

Client Voice order reception and execution procedure for brokerage service of NBI INVESTMENTS LIMITED

Abbreviations in the text:

BSA – Brokerage service agreement

BDS – Brokerage Department specialist

For the sake of providing the better service according to Brokerage Service Agreement for the customers of NBI INVESTMENTS LIMITED the following procedure in TESTING MODE is developed.

Only trading orders (not transfers of money or securities) are accepted.

Clients of NBI INVESTMENTS LIMITED who signed the BSA with the company have the opportunity to place the trading order via Brokerage Department of the company using the telephone line with automatic voice recording functionality with the ability to store the recorded information within the period of 5 years. The phone number is +357 257 47 378.

The following categories of clients are eligible for the service:

- Client or client's authorized person,
- Clients who provided NBI INVESTMENTS LIMITED with the additional form to BSA which clearly indicates the PASSWORD for voice order transmission,
- Clients whose last trading order via any means of communication was no later than 90 days from the day of placing first voice order. In opposite case the order should be placed via e-mail and the next one can be placed through telephone functionality.

Trading orders can be placed during the working days on particular execution venue from 10-00 till 17-30 CYPRUS time (NBI INVESTMENTS LIMITED voice execution time).

Client affirms the validity of the orders placed via voice order reception facility to be legally equal to other means of placing the order.

The reception from the client to BDS correct information during the telephone conversation of "client name", "client code" and "password" leaves no doubt on correct identification of the client and indemnifies NBI INVESTMENTS LIMITED in case of potential fraud or client negligence.

The process

Client is making the phone call to the authorized number and provides the specialist of Brokerage Department with the following information via telephone:

- Client name,
- Client identification number,
- PASSWORD indicated in BSA.
- Direction of trade BUY/SELL.
- Security identification

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- ✓ In case of Equity security or FX instrument, TICKER of the security must be provided. If the Brokerage Department specialist CAN NOT or has the REASONABLE DOUBT to identify the security by the TICKER name, client MUST provide the ISIN number of the security he wants to trade.
 - ✓ In case of other securities the ISIN number must be provided
 - Number of securities to trade
 - Type of order
 - ✓ Limit order,
 - ✓ Market order.
- Only good till the End of the trading day orders are accepted (EOD)
- Price of the order. In the testing mode only the GROSS price orders before commissions are accepted.
 - Execution venue (on NBI INVESTMENTS LIMITED discretion if not mentioned).

The BDS:

- Clearly states the name and surname at the beginning of the telephone conversation
- Places the order in order ledger in electronic or paper form, indicating the time of accepting the voice order receipt. The form of ledger is the following:

Time	Client (name/code)	Security identifier TICKER or ISIN	Quantity	Price	Type of order market/limit	Duration EOD	Additional info

- Executes the check of the AVAILABILITY of clients' money on the execution venue the trade has to be executed
- Execute the check of SUFFICIENCY of securities or money instruments in appropriate currency for executing the trade
- Sends the electronic message from the e-mail client@nbinvest.com to the authorized e-mail address of the client:
 - ✓ "Order is accepted for execution" in case that there is availability and sufficiency of necessary funds and securities. **The time of sending this message is considered the time of ACCEPTING THE ORDER**
 - ✓ "Order IS NOT accepted for execution" in case there is no sufficient funds or securities to execute an order. The BDS has NO OBLIGATION to make the telephone call to inform client that his/her order IS NOT accepted for execution.
- When the order is executed , BDS sends from the e-mail client@nbinvest.com to the authorized e-mail address of the client the electronic message : "Your order in the TICKER or ISIN has been fully executed"
 - ✓ BDS is not obliged to notify the client on the price of execution or on partial execution of the client order.
- BDS makes the note of execution time and gross price indication in the order ledger.

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The Client:

- Has the opportunity to modify or cancel the order using the voice order service at any time during the NBI INVESTMENTS LIMITED voice execution time, provided the order has not been executed. Beyond these time limits only order execution via e-mail is operating.
- Has to confirm and accept via e-mail the list of the voice orders he executed during the calendar month period via the e-mail, by sending the message “accepted and confirmed”.

The queries and suggestions should be addressed to:

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