

# Products & Services Regulatory Compliance

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## Products & Services Regulatory Compliance

Unifii Corporation LLP is classified as a publisher of financial news and information and therefore exempt. This is an exemption provided in the U.S. Securities Investment Advisers Act of 1940. We provide financial research and information to the public, but it is completely at the discretion of the individual as to whether they will use the information or not.

*: "a publisher of any bona fide newspaper, news column, newsletter, news magazine, or business or financial publication or service, whether communicated in hard copy form, or by electronic means, or otherwise, that does not consist of the rendering of advice on the basis of the specific investment situation of each client."*

### NOT PROVIDING ADVICE

Unifii Corporation LLP delivers Trade Strategy signals, alerts, research, analysis and convenience tools that are sent to subscribing members via email, mobile app, and website member access. There is no customization, review or consultation of the member's personal financial objectives, situation or need. The member is free to act or not to act on the information provided. All information is provided uniformly to the member base without modification or consideration of any **personal** situation or need.

### Qualifying as a Publisher

United States regulatory as defined by the Securities Exchange Commission and executed by FINRA uses the following criteria to determine eligibility for the exemption:

*4. Publishers. Publishers are excluded from the Act, but only if a publication: (i) provides only impersonal advice (i.e., advice not tailored to the individual needs of a specific client); (ii) is "bona fide," (containing disinterested commentary and analysis rather than promotional material disseminated by someone touting particular securities); and (iii) is of general and regular circulation (rather than issued from time to time in response to episodic market activity).*

Reference Source:

- [www.sec.gov](http://www.sec.gov)
- [http://www.sec.gov/about/offices/oia/oia\\_investman/rplaze-042012.pdf](http://www.sec.gov/about/offices/oia/oia_investman/rplaze-042012.pdf)
- <http://www.sec.gov/investor/pubs/cyberfraud/newsletter.htm>

### Unifii Corporation LLP is NOT an Investment Advisor, Broker, Dealer or Fiduciary

Unifii Corporation LLP provides research, commentary and trade signals for US equities, leveraged and non-leveraged ETF (exchange traded funds), currencies including cryptocurrency.

To further clarify our position as a Publisher, please note the following:

- The Company does not take possession of any person's investment capital
- The Company does not get paid by a financial institution for the research information provided
- None of the commentary, newsletters, alerts are an offer to purchase or recommend the purchase of securities
- The user of our products and services does so at their own discretion, they are free to act or **not act** on the information provided
- Users of our product may select any brokerage firm if they choose to act on the information provided. The only exception to this are certain convenience tools that require programming by brokerage firms who enable the customization.
- The Company does not know the individual financial situation, objectives or needs of the persons who use their services
- The Company does not modify the research information delivered to persons using their services, all information is delivered uniformly to subscribed members

## TRANSPARENCY

### Performance of Services

The Company maintains a strong commitment to transparency especially with the performance statistics of our services. We continually modify the method in which we review percentage gains to enable individuals to clearly understand risk, loss of capital, variances, and drawdown periods.

We have the following policies in place regarding performance statistics of our trade research:

- Each trade including date entered, exited, price and symbol since inception is published on our public site for members and non-members to review.
- We have implemented live accounts for all our trade services and use these live accounts to post performance.
- If we publish performance statistics for a particular period, we issue this information uniformly to our member base who may refer to this information when speaking about our services.
- Our members are prohibited from posting claims, performance statistics or any reference to profit that has not been specifically issued by the Company.
- We discourage members from sharing their personal trade histories however we maintain no jurisdiction in this regard and ultimately a user of our services may share their personal experience with whomever they want.
- All performance includes our basic disclaimers:
  - Past performance is not indicative of future results
  - Individual trade results will vary
  - Commissions are not reflected in trade performance
  - Trading involves risk including the risk of losing part, all or more of the initial monies invested
  - Trade results will vary from account to account
  - Both gains and losses will be experienced by users of the services and each member must define and act within their personal risk tolerance

### Disclaimers

Unifii Corporation LLP works to ensure that members fully understand both performance and use disclaimers. We have a commitment to a "plain language" representation of our disclaimers where all training sessions, recordings, newsletter alerts, emails, website posts, and subscriptions include our detailed disclosure of risk and the use of our products solely at the member's discretion.

An example of a disclaimer from our recorded sessions:

Persons who choose to purchase a subscription and subscribe to our information research and trade services also accepts additional disclaimers and risk disclosure at the time of purchase.

## CRYPTOCURRENCY

### Guidelines & Regulation

The Company provides members access to crypto education videos, webinars, and crypto trading research and alerts. Guidance regarding the cryptocurrency environment is not yet fully determined. The market is emerging, and regulatory guidance is in the process of being developed, changed, and further refined.

The Company is committed to understanding the rapidly changing regulatory environment and desires to ensure all services are within the regulatory guidelines. The Company will change, modify or eliminate a service if it is deemed to be outside regulatory guidance.

The Company does not make any representation of performance returns for any of the trade research products. Each member must accept the risk and responsibility for any service they put into practice.

## **Convenience Tool Notifications**

**The tool simply sends a trade signal, the product user determines whether they wish to make that trade. The Company does not enter any trades on the member's behalf, nor do we suggest, recommend or identify the size and risk allocation for the user of the convenience tool.**

**The best way to explain the convenience tool is that is an "automated signal" but NOT an "automated trade." Only the user can complete the process to affect the trade taking place.**

## **Independent Unifii Affiliates**

The Company offers an **optional** bonus plan to members who would like to actively sell our services to others. Compliance and governance over the actions of the Independent Affiliate is critical to our operations, reputation and overall customer satisfaction.

Our Independent Affiliates are governed by an extensive policy & procedures manual:

**<http://unifii.io/docs/Unifii-Policies-and-Procedures.pdf>**

Violations of policy are taken very seriously and could result in the termination of an Independent Affiliate Agreement.

With today's instantaneous access to information, the ability for us to police and scrutinize each post, tweet, video or comment regarding our services is challenging. We are continually deploying additional technologies to assist in automating web searches for compliance infractions.

In many cases, we find that individuals and users of our services only have a common understanding of terms and not the impact and meaning certain words have in the regulatory environment. Use of the words, "advice, automatic, opportunity, etc." seem harmless to those who are speaking in plain terms. Therefore, we have a commitment to education of our Independent Distributors to ensure their awareness and implications of using such words when discussing our products and services. We are continually adding additional courses, personnel and expanding our discussions of the regulatory environment.

Following is an excerpt from our Policies & Procedures as an example of rules concerning statements made by Independent Affiliate:

### **Summary**

The subject of compliance is extensive and rapidly changing. At times, even professional legal resources are in conflict as to the interpretation of newly implemented regulations. Despite these complexities, the Company is committed to conformance to all regulatory guidance and full transparency of our product performance and operations.

In addition to the aforementioned procedures, we strive to maintain an A rating with the Better Business Bureau and other third-party reporting agencies such as Dun & Bradstreet.

If anyone reading this document believes a policy violation has been committed, or if you have general questions regarding this document we urge you to contact us directly by calling us at:  
by email: [compliance@Unifii.io](mailto:compliance@Unifii.io)

or by mail to:

**27 Old Gloucester Street, London WC1N 3AX**

### **Effective Date**

The effective date of this Products & Services Regulatory Compliance is April 12, 2018.