

Trading Policy

Under the Investment Company Act, investment companies are required to adopt written codes of ethics containing provisions reasonably necessary to prevent customers, and certain other persons engaged in trading, from violating these Rules, as well as to maintain records, exercise reasonable diligence, and adopt and implement procedures as reasonably necessary to prevent, detect, and correct violations of these Rules.

Violations of the Trading Policy

It will be necessary for the Compliance Team to investigate any violation or potential violation of the Trading Policy brought to their attention by an individual, and they will be required to accept penalties if they determine that they are appropriate.

The Compliance Team may confer on appropriate or required actions after the investigation is complete in order to determine what type of remedial action should be taken.

Trading Policy Conditions

-In recognition of the fact that any investment is highly speculative and carries a significant risk of loss, the Client agrees to proceed.

-The Company assumes no responsibility for any trading decisions made by the Client, including decisions related to the opening of orders, investments into specific orders, and the use of automated trading programs by the Client. Only if the Company asserts in writing that it accepts the following responsibilities can the Company be considered to have accepted trading responsibility.

- In accordance with the working regulations, the Company reserves the right to temporarily suspend the Customer's trading account or to suspend the trading activity, as well as to cancel all bonuses that were awarded as a result of the cooperation, as well as the profit that has been realized, if the Manager has not been able to contact the Customer for a period of two months or more.

- Trading accounts that are inactive for more than 30 days may be subject to a fee equal to 30 percent of the total balance, according to operating regulations. If you do not resume account activity on the 61st day, commissions will be deducted from your account balance and will continue to be deducted on a monthly basis until your account balance reaches zero.

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-It is possible that the Company will introduce new fees and charges in the future, or that it will modify any existing fees and charges. For the reason that almost all trading is performed at the Customer's request and with the assistance of a personal manager, all accumulated profits may be considered Company property until all orders have been fulfilled and settled.

The closing and stating of all orders is required prior to performing any withdrawals or making any withdrawal requests. The account will be unable to process any outgoing transactions if there are any open orders on it.

-Because of the intermediation between the market and the liquidity provider, the quotes may differ from the market quotes in accordance with the Company's rules. The quotes may be changed at the discretion of the intermediary party. There may be a discrepancy between the open price and the market price because the company works with a variety of liquidity providers.