

NEOMAAA

Trading Restrictions and Anti-Fraud Policy

The Anjouan Offshore Finance Authority of the Union of Comoros with an Investment Dealer license 15968, having its registered office at Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros.

Neomaaa.com | Support@neomaaa.com



Trading Restrictions and Anti-Fraud Policy

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Neomaaa Ltd

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Hamchako, Mutsamudu, The Autonomous Island of Anjouan, Union of Comoros

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1. GENERAL PROVISIONS

1.1 Purpose of This Policy

This Policy establishes rules and restrictions designed to:

Protect the integrity of trading operations

Prevent fraudulent and abusive trading practices

Ensure fair trading environment for all clients

Comply with regulatory requirements

Protect the integrity of the trading infrastructure and execution environment

1.2 Scope of Application

This Policy applies to:

All account types (Cent, Standard, Raw, Institutional)

All trading instruments offered by the Company

All trading platforms (MT5 Desktop, Web, Mobile)

All clients regardless of jurisdiction or account size

All affiliated accounts and related parties

1.3 Client Acknowledgment

By opening an account with the Company, the Client acknowledges and agrees:

To comply with all provisions of this Policy

That patterns identified as inconsistent with fair market participation may result in account review and appropriate action

That the Company reserves the right to investigate any suspicious activity

That the Company's assessment of trading patterns is conducted in accordance with its internal compliance procedures and execution integrity framework

That this Policy may be amended with 5 business days notice

1.4 Company Rights

The Company reserves the right to:

Monitor all trading activity in real-time and retrospectively

Investigate any suspicious trading patterns

Request explanation for unusual trading behavior

Withhold withdrawals pending investigation

Void trades executed in violation of this Policy

Close accounts without prior notice in cases of clear fraud

Report fraudulent activity to relevant authorities

Share information with other financial institutions

2. PROHIBITED TRADING STRATEGIES

2.1 Complete List of Prohibited Strategies

The following trading strategies and practices are STRICTLY PROHIBITED:

2.2 Strict Compliance Policy

The Company maintains a strict compliance policy towards:

Any form of fraud or attempted fraud

Exploitation of technical infrastructure vulnerabilities

Any activity that may undermine execution integrity or fair market conditions

Circumvention of trading restrictions

Facilitating or enabling activities inconsistent with execution integrity standards

3. ARBITRAGE TRADING PROHIBITION

3.1 Definition of Arbitrage

Arbitrage trading refers to strategies that exploit price discrepancies between:

Different brokers or liquidity providers

Different instruments that should be correlated

Time delays in price feed updates

Technical latency in order execution

Trading strategies designed to exploit technical inefficiencies in the Company's pricing or execution infrastructure are prohibited.

3.2 Latency Arbitrage

Definition: Exploiting delays between the Company's price feed and faster external price sources.

Prohibited Activities:

Using faster data feeds to anticipate price movements

Executing orders based on price information not yet reflected in Company's feed

Using specialized software designed to detect latency

Co-location or proximity hosting to reduce latency

Using VPS services specifically to gain speed advantage

Detection Indicators:

Consistently profitable trades with very short holding periods

Trade execution timing correlated with price feed updates

Trading patterns demonstrating systematic pricing infrastructure exploitation

Pattern of trades immediately before price movements

Use of known arbitrage software signatures

3.3 Inter-Broker Arbitrage

Definition: Exploiting price differences between the Company and other brokers.

Prohibited Activities:

Opening opposite positions at Company and another broker

Systematically comparing prices across multiple brokers

Using price discrepancies for risk-free profit

Transferring positions between brokers to lock profit

Detection Indicators:

Trades that consistently close at better prices than market average

Trading patterns suggesting external price source usage

Account funding patterns indicating multi-broker activity

Unusually consistent profitability without apparent strategy

3.4 Triangular Arbitrage

Definition: Exploiting pricing inconsistencies between three or more related currency pairs.

Prohibited Activities:

Simultaneous positions in three currencies to exploit rate discrepancies

Using automated systems to detect triangular opportunities

Rapid cycling through currency pairs

Example of Prohibited Activity:

Buying EUR/USD + Buying USD/JPY + Selling EUR/JPY simultaneously

to exploit momentary pricing discrepancies

3.5 Statistical Arbitrage

Definition: Using statistical models specifically to exploit execution latency, pricing errors, or infrastructure inefficiencies.

Prohibited Activities:

Mean reversion strategies specifically designed to exploit pricing infrastructure inefficiencies

Pairs trading specifically designed to exploit execution or pricing infrastructure gaps

Algorithmic strategies designed to systematically exploit infrastructure pricing discrepancies

3.6 News Arbitrage

Definition: Exploiting faster access to news or economic data.

Prohibited Activities:

Using premium news feeds for faster information

Trading based on news before it's reflected in Company's prices

Automated news trading systems with speed advantage

Access to embargoed economic data

See also: Section 5 (News Trading Restrictions)

3.7 Arbitrage Detection Systems

The Company employs sophisticated detection systems including:

Real-time trade pattern analysis

Cross-reference with aggregated market data

Internal surveillance systems for execution integrity

Trade timing analysis relative to price movements

Win rate and profitability statistical analysis

Holding time distribution analysis

4. SCALPING & HIGH-FREQUENCY TRADING RESTRICTIONS

4.1 Definition of Restricted Short-Term Trading

The Company considers the following as potentially abusive short-term trading:

Scalping: Opening and closing positions within very short timeframes

High-Frequency Trading (HFT): Automated trading with extremely high order frequency

Tick Scalping: Trading on minimal price movements

4.2 Execution Integrity Standards

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EXECUTION INTEGRITY STANDARDS

The Company reserves the right to review trading activity demonstrating patterns inconsistent with fair market participation, including latency exploitation, execution abuse, or systematic exploitation of the Company's pricing infrastructure.

Trading activity inconsistent with fair market participation may be subject to:

Classification as abusive trading

Profit cancellation

Account review and potential restrictions

Cumulative violation tracking

Calculation Method:

Time measured from order execution (fill) to position close

Server time is the official reference

Partial closes: Each partial close must meet minimum time from original open

Exceptions (trades closed before the Company's execution integrity standards NOT considered violations):

Stop Loss triggered by market movement (not manually closed)

Margin Call / Stop Out forced closures

Trades closed by Company due to error quotes

Force majeure events

4.3 High-Frequency Trading (HFT) Prohibition

Definition: Trading characterized by:

Very high order submission rates

Very short holding periods

High order-to-trade ratios

Automated execution systems designed for speed

Prohibited HFT Activities:

Systematic high-frequency order submission patterns

Systematic patterns inconsistent with normal market participation

Order patterns inconsistent with legitimate trading activity

Using co-location or direct market access for speed

Automated systems demonstrating patterns inconsistent with fair market access

HFT activity is assessed based on overall trading patterns, order-to-execution ratios, and consistency with fair market participation standards.

4.4 Tick Scalping Prohibition

Definition: Trading strategy targeting profit from minimal price movements (1-3 pips).

Prohibited Patterns:

Consistently targeting 1-5 pip profits

Very high trade frequency with minimal profit targets

Using maximum leverage for minimal pip movements

4.5 Scalping Detection Metrics

The Company monitors the following metrics:

Per Trade:

Holding time (must exceed the Company's execution integrity standards)

Profit in pips (patterns of very small targets)

Entry/exit timing relative to price movements

Per Account (Rolling 30-day period):

Average holding time

Percentage of trades under the Company's execution integrity standards

Percentage of trades under 5 minutes

Trade frequency patterns

Win rate combined with holding time

Violation Thresholds:

Single trade under the Company's execution integrity standards: Warning

5+ trades under the Company's execution integrity standards in 24 hours: Review

10+ trades under the Company's execution integrity standards in 7 days: Restriction

Systematic execution abuse patterns: Account suspension

Pattern of systematic sub-execution integrity trading: Account termination

5. NEWS TRADING RESTRICTIONS

5.1 High-Impact News Events

The Company identifies high-impact news events as:

Central bank interest rate decisions (Fed, ECB, BoE, BoJ, etc.)

Non-Farm Payrolls (NFP) and employment data

GDP releases

Inflation data (CPI, PPI)

Central bank press conferences

Major political events (elections, referendums)

Unexpected geopolitical events

Indicator: Events marked with "High Impact" (red/3 bulls) on major economic calendars.

5.2 News Trading Restricted Windows

Pre-News Window: 5 minutes before scheduled release

Post-News Window: 5 minutes after scheduled release

Total Restricted Window: 10 minutes per event

5.3 Prohibited News Trading Activities

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During restricted windows, the following is prohibited:

Order Placement:

Opening new positions within 5 minutes before high-impact news

Placing pending orders designed to trigger on news release

Straddle orders (Buy Stop + Sell Stop) around current price

Order Modification:

Moving Stop Loss/Take Profit closer to current price

Modifying pending orders to be closer to market

Systematic News Trading:

Pattern of opening positions immediately before scheduled news

Using news trading EAs or automated systems

Consistently profitable trades correlated with news releases

5.4 Treatment of News-Related Trades

Trades opened during restricted windows may be:

Subject to wider spreads (normal market condition)

Subject to increased slippage (normal market condition)

Voided if determined to be news arbitrage

Subject to profit cancellation if pattern abuse detected

5.5 Pending Orders During News

Pending orders within news window:

Orders placed before restricted window: Will be executed normally (with potential slippage)

Orders placed during restricted window: May be rejected or subject to review

Straddle orders: Subject to investigation if consistently placed before news

5.6 News Trading Detection

The Company monitors:

Trade timing relative to economic calendar

Pattern of positions opened before news events

Profitability correlation with news releases

Use of known news trading EA signatures

6. SPIKE & ERROR QUOTE TRADING

6.1 Definition of Error Quotes

Error quotes (spike quotes, off-market quotes) are prices that:

Deviate significantly from the true market price

Result from technical errors in the price feed

- Are caused by liquidity provider errors
- Do not reflect actual market conditions
- Are not confirmed by other price sources

6.2 Identification of Error Quotes

The Company considers a quote as erroneous if:

- Price deviates more than 1% from average of other liquidity providers
- Price creates a spike not visible on other platforms
- Price is followed by immediate correction (gap back)
- Price occurs during technical maintenance or connectivity issues
- Price is outside of normal market hours without corresponding news

6.3 Prohibited Error Quote Trading

Strictly Prohibited:

- Intentionally trading on quotes that are obviously erroneous
- Using automated systems to detect and trade error quotes
- Placing pending orders at extreme prices hoping for spike execution
- Not reporting known error quote execution

6.4 Company Rights Regarding Error Quotes

The Company reserves the right to:

- Adjust or cancel any trade executed at prices materially inconsistent with aggregated liquidity provider pricing
- Adjust trade execution price to correct market price
- Void profits derived from error quote trades
- Delete erroneous quotes from price history
- Close positions opened at error quotes

6.5 Client Obligations

If a Client suspects an error quote execution, they must:

- Report it to Company within 24 hours
- Not close the position (if profitable) pending review
- Provide any requested information about the trade
- Accept Company's determination as final

Failure to report known error quote trades may result in:

- Classification as intentional abuse
- Forfeiture of all profits from such trades
- Account restrictions or termination

7. GAP TRADING ABUSE

7.1 Definition of Gap Trading

Gap trading refers to strategies specifically designed to profit from price gaps, particularly:

Weekend gaps (Friday close to Monday open)

Holiday gaps

News-related gaps

Session gaps

7.2 Prohibited Gap Trading Activities

Systematic Gap Exploitation:

Consistently opening positions before market close specifically for gap profit

Pattern of holding positions over weekend only when gap expected

Using pending orders at extreme levels expecting gap execution

Historical analysis to predict gap direction

Gap-Specific Strategies:

Opening large positions Friday before close without Stop Loss

Placing pending orders far from market expecting gap through

Holding positions during market closure only when gap anticipated

7.3 Detection of Gap Trading Abuse

The Company monitors:

Pattern of positions opened specifically before market close

Holding pattern (positions held only over gaps)

Profitability correlation with gap events

Position sizing (larger than normal before gaps)

Stop Loss patterns (unusually wide or absent before gaps)

7.4 Legitimate vs Abusive Gap Trading

Legitimate (positions held through gaps as part of normal strategy):

Swing trades held for days/weeks that happen to include weekends

Positions with proper risk management (Stop Loss)

No pattern of gap-specific positioning

Abusive (systematic gap exploitation):

Positions opened specifically before close

Pattern of closing Monday morning after gap

No Stop Loss or extremely wide Stop Loss

Consistent gap profitability

7.5 Gap Execution Policy

For legitimate positions held through gaps:

Stop Loss and pending orders execute at first available price (may slip)

Company not responsible for gap-related slippage

Gap execution is at market, not guaranteed price

For detected gap abuse:

Trades may be voided

Profits may be cancelled

Account may be restricted

8. HEDGING ABUSE & CROSS-ACCOUNT MANIPULATION

8.1 Permitted Hedging

Within Single Account (Allowed):

Opening opposite positions on same instrument (locked positions)

Hedging across correlated instruments

Portfolio hedging strategies

Margin Requirements for Hedged Positions:

Hedged margin: 50% of one side (depending on account type)

Must maintain sufficient margin for both sides

Hedging allowed on MT5 hedge accounts

8.2 Cross-Broker Hedging (PROHIBITED)

Definition: Opening opposite positions at Company and another broker to eliminate risk.

Prohibited Activities:

Long position at Company + Short position at Broker B (or vice versa)

Using Company account for one direction and competitor for opposite

Splitting large hedged positions across multiple brokers

Why Prohibited:

Creates risk-free profit opportunity from spreads/swaps

Exploits differences in broker pricing

Constitutes form of arbitrage

Detection Methods:

Trading patterns consistent with hedged strategy

One-directional trading (always long OR always short)

Unusual deposit/withdrawal patterns

Known hedging software signatures

Information sharing with other brokers

8.3 Cross-Account Hedging (PROHIBITED)

Definition: Using multiple accounts at Company to create hedged positions.

Prohibited Activities:

Account A: Long EUR/USD + Account B: Short EUR/USD

Using family member accounts for opposite positions

Using corporate and personal accounts for hedging

Creating "synthetic" hedges through multiple accounts

Detection Methods:

Same IP address accessing multiple accounts
Same device fingerprint
Related payment methods
Similar trading patterns across accounts
Opposite positions at similar times

8.4 Related Party Hedging (PROHIBITED)

Related Parties Include:

Family members (spouse, children, parents, siblings)

Business partners

Employees

Friends with coordinated trading

Any persons sharing financial interest

Prohibited:

Coordinated hedging between related party accounts

Sharing trading information for hedging purposes

Using related party accounts to circumvent restrictions

9. MULTI-ACCOUNT FRAUD

9.1 One Account Policy

General Rule: Each individual is permitted ONE trading account per account type.

Exceptions (with Company approval):

Different account types (e.g., Standard AND Pro)

Different base currencies (with justification)

Corporate vs Personal accounts

9.2 Prohibited Multi-Account Activities

Multiple Account Creation:

Opening accounts with false/different identities

Using family member identities without their knowledge

Using synthetic/stolen identities

Using nominee accounts

Multi-Account Abuse:

Arbitrage between own accounts

Hedging between own accounts

Bonus abuse across accounts

Circumventing position limits

Avoiding pattern detection

9.3 Account Linkage Detection

The Company uses the following to detect linked accounts:

Technical Indicators:

- IP address matching
- Device fingerprint (browser, OS, hardware)
- Cookie and session tracking
- Login time patterns
- Platform settings and preferences

Financial Indicators:

- Same payment methods
- Same bank accounts
- Related card numbers
- Similar deposit patterns
- Funds transfers between accounts

Behavioral Indicators:

- Similar trading strategies
- Coordinated trade timing
- Similar EA usage
- Same support ticket writing style
- Related contact information

9.4 Consequences of Multi-Account Fraud

Upon Detection:

- All linked accounts will be identified
- All accounts may be suspended pending investigation
- Profits across all accounts may be voided
- Deposits may be returned (minus any realized losses)
- All accounts terminated
- Permanent ban from Company services
- Reporting to fraud databases

10. COLLUSION & GROUP TRADING

10.1 Definition of Collusion

Collusion: Coordinated trading activity between two or more clients designed to:

- Exploit bonus programs
- Create artificial market activity
- Manipulate trading results
- Share profits from prohibited activities

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Circumvent individual trading restrictions

10.2 Prohibited Collusion Activities

Coordinated Trading:

- Synchronized trade opening/closing
- Hedging between colluding accounts
- Sharing trading signals for exploitation
- Coordinated large order execution

Profit Sharing Schemes:

- Agreement to share profits from specific strategies
- One party trades, other provides capital
- Ring trading among group members

Bonus Collusion:

- Coordinated bonus exploitation
- Trading between accounts to meet bonus requirements
- Referral fraud rings

10.3 Group Trading Indicators

The Company monitors for:

- Similar trading patterns across unrelated accounts
- Synchronized trade timing
- Opposite positions between accounts (hedging)
- Same IP addresses or devices
- Funds transfers between clients
- Communication patterns (social media, forums)
- Referral chains with suspicious trading

10.4 Trading Groups and Rooms

Legitimate Use:

- Independent trading based on educational signals
- Copy trading through official Company services
- Personal analysis following public analysis

Prohibited Use:

- Coordinated exploitation of Company pricing
- Group strategies designed to abuse platform
- Sharing Company-specific information for manipulation

11. BONUS AND REWARD PROGRAMME ABUSE

11.1 Bonus Terms Compliance

Yield Farming Prohibition: Executing the minimum qualifying trading volume (e.g. 1 standard lot per day) with positions held for the shortest possible duration and minimal price exposure, with the primary purpose of activating Vault Yield Credit eligibility rather than genuine trading activity, is prohibited. Indicators of yield farming include: consistent minimum-lot execution at market open or close, position hold times clustering near the minimum qualifying duration of two (2) minutes, absence of meaningful profit or loss variance across qualifying trades, and disproportionate Vault Balance relative to Trading Balance activity. The Company may suspend Vault Yield Credit, reverse accrued Yield Credit, and restrict Vault transfers for accounts exhibiting yield farming patterns. All bonus programs are subject to:

Specific terms and conditions per promotion

This Trading Restrictions Policy

Company's determination of abuse

11.2 Prohibited Bonus Activities

Multiple Bonus Claims:

Creating multiple accounts for bonus

Using different identities for repeated bonuses

Claiming bonuses in related accounts

Bonus Hedging:

Opening opposite positions to meet volume requirements risk-free

Hedging bonus positions at another broker

Using locked positions to generate volume

Bonus Arbitrage:

Strategies designed specifically to extract bonus value

Minimum risk trading to meet requirements

Calculated position sizing for bonus extraction

Volume Generation:

Opening and closing positions rapidly to generate volume

Using automated systems for volume generation

Wash trading (trades with no market purpose)

11.3 Legitimate Bonus Use

Acceptable:

Normal trading that happens to meet bonus requirements

Using bonus as additional margin for regular strategy

Completing requirements over reasonable time period

Unacceptable:
Strategies specifically designed to abuse bonus
Trading only to meet requirements then withdrawing
Risk-free bonus extraction schemes

11.4 Bonus Abuse Consequences

Upon Detection:
Bonus removal from account
Profits derived from bonus voided
Trading volume may be recalculated
Account may be restricted or terminated
Future bonus eligibility revoked

12. API & AUTOMATED TRADING ABUSE

12.1 API Access (Raw and Institutional Accounts)

Permitted API Use:
Order management for legitimate trading
Account monitoring and reporting
Integration with approved trading systems
Risk management automation
Prohibited API Use:
Arbitrage algorithms
HFT algorithms
Price feed exploitation
Order book manipulation
Excessive API calls (DDoS-like behavior)

12.2 API Rate Limits

Exceeding limits may result in:
Temporary API suspension
Account review
Permanent API revocation

12.3 Expert Advisor (EA) Restrictions

General EA Policy: EAs are permitted with restrictions.
Permitted EAs:

Manual trading assistants (one-click trading)
Risk management EAs (automatic Stop Loss)
Trade journaling EAs
Alert and notification EAs
Legitimate algorithmic strategies (complying with all policies)
Prohibited EAs:
Arbitrage EAs (any type)
EAs demonstrating execution patterns inconsistent with fair market access
HFT EAs (high order frequency)
News trading EAs with speed advantage
Error quote detection EAs
Latency exploitation EAs
Grid/Martingale EAs with extreme parameters
EAs designed to circumvent this Policy

12.4 EA Detection

The Company monitors:
Known prohibited EA signatures (Magic Numbers, comments)
Trade patterns consistent with prohibited EAs
EA names and file hashes (when detectable)
Trading behavior patterns
Order comment fields
Known prohibited EAs (partial list, regularly updated):
Arbitrage programs (names withheld)
Latency exploiters
News traders
Scalp bots under minimum time

12.5 Automated Trading Disclosure

Clients using automated trading must:
Disclose EA use upon request
Provide EA name and strategy description
Accept that prohibited EA use will void profits
Ensure EA complies with all Company policies

13. PLATFORM MANIPULATION

13.1 Definition

Platform manipulation refers to exploiting technical vulnerabilities or bugs in:

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MetaTrader 5 platform
Company's trading servers
Price feed systems
Order execution systems
Website and client portal

13.2 Prohibited Platform Manipulation

Technical Exploitation:

Exploiting software bugs for trading advantage
Manipulating platform timestamps
Bypassing trading restrictions through technical means
Reverse engineering proprietary systems
Unauthorized access to systems or data

Order System Manipulation:

Quote stuffing (overwhelming system with orders)
Layering (placing orders with intent to cancel)
Spoofing (fake orders to influence prices)
Order book manipulation

Price Feed Manipulation:

Injecting false price data
Man-in-the-middle attacks on price feeds
Exploiting price feed delays

13.3 Reporting Obligation

Clients who discover platform vulnerabilities must:

Report immediately to Company
Not exploit the vulnerability
Not share information about vulnerability
Cooperate with Company investigation
Rewards: Company may offer rewards for responsible disclosure.

14. PAYMENT & FINANCIAL FRAUD

14.1 Chargeback Fraud

Definition: Disputing legitimate transactions with payment provider after trading.

Prohibited Activities:

Disputing deposits after trading
Claiming unauthorized transactions falsely
"Friendly fraud" (disputing own legitimate transactions)

Systematic chargeback patterns
Consequences:
Account immediate suspension
Full investigation
Losses and fees charged to client
Legal action
Reporting to fraud databases
Permanent ban

14.2 Stolen Payment Methods

Prohibited:
Using stolen credit/debit cards
Using compromised bank accounts
Using payment accounts without authorization
Identity theft for payment purposes
Verification:
Company may request proof of card ownership
Video verification may be required
3D Secure authentication required
Address Verification System (AVS) used

14.3 Payment Cycling

Definition: Moving money through account without genuine trading intent.
Prohibited:
Depositing and withdrawing without trading
Using account for money transmission
Converting currencies through trading account
Structuring deposits to avoid detection

14.4 Refund Abuse

Prohibited:
Requesting refunds for legitimate deposits
False claims of technical errors for refunds
Duplicate refund requests
Manipulating refund processes

15. IDENTITY FRAUD

15.1 KYC (Know Your Customer) Compliance

All clients must provide genuine identity documentation:

Government-issued photo ID (valid, not expired)

Proof of address (recent, within 3 months)

Additional documents as requested

15.2 Prohibited Identity Fraud

Document Fraud:

Forged or altered documents

Documents belonging to others

Expired documents (presented as valid)

Digitally manipulated documents

Identity Misrepresentation:

False name or personal details

Using nominee identity

Representing corporate entity falsely

Hiding beneficial ownership

Multiple Identity Fraud:

Using different identities for multiple accounts

Synthetic identity creation

Identity theft

15.3 Identity Verification

The Company employs:

Document authenticity verification

Facial recognition matching

Database cross-referencing

Address verification

Phone verification

Video verification (when required)

15.4 Consequences of Identity Fraud

Immediate account termination

Funds frozen pending investigation

Reporting to authorities

Prosecution where applicable

Permanent ban from all services

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Information sharing with other institutions

16. MONEY LAUNDERING & TERRORIST FINANCING

16.1 AML (Anti-Money Laundering) Policy

The Company is committed to preventing:

- Money laundering
- Terrorist financing
- Financial crime
- Sanctions evasion

16.2 Prohibited Activities

Money Laundering Indicators:

- Large deposits with minimal trading
- Rapid deposit and withdrawal without trading purpose
- Complex transactions designed to obscure source
- Transactions inconsistent with stated occupation/income
- Reluctance to provide source of funds information

Structuring:

- Breaking large deposits into smaller amounts
- Multiple small deposits to avoid reporting thresholds
- Using multiple accounts to structure transactions

Layering:

- Complex series of transactions to disguise origin
- Moving funds through multiple accounts
- Converting between payment methods unnecessarily

16.3 Source of Funds

The Company may request:

- Proof of income (employment, business)
- Bank statements
- Investment account statements
- Inheritance documentation
- Sale of property documentation
- Lottery/gambling winnings proof

16.4 Sanctions Compliance

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The Company screens all clients against:
OFAC (US) sanctions lists
EU sanctions lists
UN sanctions lists
Other applicable sanctions lists
Trading with sanctioned parties is strictly prohibited.

16.5 Reporting Obligations

The Company will report suspicious activity to:
Financial intelligence units
Regulatory authorities
Law enforcement (when required)
Tipping off clients about reports is prohibited by law.

17. INSIDER TRADING

17.1 Definition

Insider trading: Trading based on material non-public information (MNPI) about:
Listed companies (for stock CFDs)
Economic data releases
Central bank decisions
Corporate actions
Any market-moving information

17.2 Prohibited Insider Activities

Trading on MNPI:
Using corporate insider information for stock CFD trades
Acting on embargoed economic data
Trading based on leaked central bank information
Using information from employment at financial institutions
Tipping:
Sharing insider information with others
Coordinating trades based on shared MNPI
Participating in insider trading schemes

17.3 Reporting Obligation

Clients who become aware of insider information must:
Not trade on such information
Report to Company compliance

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Report to relevant authorities (if required)

18. MARKET MANIPULATION

18.1 Definition

Market manipulation: Activities designed to artificially influence prices or trading conditions.

18.2 Prohibited Manipulation Activities

Price Manipulation:

Wash trading (trading with oneself)

Painting the tape (transactions to suggest activity)

Cornering (dominating supply/demand)

Pump and dump schemes

Order Manipulation:

Spoofing (orders intended to be cancelled)

Layering (multiple orders to influence price)

Quote stuffing (overwhelming order system)

Information-Based Manipulation:

Spreading false information

Rumors intended to move prices

Misleading statements about positions

18.3 Marking the Close

Prohibited: Executing trades near market close specifically to influence settlement prices.

18.4 Cross-Market Manipulation

Prohibited: Manipulating one market to profit in another (e.g., spot to affect CFD).

19. EXECUTION PATTERN STANDARDS

19.1 Definition

Execution pattern inconsistencies: Trading activity inconsistent with fair and orderly market conditions or execution integrity standards.

19.2 Execution Pattern Characteristics

Indicators of Execution Pattern:

Statistically anomalous execution patterns (statistically anomalous levels) combined with short holding periods

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Consistent profitability regardless of market conditions
Trading patterns correlated with price feed updates
Execution patterns statistically inconsistent with normal market participation
Systematic exploitation of execution or pricing infrastructure

19.3 Execution Pattern Thresholds

The Company monitors the following metrics:

19.4 Execution Pattern Consequences

Upon Detection:

Account placed under review
Trading restrictions may be applied
Order execution parameters may be reviewed and adjusted
Account may be subject to execution review
Account may be terminated

20. EXPERT ADVISOR (EA) RESTRICTIONS

20.1 EA Registration

For transparency, clients may be required to:

Disclose EA use
Provide EA name and general strategy
Allow Company to review EA behavior

20.2 Prohibited EA Types

Category A - Absolutely Prohibited:

Any arbitrage EA
Latency exploitation EA
Error quote detection EA
HFT EA (high frequency)
Scalping EA (trades <the Company's execution integrity standards)
News spike EA

Category B - Restricted Use:

Grid trading EA (with excessive parameters)
Martingale EA (with unlimited progression)
Hedging EA (with cross-account capability)

20.3 EA Behavior Monitoring

The Company monitors:

Trade frequency

Holding times

Win rates

Trading patterns

Order timing

Magic numbers and comments

20.4 EA Blacklist

The Company maintains a blacklist of known prohibited EAs. Use of blacklisted EAs results in:

Immediate profit cancellation

Account review

Potential termination

Note: Blacklist is not published to prevent circumvention.

21. COPY TRADING & SIGNAL PROVIDER ABUSE

21.1 Copy Trading Rules

If the Company offers copy trading services:

Signal Providers Must:

Pass verification (3-challenge system)

Maintain compliant trading

Not use prohibited strategies

Accept that followers' profits depend on compliance

Signal Followers Must:

Use official copy trading services only

Not coordinate with providers for abuse

Report suspicious provider behavior

21.2 Prohibited Copy Trading Activities

Provider Abuse:

Signal providers using prohibited strategies

Coordinating with followers for arbitrage

Front-running follower orders

Churning for commission

Follower Abuse:

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Creating multiple accounts to follow same signal
Hedging followed trades at another broker
Manipulating copy parameters for abuse

22. REFERRAL & AFFILIATE FRAUD

22.1 Referral Program Rules

Referral programs are subject to:

Program-specific terms

This Policy

Company's abuse determination

22.2 Prohibited Referral Activities

Self-Referral:

Referring own accounts

Creating accounts for referral bonus

Using family/friends without genuine intent to trade

Fake Referrals:

Incentivizing referrals with shared commissions

Creating non-genuine accounts for referral volume

Purchasing leads that don't trade

Referral Fraud Rings:

Coordinated referral schemes

Trading between referrer and referred accounts

Commission extraction schemes

22.3 Affiliate Fraud

Prohibited for Affiliates:

Misleading advertising

Promising guaranteed returns

Cookie stuffing

Brand bidding (without permission)

Incentivized traffic (without disclosure)

23. DETECTION METHODS & MONITORING

23.1 Real-Time Monitoring

The Company employs real-time monitoring of:

Trade execution patterns

Holding times

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Win rates and profit factors
Order timing relative to price movements
API usage patterns
Account linkages

23.2 Pattern Recognition

Automated Detection Systems:
Internal surveillance systems
Statistical anomaly detection
Behavioral pattern matching
Cross-account correlation

23.3 Manual Review Triggers

Automatic Triggers for Manual Review:
Statistical anomalies in short-term execution patterns
Average holding time <3 minutes
10 trades under the Company's execution integrity standards in 7 days
Suspicious deposit/withdrawal patterns
Multiple account indicators
Large profits from gap events
Unusual news-correlated profitability

23.4 Investigation Levels

Level 1 - Automated Flag: System monitoring
Level 2 - Analyst Review: Manual review by compliance
Level 3 - Investigation: Full investigation
Level 4 - Action: Account restrictions or termination

Trading Integrity Policy

To maintain fair and stable trading conditions, Neomaaa Ltd monitors trading activity for abusive or manipulative practices. Examples include:

Latency exploitation
Platform manipulation
Market abuse
Strategies exploiting pricing or execution infrastructure
Automated abusive trading patterns

If such activity is detected, Neomaaa Ltd reserves the right to take appropriate corrective actions, including:

Trade cancellation or adjustment
Account restriction
Account suspension

Profit adjustment where applicable

Actions are applied at Neomaaa Ltd's sole discretion to protect market integrity.

24. CONSEQUENCES & PENALTIES

24.1 Graduated Response

Depending on severity, consequences may include:

Level 1 - Warning:

First minor violation

Written warning issued

Violation documented

Reminder of policy

Level 2 - Trading Restriction:

Repeated minor violations

Moderate violation

Trading limits imposed

Enhanced monitoring

Level 3 - Profit Cancellation:

Serious violation

Pattern of abuse detected

Profits from prohibited activity voided

Account under review

Level 4 - Account Suspension:

Severe violation

Pending investigation

All trading suspended

Withdrawals frozen

Level 5 - Account Termination:

Confirmed serious fraud

Repeated violations after warnings

Account permanently closed

Profits forfeited

Permanent ban

24.2 Specific Consequences by Violation

24.3 Profit Forfeiture

Profits may be forfeited when:

Earned through prohibited activities

Cannot be separated from legitimate profits

Account terminated for fraud

Required by regulatory authorities

Calculation:

All profits from identified prohibited trades: Voided

If pattern abuse: All profits during abuse period may be voided

Deposits will be returned (after deduction of losses and fees)

24.4 Permanent Ban

Permanent ban includes:

Prohibition from opening new accounts

Inclusion in Company's fraud database

Potential sharing with industry partners

Prohibition from affiliate/partner programs

25. INVESTIGATION PROCESS

25.1 Investigation Initiation

Investigation may be initiated by:

Automated detection systems

Manual review triggers

Client complaints

External reports

Regulatory inquiries

25.2 Investigation Steps

Step 1: Initial Review (1-3 business days)

Automated data collection

Preliminary pattern analysis

Severity assessment

Step 2: Detailed Investigation (3-10 business days)

Full trade history analysis

Account linkage investigation

Payment method analysis

Communication with client (if appropriate)

Step 3: Determination (1-3 business days)

Findings documented

Violation level determined

Recommended action proposed

Review by compliance officer
Step 4: Action (1-2 business days)
Client notified
Action implemented
Documentation completed
Appeal period begins

25.3 Client Communication During Investigation

Client may or may not be notified of ongoing investigation
Client will be notified of findings and actions
Client may be asked to provide explanations
Failure to cooperate may be considered adverse
Client communication is documented

25.4 Evidence Preservation

The Company preserves:
All trading records
All communications
All documents submitted
System logs
Detection reports
Retention period: Minimum 7 years

26. APPEALS PROCESS

26.1 Right to Appeal

Clients have the right to appeal:
Warning decisions
Trading restrictions
Profit cancellations
Account suspensions
Account terminations
Exception: Decisions involving clear fraud or criminal activity may not be appealable.

26.2 Appeal Procedure

Step 1: Submit Appeal (within 10 business days of decision)
Written appeal to compliance@neomaaa.com
State grounds for appeal
Provide any supporting evidence

The Anjouan Offshore Finance Authority of the Union of Comoros with an Investment Dealer license 15968, having its registered office at Hamchako, Mutsamudu, Autonomous Island of Anjouan, Union of Comoros.

Include account number and decision reference
Step 2: Appeal Review (within 15 business days)
Independent reviewer assigned
Full review of evidence
Client may be contacted for additional information
No new violations considered
Step 3: Appeal Decision (within 5 business days of review)
Decision communicated in writing
Decision is final
No further internal appeals

26.3 Appeal Grounds

Valid grounds for appeal:
Error in fact
Procedural error
New evidence not previously available
Disproportionate penalty
Invalid grounds:
Disagreement with policy
Claimed ignorance of rules
Financial hardship

27. REPORTING SUSPICIOUS ACTIVITY

27.1 Client Reporting Obligation

Clients must report:
Suspected fraud by other clients
Suspicious approaches or solicitations
Platform vulnerabilities discovered
Suspected collusion invitations
Any activity violating this Policy
Report to: compliance@neomaaa.com

27.2 Whistleblower Protection

Clients reporting in good faith:
Will not face retaliation
May report anonymously
Will be informed of outcome (if appropriate)
May receive reward for significant reports

27.3 Company Reporting

The Company will report to authorities:

- Suspected money laundering
- Terrorist financing
- Serious financial crimes
- Regulatory breaches
- When required by law

28. DEFINITIONS

Arbitrage: Trading strategy exploiting price differences for risk-free profit.

Collusion: Coordinated activity between clients for unfair advantage.

Error Quote: Price that doesn't reflect true market conditions due to technical error.

Gap: Price discontinuity where market opens at different price than previous close.

Hedging: Opening opposite positions to reduce risk.

High-Frequency Trading (HFT): Automated trading with very high order frequency and speed.

Latency: Time delay between price change and its reflection in trading system.

Liquidity Provider: Institution providing prices and liquidity to broker.

Magic Number: Identifier used by Expert Advisors to track their own trades.

MNPI: Material Non-Public Information (insider information).

NAV: Net Asset Value (fund value per unit).

Pending Order: Order to execute at specified future price.

Scalping: Very short-term trading strategy targeting small profits.

Slippage: Difference between expected and actual execution price.

Spike: Sudden extreme price movement, often erroneous.

Spoofing: Placing orders with intent to cancel before execution.

Stop Loss: Order to close position at specified loss level.

Swap: Overnight financing charge/credit.

Execution Pattern: Order flow that consistently exploits broker's pricing.

Wash Trading: Trading with oneself to create artificial volume.

DOCUMENT CONTROL

Review Date: February 2027

Execution and Operational Rights

Neomaaa Ltd reserves the right to manage execution infrastructure, optimize order routing, adjust pricing sources, and modify execution protocols in order to maintain operational integrity, execution quality, and system stability. These actions are part of normal brokerage operations.

DISCLAIMER

This Policy is part of the Client Agreement and Trading Conditions. By trading with the Company, you acknowledge that you have read, understood, and agree to be bound by this Policy.

The Company reserves the right to interpret and apply this Policy at its sole discretion. The Company's determination of violations and appropriate consequences is final.

This Policy may be amended with minimum 5 business days notice. Continued use of services after amendment constitutes acceptance.

Trading forex and CFDs involves significant risk of loss. This Policy is designed to maintain fair trading environment and does not guarantee protection against losses from trading.

CONTACT

Compliance Department

Email: compliance@neomaaa.com

Phone: ++X-XXX-XXX-XXXX

Report Fraud

Email: fraud@neomaaa.com

Appeals

Email: appeals@neomaaa.com

END OF DOCUMENT

Contact Information

Company: Neomaaa Ltd

Email: support@neomaaa.com

Compliance: compliance@neomaaa.com

Website: neomaaa.com

Address: Hamchako, Mutsamudu, The Autonomous Island of Anjouan, Union of Comoros

Licensed and authorized by the Anjouan Offshore Finance Authority (AOFA), Union of Comoros.

International Brokerage License Number L15968/N

Acknowledgement

By using the Company's services, the Client acknowledges having read, understood and accepted the Trading Restrictions and Anti-Fraud Policy.

Neomaaa Ltd

Trading as NEOMAAA

International Business Company No. 15968

Regulated by the Anjouan Offshore Finance Authority (AOFA), Union of Comoros

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Contact Information

Company: Neomaaa Ltd

Email: support@neomaaa.com

Website: neomaaa.com

Address: Hamchako, Mutsamudu, The Autonomous Island of Anjouan, Union of Comoros