

## **Trading Policy**

In accordance with the requirements of the Investment Company, it is necessary to adopt written codes of ethics that contain provisions reasonably preventing violations of trading rules by clients and other interested parties. To ensure compliance with these rules, records must be kept, control procedures preventing violations must be implemented, as well as procedures for detecting and correcting violations. This comprehensive set of measures provides an effective control mechanism, and the company undertakes to use all necessary efforts and resources to comply with this Trading Policy.

### **Violations of the Trading Policy**

If the Compliance Department becomes aware of any violation or potential violation of the Trading Policy, it must initiate an investigation immediately. The investigation may involve the imposition of penalty sanctions if deemed necessary. Upon completion of the investigation, the Compliance Department holds a meeting to discuss further measures required to address the issue. The department takes actions in accordance with the legislation to prevent further violations.

### **Trading Policy Terms**

- 1) The client acknowledges that any investments are highly risky and may result in significant losses.
- 2) The company is not responsible for any decisions made by the client regarding investment transactions or automated trading unless it is explicitly agreed upon in writing.

In accordance with the operating rules, the company reserves the right to temporarily suspend the client's trading account or trading activity, cancel all bonuses issued within the collaboration, along with the accumulated profits if the manager is unable to contact the client for 2 months or more.

- 3) In accordance with the operating rules, an inactivity fee of 30% of the total balance may be charged to the trading account. The fees will be deducted from the account balance starting from the 61st day and will be deducted monthly until the client resumes activity on the account or the balance reaches zero.
- 4) The company may introduce additional fees and commissions and can modify any existing fees and commissions at any time.
- 5) Since most trading is conducted at the client's discretion and with the assistance of a personal manager, all accumulated profits may be considered the company's property until the orders are closed. To initiate a withdrawal or submit a withdrawal request, all orders must be closed and specified. If there are any open orders on the account, none of the outgoing transactions can be processed.
- 6) In accordance with the company's rules, quotes may differ from market values due to intermediation between the market and the liquidity provider. The intermediary may change quotes at its discretion. The company works with various liquidity providers, which may result in discrepancies between the opening price and the market price. Any losses incurred due to changes in quotes by the liquidity provider do not create financial obligations for the company towards the client.