# Conflicts of Interest Policy

**AI Trade Flow — Advanced Education and Trading**

Effective Date: [DATE] · Last Updated: [DATE]

## 1. Why This Policy Exists

Members should be able to trust that what they hear on AI Trade Flow — in courses, livestreams, speaker sessions, strategy rooms, and leaderboards — is not secretly shaped by financial interests they cannot see. This Policy identifies where conflicts of interest can arise in our business and states the controls we apply to each.

## 2. Conflicts We Have Identified

**Speakers and instructors may hold positions.** People teaching or streaming on the platform may own, or trade, the assets they discuss. A speaker's commentary could, in theory, benefit their own positions.

**Leaderboard visibility.** Traders featured on top-trader leaderboards gain reputation from being followed, which could tempt exaggeration or risk-seeking to stay visible.

**Marketing compensation.** Independent marketers and affiliates earn commissions on memberships they refer, as described in the Independent Marketers Disclosure. Their enthusiasm is compensated.

**Exchange referral arrangements.** If AI Trade Flow receives referral compensation from an exchange for members who open accounts there, we have an incentive to feature that venue.

**Vendor relationships.** Tools or services we recommend may come from companies we have commercial relationships with.

## 3. Conflicts Our Model Removes

Because of how the platform is structured, several serious conflicts common in the trading industry cannot arise here: we are never the counterparty to your trades, so we do not profit when you lose; we receive no payment for order flow; we charge no per-trade or performance fees, so we have no incentive to encourage overtrading; and we never manage pooled funds, so we cannot favor one client's account over another's.

## 4. Controls

**Disclosure.** Speakers and instructors must disclose, at the start of a session, any position they hold in an asset they intend to discuss. Exchange referral or vendor compensation, where it exists, is disclosed on the relevant page.

**No front-running members.** Employees, instructors, and featured traders may not use non-public knowledge of group strategy-room plans to trade ahead of members.

**Leaderboard integrity.** Leaderboard statistics are computed from verified account data via API, not self-reported, and cannot be edited by the featured trader.

**Marketing rules.** Compensated promoters must follow the Independent Marketers Disclosure, including the prohibition on earnings claims.

**Attestations and review.** Staff and regular instructors complete an annual conflicts attestation. The Compliance Officer reviews reported conflicts, maintains a conflicts register, and may recuse, restrict, or remove persons with unmanageable conflicts.

## 5. Reporting a Conflict

Anyone — member, speaker, employee, or marketer — who becomes aware of an actual or potential conflict should report it to compliance@[DOMAIN]. Reports may be made anonymously and are reviewed within ten (10) business days. We do not retaliate against good-faith reporters.

## 6. Residual Risk

Controls reduce, but cannot eliminate, conflicts of interest. Members should treat every opinion on the platform — however credentialed the speaker — as one input among many, and make their own decisions in their own accounts.

## 7. Review

The Compliance Officer reviews this Policy at least annually and after any material change to our business model or compensation arrangements.

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*This document is a template prepared for AI Trade Flow and must be reviewed by qualified legal counsel before publication or use.*