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# Code of Ethics

Ver. 2024.8.3



# CASTRUM CAPITAL

Castrum Capital aims to operate with high ethical and professional standards by adopting this Code of Ethics for all its employees and stakeholders. These rules aim to ensure that employees, limited partners and investors act with integrity, avoid conflicts of interest and always prioritise the interests of clients. In case of violation of the Code, various sanctions may be imposed, including dismissal.

The applicability and effectiveness of the Code of Ethics is regularly reviewed and updated when necessary. Castrum Capital adopts the principles of transparency, fairness and honesty in this process and ensures that all its employees, LPs (Liquidity Providers) and investors act in accordance with these principles.

This Code of Ethics helps Castrum Capital to maintain its position as a strong and reliable institution, while gaining the trust of its customers and stakeholders. By complying with these rules, employees demonstrate their commitment to the company's mission and values and contribute to creating a sustainable business environment.



# Our Values

**Our Ethical Values:** Castrum Capital supports the financial success of its clients and adheres to core principles such as transparency, sustainability, confidentiality, impartiality, honesty, integrity, loyalty and ethical behaviour.

**Respect for the Law:** Castrum Capital respects the law and universally recognised ethical norms in all its activities. It takes necessary measures in case of violation of laws and ethical rules.

**Respect for Diversity:** Castrum Capital respects human rights and fights discrimination. It does not accept discrimination based on gender, age, language, disability, race, religion, nationality and develops policies to prevent all kinds of discrimination.

**Employee Relations:** Castrum Capital protects the assets, information and reputation of its employees. Employees are obliged to use company assets appropriately, to protect confidential information and are obliged not to damage the company's reputation. Employees are expected to manage their financial responsibilities carefully.

**Relations with Customers:** Castrum Capital prioritises customer satisfaction and considers complaints as a source of development. It provides customers with honest information about the risks of the services offered and offers solutions that meet the needs of the customer.

**Relations with the Market:** Castrum Capital complies with fair competition rules and establishes honest relationships. It avoids sharing information that distorts competition or misleading information. It maintains active relations with the capital market and provides equal information to all investors.



**Relations with Investors:** Castrum Capital cultivates investor relationships based on equitable and objective criteria. Contracts are drafted transparently and comprehensibly.

**Politics:** Castrum Capital engages with public institutions and political parties in accordance with established protocols. It adheres to legal and ethical standards in dealings with public officials, maintains political neutrality, and fosters open relationships with local communities while upholding sustainable development principles.

**Environment:** Castrum Capital complies with environmental protection laws and advocates for sustainable development. It uses resources efficiently and offers environmentally friendly products to minimize environmental impact. The company also raises environmental awareness among employees and customers.

**Control of Ethical Violations:** Castrum Capital ensures ethical violations are reported and controlled through anonymous reporting channels, protecting employees from retaliation. Reports on violations are submitted to the Board of Directors, which takes necessary action.

**Dissemination of the Code of Ethics:** Castrum Capital publishes its Code of Ethics on its internet and intranet platforms. It conducts ethics training for all new employees and updates these trainings annually.

**Acceptance of the Code of Ethics:** New employees are required to sign a declaration confirming they have read and understood the Code of Ethics.

**Additional Provisions:** Castrum Capital regularly reviews and updates the Code of Ethics as needed. An evaluation report on the Code of Ethics is prepared by year-end.



# Code of Ethics

Articles	Explanations
<b>Introduction</b>	This Code of Ethics applies to all employees, temporary employees, interns, certain consultants, Liquidity Providers (LPs) and investors of Castrum Capital and its affiliates and sets legal and ethical standards of behaviour. It encourages employees and the company to act in accordance with high standards of integrity.
<b>Application</b>	This Code applies to all employees, temporary employees, interns, certain consultants, LPs, and investors of Castrum Capital and its affiliates. Independent directors and certain contractors and consultants without access to investment advice are excluded.
<b>Ethical Principles and Business Ethics</b>	Employees, LPs and investors must act with integrity, avoid conflicts of interest, always prioritise the interests of clients and maintain confidentiality. Sanctions, including dismissal, may be imposed for breach of the Code.
<b>Fraud and Confidential Information</b>	It prohibits the use of confidential information in personal transactions and emphasises the laws to be observed against fraud and fraudulent behaviour.
<b>Manipulation</b>	It prohibits market manipulation and the spread of false and malicious rumours about digital assets.
<b>Confidentiality</b>	Confidential information such as customer information and transaction details must be protected and not shared with unauthorised persons.
<b>Digital Asset Operations</b>	Pre-approval requirements for personal digital asset transactions, restrictions on Early Token Sales and Limited Offerings, and trade information must be kept confidential.



Articles	Explanations
Reporting Requirements	Requires initial, quarterly and annual reporting of digital asset holdings and transactions, pre-approval for new accounts and submission of account statements.
Conflict of Interest	Employees, partners, and investors are required to avoid conflicts of interest and must not misuse customer trust.
Violation	a) In the event that the employees within the Company violate the Code of Ethics, various sanctions will be imposed, including termination of the employment contract, by activating internal mechanisms.  b) In the event that Liquidity Providers (LPs) contravene the applicable rules, sanctions may be imposed, including the complete severance of the relationship with the relevant LP or the restriction of access to certain investment opportunities.
Whistleblower Policy	The Company safeguards employees, LPs, and investors who report legal violations and does not require prior authorization for such reports.
Gift and Entertainment Policy	To prevent conflicts of interest, the policy regulates the giving and receiving of specific gifts and entertainment, requires pre-approval for certain gifts, and prohibits cash gifts.
Sanctions	Compliance with this Code is a fundamental obligation for all employees, LPs, and investors of Castrum Capital. Sanctions may be imposed for any transactions that contravene the Rules.
Distribution and Modification	This Code is disseminated to all employees, LPs, and investors and may be amended by Castrum Capital at any time. Following any revision or update, the updated version will be distributed and will supersede the previous version.



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