



### 1.Financial Services Guide

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1.1 This Financial Services Guide (FSG) dated 25 March 2021 is provided to you by GOOD ENOUGH (GOOD ENOUGH, we, our, us) to inform you of the financial services we provide.

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This FSG has been prepared to give you general information about the services and products we offer before you can make a decision to invest. It contains information about remuneration, who we are, any associations or relationships we may have with financial product issuers, details of any potential conflicts of interest, our internal and external dispute resolution procedures and how you can access them, information on how we handle your personal information, and how we can be contacted.

### 2. Business Description

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2.1 GOOD ENOUGH FX was founded in 2021, and incorporated in London since 2021, to provide execution only brokerage services to retail clients. GOOD ENOUGH FX does not provide any personalized investment advice or recommendations as to any investment.

2.2 GOOD ENOUGH FX's management has an extensive experience working in the foreign exchange, derivative markets and risk management.

2.3 To provide best-of-class trading experience, GOOD ENOUGH FX provides high-end technology products that utilize fast executions, low spreads, and unmatched customer-service. utilize fast executions, low spreads, and unmatched customer-service.

### 3. What other documentation might you receive?

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3.1 In the provision of financial services, general advice and personal advice have special meanings and may differ from what you commonly understand. General advice can include direct or implied recommendations about financial products or services, whether general or for a class or kind of investor, and does not take into account your particular circumstances. General advice includes advice based on consideration of the investment alone (including by reference to current market conditions). Any such advice is provided without any express or implied recommendation that is appropriate for you in light of your personal circumstances. We only provide general advice for educational purposes, and this should not be construed as tax, legal or investment advice.

3.2 If we recommend to you a particular financial product or you acquire a financial product through us, you may also receive a Product Disclosure Statement (PDS) prepared by a product issuer which contains information about the particular product, including any relevant terms, significant risks and details of other fees and charges which may apply. This document will be provided to assist you in making an informed decision about that product.

3.3 Regular updates, marketing materials, research reports, PDSs or offer documents and website content are not personal advice. GOOD ENOUGH FX may collect personal or investment information from you to identify you, for marketing purposes or to administer your account.

Collection of personal information is not to be implied that personal advice is given. How your personal information is handled and protected is further expanded in this FSG, and a copy of our Privacy Policy is available by contacting us, or can be found on our website.



#### 4. Who are we and what services are we authorised to provide?

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4.1 GOOD ENOUGH FX Limited is a London-registered company (registration number 40313) and is regulated by the VFSC. Services are provided from London.

#### 5. What fees and commissions do you receive?

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5.1 GOOD ENOUGH FX provides CFD products that reflect the price movement of underlying financial assets such as Forex, indices and commodities. GOOD ENOUGH FX acts as the counter-party to your CFD trades, and may charge fees and commissions as a result of the provision of CFD trading services.

#### 6. Interest / Client Money

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6.1 GOOD ENOUGH FX is solely entitled to any interests or earnings derived from your money being deposited in our client trust account. Such interests or earnings may be payable to us from the relevant trust account or depository account. Upon realisation of an investment of your funds, the initial capital invested must either be invested in another

investment or deposited by us into the client trust account. In the event that the amount received upon realisation of an investment of your funds is less than the initial capital invested, we must pay an amount equal to the difference into the client trust account for your benefit, except where any such difference is the result of amounts paid out of the investment to us in accordance with the Client Agreement. We will not charge a fee for investing the money in the client trust account.

#### 7. Income

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7.1 The calculation of the price to be paid (or the payout to be received) for Margin FX Contract, at the time the Contract is opened or closed, will be based on market prices available at the time and the expected level of interest rates, implied volatilities and other market conditions during the life of the financial contract and is based on a complex arithmetic calculation. The calculation may include a spread markup in favour of GOOD ENOUGH FX. Spreads will differ depending on the currency pairs traded.

7.2 Spread means the difference between the bid price (price offered) and the ask price (price requested) for the base currency expressed against the terms currency.

The spread is incorporated into the price of the currency pair quoted to you and is not an additional fee or charge payable by you. GOOD ENOUGH FX earns its income from rebates derived from the spread in the prices of the base currencies. In other words, we add an amount to the market ask price when you open a Long Margin FX Contract position and subtract an amount from the market bid price when you open a Short Margin FX position. If holding an ECN account GOOD ENOUGH FX will offer a 'raw spread' price and charge a commission per 100K traded of USD3.50 (USD7 Round Trip). The Electronic Crossing Network (ECN) Raw spread account allows GOOD ENOUGH FX traders to trade on the raw bid and ask price that we receive from our Interbank counterparties - there is no mark up applied. For this account GOOD ENOUGH FX derives its revenue from a commission charge applied at the close of each trade.

7.3 This means you pay more to buy a currency and receive less when you sell a currency.

The spreads we quote are a number of Pips between the bid price and the ask price. A pip is the last decimal place to which an exchange rate is quoted.



7.4 The spreads we quote are determined by our liquidity provider. GOOD ENOUGH FX does not charge any fees or commissions - except in the case of a ECN account where GOOD ENOUGH FX will offer a lower spread and charge a commission per 100K traded of USD3.5 (USD7 Round Turn). It does however receive a commission from its liquidity provider for trades placed with the provider. This commission amount is derived from a markup on the spread or the actual commission amount charged in the case of a ECN Account.. This commission amount is derived from the spread and may range from 25-40% of the spread. The spread will be influenced by estimated current spot Interbank exchange rates (for gold and silver our best estimate of current spot price of gold and silver), the size of your transaction, the frequency at which you enter into Contracts with us, expected levels of interest rates, implied volatilities and other market conditions during the life of the Contracts and the currency pair and the time zone in which you choose to trade. The spreads we publish are our best possible target spreads used in normal market conditions. The spreads range from between 0.5 Pips to 10 Pips for major currency pairs and 0.5 Pips to 100 Pips for exotic currency pairs. GOOD ENOUGH FX will quote 5 decimal places for most currency pairs but the 4th decimal place is classed as the pip.

7.5 You will be charged a "roll over" fee with respect to Spot and Forward transactions. As long as the deal remains open, there is a "roll over" charge which represents the interest rate swap and a finance rate, which is determined by the currency pair being traded. Swap rates are indicative rates and are subject to change based upon market volatility. They can change daily and are published by GOOD ENOUGH FX within the trading platform. Clients are able to check the Swap rate / Rollover rate by opening the trading platform and selecting Market Watch, right clicking and selecting Symbols. The GOOD ENOUGH FX website will update periodically with these rates however we encourage you to check current rates via the trading platform.

7.6 Where your business has been referred to GOOD ENOUGH FX, GOOD ENOUGH FX may be required to share a percentage of the commission or other charge with the referring party

## 8. Details of Associations or Relationships

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8.1 GOOD ENOUGH FX has a relationship with its nominated Execution and Clearing Broker. These relationships in no way influence the provision of financial services by GOOD ENOUGH FX.

8.2 GOOD ENOUGH FX has a relationship with its Liquidity Providers and Prime Brokers. These relationships may influence the information provided to clients.

## 9. Privacy Policy

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9.1 We collect your personal information through:

1. Direct interactions with you. For example, when you submit information contained in documents, messages, comments, text and images that you upload to GOOD ENOUGH FX's website or transmit through other Services that we provide;
2. Automated technologies or interactions. For example, as you interact with our Services, submit financial or transactional data such as billing address and other payment details; and
3. Third parties. For example, we may receive contact details from an existing customer who invites you to use a Service or through a referral arrangement with our business partners.

9.2 We do not disclose any non-public, personal information about our customers, former customers, or potential customers to anyone, except as required by law or as necessary to protect our users and services.

9.3 We may contact you from time to time with promotional and marketing material via phone, email and mail. If at any time you do not wish to receive marketing material please contact us and we will remove you from our lists.



## 10. Contact Details

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10.1 GOOD ENOUGH FX Headquarters location: 83 Baker Street, London, UK <https://goodenoughtreasure.com>  
Email: [info@goodenoughtreasure.com](mailto:info@goodenoughtreasure.com) Back Office, Account application and administration  
[support@goodenoughtreasure.com](mailto:support@goodenoughtreasure.com) Partnership, Account Introducing Brokers (IB) [affiliate@goodenoughtreasure.com](mailto:affiliate@goodenoughtreasure.com)  
Marketing, Marketing opportunities and collaborations [info@goodenoughtreasure.com](mailto:info@goodenoughtreasure.com) We do not disclose any  
non-public, personal information about our customers, former customers, or potential customers to anyone,  
except as required by law or as necessary to protect our users and services.

