Trading Desk - Compliance Policy Document

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The following compliance rules apply to all trading activities on this desk. All orders must comply with applicable regulations (MiFID II, SEC, AMF, FCA, etc.) and internal

policies.

1. Restricted Securities

- It is strictly prohibited to trade securities issued by companies under current

sanctions lists or internal blacklists.

- Shares of major Big Tech companies (Google, Apple, Facebook/Meta, Amazon,

Microsoft – commonly known as GAFAM) are expressly forbidden.

2. Order Size Constraints

- Any trade over 50 shares is automatically rejected.

- Traders must split orders into smaller tranches if they wish to execute larger

strategies.

3. Product Restrictions

- No trading of complex derivatives (e.g., exotic options, leveraged ETFs, contracts with

leverage above x5).

- No cryptocurrency or digital asset trading without explicit authorization from

Compliance.

4. Regulatory Reporting

- Every trade must be logged with ticker, size, timestamp, and trader ID.

- Suspicious orders must be escalated immediately.

5. Insider Information Prohibition

- Any order suspected of being based on insider information must be rejected and reported.

Non-compliance with these rules will result in immediate rejection of the order and escalation to the Head of Compliance.