

## Trading Policy

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

## Violations of the Trading Policy

If the Compliance Team becomes aware of a violation or potential violation of the Trading Policy by an individual, it is required to investigate the matter, which may include accepting appropriate penalties.

After the investigation is complete, the Compliance Team may confer on appropriate or required actions to determine the appropriate course of action.

## Trading Policy Conditions

- The Client understands that any investment is highly speculative and carries a high degree of risk of loss.
- The Company disclaims all liability for the Client's trading decisions, including those regarding the opening of orders, investments in specific orders, and the use of automated trading programs. The Company may acknowledge accepting trading responsibility only if it makes the following written representations.
- Following the Company's operating regulations, the Company reserves the right to temporarily suspend the Customer's trading account or trading activity, cancel all bonuses awarded in exchange for cooperation, as well as the profit generated, if the Manager is unable to contact the Customer for two months or more.
- According to operating regulations, trading accounts may be assessed an inactivity fee equal to 30% of the total balance. Commissions will be deducted from your account balance beginning on the 61st day and will continue to be deducted monthly until you resume account activity or the balance reaches zero.
- At any time, the Company reserves the right to impose new charges or to modify existing fees and charges.
- Since nearly all trading is conducted at the Customer's request and with the assistance of a personal manager, all accumulated profit may be considered Company property until the orders are closed. To initiate a withdrawal or to submit a withdrawal request, all open and stated orders must be closed and stated. No outgoing transactions can be processed if the account has any open orders.
- Due to the intermediation between the market and the liquidity provider, the quotes provided by the Company may differ from those of the market. The intermediary party has the option to alter the prices as they see fit. There may be a difference between the open price and the market price because the company works with various liquidity providers.