ALMA EUROPE LTD ("the Company")

INVESTOR COMPENSATION FUND

Last Updated on 06/2024

1. General

1.1. ALMA EUROPE LTD (hereinafter, the "Company") is a member of the Investor Compensation Fund (hereinafter, the "ICF") for the Clients of Cyprus Investment Firms ("CIFs"), under the Investment Services and Activities and Regulated Markets Law 87(I)/2017, as subsequently amended from time to time (hereinafter, the "Law") and Directive DI87-07 of the Cyprus Securities and Exchange Commissions (hereinafter, the "CySEC") for the operation of the ICF (hereinafter, the "Directive").

2. Objective

2.1. The objective of the ICF is to secure claims of the covered Clients against members of the ICF, through the payment of compensation in cases where the member concerned is unable, due to its financial circumstances and when no realistic prospect of improvement in the above circumstances in the near future seems possible. The ICF compensates the covered Clients for claims arising from the covered services provided by its members, so long as failure by the member of the ICF to fulfil its obligations has been ascertained, in accordance with the terms and procedure defined in the Law, notwithstanding a relevant obligation by the member of the ICF in accordance with the legislation and the terms which govern its agreement with the covered Client and regardless of whether the said obligation of the member of the ICF is based on the agreement or on wrongdoing.

3. Covered Services

3.1. The ICF shall compensate the Company's covered Clients as to the covered investment services and ancillary services offered by the Company as these are listed on its authorization which can be found in the website of the Cyprus Securities and Exchange Commission at:
https://www.cysec.gov.cy/en-GB/entities/investment-firms/cypriot/92016/

Investment Services:

a. Reception and transmission of orders in relation to one or more of the Financial Instruments.
b. Portfolio Management
c. Provision of investment advice

Other Services (utilizing the discretion provided under Section 5.5b of the AIFM Law:

a. Loan Applications assistance and Support

4. Covered Clients

4.1. The ICF covers Retail Clients of the Company. It does not cover Professional Clients and Eligible Counterparties. For more details see paragraph 5 below.

5. Non-Covered Clients

5.1. The ICF shall pay no compensation to individuals against whom criminal proceedings under the provisions of the Prevention and Suppression of Money Laundering and Terrorist Activities Law of 2007 to 2021, as amended or replaced (the "AML Law"), are pending.

5.2. Pursuant to the Second Schedule of the Directive, the ICF does not compensate the following investor categories:

a. The following categories of institutional and professional investors:
   - Investment Firms (IFs).
   - Legal entities associated with the Company and, in general, belonging to the same group of companies.
   - Banks.
   - Cooperative credit institutions.
   - Insurance companies.
   - Collective investment organizations in transferable securities and their management companies.
   - Social insurance institutions and funds.
   - Investors characterized by the Company as professionals, upon their request in accordance with Part II of the Second Appendix of the Law.

b. Supranational organizations, government and central administrative authorities.

c. Provincial, regional, local and municipal authorities.

d. Enterprises that have close ties with the Company as the 'close ties' is construed in Section 2(1) of the Law.

e. Managerial and administration staff of the Company.

f. Shareholders of the Company whose participation directly or indirectly in the capital of the Company amounts to at least 5% of its share capital, or its partners who are personally liable for the obligations of the Company, as well as persons responsible for the carrying out of the financial audit of the Company as provided by the Law, such as qualified auditors.

g. Investors having in enterprises connected with the Company and, in general, of the group of companies, to which the Company belongs (as applicable), positions or

duties corresponding to the ones listed in sub-paragraphs (e) and (f) of this paragraph.

h. Up to second-degree relatives and spouses of the persons listed in sub-paragraphs (e), (f) and (g) of this paragraph as well as third parties acting for the account of these persons.
i. Apart from investors convicted of a criminal offence pursuant to the AML Law, investors-Clients of the Company responsible for facts pertaining to the Company that have caused its financial difficulties or have contributed to the worsening of its financial situation or which have profited from these facts.
j. Other firms in the same group.
k. Investors in the form of a company which, due to its size, is not allowed to draw a summary balance sheet in accordance with the Companies Law or a corresponding law of a Member State of the European Union.

5.3. In the cases of sub-paragraphs (e), (f), (g), (h) and (j) of paragraph 5.2., the ICF suspends the payment of compensation informing the interested parties accordingly, until it reaches a final decision as to whether such cases apply.

6. Compensation Payment Process

6.1. The ICF compensates the covered Clients for claims arising from the covered services provided by the Company, when failure by the Company to fulfil its obligations has been ascertained (see also paragraphs 6.2, 6.3. and 6.4. below).

6.2. The following constitutes failure by the Company to fulfil its obligations:

a. To repay the funds owed to covered Clients or belonging to them and held on their behalf in connection with investment operations, or

b. To return to the covered Clients any financial instruments which belong to them and which the Company holds, manages or administers on their behalf in connection with investment operations.

6.3. The ICF initiates the compensation payment process in one of the following situations:

a. The Cyprus Securities and Exchange Commission (CySEC) has determined by resolution that that the Company appears, for the time being and for reasons directly related to the Company's financial circumstances, to be unable to meet its obligations arising out of Clients' claims and has no early prospect of being able to do so.
b. A Court of the Republic has made a ruling, for reasons directly related to the financial circumstances of the Company, which has the effect of suspending the investors' ability to make claims against the Company.

6.4. CySEC shall issue its decision for the initiation of the compensation payment procedure by the ICF within a reasonable time and publish the relevant information on its website.

6.5. Upon issuance of a decision to initiate the compensation payment process by a Court or by CySEC, the ICF publishes as soon as possible in at least two (2) newspapers of national coverage, an invitation to the covered Clients to make their claims against the Company. The invitation outlines the procedure for submission of the relevant compensation applications, including the deadline for submission and the content of such applications.

6.6. The compensation applications of covered Clients with which they make their claims against the Company are submitted to the ICF in one (1) of the following two (2) ways:

a. By filling in the online application form which can be found on CySEC's website, or
b. By post or by hand, a compensation application (in a form of simple letter) to the offices of the ICF, accompanied by all supporting evidence, to the following address:
   - Investor Compensation ICF for IF Clients,
     27 Diagorou Str., 1097, Nicosia, Cyprus.

6.7. When submitting a compensation application pursuant to point (b) of this paragraph, the following minimum information shall be included:

a. The name, Identity Card/Passport No of the claimant-Client.
b. The address, telephone and fax numbers as well as any email address of the claimant-Client.
c. The name of the Company.
d. Client code that the claimant-Client had with the Company.
e. Copy of the covered services agreement between the Company and the claimant-Client.
f. The exposition of the particulars from which the alleged claims of the claimant-Client and their amount are delivered.
g. Copy of account statement from the transactions platform the claimant-Client has used.
h. Copy of documents that prove the claimant-Client deposits to the Company (e.g. swift transfers, deposit orders, debit advice, etc.).
i. Reference and copies of any correspondence with the Company regarding the alleged claim.
j. Written confirmation of the claimant-Client that the information included in the application/letter as well as all the documents accompanied it are correct and true.
k. Any other information the ICF might or will request.

6.8. Upon submission of the compensation applications, the Administrative Committee of the ICF shall check whether the following conditions are fulfilled:

a. The initiation of the compensation payment procedure.
b. The existence of a valid claim by a covered Client against the Company which derives from an investment operation of a duly completed application claimant-Client falls within the category of covered Clients.
c. The submission in time of a duly completed application form accompanied by the necessary supporting documents.
d. The claims do not arise from transactions in connection with which there has been a criminal conviction for money laundering as defined in the AML Law;
e. There are no criminal proceedings pending and/or the claimant-Client is not convicted of a criminal offence pursuant to the AML Law.
f. The conditions for the valid submission of compensation applications are fulfilled pursuant to Limitation of Actions Law, as amended.

6.9. The Administrative Committee rejects the compensation application in case the claimant-Client does not fulfil the conditions referred to in paragraph 6.6 above, or if at the Administrative Committee's discretion, the claimant-Client used fraudulent and/or false and/or misleading means in order to secure the payment of compensation by the ICF, especially if it knowingly submitted false evidence.

6.10. Upon completion of the valuation, the ICF:

a. Issues a decision listing the Clients of the Company which are compensation beneficiaries along with the amount of money each one of them is entitled to receive (including the Clients to whom compensation will not be paid and the reasons thereof) and, communicates it to CySEC and the Company within five (5) working days from its issue; and
b. Communicates to each affected Client its decision the soonest possible from the issue of the aforementioned decision.

7. Amount of Compensation

7.1. The amount of compensation payable to each covered Client is calculated in accordance with the legal and contractual terms governing the relation of the covered Client with the Company, subject to the rules of setoff applied for the calculation of the claims between the covered Client and the Company.

7.2. The calculation of the payable compensation derives from the sum of total established claims of the covered Client against the Company, arising from all covered services provided by the Company and regardless of the number of accounts of which the Client is a beneficiary, the currency and place of provision of these services within the European Union.

7.3. The maximum payable compensation to each covered Client of the Company will be, either the 90% of the cumulative covered claims of the covered investor, or the amount of €20.000, whichever is lower. Therefore coverage = Min (90% X claimed amount, €20.000). This means that, if the claim is for €50.000, the coverage will be €20.000, due to the fact that 90% of this claim, equals to €45.000. However, if the claim is for €10.000, the coverage will be €9.000 (Min (€10.000 X 90%, €20.000) = €9.000).

7.4. In the case whereby beneficiaries of a joint account of the Company are in their majority covered Clients:

a. in the calculation of the coverage provided for in paragraph 7.3 above, the share attributable to each covered Client shall be taken into account
b. the claims shall be allocated equally amongst covered Clients pursuant to the provisions of paragraph 7.3 unless there exist special provisions and subject to the exceptions of point (c) of this paragraph
c. the claims resulting from joint investment operation where two (2) or more persons are entitled as members of a business partnership, association or grouping of similar nature, which has no legal personality, for calculation purposes pursuant to the provisions of paragraph 7.3, are consolidated and are considered as an investment of one and the same investor.

7.5. The currency in which compensation is paid to covered Clients shall be the Euro. Where the funds and/or financial instruments are expressed in a currency other than the Euro, for purposes of calculation of the compensation amount, the exchange reference rate of the said currency against the Euro fixed by the European Central Bank at the end of the day the compensation payment procedure has been activated, shall be used.