INVESTOR COMPENSATION FUND POLICY

Last Updated on October 2026

1. GENERAL

EPIDI EU LTD (hereinafter, the "**Company**") is a member of the Investor Compensation Fund (hereinafter, the "**ICF**") for the Clients of Cyprus Investment Firms (hereinafter, the "**CIFs**") under the Provision of Investment Services, the Exercise of Investment Activities, the Operation of Regulated Markets Law 87(I)/2017 (hereinafter, the "**Law**"), and Directive DI87-07 for the operation of the Investors Compensation Fund (hereinafter, the "**Directive**") as amended from time to time.

2. PURPOSE

The objective of the ICF is to protect the claims of eligible clients (hereinafter, the "**Covered Clients**") against ICF members by providing compensation when the member is unable to meet its obligations due to financial difficulties, with no realistic prospect of recovery in the near future. The ICF compensates Covered Clients for claims arising from services offered by its members when it has been confirmed that the member is unable to fulfil its obligations, as outlined by the Law and the Directive. This applies whether the member's obligations stem from an agreement or unlawful conduct.

3. COVERED SERVICES

The Company provides the following covered investment services (hereinafter, the "**Covered Services**"):

(a) Reception and transmission of orders in relation to one or more of the Financial Instruments;
(b) Execution of orders on behalf of Clients;
(c) Portfolio management; and
(d) Investment advice.

And the following Ancillary Services:

(a) Safekeeping and administration of Financial Instruments for the account of Clients, including custodianship and related services such as cash/collateral management;
(b) Granting credits or loans to one or more financial instruments, where the firm granting the credit or loan is involved in the transaction; and
(c) Foreign exchange services where these are connected to the provision of investment services.

4. COVERED CLIENTS

The ICF offers coverage to retail clients (hereinafter, the "**Retail Clients**") of the Company. Professional clients and eligible counterparties are not eligible for compensation under the ICF.

Further details are provided in Section 5 below.

5. NON-COVERED CLIENTS

No compensation shall be paid by the ICF to individuals against whom criminal proceedings have been initiated under the Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007 to 2025 (hereinafter, the "**AML Law**"), as amended from time to time.

The following categories of clients (hereinafter, the "**Non-Covered Clients**") are also excluded from ICF compensation, as per applicable regulations:

(a) Institutional and professional investors, including:

i. Investment firms (hereinafter, the "**IFs**");

ii. Legal entities associated with the Company or part of the same group of companies;

iii. Banks;

iv. Cooperative credit institutions;

v. Insurance companies;

vi. Collective investment organizations in transferable securities and their management companies;

vii. Social insurance institutions and funds;

viii. Investors categorized as professionals by the Company, in accordance with Part II of the Second Appendix of the Law;

(b) States and supranational organizations;

(c) Central, federal, confederate, regional, or local administrative authorities;

(d) Companies affiliated with the Company;

(e) Senior management and administrative personnel of the Company;

(f) Shareholders owning directly or indirectly at least 5% of the Company's share capital, as well as partners with personal liability for the Company's obligations, and auditors responsible for the Company's financial audit, as outlined by the Law;

(g) Individuals holding similar positions or duties within companies connected to the Company or its group, as specified above;

(h) Second-degree relatives and spouses of individuals mentioned in this section, as well as third parties acting on their behalf;

(i) Clients responsible for the Company's financial difficulties or worsening financial condition, or those who have benefitted from such events;

(j) Investors in companies that cannot prepare a summary balance sheet under the Companies Law or equivalent legislation in an EU member state.

The ICF may suspend compensation payments to individuals in the aforementioned categories, pending a final decision, if applicable.

6. COVERED CLAIMS

The ICF compensates claims arising from the Company's inability to:

(a) Return funds owed to Covered Clients or held on their behalf by the Company in connection with investment services;
(b) Deliver to Covered Clients financial instruments belonging to them, which the Company holds, manages, or administers on their behalf, in accordance with relevant legislation and contractual terms.

Compensation is calculated based on the legal and contractual terms governing the relationship between the Company and the Covered Client. The calculation includes relevant setoffs and counterclaims, and values are determined based on market prices where applicable.

7. PRECONDITIONS FOR COMPENSATION PAYMENT PROCEDURE

The ICF initiates the compensation payment process when either:

(a) The Cyprus Securities and Exchange Commission (hereinafter, the "**CySEC**") determines that the Company cannot meet its obligations to investor clients due to its financial circumstances, with no realistic prospect of improvement; or
(b) A court ruling within the Republic of Cyprus suspends the ability of investors and clients to make claims against the Company, due to financial reasons.

CySEC publishes its decision regarding the commencement of the compensation process on its official website.

8. CLIENT CLAIMS PROCESS

Once the compensation process is initiated, the ICF will announce in at least two nationally circulated newspapers an invitation for Covered Clients to submit claims. This publication will specify the procedure, the submission deadline (between 5 and 9 months from the initiation date), and the required content of the claims.

In cases where Covered Clients are unable to submit their claims within the specified deadlines due to valid reasons, they may submit late claims with appropriate supporting documentation.

9. REQUIRED CONTENT OF COMPENSATION CLAIMS

The ICF issues a standard compensation application that specifies the necessary information and evidence required for claim evaluation. The ICF may request additional information if needed to assess the claims.

10. PRECONDITIONS FOR PAYMENT OF COMPENSATION

Compensation payment by the ICF is contingent upon the following:

(a) The commencement of the compensation payment process;

(b) A valid claim by a Covered Client arising from an investment service provided by the Company;

(c) Submission of a compensation application as defined by CySEC's Directive;

(d) The claim is unrelated to any criminal conviction or proceedings for money laundering, as outlined by the AML Law; and

(e) The claimant's rights have not lapsed under relevant legislation.

11. AMOUNT OF COMPENSATION PAYABLE

The amount of compensation is calculated as the lesser of 90% of the Covered Client's total claims or €20,000, regardless of the number of accounts held or the currency used.

For joint accounts:

(a) The compensation is calculated based on each Covered Client's share, unless otherwise agreed;

(b) Claims from joint accounts where the account holders are partners in a company or similar entity are considered to be from one investor.

12. RESOLUTION OF CLAIMS AND PAYMENT

Upon reviewing compensation claims, the ICF's designated committee will assess whether the preconditions for compensation have been met. If a claimant is found to have used fraudulent means, the application will be rejected. After evaluation, the ICF will issue a report listing entitled clients and their respective compensation amounts, which will be communicated to CySEC and the Company.

Clients may challenge the ICF's decision by submitting a written objection to CySEC within one month of receiving the decision. CySEC must resolve objections within forty-five (45) days, and any errors will be corrected accordingly.

The ICF will pay compensation within three (3) months of issuing its final decision. Payments are made in euros, using the European Central Bank's exchange rate for cases involving other currencies.

Should you require any further information and/or have any questions about this Policy, please direct your request and/or questions to compliance@epidi.com.