

Trading Policy

The Investment Company Act requires investment companies 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

If the Compliance Team learns of a potential violation of the Trading Policy, it must investigate and, if necessary, embrace penalties.

Upon completion of the investigation, the Compliance Team may discuss necessary actions to be taken.

Trading Policy Conditions

- The Client understands that any investment is highly speculative and subject to loss. The Company is not responsible for any trading decisions made by the Client, including opening orders, investing in specific orders, or using automated trading programs. The Company may only accept trading responsibility if it states so in writing.
- If the Manager cannot contact the Customer for 2 months or more, the Company reserves the right to temporarily suspend the Customer's trading account or trading activity, cancel all bonuses and the implemented profit.
- An inactivity fee of 30% of the total balance may be charged to a trading account. Commissions will be deducted monthly from your account balance until you resume account activity or until the balance reaches zero.
- The Company may impose new fees and charges at any time and may modify existing fees and charges.
- Because almost all trading is done at the customer's request and with the assistance of a personal manager, all profits accrue to the company until the orders are closed. All orders must be closed and stated before requesting a withdrawal. No outgoing transactions can be processed if the account has open orders.
- The quotes may differ from the market due to intermediation between the market and the liquidity provider. The third party may change the quotes at any time. The company works with various liquidity providers, which may cause a price discrepancy.