Swaps Program - "Long-Term Funds Placement T + 12 months" Specification

Reference is made to the Swaps Program - "Long-Term Funds Placement T +12 months" Terms and Conditions of Freedom Finance Europe Ltd (the "**Swap Conditions**"). Capitalised terms not otherwise defined herein shall have the meanings ascribed to them in the Swap Conditions.

The purpose of this document is to specify certain terms and conditions of the Transaction entered (or to be entered) between of Freedom Finance Europe Ltd ("**FFE**") and the Client (the "**Transaction**"). This Specification constitutes a "**Specification**" as referred to in the Swap Conditions. This Specification, the Swap Conditions and the applicable Investment Order form and evidence a single complete and binding agreement between the Parties as to the terms of the Transaction. In the event of any inconsistency between the Swap Conditions and this Specification, this Specification will govern.

The terms of the Transaction (or prospective Transaction) to which this Specification relates are as follows:

General Terms:

Applicable Terms:	Swaps Program -"Long-Term Funds Placement T + 12 months"
Placement Date:	The date specified in the relevant Investment Order
Effective Date:	The date when a Counterparty (as defined in the Swap Conditions) acceded to the Transaction
Swap Transaction (Transaction)	A pair of conversion transactions in which cash flows in one financial instrument or in currency is exchanged for those of another financial instrument or cash on the expiration of 12 months period.
	Where:
	One - with the settlement date T on the Swap opening day (selling Financial Instrument or Currency), the second - with the settlement date $T + N$ (buying Financial Instrument or Currency).
	Where N is participating Term chosen by the Client under the Swap Conditions and indicated in Investment Order.
Termination Date = Settlement Date:	On the expiration of 12 months period upon settlement of the Transaction,
	subject to Early Termination in accordance with this Specification.
Underlying Financial Instrument (or Currency)	Any (or any available currency for currency Swap transactions)

Number of Underlying Financial Instruments:	subject to the execution conditions according to clause 2 of the Swap Conditions	
Notional Amount:	Amount of placement at the minimum of USD 1,000 or equivalent in any other available currency	
Interest Amount	Amount of interest accrued on the Notional Amount for the entire Swap's Term at the Interest Rate as defined below	
Interest Rate	Fixed-rate in the Investment Order based on SOFR rate for USD and Euribor rate for EUR, on the Placement Date for the entire Swap's Term	
Interest Payment Date	Termination Date	
Business Day Convention:	Following	
Initial Exchange Amount payable by the Client:		
Initial Exchange Date:	Effective Date	
Initial Exchange Amount:	Notional Amount	
Final Exchange Amount payable by FFE:		
Final Exchange Date:	The Final Exchange Amount (as defined below), if any, shall be payable on the Termination Date	
Final Exchange Amount:	On the Termination Date, FFE shall pay to the Client an amount in a currency selected by the Client on the Placement Date upon submission of the Investment Order, calculated as follows:	
	Final Exchange Amount = profit on the Settlement Date (on the second transaction of Swap transaction) + Interest Amount	
Final Value of Underlying Financial Instrument (or Currency):	In respect of the Underlying Financial Instruments (or Currency), as of the Final Exchange Valuation Date:	
	(i) to the extent the Underlying Financial Instruments comprise Underlying Financial Instruments that are listed, quoted or traded on an exchange ("Listed"), such portion of the Final Value of Underlying Financial Instrument shall be determined by the Calculation Agent with reference to the Closing Prices of such Underlying Financial Instruments on the Final Exchange Valuation Date; and	

- (ii) to the extent that the Underlying Financial Instruments comprise Underlying Financial Instruments or other assets that are not Listed, such value as determined by the Calculation Agent as follows:
 - (a) in respect of any cash, the face value of such cash amount (as converted into USD or any other available currency at prevailing spot rates on the Final Exchange Valuation Date);
 - (b) in respect of any Underlying Financial Instruments or other assets, the price at which the Calculation Agent determines that a holder of such Underlying Financial Instruments or assets could dispose of such assets on the Final Exchange Valuation Date (or if that is not practicable or would not produce a commercially reasonable result, on one or more dates over a period ending not more than 30 calendar days following the Final Exchange Valuation Date (the "Final Valuation Cut-off Date"), as determined by the Calculation Agent in its sole discretion); provided that, if FFE has entered into any hedging arrangements in respect of the Underlying Financial Instruments, the Calculation Agent may determine the Final Value of Underlying Financial Instrument with reference to such hedging arrangements; and provided further that if Calculation Agent determines that it would not be possible or practicable for a holder to dispose of such Underlying Financial Instruments or assets by the Final Valuation Cut-off Date, then the value of such assets will be deemed to be zero.
- (iii) in the case of a currency Swap Transaction the Final Value of Currency is determined by the Calculation Agent at the market value of currency applicable on the Termination Date.

in each case less any applicable taxes, fees,

	commissions or other costs (including brokerage fees).
Final Exchange Valuation Date:	The day that is 3 Scheduled Trading Days (or, if the Underlying Financial Instruments are not Listed, the day that is 2 Business Days) prior to the Termination Date.
Other Terms:	
Early Termination:	On early termination of the Transaction at the initiative of the Client, before the Termination Date, the Notional Amount shall be credited back to the Client's Account, but no Interest Amount accrued thereto, in each case less any applicable taxes, fees, commissions, or other costs (including brokerage fees).
Calculation Agent:	FFE