to the investor.

### 3) Hedge other investments



The ability of CFDS to "go long" and "short" means they are an excellent hedge against 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.

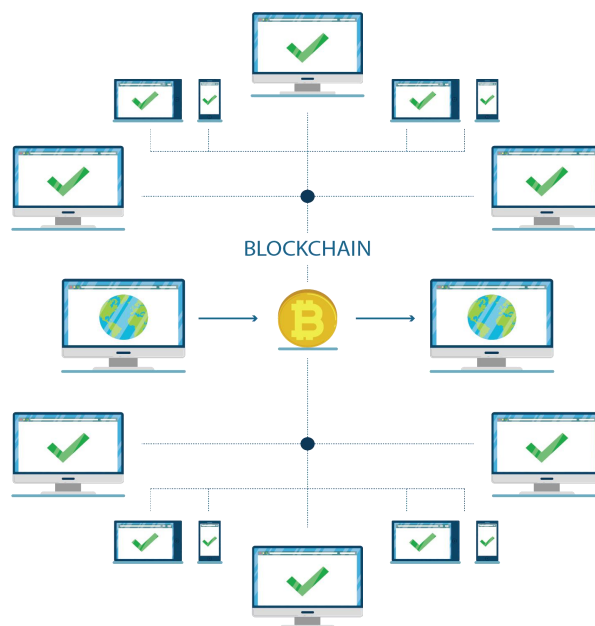
For example, if an investor has a long-term portfolio that he wishes to keep, but the investor believes there is some short-term risk to the value of that portfolio, the investor can use a CFD to "hedge" the investor's position. If the value of the portfolio falls, the profit the investor makes on the CFD will offset the loss of the investor's portfolio.

#### 4) Flexible contract size

The contract size of a CFD is usually smaller than the typical contract size of the underlying instrument, meaning that investors do not need to make large deposits to gain exposure to changes in the instrument's price. Flexible scale allows investors to tailor their trades to their 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 the need to trade futures contracts themselves.





## 2.5 Core advantage

At COFs, starting from 0.0 points to become the best trader. From the above section description, we can clearly see the advantages of COFs in various aspects:

### 1) low point differential advantage

- The low point difference is the most significant difference between COFs and other similar platforms.
- Trade with a spread starting at 0.0 points \*, no re-quotes, best prices and no limits.
- COF is the preferred multi-asset trading platform for high-volume traders, scalpers, and bots.

The spread comes from 0.0:

- COFEURUSD has an average spread of 0.1, one of the best in the world
- Low spread means it really starts at 0.0
- Our diversified and proprietary liquidity portfolio keeps the spread tight 24/7

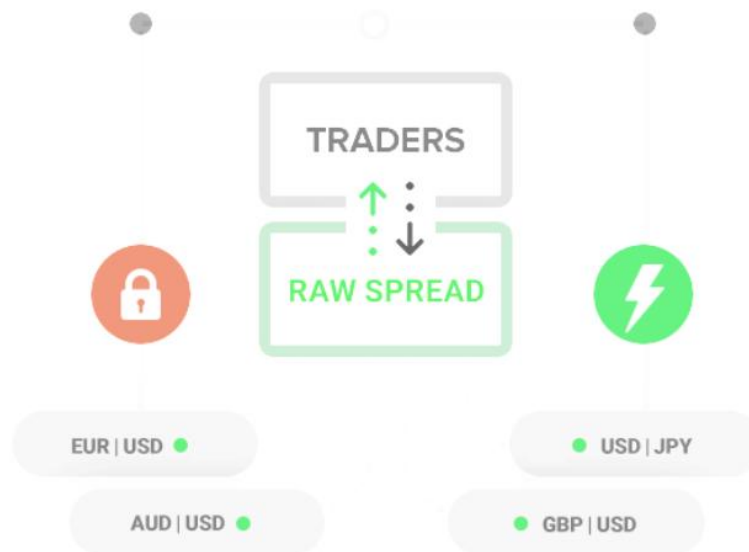
### 2) Automatic trading system

COF is one of the top picks for automated traders. Our order matching engine in our Dallas data center processes more than 500,000 transactions per day, with more than two-thirds of those transactions coming from automated trading systems.

Quick order execution:

- Average execution speed less than 40 milliseconds
- Low latency fiber and Equinix NY4 server

### 3) Institutional trading



- Real, deep and diversified liquidity that can be traded
- Reduce sliding
- Handles more than \$29 billion in foreign exchange transactions daily

### 4) Layout the global market

COF is one of the largest foreign exchange trading platforms in the world with more than \$1.04 trillion in trading volume and more than 180,000 active clients worldwide.

- Foreign exchange market: 61 products
- Merchandise: 22 products
- Index: 25 products
- Digital currency: 10 products



## 5) Powerful trading terminal

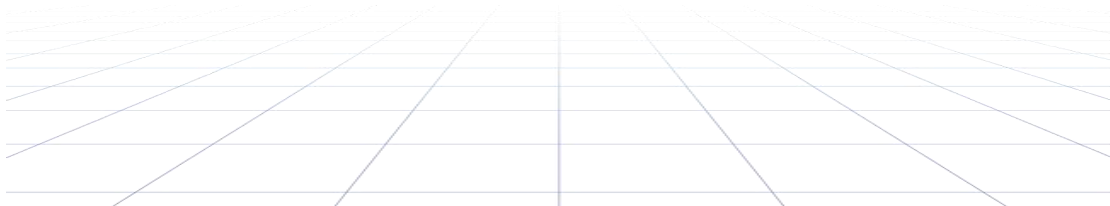
COF User multi-terminal and platform transactions to support customers with different needs to participate in the transaction.



## 6) Transaction safety

COF Complete security mechanism and protection policy for users:

- Instant deposit
- Make quick withdrawals
- Regulatory qualifications
- Financial security
- Privacy policy guarantees



## 7) Continuous compliance

COF Has obtained the US MSB and NFA regulatory licenses, has become a model of global compliance.



- MSB Licence: The full name of Money Services Business is a kind of financial license supervised and issued by Fincen(Financial Crimes Enforcement Bureau under the U.S. Treasury Department). The main subject of supervision is money services-related businesses and companies, including digital currency and virtual currency transactions, ICO issuance, and foreign exchange exchange. International remittance and so on. Companies engaged in the above related businesses in the United States must apply for an MSB license in order to operate legally.
- NFA License: National Futures Association is a foreign exchange futures license issued by the U.S. Futures National Association (an independent self-regulatory organization in the U.S. futures and derivatives markets). All eligible entities trading in the futures market are required to register with the NFA. These include various entities such as brokers, futures dealers, commodity pool operators, swap dealers, exchanges and commodity trading advisers.



## Chapter 3: COF Business examples

COF The business includes foreign exchange, commodities, index, digital currency and futures, etc. We will describe each business module in this chapter in detail.

### 3.1 Foreign currency operations

COFForex Products are one of the most competitive products in the world.

The foreign exchange market, open 24 hours a day, five days a week, is the largest and most liquid market in the world, trading more than \$4 trillion a day, more than any exchange-based market. Exchange trading involves trading one currency pair with another, predicting that one currency will rise or fall against another. Currency trades in pairs, such as euro / USD (EUR / USD).

#### 1) Foreign exchange point difference

COF Give forex traders the narrowest spread of all forex brokers in the world, with our euro / USD spread average of 0.1. The low difference combined with our low-latency enterprise-class hardware makes COF ideal for active daytime traders and those using Expert Advisor. The table at the bottom of this page shows our minimum and average point difference for all major currency pairs.

#### 2) How does Forex trading work?

Foreign exchange trading is similar to trading stocks or futures, and the difference is that when an investor trades foreign exchange, the investor is buying and selling one currency against another currency, and the investor does not accept the delivery of the underlying currency. One of the main advantages of foreign exchange over other financial instruments is that the number of hands — hands can be as small as 1,000 units (a tiny hand). Usually, foreign exchange also involves leverage, which in some cases can be as high as 1:500, which is very different from the trading of stocks that do not involve leverage.



## 3.2 commodities trading

Trading the most popular commodities around the world, including energy, produce and metals. COF Combining strict pricing and flexible conditions to provide users with a powerful product.

COF provides a flexible and simple way to capture some of the world's most popular goods, including energy and metals, from users' MetaTrader 5 trading platform. Commodity markets are attractive to speculators because they are vulnerable to drastic changes in supply and demand.

### 1) Energy

COF allows trading of physical energy contracts, including crude oil, Brent crude and natural gas, from investors' MetaTrader 5 platform. For investors interested only in price speculation, trading energy contracts as physical instruments has many advantages.

### 2) Precious metals

COF allows spot metal prices, including gold or silver against the dollar or euro and platinum or palladium against the dollar as currency pairs, to be traded at a leverage ratio of 1:500.

### 3) Soft goods

In addition to energy and metals contracts, at COF we offer a range of soft commodity products to trade, including corn, soyabeans, sugar, cocoa, coffee and wheat CFDS - all of which have low spreads and leverage of up to 1:100.

### 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. Goods can be traded as stand-alone products or in pairs.
- Metals and energy are traded against major currencies, while agricultural futures contracts are traded as separate contracts.

### 3.3 index number

Only one transaction is needed to access the package of tools that make up the index. All COF trading platforms offer the world's most popular index. Index is the most popular form of CFDS. COF Has a wide selection of indexes from around the world, including the S & P 200, the FTSE 100, the E-Mini S & P 500 and the Dow Jones Index of the US.

The stock index is a very good measure of the market's performance. Indices such as FTSE 100 and the DJIA index are a basket of blue chips listed on exchanges and are often a good measure of current market sentiment. Changes in the performance of any component stocks in the index will be reflected in changes in the overall value of the index. The advantage of an index is allowing traders to look at a stocks more widely than focusing on one stock. COF MetaTrader 5 Both platforms offer online price-difference contracts and futures-based indices.

#### 1) (Spot) stock pointing to the poor

COF Provide competitive points for all our spot indexes, including the E-mini S & P 500 from 0.4, 1 FTSE 100, 1 Xetra DAX and 1 S & P 200.

#### 2) Futures index

In addition to the stock index, the COF also provides the futures index: the ICE dollar index and the VIX index.



How do you determine whether a customer is entitled to the AUS200 index dividend?

From the above example, we assume that the ex-dividend date of the AUS200 index is August 18,2016. Therefore, customers must hold an open position in the AUS200 Index by August 18,2016, and must remain open until August 18,2016, for a dividend adjustment of \$2.44 per lot. To determine whether a dividend adjustment is added to the customer account or deducted from the customer account will depend on whether it is a sell or buy for AUS200. If the customer holds one lot AUS200, the customer will be entitled to \$2.44 per lot. However, if AUS200 sells, the customer will be deducted \$2.44 per hand. The amount of \$2.44 per hand will be converted to the customer's base currency before the deduction.

Since this is from the AUS200 index, the dividend is adjusted to A \$2.44 per hand. Or, if the index is \$500, the dividend is adjusted to \$2.44 per lot. The COFEX-Dividends Excel table shows the expected indices that will adjust their index points for a given week and the actual ex-dividend adjustments for each index will be updated regularly, on the ex-dividend adjustment on our blog.





## 3.4 Digital cash

Unlike other asset classes (forex, stocks, commodities, etc.), cryptocurrency markets are dominated by retail speculators. With the COF cryptocurrency contracts for Difference, investors will trade in a market without central bank intervention, interbank dealers controlling the flow of orders or giant pension funds moving prices.

Price movements in cryptocurrencies such as bitcoin or Ethereum are largely driven by news and general sentiment, namely fear and greed among retail speculators. These sometimes dramatic changes can cause large intraday price swings, making cryptocurrency CFDS exciting products for aggressive and experienced day traders.

COF's cryptocurrency CFD product allows traders to go long or short cryptocurrencies without actually owning them. This means that traders can have access to the price of the cryptocurrency without having to worry about the security risks associated with storing it as well as counterparty risks from exchanges. This is similar to trading energy futures such as oil, rather than owning physical oil to speculate on its price. Cryptocurrency transactions will not be available between 17:00 and 00:00 server time on Saturday. Our dedicated servers need to be maintained during this period to ensure optimal performance and an exceptional trading experience. Cryptocurrency transactions on cTrader will remain available 24/7.

- **Bitcoin Contracts for Difference:** As the first and largest cryptocurrency, Bitcoin paved the way for hundreds of similar currencies and has a market cap of more than \$100 billion.
- **Ethereum contracts for Difference:** As the world's second largest cryptocurrency, it has been dubbed by many as the "next Bitcoin." Ethereum has been recognized and supported internationally by major institutions such as Microsoft, jpmorgan Chase and Intel.
- **Dash Contracts for Difference:** Dash focuses on instant transactions and owner privacy. Dash's infrastructure can enable faster transactions than other cryptocurrencies, and thus shows higher liquidity than many of its peers.



- **Litecoin Contracts for Difference:** Litecoin was designed by a former Google engineer to improve Bitcoin technology, offering faster processing times and a larger number of tokens. It was also the first cryptocurrency to implement SegWit, a way to speed up transaction times without compromising the underlying blockchain technology.

- **Bitcoin Cash contracts for Difference:** Bitcoin Cash stems from a hard fork in the bitcoin blockchain. It increases the block size from 1 Megabyte to 8 megabytes without incorporating SegWit.

- **Ripple Contracts for Difference:** Created in 2012 as a trading network and crypto token, Ripple is the cryptocurrency of choice for banks and global remittances and has recently experienced a period of growth.

- **EOS Contracts for Difference:** EOS is a decentralized operating system based on blockchain technology. It is designed to support commercial-scale decentralized applications by providing all the required core functionality.

- **Emercoin Contracts for Difference:** Emercoin is an open-source cryptocurrency that originated with Bitcoin, Peercoin, and Namecoin. In addition to being a cryptocurrency, it is also a secure distributed blockchain business service platform.

- **Namecoin Contracts for Difference:** Namecoin is a blockchain protocol used as a naming system. Since Namecoin is an offshoot of Bitcoin, it is also a cryptocurrency that can be used for peer-to-peer transactions.

- **PeerCoin Contracts for Difference:** PeerCoin is designed to address the proof-of-work inefficiencies used by Bitcoin and many other coins using their own proof of equity system.

- **Poca contracts for Difference:** Polkadot is a platform that allows different blockchains to transmit messages, including values, in a trust-free manner; Share their unique features, but also share their security. In short, Polkadot is a scalable, heterogeneous, multi-chain technology.

- **Stellar Contracts for Difference:** Stellar, or Stellar Lumens, is an open source, decentralized protocol for low-cost transfers of digital currency to fiat currency, allowing cross-border transactions between any currency pair.





- Chainlink Contracts for Difference: Chainlink is a decentralized network of prognostics and cryptocurrency that feeds data to the blockchain. It is one of the primary sources of data used to inform decentralized financial applications.
- Dogecoin Contracts for Difference: Dogecoin was founded by software engineers Billy Markus and Jackson Palmer as a payment system. Originally a "meme coin," the coin is now seen as a popular choice among traders.
- Tezos Contracts for Difference: Tezos is a decentralized proof of equity blockchain network that performs peer-to-peer transactions and serves as a platform to help arrange smart contracts.
- Uniswap Contracts for Difference: Uniswap is used to exchange cryptocurrencies. It enables automated transactions between cryptocurrency tokens on the Ethereum blockchain via smart contracts.
- Cardano Contracts for Difference: Cardano is a public blockchain platform that enables peer-to-peer transactions using its in-house cryptocurrency, Ada. It is open source and decentralized, using equity proof to reach consensus.
- Binance Contracts for Difference: Binance was originally formed as a practical token to reduce transaction fees, but its use has expanded to cover payment of transaction fees (on the Binance chain), travel bookings, entertainment, online services and financial services.

How does cryptocurrency CFD trading work?

Bitcoin is a digital cryptocurrency that derives its value from the supply and demand factors unique to such assets. There is a limited supply of bitcoins, so the price rises as demand increases. Demand stems from speculative sources and more practical ones, such as Internet purchases paid for with bitcoin. Bitcoin also tends to respond to market sentiment in more traditional markets such as equities and currencies, increasing during periods of negative sentiment.



## 3.5 futures

Futures are one of the most popular forms of CFDS. Futures contracts for spread are priced directly from the underlying futures market, and commissions, financing fees and dividend adjustments are all included in the spread itself. Provide competitive spreads for all of our futures CFDS.

Expiring spot oil and tradable markets

Futures expiry / rolling process:

COF Futures contracts for difference are set to expire the day before the expiration of the underlying market contract. When the futures contract for difference expires, all open positions will be closed at the futures settlement price; according to the Futures Exchange. This process usually takes place the day after its expiration. The open position will not roll up to the next month, so any customer wishing to hold a long-term position must resume trading on the next available contract.





## Chapter 4: Based on the future expansion of blockchain technology

At present, the foreign exchange trading market continues to expand, the global average daily foreign exchange trading volume has reached nearly \$6 trillion, and the foreign exchange market participants are becoming more extensive. The booming development of foreign exchange market promotes the digitalization of foreign exchange trading and the continuous innovation of trading system. With the rapid rise of blockchain, big data, cloud computing and other information technologies, and the advent of the wave of financial digitalization, banks and non-bank foreign exchange traders are trying to reconstruct the foreign exchange trading mode with advanced technology. COF We will also continue to explore the application of blockchain + foreign exchange market to continuously solve the market pain points.

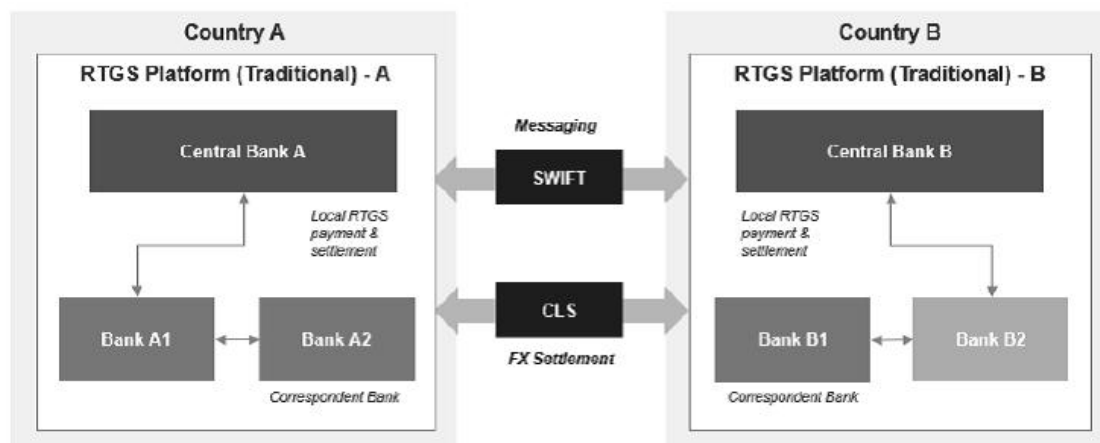
### 4.1 The collision of blockchain and the foreign exchange industry

Blockchain technology has gradually started from the field represented by fintech (FinTech), and has been derived to digital asset trading, supply chain management, artificial intelligence and other fields. This new technology is also breaking the development model of the derivatives industry represented by foreign exchange.

#### 1) Reduce the clearing and settlement risk of foreign exchange transactions

Clearing and settlement are important links of foreign exchange trading. The development of information technology has revolutionized the clearing system of the global foreign exchange market. Given the interrelevance of the financial system, the clearing failure of a large transaction will trigger a series of defaults. The risk is that the cross-border settlement of funds is only carried out during the normal working hours of the central bank of the home currency, and the clearing parties may be in different time zones. If the foreign exchange transaction party is liquidated before the other party, the party waiting for the other party will face the risk of default of the counterparty. If the forex trader trades and pays the payable

currency without simultaneously acquiring the due currency, the currency trader faces exchange rate changes or the loss of the due currency. The risk comes from the asynony of both payments.



And block chain is essentially a kind of solve the problem of trust, reduce the cost of trust information technology solutions, without credit accumulation can guarantee the integrity of the data, because all of the data recorded in tamper-proof block chain, so in the foreign exchange transactions saves concentrated verification id complex steps, the whole process completely transparent, and tracking is very safe and easy, so can help brokers to speed up the transaction clearing and settlement, trading risk is greatly reduced.

## 2) Improve transaction efficiency and reduce costs

The general process of foreign exchange trading is that the party to the transaction transfers funds to a middleman, such as the foreign exchange settlement service provider CLS. CLS will always hold the funds of the initial party of the transaction until the counterparty provides funds. The problem with this process is that the first party's funds are frozen in a specific transaction before the settlement is completed, and the whole process often takes a day. This leads to slow trading in the foreign exchange market. Regional chain technology can make forex trading faster and cheaper. Because of the transaction mode based on regional chain technology, there is no central organization and no central server. All transactions occur in client applications installed on everyone's computer or mobile phone, directly eliminating commission costs or intermediate fees. Whether it is cross-border transfer or domestic transfer, this decentralized approach not only reduces transaction costs but also improves transaction speed.

## 3) Enhance the security of foreign exchange transactions



The average daily trading volume in the global foreign exchange market is \$6 trillion, and the stability and security of the system for such a huge daily throughput.

Blockchain has a natural security and defense mechanism. Because each data block contains all the information exchange data of the system within a certain period of time, and the cryptography method is encrypted, eliminating the security loopholes from the very beginning. When a transaction occurs, the miner in the blockchain network (Miner) uses the algorithm to decrypt the validation transaction to create new data blocks of records, which will be placed to the end of the last data block and continue to spread.

The whole process must be completed through a complex digital signature, digital feature algorithm, and computational verification, etc. Each block of data is constantly recorded during the verification process, and each node can be traced. It enables a fully transparent and traceable trading process in foreign exchange trading, while its stability and security are more reliable than before. Data shows that even if the blockchain is attacked, the attacker can only break more than 51% of the nodes to tamper with the information, but in a large enough blockchain system, the cost is extremely high and can be considered basically impossible.

#### **4) To facilitate foreign exchange supervision**

The main trading mode of the foreign exchange market is OTC (Over TheCounter, namely over-the-counter trading, also known as over-the-counter trading). The international nature of the trading boundary means the lack of centralized and unified regulators. Therefore, the supervision problem of foreign exchange trading has always been a difficult problem for the industry.

According to the above, the data of blockchain is self-verified by the system, with no need for identity verification, no data collection from regulatory authorities, and no need for enterprise reporting, which will greatly reduce the regulatory cost and improve the regulatory efficiency. At the same time, due to the stability and reliability of its data blocks, the blockchain technology ensures the accuracy of data and data security in the application of foreign exchange supervision. In addition, the imtamability of data blocks and the traceability of data nodes provide great convenience for supervision and enhance the efficient implementation of supervision.



## 4.2 COF's quest

COF Will be on the basis of the existing business network, expand block chain application, build the world's leading decentralized foreign exchange platform, create an autonomous, efficient, transparent assets trading environment, let traders and investors can safely on any scale of trading, without concern about the platform of fairness and transparency, the reliability of data security privacy protection, or the integrity of the order management system and robustness.

COF It will create a fair and ideal environment for investors to invest,trade and manage their digital assets. Therefore, the goal of the platform design is to ensure the fairness and transparency of the global trading process. And can meet the needs of safety, audit, reporting and analysis in the safest and most effective way.

### 1) Open and transparent

COF Will be a real-time, open and transparent trading community. The main reason why traditional types of exchanges cannot make their assets open and transparent is because they are restricted by technology. The creation of new technologies makes this goal technically feasible. COF Is to translate this feasibility into real practice. Establish a real-time asset and transaction data inquiry and verification mechanism, and make it public to the public.

### 2) Community-based autonomous organization

Relying on core technologies and innovative foreign exchange economic concepts, COF will build the world's first autonomous community trading platform, and the nodes will complete community governance through smart contract voting.

### 3) Financial-level trading system

COF The trading system can realize the financial level of fast and stable,so that the transaction is efficient and guaranteed. Provide securities-level first algorithm, provide professional quantitative support for traders, based on years of market experience and independent foreign exchange trading system related



experience, can handle one million transactions per second.

#### 4) Safe guarding

Security is a top priority for foreign exchange trading. COF Using the security design based on multiple signature, offline signature, hierarchical architecture, 95% of the digital assets are stored in the cold wallet. Unbiased zero-knowledge order encryption is completed through the key provided by CertEurope6's PKI-on-blockchain service. We will conduct regular external audits.

### 4.3 Market pain point solution

#### 1) Foreign exch

Foreign exchange trading involves multiple links, and a failure to clear a large transaction will trigger a series of defaults. For example, the cross-border settlement of funds is only carried out during the normal working hours of the central bank of the home currency, and the clearing parties may be in different time zones. If the party in the foreign exchange transaction is liquidated before the other party, the party waiting for the other party will face the risk of default of the counterparty. If the forex trader trades and pays the payable currency without simultaneously acquiring the due currency, the currency trader faces exchange rate changes or the loss of the due currency. The risk comes from the asynony of both payments. On the other hand, the international nature of the transaction boundary means the lack of centralized and unified regulators, so the supervision problem of foreign exchange transactions has always been a difficult problem for the industry.

Through COF building block chain foreign exchange trading system is to solve the problem of trust, reduce the cost of trust of consistent information technology solutions, without credit accumulation can guarantee the integrity of the data, all of the data are recorded in the tamper system, so in the foreign exchange transaction saves concentrated verification id complex steps, the whole process completely transparent, and tracking is very safe and easy, so can help brokers to speed up the transaction clearing and settlement, trading risk is greatly reduced.

COF The data has system self-verification records, no identity



authentication, no data collection by regulatory authorities, and no enterprise to report, which will greatly reduce the regulatory cost and improve the regulatory efficiency. At the same time, due to the stability and reliability of its data blocks, COF technology ensures the accuracy of data and data security in the application of foreign exchange supervision. In addition, the immutability of data blocks and the traceability of data nodes provide great convenience for supervision and enhance the efficient implementation of supervision.

## **2) Anti-fraud fraud**

Fraud and fraud are the main risks of centralized foreign exchange trading institutions. Based on the application of blockchain technology, COF can effectively prevent fraud and fraud.

In the future, in COF, data will be recorded and stored by each transaction node, and each node can participate in data inspection and jointly prove the data, which improves the authenticity of data. A single node cannot add or change data at will, thus reducing the possibility of a single node creating wrong data.

For example, by establishing links within the trading platform, a customer forms a node, on the one hand, it can avoid large amounts of data from a single information center and reduce the operation risk; on the other hand, unilateral fraud can be contained through verification to ensure the authenticity and effectiveness of the data. If the forged data is to be verified by the network, it must master more than 50% of the computing power in the private chain. When there are enough nodes, the control cost of the private chain rises sharply.

In addition, each node in COF has a complete copy of the data, which is only lost when the node on the entire system is down, and the data record cannot be modified once it is written. Therefore, COF has the characteristics of openness, transparency and security, which can improve the quality of data from the source and enhance the data inspection ability.

## **4.4 Blockchain application advantages**

Through the existing data testing and analysis of COF Company, after introducing blockchain technology, COF can achieve performance:





millisecond transaction verification, massive data storage, high throughput, fast node data synchronization; scalability: meeting the functions of multi-business structure, authority control strategy, transaction endorsement strategy, channel management strategy, etc. Meanwhile, we also provide investors with secure private key access service and perfect privacy protection scheme.

### 1) Performance

- Rapid transaction verification: COF blockchain system can achieve rapid transaction verification in seconds by optimizing key links such as signature algorithm, ledger structure, data manipulation, serialization, consensus mechanism, and message diffusion. Meet the user experience of most application scenarios.

- Mass data storage: double entry bookkeeping mode, historical data accumulates continuously under long-term operation of the system; COF blockchain learns from the mechanism of separate storage of hot and cold data and separate table storage in the traditional financial system to realize effective storage of massive data.

- High throughput: The essence of COF blockchain system is a distributed shared accounting technology, whose distributed characteristics are mainly reflected in distributed consistency rather than distributed concurrent processing. In order to ensure the consistency of data and prevent the Byzantine checkmate problem, some specific links can only be executed in serial, rather than parallel.

- Rapid node data synchronization: COF blockchain supports the Snapshot mechanism, which can mirror local ledger regularly to achieve a convenient rollback mechanism. Under a unified consensus, mirror labels can be specified for rollback; At the same time, the cycle of adding new nodes to the operation is shortened. Only the latest images and a small number of recent transaction sets need to be synchronized to integrate into the network and participate in consensus verification.

### 2) Expansibility

- Multi-business block chain structure: COF blockchain data structure can meet the needs of different business areas, improve the system's scalability and maintenance efficiency. It can be used to mark assets and transfer assets, provide immutable multidimensional event records, and can be used to trace and track the



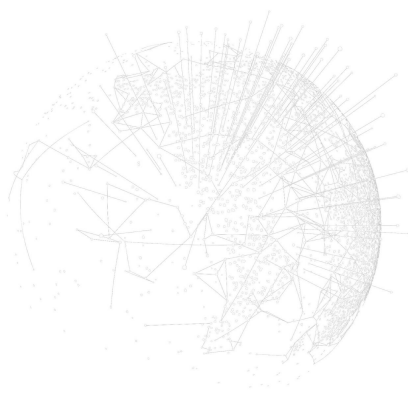
flow of assets.

- **Permission control policy:** provides two types of permission control policies for data writing and reading. You can set multiple data write permissions for the same account and set permissions for different operations to meet the multi-signature control scenario. The user can grant or revoke the data access permission of a single user or user group. User groups can be flexibly configured by the user. Data includes user account information, transaction information, etc. The granularity can be refined to various attribute fields of transactions or accounts.

### 3) Security

- **Secure private key access:** In order to facilitate COF's blockchain forex trading products and services, in addition to the traditional client generation and saving mechanism, we also provide network managed access and private key hardware access (U-key) solutions. Network managed access, that is, the user name and password are mapped to a private key by a specific algorithm and stored on the server. The private key stored on the server is encrypted data, and the private key can only be decrypted on the client side. The hardware private key is designed to meet the requirements of the financial industry.

- **Multiple privacy protection:** Provides multiple privacy protection functions. First, the underlying layer of COF blockchain provides homomorphic encryption, in which all data of the user is encrypted and stored, visible only to the user. Secondly, it provides encryption middleware service, which users can choose according to business needs. Finally, the upper layer application can encrypt the data at the time of entry, and the blockchain is responsible for writing and reading the encrypted data generated by the user.





## Chapter 5: Core team and Development Advantages

### 5.1 Core team

COF's core technology research and development team members are mostly from Silicon Valley technology elites, Wall Street, other top projects and well-known Internet companies. It brings together the best technical experts in the fields of computer, information security, payment, foreign exchange, communication, mathematics, finance, web development and high-frequency algorithmic trading. At the same time, the team members have market and practical experience in trading system development, payment, big data, foreign exchange and other aspects, and have not only strong technical capabilities, but also excellent scientific research capabilities. COF has made outstanding achievements in the field of foreign exchange trading.

Goddard -- an internationally renowned data engineer, Goddard has served as a key position in several world-renowned Internet big data research centers, responsible for the application research and development of basic Internet technologies, participates in numerous internationally renowned projects, and is a pioneer in the field of foreign exchange technology.

Harvey -- Graduated from the Department of Computer Science at Yale University, and obtained a PhD in computer and big data. He is an architect, database expert, and chief technical expert of exchange construction. He has been engaged in database application, data warehouse and big data development in the trading industry for a long time, and has rich experience in project development.

Lambert is a world-renowned foreign exchange trading expert and a global leader in the commercial application of foreign exchange technology. He is a former director of the Business Council of the United States, a PhD in sociology from Columbia University, a researcher at the Center for Financial Studies, and a global authority on the application of intelligent financial technology.

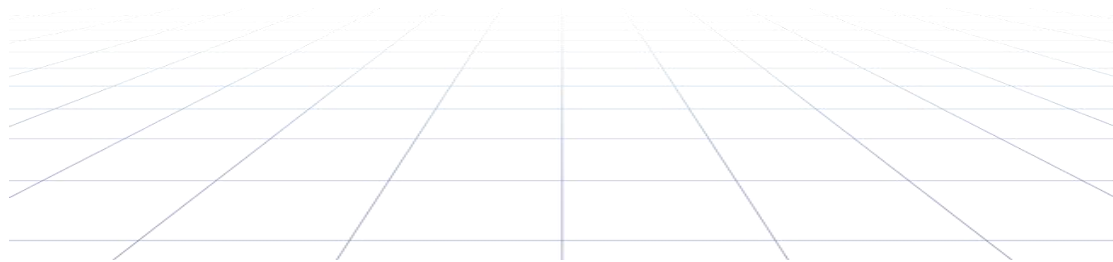
Meredith -- Meredith is a research scholar, engineer and leader with 15 years of



experience in technology development and authoritative influence in the development of underlying technologies in the financial system. Her career has spanned both academia and the corporate world. He held various engineering management positions at Google and Amazon.

Roice Morrison -- Financial systems developer Roice Morrison has been involved in the forex industry since 2013 and has worked on several projects. Including proof-of-concept platform, smart foreign exchange trading system, online wallet.

Wolf Carr -- Graduated from the University of California, USA, with a Master's degree in Mathematics and a PhD in Computer Science, with a focus on applied cryptography. He was an architect at RSA Security, a leading provider of world-class information security and encryption solutions, and a core developer of RSA Go ICOFM products.



## 5.2 Core resource integration

COF is competitive in the following areas thanks to its continuous development and innovative technology, extensive foreign exchange commercial application, and refined governance:

- **Technical team:** COF has 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 COF team is a perfect mix of experienced forex operators with years of hands-on experience and deep insights into the industry.

- **Industry resources:** COF signs strategic cooperation agreements with top projects in target industries, providing strong support for COF to enter



the foreign exchange scene, so as to really promote the actual landing of COF applications. Industry Partners include: Goldman Sachs, IDG Capital, Accel Partners, Fidelity Investment Group, IBM, and others.

- **Liquidity support:** COF has rich resources and numerous partners in the industry. It has cooperated with many banks, active communities, investment funds and professional investment institutions to provide sufficient liquidity for the platform. COF has a professional quantitative team to connect the market depth of the world's leading exchanges, provide aggregate fragmented liquidity schemes, support high-frequency quantitative trading, and adapt API interface sets for fast programmatic trading. Introduce the market maker system.

- **Powerful tools of the trade:** As the market matures, transaction demands become more complex, and the previous simple trading and trading functions are no longer able to satisfy the appetite of professional investors. COF, with its senior experience in securities investment and combined with artificial intelligence deep learning technology, provides a richer suite of trading tools for professional investors. It includes automatic investment tools, quantitative trading tools, strategies, etc. At the same time, ordinary investors can easily access professional foreign exchange tools, lower the threshold of foreign exchange investment, and make foreign exchange trading more popular.

- **Business governance:** Unlike other projects, COF has a clear and explicit strategic plan for its target industries, and continues to enable free, fair and high-value ecological prosperity through an autonomous community model. is more focused and professional in penetrating target industries and rapidly gaining market shares by means of distributed decentralization, tamper-proof and encrypted security of distributed technology and the characteristics of point-to-point transmission of value.

- **Money management:** COF's money management is guided by the Investor Protection Fund, which strictly adheres to the principles of fairness, fairness, and openness, with the development of the platform as the primary purpose. The Investor Protection Fund is dedicated to keeping and ensuring the safety and sustainability of funds. COF's use of all funds will be disclosed to all investors on a regular basis to ensure that the use of funds is public.

- **Space for growth:** COF's target industry is the trillion-dollar forex 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 operation scope to ensure sustainable development.

With the support of core competitiveness, COF has a clear commercialization logic, and each technical link and organization has a strong target and logic gene. On this basis, many modular and reformed technical solutions or mechanisms are proposed.

## 5.3 Investor protection

COF Under the supervision of the three major financial institutions, investors' funds will be deposited in the most trustworthy banks to fully protect the rights and interests of users.

### 1) Regulation of the three major financial institutions

- Australian Securities and Investments Commission: ASIC (Australian Securities and Investments Commission) is an independent government body responsible for implementing and regulating corporate and financial services laws. Their focus is on protecting Australian consumers, investors and creditors. As one of the most advanced regulators in the world, ASIC is committed to protecting market integrity and protecting consumer rights.

- New Zealand Financial Markets Authority: The Financial Markets Authority (FMA) is the New Zealand government body responsible for implementing securities, financial reporting and corporate law as it applies to financial services and securities markets. It also regulates stock exchanges, financial advisory providers and client money or property services, auditors, trustees and publishers.

- Vanuatu Financial Services Commission: The Vanuatu Financial Licence is issued by the VFSC (Vanuatu Financial Services Commission). With the support of the Reserve Bank of Vanuatu, the VFSC was established to regulate banking and financial services in Vanuatu. VFSC financial license supports remittance, payment, foreign exchange trading, commodities, securities trading, financial consulting and



other trade businesses. The VFSC finance licence has generated significant interest from the global forex industry.

- External Audit: As previously stated, COF Forex Group has an external independent auditor to ensure that we are meeting our regulatory obligations and operational processes.

## **2) Fund trusteeship**

Customer funds will be safely deposited in an Australian Bank trust account. In accordance with our licensing obligations, customer funds are held in AA Level ADI Australia (Authorized Depository Institution). The National Australia Bank (NAB) is one of Australia's four largest financial institutions and is ranked highly globally. In addition, COF Forex provides separate trust accounts for high net worth individuals or institutions and provides access to their dedicated bank accounts using NAB to check account balances at any time.

## **3) Protection of rights and interests**

COF will fully protect users' rights and interests, and provide professional indemnity insurance.

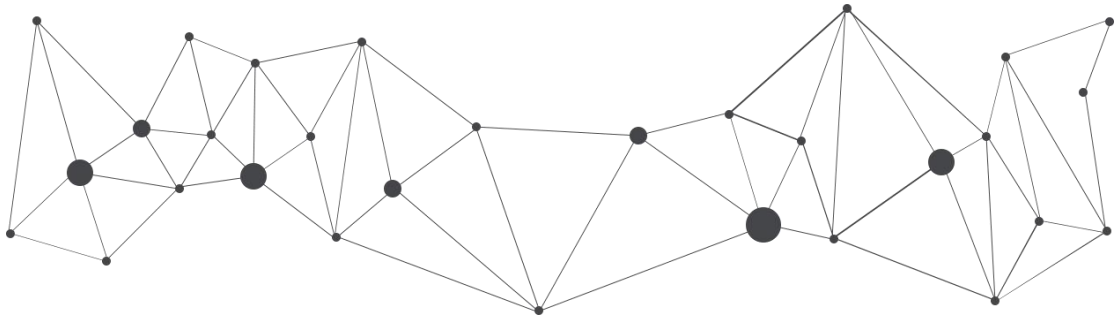
COF Forex always adheres to the "customer-centric" service philosophy. Customer first provides professional liability insurance (PI insurance) for customers, while protecting the financial security of customers, meeting the common requirements of various regulations. The insurer is a partner of COF Forex and can offer up to \$5 million in individual policies to COF Forex customers.

## **5.4 Participation in the COF**

As the world's leading online broker, COFs offers broker partner programs tailored to investors' business needs. By joining as a COFs partner, investors 'customers will be able to use COF's powerful trading platform and professional quality customer service. Now investors have the opportunity to join our team of broker partners.



We welcome investors to join the COFs Broker Partner Award Program. Becoming a COFs broker gets a brokerage bonus, and sign-up has a chance to win up to a \$2,500 sign-up bonus and a \$20,000 rebate bonus.







## Chapter 6: Policy and Statement

### 6.1 KYC and AML policies

We ensure that we comply with the laws and regulations that understand your customers and AML and do not intentionally violate understanding your customers and AML policies.

#### 1) introduction

We ensure that we comply with knowing your customers and AML laws and regulations and do not intentionally violate knowing your customers and AML policies. Within our reasonable control, we will take the necessary measures and technologies to provide you with safe and reliable services to maximize your protection from money-laundering activities.

Our knowledge of your clients and AML policy is an integrated, international system of policies that includes knowledge of your clients and AML policies in the jurisdictions under your jurisdiction. Our strong compliance framework ensures that we meet regulatory requirements and regulatory standards at both local and global levels and ensures the operational sustainability of our site.

#### 2) We know your customers and the contents of 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 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 established 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
- Proof of identity, address and transaction records will be kept for at least six (6) years; If they are referred to a regulatory authority, please understand that no separate notice will 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 verification

#### ⊙ Identity Information

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

- Basic personal information: your name, address (and permanent address, if different), date of birth and nationality, and other available information. Identification should be based on documents issued by an official or other similar body, such as a passport, identity card or other identification document required by the relevant jurisdiction. The address you provide will be verified in the appropriate way, such as by checking the fare ticket of 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; Copies of the articles of association and memorandum of the company; Detailed certification materials of the company's ownership structure and ownership description, and the decision of the Board of Directors to appoint an agent authorized by the company to be responsible for the opening and implementation of the company's website account; The identity certificates 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 only accept identifying information in both Chinese and English. If your identifying information is not in either language, 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

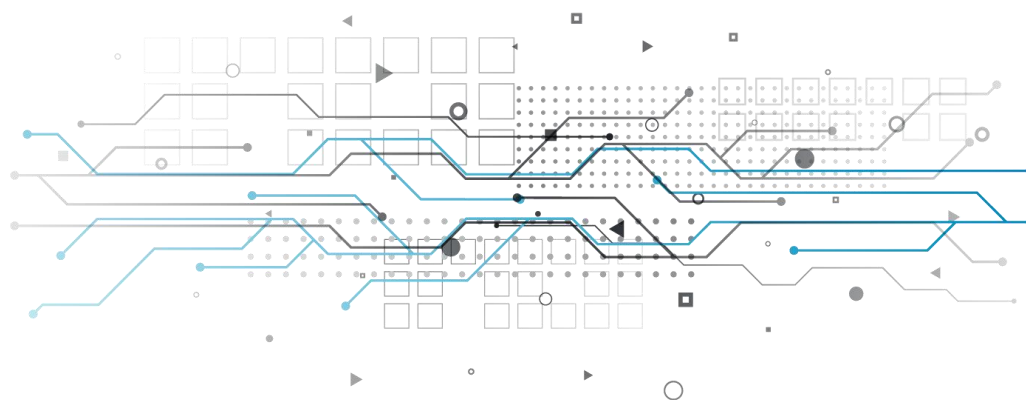
Copies of supporting documents should be checked against originals. Nevertheless, such copies shall be deemed acceptable if reliable and suitable references can certify that they are accurate and comprehensive copies of their originals. Such references include ambassadors, judicial officers, magistrates, 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 is executed by another person. If you are a business, you should verify the identity of its major shareholders (for example, those who hold 10% or more of the voting rights in the business). Under normal circumstances, shareholders holding 25% of the company's shares belong to the medium risk and need to verify the identity of shareholders; If a shareholder holding more than 10% of the voting rights or shares is identified as high risk, the identity of the shareholder shall be verified.

#### 4) Transaction supervision

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

We reserve the right to reject 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 are determined to be suspicious based on our own assessment, however, this will not violate any of our obligations and obligations to you.



## 6.2 The law requires policy

COF receives from time to time 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 COF, law enforcement authorities are typically interested in two types of data: information about the identity of their clients and information about their trading activities. When a request for information was received, COF requested that it be accompanied by the appropriate legal process. This can vary from place to place. For example, production warrants, search warrants and subpoenas, as well as voluntary requests for data disclosure, may constitute legal proceedings. COF reviews each order and voluntary disclosure request to determine that it has a valid legal basis and that any response is strictly tailored to ensure that only data is provided that law enforcement is entitled to. COF 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 (authorization certificate) and current position in a law enforcement agency;
- Identification certificate of law enforcement personnel (e.g. ID number);
- Letter of investigation issued by law enforcement authorities;
- Email addresses from the government domain;
- The name of the specific legal entity from which you are requesting information;
- Request specific content of customer information;
- Additional details, including 1) stating reasonable deadlines and 2) Treaty requests for judicial assistance for international law enforcement.

COF also reserves the right to disclose information to the authorities to protect itself and its clients.



## 6.3 Disclaimer

Our products are traded on margin, meaning they involve high risk and you may suffer more than you deposited. These products are not necessarily suitable for all investors. Please ensure that you are fully aware of the risks involved before trading and carefully consider your financial position 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, business or other professional advisor before participating in any activity related to this. The staff of the platform, members of the project R & D team, third-party R & D and development organizations, and service providers shall not be liable for any direct or indirect damages and losses that may be caused by the use of this white paper.

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