Trading Policy

Rule under the Investment Company claims to adopt written codes of ethics containing provisions reasonably necessary to prevent customers, and certain other persons engaging in trading, from violation of these Rules, and to maintain records, use reasonable diligence, and adopt and implement procedures as reasonably necessary to prevent, detect and correct violations.

Violations of the Trading Policy

If a violation or potential violation of the Trading Policy by an individual comes to the attention of the Compliance Team, it shall be required to investigate the matter, which may include an acceptance of penalties, if appropriate.

Upon completion of the investigation, the Compliance Team may confer appropriate or required actions in order to determine what type of remedial action should be taken.

Trading Policy Conditions

- The Client acknowledges any investment is highly speculative and involves substantial risk of loss.

- The Company does not bear any responsibility with respect to any trading decisions made by the Client; including decisions related to opening orders, investments into particular orders or using automated trading programs. The Company may acknowledge accepting trading responsibility only if the Company claims in written form to accept the following.

- In accordance with the working regulations, the Company reserves the right to temporally suspend Customer's trading account or suspend the trading activity, cancel all the bonuses that were given upon the cooperation together with the implemented profit, if the Manager cannot contact the Customer for 2 months or more.

- In accordance with the working regulations, trading account might be charged an inactivity fee of 30% of the total balance. Commissions will be deducted from your account balance for 61st day and will be deducted monthly, until you resume your account activity, or until the balance reaches zero.

- The Company may introduce additional fees and charges, and may change any existing fees and charges, at any time.

- As almost all trading performs by request of the Customer and with the help of a personal manager, all the accumulated profit might be considered as Company's property until the orders are closed. In order to perform any withdrawal or submit any withdrawal request, all the orders should be closed and stated. If the account has any open orders, none of the outgoing transactions can be processed.

- In accordance with the Company’s rules, the quotes might differ from the market ones due to intermediation between the market and the liquidity provider. The intermediary party might change the

quotes at own discretion. The company works with different liquidity providers and it might lead to a discrepancy between the open price and the market price. Any losses suffered due to changed quotations by the liquidity provider, do not create any financial obligations of the Company to the Client.