
MARKET ABUSE POLICY

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1. Purpose

This policy outlines prohibited trading behaviors and ensures a fair trading environment for all BXPRO clients. This Policy forms part of, and is incorporated by reference into, the Client Agreement between BXPRO and each client. It should be read alongside BXPRO's Risk Disclosure Policy, Swap-Free Account Policy, AML & KYC Policy, and Complaints Handling Policy.

2. Definition of Market Abuse

Market abuse includes any trading activity, whether manual or automated, designed to exploit pricing delays, system weaknesses, promotional tools, execution practices, or account structures for an unfair advantage, rather than genuine market exposure.

3. Prohibited Trading Practices

- **Latency Abuse** — exploiting execution delays, stale pricing, or feed-latency differences between BXPRO's pricing and other venues.
- **Rebate Abuse** — trading with the primary purpose of generating rebates or bonuses rather than taking genuine market exposure.
- **Hedging Abuse** — offsetting positions to eliminate market risk while extracting rebates, bonuses, or swap-free benefits. This includes offsetting across the client's own accounts, related accounts, and accounts believed to be coordinated with other clients, introducers, or referrers, whether or not those parties are formally related.
- **Bonus Abuse** — misuse of bonuses, promotions, or swap-free (Islamic) account terms, including using swap-free status to run risk-free carry-style positions purely to avoid swap charges.
- **Wash Trading / Self-Dealing** — trading with oneself or a related party, directly or indirectly, to create artificial volume or manipulate pricing.
- **Coordinated / Collusive Trading** — trading in coordination with other clients, introducers, or referrers, whether or not formally related, with the effect of eliminating genuine market risk or extracting rebates, bonuses, or commissions.
- **Other Abuses** — price manipulation, abusive scalping targeting system latency, and automated exploitation of pricing or system errors.

4. Algorithmic Trading, EAs & Third-Party Tools

Clients using Expert Advisors, bots, or other automated tools remain fully responsible for the trading activity those tools generate. Automated strategies are subject to this Policy in the same way as manual trading, and BXPRO may take action against abusive activity regardless of whether it was manually or automatically executed.

5. Monitoring & Detection

BXPRO uses automated and manual monitoring systems, which may include (without limitation) trade pattern analysis, timing analysis, cross-account correlation, and other techniques generally

used in the industry. Suspicious activity may be reviewed without prior notice, and BXPRO is not required to disclose the specific method used to detect any particular instance of abuse.

6. Actions & Remedies

Where BXPRO reasonably determines that market abuse has occurred, it may, at its sole discretion, take one or more of the following actions: cancel or adjust the relevant trades, adjust profits arising from the abusive activity, withhold or reclaim related bonuses/rebates, restrict trading conditions, suspend the account, or terminate the account relationship. For the avoidance of doubt, BXPRO may reverse profits arising from abusive trades, but reversing or cancelling such trades does not entitle the client to compensation for any related losses.

7. Liability for BXPRO's Losses

Where a client's abusive trading activity causes BXPRO to suffer losses, costs, or liabilities beyond the profits generated by that activity, the client shall be liable to indemnify BXPRO for such losses, costs, and liabilities, in addition to any profit reversal or other remedy applied under clause 6.

8. Lookback Period

BXPRO may review and take action under this Policy in respect of trading activity going back up to twelve (12) months from the date the activity is identified, or such longer period as required for an ongoing investigation or regulatory matter.

9. Relationship to AML/KYC

Where activity reviewed under this Policy also raises money laundering, terrorist financing, or other financial crime concerns, BXPRO may additionally act under, and report through, its AML & KYC Policy, including suspicious activity reporting to the relevant authorities.

10. Client Responsibility

Clients are responsible for all activity on their accounts, including activity conducted through third-party or automated trading tools, shared account access, or IB/referrer-introduced activity.

11. Determination of Market Abuse

BXPRO's determination as to whether an activity constitutes market abuse will be made reasonably and in good faith, in accordance with Applicable Law. A client who disputes a determination may raise the matter under BXPRO's Complaints Handling Policy.

12. Related Policies

This Policy should be read together with BXPRO's Risk Disclosure Policy, Swap-Free Account Policy, AML & KYC Policy, and Complaints Handling Policy.