

Material Non-Public Information (MNPI) Policy

Version 1.0 · Effective 1 November 2026 · Owner: Aleksandr Senkevich, katelabs, Belgrade, Serbia · katelabs.io

1. Purpose

Clients who use alternative data must be able to show that it contains no material non-public information and was not obtained in breach of any duty. This policy states how katelabs ensures that, what happens if non-public information reaches katelabs anyway, and how the operator's own trading is handled.

2. Definition

Material non-public information is information that a reasonable investor would consider important in making an investment decision and that has not been made generally available to the public. For digital assets the same standard is applied even where the asset is not a security under a given law.

3. Public sources only

1. Every record in the dataset originates from a publicly available news item: a publisher's public feed, sitemap or endpoint. Each record carries the public URL of its source, so the public nature of the input can be verified line by line.
2. katelabs does not collect from private messaging channels, closed groups, paid tip services, leaked documents, exchange internal data, order books of private venues, or any source that requires a login, an invitation or a relationship.
3. katelabs does not pay individuals for information, does not conduct expert-network calls as a data input, and does not accept information from company insiders, exchange employees, project team members or their representatives for inclusion in the dataset.
4. katelabs does not scrape content in breach of a website's terms of use or technical access restrictions.
5. The scores and types in the dataset are produced by an automated model from the public headline text alone. No human judgement, external information or client input enters the score of any record.

4. Timing and point-in-time integrity

Records are written as they are published and carry the time of ingestion and the time of scoring. Nothing is scored retrospectively and nothing is revised. A client therefore receives exactly what was publicly known, when it became known, and nothing earlier.

5. Inadvertent receipt of non-public information

1. If the operator receives information that appears to be material and non-public, from any channel, it is not entered into the dataset, not used in any research note, not acted on in the live trading account, and not passed to anyone.
2. The receipt is recorded in an internal log with date, source and a description sufficient to identify the item without repeating it.
3. Where the information came from a client, the client is informed that it has been quarantined and will not be used.
4. If a publisher's feed turns out to have exposed embargoed material before publication, the affected records are flagged to licensees who received them, with the timestamps that show when the item became public.

6. Personal trading and conflicts of interest

1. The operator trades a small live account on the strategy published in the research notes. Every trade on that account is published on katelabs.io after execution, so the operator's own activity is itself public and auditable.
2. The operator does not trade ahead of, or in response to, information received from clients, does not front-run client questions, and does not adjust the dataset or the research to benefit any position.
3. katelabs does not provide investment advice. Scores are classifications of public text, not recommendations.
4. Any future employee or contractor is bound by this policy, must disclose personal digital-asset holdings on request, and may not trade on client information.

7. Client obligations

Licensees remain responsible for their own compliance with market-abuse, insider-dealing and data-protection law in their jurisdictions, and for how they combine katelabs data with other information. katelabs will answer due-diligence questionnaires and provide the source list and sample records to support a client's own review.

8. Review

This policy is reviewed at least annually, after any quarantine event, and whenever a new type of source is added to collection. Questions: **aler.senkevich3301@gmail.com**.