



# Code of Conduct and Ethics

Digital Trading Group of Central America S.A. DE C.V.

[www.solonix.one](http://www.solonix.one)

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## 1. INTRODUCTION

### 1.1 Purpose

Digital Trading Group of Central America S.A. DE C.V. ("the Company") operates the Solonix.one digital asset trading platform with a firm commitment to conducting all of its business activities with the highest standards of integrity, ethics, and professional conduct. This Code of Conduct and Ethics (the "Code") articulates those standards and sets out the principles and rules that govern the behaviour of all individuals associated with the Company.

This Code is designed to protect the interests of our clients, our business partners, the integrity of digital asset markets, and the long-term reputation of Solonix.one. It provides clear and actionable guidance on how personnel are expected to act in a wide range of professional situations.

### 1.2 Scope and Application

This Code applies to all individuals who carry out work for or on behalf of Digital Trading Group of Central America S.A. DE C.V., including:

- All directors, officers, and senior management;
- All full-time, part-time, and temporary employees;
- Contractors, consultants, agents, and third-party representatives acting on behalf of the Company;
- Any other individual who represents Solonix.one in any capacity.

The Company is a licensed digital asset service provider operating under licence number PSAD-0063, issued by the Comisión Nacional de Activos Digitales (CNAD) of El Salvador. All activities of the Company are subject to the regulatory framework established by CNAD and any applicable laws and regulations of El Salvador.

### 1.3 How to Apply This Code

The principles set out in this Code are not exhaustive. They are intended to provide a framework for ethical decision-making. When facing a situation not explicitly addressed in this Code, personnel should ask themselves:

- Is this action consistent with the values and principles of Solonix.one?
- Would I be comfortable if my colleagues, management, or our regulators could observe my actions?
- Does this action comply with all applicable laws, regulations, and Company policies?

- Could this action harm the interests of our clients, the Company, or the wider market?

If you are unsure whether a particular course of action is appropriate, you should seek guidance from the Compliance team before proceeding.

## 1.4 Compliance with This Code

Compliance with this Code is mandatory for all personnel within its scope. Failure to comply may result in disciplinary action, up to and including termination of employment or engagement, as well as potential legal consequences. Personnel are expected to familiarise themselves thoroughly with this Code and to complete any related training provided by the Company.

## 2. INTEGRITY AND MORALS

### 2.1 Good Repute and Professional Standards

All personnel of Solonix.one are expected to maintain an impeccable personal and professional reputation at all times. This applies not only in the course of their duties but also in any public capacity where their conduct could be associated with or reflect upon the Company.

Personnel must:

- Act with honesty and transparency in all professional dealings;
- Treat clients, colleagues, regulators, and business partners with courtesy and respect;
- Avoid conduct that is dishonest, deceptive, or likely to bring the Company into disrepute;
- Uphold the standards expected of professionals operating within the regulated financial services industry.

### 2.2 Gifts, Hospitality, and Entertainment

The Company recognises that gifts and hospitality are a normal part of business relationships, but also acknowledges that they can create conflicts of interest or give rise to perceptions of improper influence. All gifts, hospitality, and entertainment must be declared in accordance with the Company's Gifts and Hospitality Policy.

Personnel must not:

- Accept any gift, payment, benefit, or hospitality that could reasonably be perceived as an inducement to act improperly or to confer an unfair advantage;
- Offer gifts or hospitality to clients, counterparties, or officials that could constitute a bribe or improper incentive;
- Accept cash gifts under any circumstances.

Modest gifts of a nominal value (generally not exceeding USD 50 in value), such as branded merchandise or customary seasonal gifts, may be accepted where they are clearly promotional in nature and do not create any obligation or expectation of reciprocal treatment. All gifts and hospitality above a de minimis threshold must be declared to the Compliance team.

### 2.3 Respect for Human Rights

The Company is committed to conducting its business in a manner that respects the fundamental human rights of all individuals with whom it interacts, including employees, clients, contractors, and members of the communities in which it operates.

Personnel must not engage in, facilitate, or remain silent in the face of conduct that involves:

- Discrimination on the basis of race, gender, nationality, religion, disability, age, sexual orientation, or any other protected characteristic;
- Harassment, bullying, or any form of hostile or intimidating behaviour;
- Child labour or forced labour in any part of the Company's operations or supply chain;
- Any other conduct that violates applicable human rights norms or the Company's equal opportunities and dignity at work policies.

## **3. BUSINESS CONDUCT**

### **3.1 Prohibition on Improper Conduct**

The Company has a zero-tolerance policy towards any form of improper business conduct. Personnel must not engage in, facilitate, or condone any of the following:

#### **3.1.1 Bribery and Corruption**

Offering, promising, giving, accepting, or soliciting any financial or other advantage with the intention of improperly influencing the actions of any person — whether a public official, regulatory authority, client, counterparty, or employee — is strictly prohibited. Personnel must comply with all applicable anti-bribery and anti-corruption legislation.

#### **3.1.2 Inadequate Due Diligence**

Failing to conduct appropriate due diligence on clients, counterparties, or business relationships is a serious compliance breach. Personnel must adhere to the Company's Know Your Customer (KYC), Know Your Business (KYB), and enhanced due diligence procedures in all circumstances.

#### **3.1.3 Forgery and Document Fraud**

The creation, alteration, or use of forged, falsified, or misleading documents or records — whether internal or external — is strictly prohibited. Personnel must ensure the accuracy and integrity of all documents and records they create or handle.

#### **3.1.4 Market Abuse**

Personnel must not engage in any conduct that constitutes market abuse under applicable law, including insider trading, market manipulation, front-running, spoofing, wash trading, or any other practice designed to create a false or misleading impression of the price or volume of any digital asset.

#### **3.1.5 Money Laundering and Terrorist Financing**

Personnel must strictly comply with the Company's AML/CTF policies and procedures at all times. Any suspicious activity must be promptly reported to the Money Laundering Reporting Officer (MLRO) in accordance with internal reporting procedures. Personnel must never tip off a client or third party that a report has been made.

#### **3.1.6 Brand and Intellectual Property Protection**

Personnel must not use the Solonix.one name, brand, logo, or any other intellectual property of the Company in any unauthorised manner. This includes using Company branding in personal social media accounts, external communications, or promotional activities without prior approval from the relevant department.

### 3.1.7 Cooperation with Regulators and Authorities

Personnel must cooperate fully and openly with any regulatory examination, audit, investigation, or enforcement action. Obstruction, non-cooperation, or providing false or misleading information to a regulator or law enforcement authority is strictly prohibited and may constitute a criminal offence.

## 3.2 Business Conduct with Clients

The Company is committed to treating all clients fairly, honestly, and with respect. All personnel who interact with clients, whether directly or indirectly, must adhere to the following standards:

1. Act at all times in the best interests of the client, and avoid allowing personal interests or the interests of the Company to conflict with those of the client in ways that are not properly managed and disclosed;
2. Provide clients with clear, accurate, and complete information about our services, including all applicable fees, charges, risks, and terms and conditions;
3. Never make false, misleading, or unsubstantiated representations about the performance, capabilities, or benefits of any product or service offered by the Company;
4. Maintain client confidentiality at all times and not disclose any client information to unauthorised persons, in accordance with our Privacy Policy and applicable law;
5. Handle client funds and assets with the highest standard of care and in strict accordance with segregation of assets requirements and applicable regulatory obligations;
6. Process client instructions promptly, accurately, and in accordance with the agreed terms, without undue delay or prejudice;
7. Treat all clients equitably, without discrimination or preferential treatment based on any personal characteristic or relationship;
8. Identify and appropriately manage any actual or potential conflict of interest that arises in connection with a client relationship;
9. Ensure that clients are adequately informed of the risks associated with digital asset trading before they begin trading;
10. Respond to client communications and complaints in a timely and professional manner, in accordance with our Complaint Handling Policy;
11. Never engage in or facilitate practices that exploit client vulnerability, inexperience, or limited market knowledge;
12. Maintain clear and accurate records of all client interactions and transactions;
13. Support client requests to exercise their rights under applicable data protection and financial services legislation;
14. Immediately escalate to compliance management any situation that could compromise the fair treatment of a client.

## 3.3 Consequences of Failure to Comply

Failure to observe the standards of business conduct set out in this Code may result in:

- Formal disciplinary action, up to and including summary dismissal or termination of engagement;
- Referral to regulatory authorities or law enforcement agencies where the conduct may constitute a criminal or regulatory offence;
- Civil liability to clients or other affected parties for losses arising from the misconduct;
- Reputational harm to the Company and potential adverse regulatory consequences, including sanctions or licence revocation.

## 4. MANAGING CONFLICTS OF INTEREST

A conflict of interest arises when a personal or financial interest of any personnel member has the potential to improperly influence — or create the appearance of improperly influencing — their professional judgement, decisions, or actions in the course of their duties.

Personnel are required to:

- Proactively identify and disclose to the Compliance team any actual, potential, or perceived conflict of interest as soon as it arises;
- Recuse themselves from any decision-making process or transaction in which they have a personal financial interest;
- Refrain from using information obtained in the course of their employment to gain personal financial advantage or to benefit any associated party;
- Comply with any restrictions, conditions, or monitoring arrangements imposed by the Company in response to a disclosed conflict;
- Avoid taking on outside employment, directorships, or advisory roles that could conflict with their duties to the Company without prior written approval.

The Company maintains a Conflicts of Interest Register that records all declared conflicts and the measures taken to manage them. Details of how the Company identifies and manages conflicts are set out in the Company's Conflicts of Interest Policy.

## 5. REPORTING OBLIGATIONS AND RECORD KEEPING

### 5.1 Regulatory and Internal Reporting

Personnel have a duty to ensure that all reporting obligations — whether to regulators, clients, or within the Company — are fulfilled accurately and on time. This includes:

- Reporting suspicious transactions or activities to the MLRO without delay;
- Providing accurate information to regulators and supervisory authorities when required;
- Submitting internal compliance reports and declarations within specified deadlines;
- Immediately notifying senior management or the Compliance team of any potential breach of this Code, applicable law, or regulatory requirement.

### 5.2 Record Keeping

The Company maintains accurate and complete business records in accordance with applicable legal and regulatory requirements. All personnel are expected to:

- Create and maintain records that are truthful, accurate, and complete;
- Never falsify, alter, destroy, or conceal any business record, whether electronic or physical;
- Store records securely and ensure that access is restricted to authorised personnel;
- Comply with the Company's data retention and disposal policies;
- Cooperate fully with any internal or external audit of Company records.

## 6. COMPLYING WITH THE CODE

### 6.1 Reporting Violations

If you become aware of any actual or suspected violation of this Code, applicable law, or Company policy, you have a duty to report it. Reports can be made:

- Directly to your line manager or department head;

- To the Compliance team at [legal@solonix.one](mailto:legal@solonix.one);
- Anonymously through the Company's internal whistleblowing channel, where available.

All reports will be treated with the strictest confidentiality to the extent permitted by law. The Company is committed to ensuring that individuals who report concerns in good faith are protected from any form of retaliation.

Reports may be made anonymously where the individual is not comfortable disclosing their identity. Anonymous reports will be investigated to the extent practicable given the information available.

## 6.2 Non-Retaliation

The Company strictly prohibits retaliation against any individual who, in good faith:

- Reports a suspected violation of this Code, applicable law, or Company policy;
- Cooperates with or participates in any internal or external investigation;
- Exercises any right afforded to them by applicable employment, whistleblowing, or financial services legislation.

Retaliation against a good-faith whistleblower is itself a serious violation of this Code and will be subject to disciplinary action. Any personnel who believes they have experienced retaliation should report this to the Compliance team or to senior management immediately.

## 7. CONTACT

For any questions regarding this Code of Conduct and Ethics, or to report a concern in confidence, please contact:

**Compliance Team:** Digital Trading Group of Central America S.A. DE C.V. (Solonix.one)

**Email:** [legal@solonix.one](mailto:legal@solonix.one)

**Website:** [www.solonix.one](http://www.solonix.one)

This Code is reviewed and updated periodically to reflect changes in applicable law, regulatory expectations, and Company policy. The current version is available at [www.solonix.one](http://www.solonix.one).