Appendix No. **3**
to the Client Service Regulations

Brokerage Company “Rioni Capital”

DECLARATION

on Risks Related to Electronic Trading and Routing of Client Orders

TBILISI
2025

This Declaration on Risks Related to Electronic Trading and Routing of Client Orders (hereinafter – the Declaration) constitutes an appendix to and an integral part of the Client Service Regulations (hereinafter – the "Regulations") of the brokerage company "Rioni Capital" (hereinafter – the Company).

This Declaration describes risks related to electronic trading and routing of client orders when trading on financial markets using software products and other means of client access. At the same time, this Declaration does not reflect all risks related to electronic trading, but provides the Client with a general understanding thereof.
The purpose of this Declaration is to warn the Client about possible losses associated with malfunctions of electronic trading systems and data transmission systems.
Electronic trading and client order routing systems differ from traditional open outcry trading and manual order routing methods.
Transactions executed using electronic systems are governed by the rules and regulations of the exchanges offering the electronic trading system and/or by contract listing rules.
You are responsible for managing your trading in accordance with the applicable policies, procedures and trading rules of the exchanges or systems to which your orders are routed.
Before executing a transaction using an electronic system, you should carefully familiarize yourself with the rules and regulations of the exchanges that offer such systems for the instruments you intend to trade and/or with the contract listing rules.

1. Differences between electronic trading systems

Trading or submitting orders via electronic systems may differ significantly between various electronic systems and different brokers.
You should review the rules and regulations of the exchange offering the electronic system and/or contract listing in order to understand, inter alia, the system's order matching, opening/closing procedures and pricing, erroneous trade policies, trading restrictions or requirements, and, in all systems, access qualifications and the grounds for prohibitions or restrictions on the types of orders entered into the system.
Each of these matters may represent different risk factors associated with trading using a particular system.
Each system may also have risks related to system access, variability of response time and security. In the case of internet-based systems, there may be additional security risks, as well as risks related to service providers, receipt and monitoring of e-mail.

2. Risks related to system malfunctions

The use of an electronic trading system or a client order routing system involves the risk of malfunction of the system or its individual components.
In the event of malfunction of the system or its components, it is possible that for a certain period of time the Client may not be able to:

- place new orders;
- execute existing orders;
- modify or cancel previously placed orders.

In the event of malfunction of the system or its individual components, it is possible that for a certain period of time the Client may not be able to:

- place new orders;
- cancel or modify previously transmitted orders;
- view the current portfolio value (NLV), initial and maintenance margin (IM/MM), as well as current quotations of financial instruments.

In this regard, the Client must ensure the availability of alternative trading mechanisms in addition to the account maintained with the Broker, in case the Broker's system becomes temporarily unavailable for any reason.

3. Simultaneous open outcry trading and electronic trading

Some contracts offered in electronic trading systems may be executed on the platform both electronically and through open outcry trading during the same trading hours.
You should study the rules and regulations of the exchange offering the electronic trading system and/or contract listing in order to determine how orders that do not specify a particular buy/sell process will be executed.

4. Limitation of liability

Exchanges offering electronic order routing systems and/or contract listings may adopt rules to limit their liability, the liability of FCMs, software and communication system providers, and/or the amount of damages that may be claimed as a result of system malfunctions and/or delays in order execution.
These liability limitation provisions vary between exchanges.
You should review the relevant exchange rules and regulations or consult with the Broker to understand these limitations of liability.

5. Internet services

To the extent that the Client or the Broker uses internet services for data transmission or communication, the Broker disclaims any liability for the security of any such data or communications.
The Broker is not responsible for and does not guarantee access to, speed, availability or security of internet or network services.

6. Specific features of the Broker's electronic trading systems and client order routing

Electronic trading systems used by **Rioni Capital** (dxFINA, WebTrader, mobile applications, API) may have different functionality, execution parameters and data transmission delays.
The Client acknowledges and agrees that:

- information may be displayed at different speeds on different electronic platforms;
- risk calculation parameters (IM / MM / NLV) are determined by the Broker's Risk Management System (RMS), and priority is given to the data displayed in the personal account, as defined by Article 6.4.7 of the Regulations;
- exchanges and ECN platforms may have different execution mechanisms, order priority, trading sessions, price limits and policies regarding erroneous trades.

Everything stated above is intended to recommend that the Client carefully consider, taking into account the Client's investment objectives and financial capabilities, whether the risks related to electronic trading and routing of client orders are acceptable.
This Declaration is not intended to prevent the Client from executing such transactions; it is intended to assist the Client in their assessment.
The Client must ensure that the above information is clear and, if necessary, obtain clarification from Rioni Capital or from a consultant specializing in the relevant matters.