

# Code of Conduct Solid FX

Approved and adopted by the Management Board on 29<sup>th</sup> of September 2016

## Introduction and scope

This Code of Conduct is established pursuant to best practice provision II.1.3 (b) of the Dutch Corporate Governance Code. Solid Trading B.V. (the “Company”) has laid down its business principles in this Code of Conduct. The Code of Conduct applies to each person throughout the Solid Trading group, including board members, supervisory board members, employees and officers and, where applicable, third parties such as agents, advisers, consultants, work-experience students, secondees, temps and other third parties designated as such by the Company, each referred to as “employee” and jointly referred to as “employees”. The Code of Conduct provides a minimum standard for the conduct of our employees. We have adopted several internal policies to further elaborate on any prohibitions and obligations that may apply.

## Culture

We foster a fair and transparent culture. As it comes to our services we set ourselves very high standards as it comes to customer service and development of our technologies. We are ‘Down to Earth’ and have a strong family orientated culture. We rewards people for their contributions to the company as a whole rather than only in their direct area of responsibility. Our culture is underpinned by the four-eyes principle and by disciplined risk awareness at every level of the organization. We strive for continuous improvement and hold ourselves to industry-leading compliance and regulatory standards. We have a strong track record in recruiting, developing and retaining talent. We nurture our unique ‘one family’ philosophy by stimulating the sharing of ideas and best practices. The seamless integration of teamwork, FOREX market expertise, risk management, technology and connectivity enables us to offer competitive pricing, while always remaining in control.

## Compliance

We operate in a highly regulated environment. Integrity of the market as a whole starts with the integrity of our employees. They must be aware of applicable laws, regulations and internal policies that the Company has adopted as a benchmark for integrity.

## Conflict of interest

Our employees should avoid any (appearance of) a conflict of interest. If the employee suspects a possible conflict of interest or if a conflict of interest has materialized, the employee should inform the Compliance Department.

## Personal transactions and insider trading regulations

The Personal Transactions and Insider Trading Regulations (the “Regulations”) contain the code of conduct for relevant persons pursuant to the Financial Supervision Act (Wet op het financieel

toezicht). In the execution of personal transactions the Regulations aim to prevent the mixing, or appearance of mixing of business and personal interests.

Relevant persons must take the utmost care that price-sensitive or confidential information does not become known outside the circle of persons who need to be aware of it as part of their duties, profession or position and will exercise the utmost care in dealing with price-sensitive or confidential information.

### **Gifts**

No gift, favour or form of entertainment should be accepted or provided by the employee if it will obligate or appear to obligate the person receiving it.

### **Fair and orderly markets**

We have the obligation to report suspicious orders or trades to the competent authorities without delay. Our employees must make themselves familiar with these obligations and will inform the Compliance Department in case of an alleged suspicious order or trade.

### **Honest and ethical conduct**

We expect our employees to comply with applicable laws, regulations and internal policies. They are responsible for ensuring the honest and ethical conduct of business at Solid. They have the right but also the responsibility to report abuse or reasonable suspicion of it, without jeopardising their legal position.

### **Equal treatment**

We wish to maintain a stimulating and fair working atmosphere. Such an atmosphere requires the active contribution of our employees, not only with regard to their own behaviour but also in being alert to any form of inappropriate behaviour involving themselves and others, including but not limited to (sexual) harassment, aggression or discrimination.

### **Use of corporate assets**

Our employees are expected to use the Company's assets and services solely for legitimate business purposes and not for any personal benefit or the personal benefit of others.

### **Media**

All media inquiries should be directed to the designated spokesperson(s). Our employees may not communicate information relating to Solid Trading on (social) media without prior approval.

The Company reserves the right to amend or alter this Code of Conduct at any time. This Code of Conduct shall be published on the Company's website, [www.solid-fx.com](http://www.solid-fx.com)