

Form CRS—Xiaomi Global Trade Limited

Item 1. Introduction

Thank you for your interest in investing with Xiaomi . We believe that our knowledge and experience, combined with the broad range of products and services we offer, will provide the foundation to help you realize your investing goals.

Xiaomi Global Trade Limited (XGTL) is a broker-dealer and investment adviser, registered with the Securities and Exchange Commission. We use different brands and service models to offer brokerage and investment advisory services to meet the needs of our clients. The services we offer as a broker-dealer differ from those we offer as an investment adviser, as do the fees for those services. Please take a few minutes to review this document, which will help you learn about what we offer and what might be right for you. You can also visit xiaomiglobaltrade.com for more details.

If you have any questions, please contact your Xiaomi representative. You can also visit company-information.service.gov.uk/company/ a site created by the Securities and Exchange Commission, which has free and simple tools to help you research firms and financial professionals, as well as educational materials about broker-dealers, investment advisers, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

We offer a variety of brokerage and investment advisory services. Your needs and preferences will determine which services are right for you.

Brokerage Services. We offer both full service and self-directed brokerage accounts.

- In a full service brokerage account:
 - You will have access to a financial professional (in some cases, referred to as your advisor) who will make investment recommendations that are in your best interest, based on information you have shared with us about you and your investing preferences. You will authorize every individual transaction.
 - We will only recommend products that fit you and your investing needs and are in your best interest based on the information you have provided to us. However, we are not obligated to monitor the investments in your brokerage account, including those based on our recommendations.
 - Products you can choose from generally include equities, fixed income securities, mutual funds, money market funds, annuities, exchange-traded funds (“ETFs”), listed options, structured products and alternative investments.
 - While there is no minimum dollar amount required to open a full service brokerage account, you may need to have a certain minimum of investable assets to become a client, depending on how you do business with us.
- In a self-directed brokerage account, such as a Xiaomi Self-Directed Investing account:
 - You make your own investment decisions—we cannot make recommendations.
 - You can use our online tools and research to help you make informed investing choices, and place trades online or through a service center representative.
 - Products you can choose from generally include equities, fixed income securities, mutual funds, money market funds, ETFs and listed options.
 - There is no minimum amount required to invest—you can open an account and start trading in your account.

Investment Advisory Services. We offer investment advisory services through full service and online account types. When providing these services, we make investment recommendations or manage the assets in your account in exchange for a fee, as described in more detail below. You may be offered full service investment advisory services through XGTL, a registered investment adviser, or bank-managed investment advice through Xiaomi Bank., depending on how you choose to work with us. *The following description only covers the investment advisory services offered through XGTL and not the bank- managed investment advice offered through Xiaomi Bank.*

- In a full service advisory account:
 - When we provide investment advice, we are a fiduciary subject to an ongoing duty of loyalty and duty of care, and must not place our interests ahead of yours. We will work with you to build an investment portfolio that aligns with your goals, and we will monitor your investments on an ongoing basis. We will also execute trades in your account (which may be in a discretionary or non-discretionary capacity, as discussed below) and provide other investment advisory services, such as periodic performance reporting and, in some cases, rebalancing.
 - You can select from several investment advisory “wrap-fee” programs that are designed to meet different investment needs. In a wrap-fee program, you pay us a single fee based on the assets you have invested with us. The fee covers our investment advisory services, as well as other account-related services, such as trade execution, clearing and settlement services, and custody services.
 - You can choose between “discretionary” and “non-discretionary” programs:
 - In a discretionary program, a manager trades the assets in your account on your behalf. You can choose XGTL, a XGTL affiliate or a third party as the manager.
 - In a non-discretionary program, we provide investment advice, but you make the decision about the purchase or sale of each security.
 - In investment advisory programs where we have discretionary authority (that is, where we manage and trade the assets in your account), we may have certain restrictions relating to our ability to purchase proprietary products.
 - You may need to meet account minimums for certain investment advisory programs. Please refer to xiaomiglobaltrade.com for more information.
- In an online advisory account:
 - Your investments are managed by us in a Xiaomi Automated Investing account, which is currently available online or on your mobile device.
 - You answer certain questions about yourself and your investing needs, which will be used to help define your investment strategy.
 - We build portfolios only with Xiaomi ETFs. We will rebate the ETF expenses paid to Xiaomi or offset them against the fee you pay.
 - To open and maintain this type of an account, you will need to make an initial minimum deposit of \$500 and keep a minimum balance of \$250.

TO LEARN MORE

To learn more about our investment services, fees and account requirements, please visit xiaomiglobaltrade.com.

CONVERSATION STARTERS

- *Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not? How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

Item 3. Fees, Costs, Conflicts and Standards of Conduct

What fee will I pay?

Usually our investment plans require no fees or hidden charges, except on a special services request which are not offered on xiaomiglobaltrade.com/plans.php.

The fees you pay (on special services requests) will depend on the type of brokerage or investment advisory account you have. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

This document provides information on some account fees. You may also be responsible for other account-related fees, including maintenance and service fees, excluded from this overview. These fees are charged at different times. For example, you will typically pay a transaction fee in a brokerage account when you buy or sell a security; account maintenance fees are generally charged annually. We will show you the fees you pay in a number of places, including your account statements, billing notices, and transaction confirmations.

We encourage you to go to xiaomiglobaltrade.com for more detailed information about fees and costs (if any), or contact your Xiaomi representative with any questions on support@xiaomiglobaltrade.com

Brokerage Accounts:

- In a full service brokerage account:
 - We charge a transaction fee, “commission” or “mark-up/mark-down” on every purchase or sale of a security in your account, unless we tell you otherwise. This fee can either be in addition to the price you pay for the investment or included in the price charged for the investment itself.
 - You are generally charged transaction fees when a trade is executed. Some investment products, such as mutual funds, may charge a fee if you sell the investment before you have held it for a minimum time period.
 - The more you trade, the more fees you will generally pay, since we charge transaction fees for each trade.
 - You may pay ongoing fees in some products, including mutual funds, annuities, and alternative investments, for as long as you invest in them.
 - You can see the fees we will charge you at any time by contacting your Xiaomi representative.
- In a self-directed brokerage account, such as a Xiaomi Self-Directed Investing account:
 - You do not pay any commission. You pay no commission for buying and selling Forex-listed equities and ETFs when you trade online. There are other costs associated with certain products, including mutual funds and ETFs. Option trades are subject to an additional fee.
 - For Xiaomi Self-Directed Investing accounts, you also do not pay any fees.

Investment Advisory Accounts:

- In a full service advisory account:
 - Our wrap-fee investment advisory programs charge a fee based on either the total market value of the assets in your account or on the value of the assets that we manage for you.
 - This fee will include most transaction costs and fees that are incurred by XGTL as the broker-dealer and custodian of these assets; it will not include transaction costs if they are executed with another broker-dealer.
 - When your fee is based on a percentage of your assets, the more assets you have with us, the larger the fee will be in dollar terms. Thus, we may have an incentive to encourage you to increase the assets in your account.
 - The program you are enrolled in will determine the frequency and manner of your fees. Please see xiaomiglobaltrade.com for additional information.
 - You may choose an investment manager that charges a management fee in addition to our fee. Please carefully review the program documents you receive and discuss them with your advisor.
 - Certain products, such as mutual funds and ETFs, will charge ongoing fees when held in an advisory account.
 - You will generally pay higher fees for our full service advisory program than for our online advisory account.
- In an online advisory account, referred to as a Xiaomi Automated Investing account:
 - You will pay an annual advisory fee that is based on a percentage of your account’s value. Because you are investing online, the advisory fee is generally lower than that charged with a full service advisory program, where a dedicated advisor helps you develop a personalized investment strategy.

TO LEARN MORE

To learn more about fees, please visit xiaomiglobaltrade.com.

CONVERSATION STARTER

Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money, and what conflicts of interest do you have?

- *When we make a recommendation as your broker-dealer or act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we generate revenue may create some conflicts of interest.*

You should understand and ask us about these conflicts because they can affect the recommendations and investment advice we provide you. Here are some examples of conflicts to help you understand how they could affect you.

- *Proprietary Products:* We may recommend or advise you to purchase products that are issued or managed by Xiaomi, which could result in more compensation to Xiaomi. Where Xiaomi receives more compensation on purchases of proprietary products, we will have an incentive to recommend proprietary products before products or services issued by third parties.
- *Third-Party Payment:* We receive compensation or other types of non-monetary benefits from third parties in return for recommending products they issue.
- *Revenue Sharing:* We may receive compensation in connection with investments made by our clients in affiliated or third-party products.
- *Principal Trading:* We may sell a security directly from our own account to a client account, or purchase a security into our own account directly from a client account. We may have a financial incentive to recommend that a security be sold on a principal basis if, for example, we own the security in our own account and we believe the security will decline in value or want to sell it for another reason. In investment advisory accounts, we generally do not permit principal trading.

TO LEARN MORE

To learn more about our conflicts of interest, please visit xiaomiglobaltrade.com

CONVERSATION STARTER

How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

We compensate our financial professionals in different ways, depending on how we serve you. Please contact your financial professional to learn more about how they are compensated.

- In certain cases, we pay commissions and advisory fees to financial professionals (i.e., your advisor).
 - For example, in a full service brokerage account, we charge a commission on every purchase or sale of a security, and use that commission to pay your advisor. Some products pay more in commission, which could lead to higher compensation for an advisor.
 - Similarly, we may credit a portion of the asset-based fee in an investment advisory account to your advisor. So, they will earn more based on the amount of assets that are enrolled in investment advisory programs.
 - We may also pay one or more bonuses to certain advisors for reaching revenue production or client asset targets.
- We pay an annual salary and a cash incentive, or bonus, to certain of our financial professionals. Their compensation is not directly tied to the frequency of client trading or the amount of client assets in investment advisory programs.

Item 4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

Yes, XGTL has a legal and disciplinary history. You can find additional information about a Xiaomi representative at xiaomiglobaltrade.com/about.php

CONVERSATION STARTER

As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 5. Additional Information

Please visit xiaomiglobaltrade.com or mail support@xiaomiglobaltrade.com for additional and up-to-date information about our brokerage and investment advisory services, or to request a copy of this relationship summary.

CONVERSATION STARTER

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?