



FINANCIAL TRADING DIMENSIONS

FTD LIMITED CODE OF CONDUCT

FTD LIMITED - VOL 1

FTD Limited is licensed and regulated by the BVI Financial Services Commission under Investment Business License number SIBA/L/19/1123



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1. INTRODUCTION

Under the rules of the BVI Financial Services Commission, this Code of Conduct (the “Code”) sets forth a summary of the common standards we have established for the FTD Limited (together referred as, “the Company”, “we”, “our” or “us”), its managers, and staff. The Code is designed to promote the values and principles it embodies and to deter any wrongdoing.

FTD Limited is dedicated to maintaining the highest level of trust and confidence of our customers. FTD Limited has earned a reputation for fairness, honesty, and integrity, and considers this to be our most valuable corporate asset. We recognize that our reputation depends on the adherence of our staff to the highest standards of ethical behaviour and professionalism in the performance of their duties.

The Code is crucial in ensuring that our staff—as well as the public—is aware of the standards we have set for ourselves. Our staff are personally responsible for compliance with the Code, and failure to comply with its provisions is grounds for disciplinary action, which may include dismissal, and referral to the relevant governmental authorities and other regulatory bodies, where appropriate. Regarding any course of conduct not specifically addressed in the Code, staff are instructed to consult their supervisors or the Compliance Officer, but ultimately, they are responsible for using good judgment and acting in a manner consistent with the spirit, principles, and values stated in the Code.

The Code is notified to all employees of the company by taking their signatures and they are expected to work in accordance with the principles specified in this Code.

GOVERNING LAWS & REGULATIONS

FTD Limited’s objective is to provide our customers with the greatest in value and customer service and to maximize their financial markets trading experience. Notwithstanding these objectives, the Company places legal and regulatory compliance above profits. In our business conduct, we must always be in compliance with applicable laws and regulations.

FTD Limited is authorized and regulated by the BVI Financial Services Commission.



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CORE ETHICAL VALUES

Integrity

FTD Limited realizes that our success is based on the Company's reputation for integrity along with the public trust and confidence. We respect the interests of our customers; we will honour our obligations, and are straightforward in promising only what we can deliver.

Honesty

FTD Limited requires that a person must not engage in dishonest conduct or conduct which is misleading or deceptive. FTD Limited believes that the truthfulness and honesty does not stem merely from the regulatory compliance; rather, it is due to our philosophy of increased customer protection. Accurate and complete information enables investors to make intelligent decisions and, therefore, our statements are designed not to confuse or mislead.

Fairness

FTD Limited is dedicated to treating those with whom we deal in the same manner that we expect to be treated by others. We apply this approach in a consistent, non-discriminatory manner; from our largest institutional investors to our smallest account holders.

We compete in persistence of our overall interests, yet we do so fairly, ethically, and in a manner that fully complies with all applicable laws, as well as the values and principles stated in this Code.

We endeavour to deal fairly with our customers, service providers, other firms, and individual colleagues. We oppose taking unfair advantage of anyone through any form of manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

Responsibility

To our customers, we are dedicated to providing our products and services in an effective and innovative manner consistent with their needs, and we offer a trading environment that is fast, reliable, convenient, and valuable in terms of price and quality. We maintain adequate financial resources, including capital resources as appropriate, taking into account the nature, scale, complexity and diversity of our business and the risks we face. To our staff, we offer challenging positions in a professional and collegial environment and equal opportunities for performance-based professional development. To our service providers, we seek to build mutually beneficial relationships, while promoting the Code's principles in the process. To our governing authorities, we strive to strictly observe and comply with all relevant laws, and standards of good business practice. We do not sacrifice legal compliance for the sake of profits; rather, we offer the authorities our cooperation and assistance toward the shared goal of investor protection. We are dedicated to remaining a responsible, law-abiding corporate member of society.



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PROFESSIONAL VALUES

Regulatory Compliance

FTD Limited is licensed by the Financial Services Commissions (“FSC”) in the British Virgin Islands. FTD Limited acknowledges the importance of all relevant laws, rules, regulations, policies and standards, whether internal or external. We are dedicated to strict management discipline and a first-class control and compliance environment.

Due Diligence

FTD Limited conducts due diligence so that we can know our customers, and conduct our transactions pursuant to all applicable laws. FTD Limited has adopted a Know Your Customer Policy, which documents our procedures on how we obtain, verify, and record the information of every individual who opens an account with FTD Limited. All employees are required to comply with the Know Your Customer policies and procedures.

Communication

It is our policy that the information in our communications should be full, fair, accurate, timely, and understandable. This policy applies to communications with government authorities, staff, and customers. All staff involved in our disclosure process (including upper-level management) are responsible for complying with this policy. In particular, these individuals are required to maintain familiarity with applicable disclosure requirements, and they are prohibited from knowingly misrepresenting, neglecting, or causing others to misrepresent or neglect, material facts to others, whether within or outside the Company, including our independent auditors.

Books & Records

All transactions and obligations on our customer accounts are recorded in a complete, accurate, and timely manner. We maintain systems of internal accounting controls designed to ensure the reliability and adequacy of our customer account records, and the reports they generate. We retain records for the requisite period mandated by laws and regulations.

Audits

FTD Limited is dedicated to an independent, strong internal and external audit process to supplement our operational processes. Regular audits help FTD Limited identify and address any relevant accounting, internal accounting controls, or auditing issues that may arise. FTD Limited’s managers cooperate fully with our auditors to reach and implement solutions in an efficient and timely manner.

Confidentiality

FTD Limited maintains appropriate instruments to control and monitor the transfer of confidential and sensitive information within and outside the Company. We do not deliberately disclose non-public information concerning our business, our customers or our staff, unless it is in connection to the delivery of services to our customers, upon request of our customers, or as required by law.



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Transparency

FTD Limited endeavours to maintain an open and transparent dialogue with our customers and others, based on fairness, mutual respect, and professionalism.

Data Protection

Data protection is the process of protecting data and involves the relationship between the collection and dissemination of data and technology. It is the process of safeguarding important information from corruption, compromise or loss.

FTD Limited ensures that our customers' information is

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorized processing, access, loss, destruction or damage.

Cyber Security

Cyber security is defined as the collection of tools, policies, security concepts, security safeguards, guidelines, risk management approaches, actions, training, best practices, assurance, and technologies that can be used to protect FTD Limited's information assets against internal and external cyber threats.

Users are only to utilize FTD Limited information resources for business purposes for which they have been authorized. Excessive use of FTD Limited information systems and resources for personal use or use on behalf of a third party (i.e., personal client, family member, political, religious, charitable, school, etc.) is prohibited.

All computer data created, received, or transmitted using FTD Limited's information technology resources is the property of FTD Limited and is not to be considered the private information of the user. FTD Limited reserves the right to examine all data for any reason and without notice, such as when violations of this Code or other Company policies or procedures are suspected. By using FTD Limited information technology resources, the users consent to this monitoring. When warranted, such data will be disclosed to appropriate authorities and/or law enforcement agencies.



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Risk Management

FTD Limited advises customers to engage in conscious, disciplined, and intelligent risk taking. FTD Limited's risk management policies are guided by the principle of adherence to the appropriate legal frameworks as well as the instruments, procedures, and managerial approval processes we apply to monitor, control, and manage the risks to which we are exposed.

Anti-Bribery and Corruption

FTD Limited strictly prohibits any form of bribery, kickback, payoff and any other improper payment, gift, contribution, benefit or any other inducement having a similar corruptive effect, whether in cash (including cash equivalent, cashable items or financial instruments of any kind) or not.

Each FTD Limited staff is obliged to not request or accept for yourself or others whether directly or indirectly any gifts, enticement or inappropriate entertainment or a promise for providing lawful or unlawful service.

Our staff refrains from offering or giving or accepting for themselves or others, directly or indirectly, any bribe, kickback, payoff or any other improper payment, gift, contribution, benefit, promise, or inducement in trying to obtain or retain business or secure services for FTD Limited or to illegally influence any governmental decision or action.

Our honest working policies forbid to solicit or receive, directly or indirectly, any payment, loan, extension of credit, guarantee, gift, object of any value or any kind of preferential treatment from a third party in exchange for favourable treatment or consideration with regards to a transaction or dealing or engagement of any kind with FTD Limited.

Any Staff become aware such situations, or suspect that an attempt at bribery, kickback or corruption is being made, we encourage them to report it immediately.



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Anti-Money Laundering and Counter-Terrorism Financing

Money laundering is the process by which persons or businesses attempt to conceal the origin and ownership of the proceeds of illegal activity such as fraud, drug trafficking, or and other crimes. Money laundering may also involve the use of legitimately derived funds to finance terrorism. Various financial products and transactions, including those related to the foreign exchange market, may be involved in money laundering schemes or financing terrorism. Accordingly, we are aggressive in ensuring FTD Limited is not used as a vehicle for such action. Money laundering and financing terrorism are criminal offenses and can subject its perpetrators and/or facilitators to substantial criminal and civil sanctions, including imprisonment and fines.

FTD Limited is committed to comply with sanctions programs issued by the United Nations, Office of Foreign Asset Control (OFAC) of the United States, Her Majesty's Treasury of the United Kingdom, European Union, and sanction programs placed by the local authorities where FTD Limited operates. The Company prohibits dealings with any jurisdiction or party targeted by applicable international sanctions. Our staff is committed to prevent, detect and where applicable report any dealings with sanctioned persons.

To ensure compliance with anti-money laundering and counter-terrorism financing laws and regulations, FTD Limited has implemented policies and procedures to detect, prevent, and report money laundering and other suspicious activity.

CORE PROFESSIONAL VALUES REGARDING EMPLOYMENT

Staff Excellence & Equal Opportunity

FTD Limited targets to create and maintain a professional atmosphere designed to attract, develop, and retain outstanding people. We offer equal opportunities, irrespective of race, national origin, ancestry, gender, sexual orientation, religion, age, physical disability, medical condition, or pregnancy. We will not tolerate any form of unlawful discrimination, harassment, retaliation, or retribution.

Competitive Reward System

FTD Limited offers a performance-based culture, with a corresponding competitive reward system and periodic fair and objective evaluations that take into account personal contribution to our overall efforts, as well as adherence to the values and principles set forth in this Code. Our partners and managers maintain an open-door policy designed to give each and every staff easy access to management.



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Violations

We assess whether violations of this Code have occurred and, if so, determine whether or not disciplinary measures should be taken against the violator and others involved in misconduct. Disciplinary measures may include, but are not limited to, counselling, oral or written reprimands, warnings, probation or suspension without pay, demotions, and reductions in compensation, termination of employment, restitution, and legal action.

We may waive application of the Code in certain limited situations. Any waivers of Code provisions may be granted only in extraordinary circumstances and only upon management review. An employee who believes that a waiver may be called for is instructed to discuss the matter with our Compliance Officer.

RESPONSIBILITIES OF STAFF

Compliance

Each FTD Limited staff is personally responsible to comply with all applicable laws, as well as the internal policies of FTD Limited, including the principles and values stated in this Code. These responsibilities include being familiar with the applicable laws, guidelines, manuals, and require the implementation of best business practices in accordance with their duties and performing them to the best of their capabilities.

Customer Focus

We actively endeavour to differentiate ourselves from other firms in the area of customer service. We expect and encourage our staff to foster a customer-focused approach, and to treat our customers with greatest courtesy, professionalism, and respect.

Teamwork

We expect our staff to embrace teamwork and to contribute their best efforts toward reaching common objectives.

Honesty

We expect our staff to act at all times in good faith, with due care, competence, honesty, credibility and diligence, and without any misrepresentation of material facts.

Confidentiality

During the course of their service, staff may be provided access to information regarding our customers, trade practices, systems, marketing or strategic plans, fees and revenues, and other knowledge considered proprietary by FTD Limited or our customers. staff are not allowed to disclose or use, either during or subsequent to their employment with FTD Limited, any such information they receive or develop, except for authorized business purposes or where legally mandated. This includes, but is not limited to, information stored on any computer system as well as proprietary software developed by FTD Limited.

Any staff who possess confidential information has a significant responsibility to keep that information confidential, and to disclose such information internally only on a need-to-know basis. staff must be discreet with confidential information and avoid communicating confidential matters in ways that are susceptible to interpretation or use by third parties.



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Conflicts Of Interest

Personal conflicts of interest arise when staff face a choice between their personal interests (financial or otherwise) and those of the Company or customers. Conflicts of interest may call into question the Company's integrity as a whole. Accordingly, a staff's service to the Company may not be subordinated to personal gain or advantage. All employees are expected to act in the Company's best interest. Any staff in a position where his or her objectivity may be questioned because of an individual interest or family or personal relationship should consult his or her supervisor or Compliance Officer. Similarly, any staff aware of a material transaction or relationship that could reasonably be expected to give rise to a personal conflict of interest should promptly discuss the matter with a supervisor and/or Compliance Officer.

Outside Employment

Employment and involvement in other activities outside the Company could interfere with an individual's duties as an FTD Limited staff. Service by any staff as a director, trustee, or officer (paid, unpaid, elected, appointed, or otherwise) of any business other than FTD Limited requires written approval from the Compliance Officer. Unless given specific authorization, service by any staff on a board or in an advisory position with other firms in the financial market industry, and particularly with any of our customers, is forbidden.

REPORTING VIOLATIONS

All employees of the Company are encouraged to talk to their supervisors when in doubt about the best course of action in a particular situation. Any questions regarding the Code and its applicability may be directed to your supervisor or the Compliance Officer.

We encourage reporting of violations of laws, rules, regulations or the Code to be done directly to relevant supervisors and the Compliance Officer or, where appropriate, directly to higher levels of management. Reports by officers and staff may be made on a confidential, anonymous basis. In case of violations by directors, senior staff and officers, such reports should be made to the Compliance Officer.

All reports should be factual rather than speculative or conclusory, and should contain as much specific information as possible to allow for proper assessment. In addition, all reports should contain sufficient corroborating information to support the commencement of an investigation, including, for example, the names of individuals suspected of violations, the relevant facts of the violations, how the complainant became aware of the violations, any steps previously taken by the complainant, who may be harmed or affected by the violations, and, to the extent possible, an estimate of the misreporting or losses to the Company as a result of the violations.

The Company expressly prohibits retaliation against any director, officer or staff for reports made in good faith.



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RELATIONSHIP WITH FINANCIAL SERVICES COMMISSION

On every step of our business, we endeavour to deal with the Commission in an open and cooperative manner. We encourage our employees to actively work with the Commission when necessary.

FTD LIMITED

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FTD Limited is incorporated under the laws of the British Virgin Islands as a BVI BUSINESS COMPANY with registration number 1944994, licensed and regulated by the **BVI Financial Services Commission (FSC)** under **Investment Business License number SIBA/L/19/1123**.