

FXCMAPPS

DEVELOPERS GUIDE

A Guide to Developing, Submitting and Marketing Your Apps,
as well as FXCM's Review and Payment Process

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I. DEVELOPER GUIDELINES

OVERVIEW

Like other app stores, FXCM Apps has a review process to ensure a population of high-quality trading apps.

These guidelines are meant to help you understand our app store thought process, so that your hard work is showcased to thousands of traders around the world.

This is a living document that may be edited and updated by FXCM. Updates, changes and adjustments may occur at any time at FXCM's sole discretion. See the cover page for the guide's release date.

APP GUIDELINES

Terms and Conditions

As an FXCM Developer for FXCM Apps, you are bound by the terms of the Developer Agreement and any other licenses or contracts between you and FXCM. The following is intended to assist in ensuring your app meets our standards for placement on www.FXCMapps.com and does not amend or remove provisions from any other agreement.

Functionality

We are looking for unique apps that offer distinctive functionality. Please do not spam us with many versions of similar apps. In general:

- Apps that crash are rejected.
- Apps that exhibit bugs are rejected.
- Apps that do not perform as advertised are rejected.
- Apps with undocumented or hidden features inconsistent with the description are rejected.
- Apps that are beta, demo, trial or test versions are rejected.
- Apps that are primarily marketing materials or advertisements are rejected.

If Placing Live Trades

Not every app places live trades. However, if yours does, we expect you to create strategies you would confidently put your own money behind.

- Apps that place live trades are held to a higher standard of excellence.
- Strategies should not "churn and burn."

- Apps that place live trades should keep an accessible log of trades, orders, stops, limits and any other functionality that affects a live trade.

Trademarks

- Apps that suggest FXCM is a source or supplier of the app, or that FXCM endorses any particular quality or functionality, are rejected.
- Use of protected third-party material (trademarks, copyrights, trade secrets or other proprietary content) requires a documented rights check, which must be provided upon request.

Media Content

- Apps that use media content may not slow down a platform to a point that hinders trading.

User Interface

Simple apps are easier to sell. Overly complicated apps can frustrate customers, which can only lead to lower sales.

- FXCM appreciates well thought-out interfaces and may reject those with poor interfaces.
- Spelling and grammar are important—confusing or unreadable apps are rejected.

Scraping and Aggregation

- Apps that scrape information from FXCM sites (www.fxcm.com, www.dailyfx.com, www.FXCMapps.com) or create rankings using content from FXCM sites and services may be allowed but require special authorization from FXCM.

Privacy

Apps cannot transmit data about a user without obtaining (FXCM's prior and) the user's permission. These apps must provide the user with access to how and where the data is used.

- Apps that require personal user information, such as email address, date of birth and FXCM account number, in order to function may be rejected.
- Apps that require a product code to unlock must be authorized by FXCM.

Legal Requirements

Apps must comply with all legal requirements in any location available to users. You are obligated to understand and conform to all local laws.

- Apps that contain false, fraudulent or misleading representations are rejected.

- FXCM Developers who create apps that attempt to discover passwords or other private user data are removed from the FXCM Developer Program and will be subject to further investigation in line with FXCM's Identity Theft Prevention Policy.

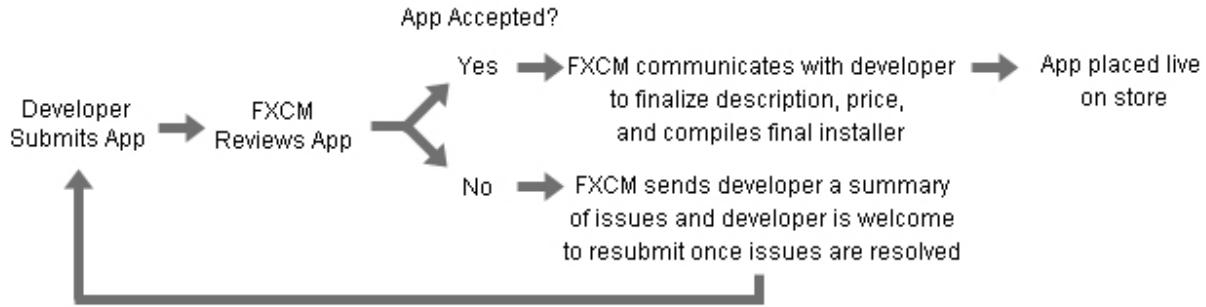
Personal Advice

- Unless authorized to do so in the locations in which you operate, such as if you are a Commodity Trading Advisor (CTA) in the US, advice must not be provided that takes into account one or more of the client's personal objectives, financial situation or needs.
- Clients should be informed that all trading advice is general and does not take into account the needs or circumstances of any individual. If in doubt, clients should seek advice from an independent financial advisor.

II. REVIEW PROCESS

OVERVIEW

Like other app stores, FXCM has a review process meant to ensure that our store is populated with high-quality trading apps.



HOW TO SUBMIT YOUR APP

Submitting your app is a simple two-step process:

- [Sign up online](#) as an FXCM Developer.
- Email your app to consulting@fxcm.com.

FXCM confirms receipt of your app and begins the review process.

REVIEW PROCESS

After receiving your app, FXCM undergoes a basic process to run the app, check for issues and verify that the description matches the functionality.

Timeframe

Depending on what type of app you've developed, the timeframe to review can vary.

- Non-trading apps, which do not place, modify or cancel live trades, generally have a faster review time. Ideally, a review of these types of apps takes 10 business days.
- Trading apps may require additional steps by our review team to make reasonably sure the app functions as described. Ideally, a review of these types of apps takes 15 business days.
- Automated strategy apps require our review team to complete additional due diligence steps. After completing our review, we forward-test the strategy for a minimum of 30 days. Automated strategy apps must be accompanied with a 90-day record of live trading.

Nondisclosure

FXCM is committed to keeping your coding work and personal information private. We abide by the Developer Agreement, which guarantees not to take your app idea, even if your app was rejected by the store.

Communicating Issues

If any issues are found during the review process, FXCM contacts you about specific issues to address before the review process moves forward. To keep a written record, most communication is by email.

If you have specific questions during the review process, use either the Developer Support Forum or contact consulting@fxcm.com.

Acceptance

When your app is accepted, we contact you about your preferred method of payment. (See Developer Payment for more information.)

Rejection

If we are unable to reach an agreement on an app's issues, we reject the app. You are welcome to resolve issues identified by FXCM or create an entirely new app to submit for review.

Next Steps

Once an app is approved, FXCM communicates the approximate time when the app goes live on www.FXCMapps.com. Once live, the app can be purchased and you can start earning your 80% revenue share.

If you maintain your own website, you can drive traffic by linking directly to your app's product page. (See Marketing And Advertising Guidelines for more information.)

III. MARKETING AND ADVERTISING GUIDELINES

OVERVIEW

Hosting your app on FXCMapps is a privilege, and therefore, we expect thoughtful marketing when you advertise on your own site. Generally, we take a hands-off view on how FXCM Developers market their own apps outside of www.FXCMApps.com. Use this document as a guide when marketing your app.

APPROVED MARKETING BADGES

Available At Badge Basics

Download from https://www.fxcmapps.com/wp-content/uploads/2016/07/FXCMApps_Badges.zip



When discussing how a customer can download your app, use FXCM's Available At badge on all electronic communication (websites, banner ads, email promotions, enewsletters).

The badge must be used as provided and cannot be modified.

Link your marketing content to your FXCM Apps product page. Embed your product page's URL in the badge so user clicks link directly to your app.

Preferred Broker Badge Basics

Download from https://www.fxcmapps.com/wp-content/uploads/2016/07/FXCMApps_Badges.zip



Use the Preferred Broker badge on all electronic communication when the content refers to where (from which broker) the app can be used. Do not use this badge as the primary message or main graphic in your content; it is secondary to your message and identity.

This image should link directly to: <http://www.fxcm.com/global-portal/>.

The badge must be used as provided and cannot be modified.

IMPORTANT NOTE

As an app developer, **you may not present yourself as a referring broker or partner of FXCM** (or imply that you have a referring or partnership relationship with FXCM).

GRAPHIC STANDARDS

FXCMapps intentionally chose graphic standards similar to many other app stores, so customers instantly recognize content interaction.

Placement

- The badge must always appear legibly on a clear background.
- Do not alter badge colors—only use the official FXCM blue and white.
- If your page has a light background, use the blue-background badge; if your page is dark, use the white-background badge.
- Always maintain clear space around badge to protect from distracting graphics or typography (minimum clear space: one-quarter badge height).
- Do not place photos, typography or other graphic elements inside the minimum clear space.
- Always select a size that is legible but not dominate (online minimum: 12 millimeters).

**LANGUAGE VERSIONS**

FXCM provides badge artwork translated into several languages. Do not create your own version of a language badge. Always use artwork provided by FXCM without modification.

You may [contact FXCM](#) to have badges translated to your preferred language.

“FXCMapps.com” always appears in English.

LEGAL REQUIREMENTS

FXCM developers and their marketing material are subject to the current Developer Agreement. To ensure the highest ethical standards when communicating with the public, your marketing materials:

- May not use deceptive or misleading sales measures
- May not use deceptive or misleading marketing material
- May not use high-pressure sales tactics
- Must be capable of being verified regarding facts or statements being presented as true
- Must have reasonable basis in fact for all offered opinions
- Must state all offered opinions as opinions
- Must mention loss potential equally prominent to all statements implying profit
- Must include appropriate disclaimers
- Cannot guarantee earnings, spreads, execution type
- Should not use potentially misleading language such as “guaranteed,” “protected,” “secure,” “free,” “independent,” “impartial” or “unbiased”

As marketing material is likely to be received by a retail client, please ensure that:

- The information is accurate and does not emphasize potential benefits without giving fair and prominent indication of the risks
- The marketing material is sufficient for, and presented in a way likely to be understood by, the average member of the group at whom it is directed or by whom it is likely to be received
- The information in the marketing material does not disguise or diminish or obscure important items, statements or warnings
- The marketing material should not state or imply that a product is suitable for particular types of consumers unless the intermediary has assessed that the product is suitable for retail clients
- If comparisons are made, they must be meaningful and presented in a fair and balanced way. Data sources for comparisons must be cited, as must any key facts and assumptions used.
- Marketing material should not make any statement that trading is appropriate for all persons.

Disclaimers

For all apps, the following disclaimer should be displayed in a prominent manner in your marketing materials:

The application displayed does not take into consideration your individual personal circumstances and trading objectives. Therefore, it should not be considered as a personal recommendation or investment advice. Past performance is not indicative of future results.

You may not present yourself as a referring broker or partner of FXCM. When describing your relationship with FXCM or using an FXCM logo, use the following:

FXCM is an independent legal entity and is not affiliated with [App Developer]. FXCM does not endorse any product or service described on this [type of marketing material]. [App Developer] acts as a developer for FXCM and the FXCM platform is able to support [App Developer] apps.

When linking to third-party material, use the following disclaimer:

The views and opinions represented in the provided website links and resources are not controlled by the site owner. Further, the site owner is not responsible for their availability, content or delivery of services.

When the advertising materials contain statistics on actual past trading profits, use the following:

Past results are not necessarily indicative of future results.

Data should not be cherry picked to ensure that the promotion does not highlight the performance of isolated trades or accounts (real or hypothetical) to create the appearance of overall profitability.

The past performance should not be a prominent feature. It must cover at least the immediately preceding five years, or the whole period that the investment has been offered/the financial index has been established/the service has been provided if this is less than five years. In any event, it must show complete 12-month periods. Reference periods and sources must be clearly shown. If the figures are in a currency other than that of the EEA state in which the client is resident, the currency is stated and there is a warning about the possible effects of the currency fluctuation.

If the performance is cited gross, the effect of commissions, fees and other charges must be disclosed.

When using hypothetical performance results, use the following disclaimer immediately following the hypothetical performance results:

HYPOTHETICAL PERFORMANCE RESULTS HAVE MANY INHERENT LIMITATIONS, SOME OF WHICH ARE DESCRIBED BELOW. NO REPRESENTATION IS BEING MADE THAT ANY ACCOUNT WILL OR IS

LIKELY TO ACHIEVE PROFITS OR LOSSES SIMILAR TO THOSE SHOWN. IN FACT, THERE ARE FREQUENTLY SHARP DIFFERENCES BETWEEN HYPOTHETICAL PERFORMANCE RESULTS AND THE ACTUAL RESULTS SUBSEQUENTLY ACHIEVED BY ANY PARTICULAR TRADING PROGRAM.

ONE OF THE LIMITATIONS OF HYPOTHETICAL PERFORMANCE RESULTS IS THAT THEY ARE GENERALLY PREPARED WITH THE BENEFIT OF HINDSIGHT. IN ADDITION, HYPOTHETICAL TRADING DOES NOT INVOLVE FINANCIAL RISK, AND NO HYPOTHETICAL TRADING RECORD CAN COMPLETELY ACCOUNT FOR THE IMPACT OF FINANCIAL RISK IN ACTUAL TRADING. FOR EXAMPLE, THE ABILITY TO WITHSTAND LOSSES OR TO ADHERE TO A PARTICULAR TRADING PROGRAM IN SPITE OF TRADING LOSSES ARE MATERIAL POINTS WHICH CAN ALSO ADVERSELY AFFECT ACTUAL TRADING RESULTS. THERE ARE NUMEROUS OTHER FACTORS RELATED TO THE MARKETS IN GENERAL OR TO THE IMPLEMENTATION OF ANY SPECIFIC TRADING PROGRAM WHICH CANNOT BE FULLY ACCOUNTED FOR IN THE PREPARATION OF HYPOTHETICAL PERFORMANCE RESULTS AND ALL OF WHICH CAN ADVERSELY AFFECT ACTUAL TRADING RESULTS.

When the promotional material contains hypothetical trading data in order to demonstrate returns, it must clearly state that such data is not based on actual trades made with real funds. Hypothetical trading data must not be presented without the full disclosure wherever such data is used. Further, any hypothetical trading data contained in the advertising material must also state that the results could vary if actual funds had been used in real trades. Hypothetical results must include comparable information regarding the past performance of all customer accounts managed by the trader over the past five years.

Once a system has three months of actual trading activity, hypothetical data may no longer be used [NFA Compliance Rule 2-29(c)].

If the program has either less than one year of experience in directing customer accounts or trading proprietary accounts, then the disclaimer must also contain the following statement:

(THE MEMBER) HAS HAD LITTLE OR NO EXPERIENCE IN TRADING ACTUAL ACCOUNTS FOR ITSELF OR FOR CUSTOMERS. BECAUSE THERE ARE NO ACTUAL TRADING RESULTS TO COMPARE TO THE HYPOTHETICAL PERFORMANCE RESULTS CUSTOMERS SHOULD BE PARTICULARLY WARY OF PLACING UNDUE RELIANCE ON THESE HYPOTHETICAL PERFORMANCE RESULTS.

Execution Language Used in Materials

Stop, limit and entry orders must never be presented or described in a manner that suggests these types of orders are “guaranteed,” even if there is an accompanying qualification indicating that the guarantee applies only under normal market conditions. Execution can be rapid most of the time; however, under extraordinarily volatile market conditions, order execution may experience delays. Therefore, fills cannot not be represented as “guaranteed” or instantaneous even during normal market conditions. Please refer to FXCM’s website (www.fxcm.com) as well as the Execution Risks page

(<http://www.fxcm.com/trading-execution-risks.jsp>) for an updated version of our execution language and policy.

In addition, spreads cannot be represented as fixed or guaranteed even under normal market conditions. As noted above, please refer to FXCM's website for an updated version of our execution language and policy.

Additionally, whenever promotional material discusses the benefits of the leverage available in Forex trading, you must also disclose the fact that increased leverage may also increase the losses suffered. An example of a balanced disclaimer to incorporate into the text when discussing the benefits of leverage in the Forex market is:

The high degree of leverage that is often obtainable in Forex trading can work against you as well as for you. The use of leverage can lead to large losses as well as gains.

Please place these words prominently near each mention of leverage, or add pertinent asterisks (*) after each mention of leverage and place the disclaimer at the bottom of each relevant page, preceded by another asterisk so as to guide the reader to its location.

Material Assumptions

Hypothetical results must include the below material assumptions:

- initial investment amount
- reinvestment or distribution of profits
- commission charges
- management and incentive fees
- method used to determine purchase or sale prices for each trade

Members must also make all material disclosures necessary to place the hypothetical results in their proper context, which in some instances may go well beyond the prescribed disclaimer. NFA Members and Associates must calculate hypothetical performance results in a manner consistent with that required under the CFTC's Part 4 Regulations.

Actual and Hypothetical Results

When actual and hypothetical results are used, then the actual results must be presented with at least the same prominence devoted to the hypothetical results.

Hypothetical and actual performance results must be appropriately labeled, separately formatted, discussed in an equally balanced manner and calculated pursuant to the same rate of return method. Hypothetical and actual results must be displayed separately, not commingled.

The promotional material must not downplay the significance of any actual performance results.

The FXCM Compliance Department conducts periodic reviews of marketing materials to ensure that our internal and regulatory standards are met. Following a review, you may be asked to provide further information or to make amendments to your marketing materials. For questions regarding your marketing materials, contact the FXCM Compliance Department at compliance@fxcm.com.

Please be sure to review the following links that explain all of the rules and regulations surrounding your marketing material requirements:

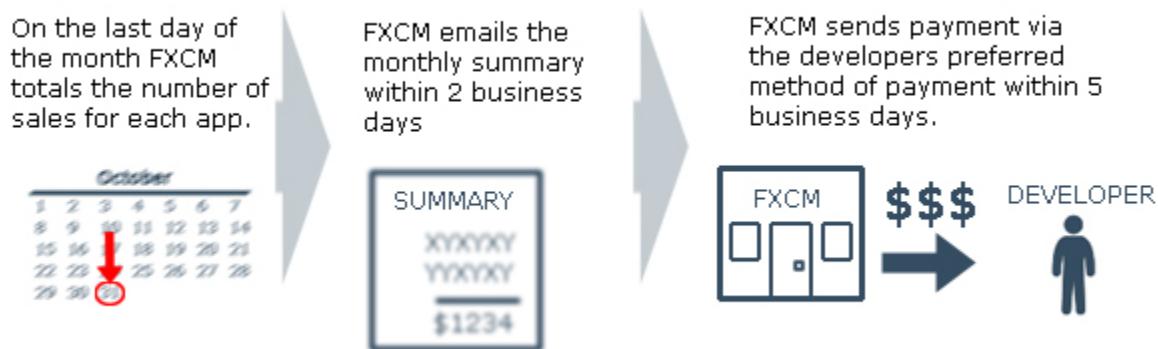
For more information on marketing regulations, see:

- Financial Promotions and Adverts: <https://www.the-fca.org.uk/firms/financial-promotions-adverts>
- ASIC RG 234 Advertising financial products and advice services including credit: Good practice guidance: <http://asic.gov.au/regulatory-resources/find-a-document/regulatory-guides/rg-234-advertising-financial-products-and-advice-services-including-credit-good-practice-guidance/>
- NFA Rule 2-29. Communication With the Public and Promotional Material: <http://www.nfa.futures.org/nfamanual/NFAManual.aspx?RuleID=RULE%202-29&Section=4>
- A Guide to NFA Compliance Rules 2-29 and 2-36: <http://www.nfa.futures.org/nfa-compliance/publication-library/compliance-rule-2-29.pdf>

IV. DEVELOPER PAYMENT

OVERVIEW

One of the main benefits of developing apps for FXCM is your 80% revenue share. Here are instructions for payment and revenue tracking.



PAYMENT OPTIONS

Payments can be sent domestically and internationally as either:

- Paper Check
- Bank Wire

Make certain your bank accepts USD-denominated checks and wires. Some non-US banks do not take international checks, or may take four to eight weeks to clear. Some non-US banks charge an additional transaction fee for USD wires. Consult your bank when deciding on payment options; FXCM has no control over additional fees charged by individual banks.

HOW TO SUBMIT PAYMENT DETAILS

After receiving your FXCM Developer confirmation email, send your preferred method of payment and all required information to appstore@fxcm.com:

- Required Information for Paper Check Payment
 - Developer Name
 - Mailing Address
- Required Information for Bank Wire Payment
 - Developer Name
 - Swift Code: (International)
 - Fed Wire ABA #: (Domestic)
 - Bank Name
 - Bank Address
 - Beneficiary Name
 - Beneficiary Account or IBAN
 - Beneficiary Address

You are responsible for ensuring that FXCM has the correct address/bank wire information on file.

HOW TO CHANGE PAYMENT DETAILS

If you need change your payment address or wish to switch methods of payment, email consulting@fxcm.com as soon as possible.

We make every effort to update payment details in a timely manner. Payments already sent may be subject to a recovery and delivery fee.

TIMEFRAMES

The time when FXCM calculates and sends total monthly payments and you receive payment depends on many factors, some outside of FXCM's control. We strive to send monthly payments within five business days of the end of the previous month. In general, you may receive:

- Paper Checks
 - Domestic—15 business days after the end of the month
 - International—20 business days after the end of the month
- Bank Wires
 - Domestic—six to seven business days after the end of the month
 - International—eight to 10 business days after the end of the month

We aim to make payment as easy as possible. If you have any questions about the status of your payment, please contact appstore@fxcm.com.

V. CONCLUSION

Developing for FXCM Apps is intended to be exciting and profitable! If you have questions on developing your app or on the app-development process, please [contact us online](#) or consulting@fxcm.com.