

## **Trade History Migration and Import Policy**

### **Purpose**

This policy establishes the requirements and limitations for importing historical trading data from one trading account, server, or broker to another account within the Company's copy trading ecosystem.

The objective of this policy is to ensure the integrity, accuracy, transparency, and verifiability of performance statistics presented to users while maintaining compliance with applicable regulatory and industry standards.

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### **General Policy**

As a general rule, the Company does not permit the import or migration of historical trading data from external brokers, servers, or trading platforms into newly created signal provider accounts.

Historical trading records that have not been independently verified by the Company may result in inaccurate, misleading, or unsubstantiated performance statistics being displayed to copiers and prospective investors. For this reason, imported trade histories are prohibited unless they meet the exception criteria outlined in this policy.

Historical performance generated outside of the Company's ecosystem shall generally not be displayed on the platform unless it satisfies the verification requirements and exception criteria set out in this policy.

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### **Rationale**

The Company has identified several risks associated with the importation of external trading histories:

#### **1. Verification Risk**

The Company is often unable to independently verify the authenticity, completeness, or accuracy of trading records supplied by third-party brokers with whom the Company has no commercial relationship or direct access to trading data.

Without independent verification, there is a risk that imported trading histories may contain errors, omissions, or alterations that could result in misleading performance metrics.

#### **2. Statistical Distortion**

The Company's performance calculations utilize Time-Weighted Return (TWR) methodology.

When lengthy historical records are imported, particularly those spanning multiple years, the compounding effect of TWR calculations may generate disproportionately large return figures that do not accurately reflect the signal provider's current trading performance, risk profile, or account size.

This may result in performance statistics that are potentially misleading to copiers and other users.

### **3. Transparency and Fairness**

Signal providers who begin trading directly within the Company's ecosystem should compete on a level playing field. The importation of unverified historical data may provide certain signal providers with a perceived advantage over others whose performance records have been generated exclusively within the Company's environment.

### **4. Compliance Considerations**

The Company must ensure that any performance information displayed on its platform can be reasonably substantiated and verified.

Displaying performance records that cannot be independently verified may expose the Company to regulatory, compliance, reputational, or consumer protection risks, particularly where historical performance is used as a basis for investment or copying decisions.

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#### **Exceptions**

Exceptions to this policy may be granted only under limited circumstances where the Company is satisfied that the historical trading data can be independently verified.

Examples of situations that may qualify for an exception include:

#### **A. Migration Within the Company's Broker Network**

A signal provider is moving from one broker within the Company's partner network to another broker within the Company's partner network, and the Company has direct access to both trading accounts and associated trading records.

#### **B. Broker-Initiated Migration**

A broker terminates or discontinues its participation in the Company's copy trading services, requiring signal providers to migrate to another supported broker.

In such cases, the Company may approve the migration of verified historical trading data to preserve the continuity of the signal provider's performance record.

#### **C. Verified Third-Party Data**

In exceptional circumstances, historical trading data from an external broker may be considered if the Company is able to independently verify the accuracy, completeness, and ownership of the trading records through reliable documentation and direct cooperation with the originating broker.

Approval under this provision shall be at the sole discretion of the Company.

#### **D. Limitation on Imported Trading History**

Even where an exception is approved under this policy, the Company reserves the right to limit the amount of historical trading data that may be imported.

When determining the permissible period of imported history, the Company may consider factors including:

- The impact of the imported history on performance calculations and displayed statistics.
- The age and relevance of the historical trading activity.
- The accuracy and completeness of available records.
- The interests of transparency and fair comparison between signal providers.

The Company may, at its sole discretion, restrict imported trading history to a defined period (for example, the most recent 12 or 24 months) or otherwise adjust the amount of imported data displayed on the platform.

Such limitations may be applied to mitigate statistical distortions arising from long-term compounding effects, to improve the relevance of displayed performance metrics, and to ensure that users are presented with a fair and representative view of a signal provider's trading performance.

Approval of a trade history migration does not guarantee that the entirety of the historical trading record will be imported or displayed.

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### **Approval Process**

Any request to import historical trading data must be reviewed and approved by management prior to implementation.

Approval decisions should consider:

- The ability to independently verify the trading history.
- The source and reputation of the originating broker.
- The completeness and integrity of the historical records.
- The potential impact on displayed performance statistics.
- Compliance, legal, and reputational considerations.

The Company reserves the right to reject any request for historical trade migration without providing detailed justification.

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### **Final Authority**

The Company retains sole discretion regarding whether historical trading data may be imported, migrated, displayed, modified, limited, or removed from the platform.

Approval of one migration request shall not create a precedent or entitlement for future requests.

All exceptions shall be evaluated on a case-by-case basis in accordance with the principles outlined in this policy.