



INVESTOR COMPENSATION FUND POLICY

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| Owner(s): | ARUMPRO CAPITAL LIMITED |
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1. SCOPE AND DISCLAIMER

- 1.1. '**ARUMPRO CAPITAL LIMITED**', is a Cyprus Investment Firm incorporated under the laws of the Republic of Cyprus, with Company Registration Number HE 352 951, having its registered office at 2 Gregory Afxentiou street, 2nd floor, Office 201, 4003 Limassol, Cyprus (hereinafter the "**Company**", "**we**", "**us**" or "**our**").
- 1.2. The Company is regulated as a Cyprus Investment Firm ("CIF") by the Cyprus Securities and Exchange Commission ("CySEC") under license number 323/17, and is operating in accordance with the Markets in Financial Instrument Directive 2014/65/EU and its implementing measures ("**MIFID II**") and Regulation 2014/600/EU ("**MIFIR**"), as transposed into Cyprus law by Cyprus Law 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets and its implementing measures (the "**Investment Services Law**").
- 1.3. The Company is a member of the Investor Compensation Fund (hereinafter called the "ICF"), which has been established pursuant to the Investment Firms Law 2002 – 2004 and consequent Regulations¹.
- 1.4. With this Policy, our objective is to outline in summary the provisions of the law relating to the ICF and the compensation payable to clients under it. Although we have taken every care to ensure that to the best of our knowledge we have given a detailed and accurate description of the provisions of the law, the Company can accept no responsibility or liability as a consequence of any inaccuracies or omission contained in this informative policy, and we recommend our clients interested further in the ICF, to refer directly to the laws governing the ICF².

2. GENERAL

- 2.1. The ICF is a private law legal entity, set up with the objective of securing the claims of covered clients against its members through the payment of compensation, which is made subject to the fulfilment of certain preconditions and the existence of a well-founded claim by the claim against a member of the ICF.
- 2.2. The ICF is managed, administered and represented by a five-member Administrative Committee, which is designated for a term of three years.
- 2.3. The Company is a member of the ICF and the covered services provided are the investment services listed on the Company's license (license number 323/17) issued by the Cyprus Securities and Exchange Commission.

¹ Namely, the Establishment and Operation of an Investor Compensation Fund of Clients of CIFs Regulations 2004

² At the time of writing these laws are The Establishment and Operation of an Investor Compensation Fund of Clients of CIFs Regulations 2004 and the Investment Firms Laws 2002 - 2004

3. THE OBJECTIVE OF THE ICF

- 3.1. The objective of the ICF is to secure any claims of covered clients against members of the ICF, and the main essence of the ICF is to compensate covered clients for any claims arising from the inability by a member of the ICF to fulfill its obligations despite whether that obligation arises from legislation, the client agreement or from wrongdoing on the part of the member of the ICF.
- 3.2. A failure to fulfil its obligations consists of the following:
 - a. A failure to return to a covered client (see Section D below) funds owed to them or funds which belong to them but are held by a member of the ICF, directly or indirectly, in the framework of the provision by the member of the ICF to the client of a covered services, and which the client has requested that the member of the ICF returns in exercise of their relevant right; or
 - b. A failure to hand over to a covered client (see Section D below) financial instruments which belong to them and which the member of the ICF holds, manages or keeps on its account, including the case where the member of the ICF is responsible for the administrative management of the said financial instrument.
- 3.3. The Company's clients have the risk of losing their assets, which are held by third parties, especially in case of their insolvency, and in case the third parties are not covered by any investor compensation system and/or other insurance cover.
- 3.4. The payment of compensation will be initiated where:
 - a. The member of the ICF is unable to meet client claims provided that this inability is resultant from its financial circumstances which show no realistic prospect of improvement in the near future; or
 - b. A judicial authority has, on reasonable grounds directly related to the financial circumstances of the member, issued a ruling with the effect that investors' ability to lodge claims against it are suspended;
 - c. A well-founded claim by the client against the member must exist.

4. WHO IS ENTITLED TO BRING A CLAIM?

- 4.1. All Company's clients are covered by the ICF unless they fall within the following categories:
 - A. The following categories of institutional and professional investors:
 - a. Investment Firms;
 - b. Legal entities associated with the Company and, in general, belonging to the same group of companies;
 - c. Banks;
 - d. Cooperative credit institutions;
 - e. Insurance companies;

- f. Collective investment organizations in transferable securities and their management companies;
 - g. Social insurance institutions and funds;
 - h. Investors characterized by the Company as professionals.
- B. States and supranational organization.
 - C. Central, federal, confederate, regional and local administrative authorities.
 - D. Enterprises associated with the Company.
 - E. All staff of the Company inclusive of Managerial and Administration staff.
 - F. Shareholders of the Company whose participation directly or indirectly in the capital of the member of the ICF amounts to at least 5% of its share capital, or its partners who are personally liable for the obligations of the member of the ICF, as well as persons responsible for the carrying out of the financial audit of the member of the ICF as provided by the Law, such as qualified auditors.
 - G. Investors having an enterprise connected with the Company and in general of the group of companies to which the Company belongs, positions or duties corresponding to the ones listed in paragraphs 5 and 6 above.
 - H. Second-degree relatives and spouses of the persons listed in paragraphs 5, 6 and 7 as well as third parties acting for the account of these persons.
 - I. Apart from investors convicted of a criminal offence pursuant to the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007 – 2018, as amended or replaced, investor-clients of the Company responsible for facts pertaining to the Company that has caused its financial difficulties or has contributed to the worsening of its financial situation or which have profited from these facts.
 - J. 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.

In the cases of paragraphs E, F, G and H, the Fund suspends the payment of compensation informing the interested parties accordingly, until it reaches a final decision as to whether such cases apply.

5. PROCEDURE FOR DECISION TO COMMENCE THE COMPENSATION PAYMENT PROCESS

- 5.1. The ICF will commence the compensation payment process in at least one of the following circumstances:
 - A. The Cyprus Securities and Exchange Commission has determined by Resolution that a member of the ICF is unable to meet client claims provided that this inability is a result from its financial circumstances which show no prospect of improving in the near future; or

- B. A judicial authority has on reasonable grounds directly related to the financial circumstances of the member issued a ruling with the effect that investors ability to lodge claims against it are suspended or that a well-founded claim by a client exists then the compensation payment procedure will commence;
- C. The fulfillment of the precondition referred to in paragraph A above is presumed:
- a. If the member of the ICF submits to the ICF or to the Cyprus Securities and Exchange Commission ("CySEC") a written statement declaring its failure to fulfill its obligations toward its clients;
 - b. If the member of the ICF files an application for liquidation in accordance with the provisions of Part V of the Companies Law, or
 - c. If the Cyprus Securities and Exchange Commission has revoked or suspended the Company's authorization to provide investment services and ascertains that the Company is not expected to be in a position to fulfill its obligations toward its clients in the near future, for reasons which do not concern a temporary lack of liquidity which can be dealt with immediately.
- 5.2. CySEC will decide whether the member of the ICF is unable to meet the client claims either *ex officio* or upon request submitted to it by a covered client of the member of the ICF or other competent supervisory authority and any other person with a legitimate interest.
- 5.3. The member of the ICF may be requested by CySEC to set out its views on the decision within a short deadline, which cannot be less than three working days.
- 5.4. CySEC is obliged to issue its decision on the commencement of the compensation payment procedure by the ICF within a reasonable timeframe. It will publish the decision in the Official Gazette of the Republic and on its website (www.cysec.gov.cy).
- 5.5. CySEC may extend by up to three months the issue of its decision as to whether to commence the compensation payment procedure in the event that there is lack of certainty on whether the failure by the member of the ICF to fulfil its obligations is reversible or not and in particular when such failure is mostly due to a liquidity problem faced by the member of the Fund which can reasonably be expected to be settled.
- 5.6. CySEC will reach its decision considering the guarantee of the smooth operation of the capital market and upon weighing the interests of the clients and the member of the ICF.
- 5.7. It is possible for CySEC to prohibit a member of the ICF from disposing of specific assets, with the object of securing the interests of the clients and in general its lenders or to take other appropriate measures to attain this objective.

6. INVITATION TO SUBMIT COMPENSATION APPLICATIONS

- 6.1. Upon issuing a decision to initiate the compensation payment process, CySEC will publish, in at least three newspapers of national coverage as well as in the Official Gazette of the Republic of Cyprus, an invitation to the covered clients to make their claims. In that invitation

a procedure for submission of the relevant applications, a deadline for submission and the content will be outlined.

- 6.2. The compensation applications of covered clients with which they make their claims against the member of the ICF are submitted to the ICF in writing. The compensation applications must at least include:
 - a. the name of the claimant;
 - b. the address, telephone and fax numbers as well as any email address of the claimant;
 - c. the client code that the claimant had with the member of the ICF;
 - d. the particulars of the covered services agreement between the ICF and the claimant;
 - e. the type and amount of the alleged claims of the claimant;
 - f. the exposition of the particulars from which the alleged claims of the claimant and their amount are derived; and
 - g. Any other information the ICF will request.
- 6.3. Upon submission of the applications, the Administrative Committee of the ICF has control especially if:
 - a. the claimant falls within the category of covered clients;
 - b. the application was timely submitted;
 - c. the ICF shall pay no compensation in respect of claims arising out of transactions involving individuals convicted of a criminal offence pursuant to the Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007 – 2018, as amended or replaced; and
 - d. The conditions for the valid submission of compensation applications are fulfilled.
- 6.4. The Administrative Committee rejects the application in case the claimant does not fulfill the conditions of points (a) to (d) of the paragraph immediately above or, if at the Administrative Committee's discretion, exists at least one of the following reasons:
 - a. the claimant used fraudulent means in order to secure the payment of compensation by the ICF, especially if it knowingly submitted false evidence;
 - b. the damage suffered by the claimant substantially derived from concurrent negligence or offence on its behalf in relation to the damage it suffered and to its underlying cause.
- 6.5. Upon completion of the valuation, the ICF:
 - a. Issues minutes listing the clients of the member of the ICF which are compensation beneficiaries along with the amount of money each one of them is entitled to receive, and, communicates it to CySEC and the member of the ICF within five working days from its issue date; and

- b. Communicates to each affected client its finding no later than fifteen days from the issue of the aforementioned minutes determining the total compensation amount this client is entitled to receive.

7. AMOUNT OF COMPENSATION

- 7.1. The Administrative Committee of the ICF will take into consideration the recommendations of the qualified auditor and lawyer on determining the amount of compensation for each covered client claimant.
- 7.2. The ICF may demand at any time from a covered client that he returns the compensation paid if it finds out subsequently that there was in fact a reason to reject the application.
- 7.3. The Company's books will be used together with supporting evidence to ascertain the claims of a member and the amount payable will be calculated in accordance with the legal and contractual terms governing the relation of the client with the member of the ICF subject to set-off rules.
- 7.4. The valuation of financial instruments pertaining to compensation payable is based on their value at the day:
 - a. Of publication of a court ruling with the effect of suspending the investors ability to lodge claims against the member of the ICF; or
 - b. Of the day on which the Resolution of CySEC is made determining that the member of the ICF is unable to fulfil duties arising from its client claims.
- 7.5. The calculation of compensation payable will derive from the sum of the total established claims of the covered client arising from all covered services provided, regardless of the number of accounts of which it is a beneficiary, the currency and the place of provision of these services.
- 7.6. If the claim exceeds €20,000 then the claimant is only entitled to receive a maximum of the equivalent of €20,000.
- 7.7. Upon completing the valuation, the ICF will issue minutes listing the clients which are compensation beneficiaries and the amount of compensation each of them is due to receive. This information will be communicated to CySEC and to the member of the ICF within five working days. Each of the listed clients will then be informed within fifteen days from the issue of the minutes.
- 7.8. A claimant will have ten days from the communication of the decision to appeal to CySEC, justifying sufficiently its alleged claim. Should the CySEC find errors or inaccuracies as to the evaluation carried out by the ICF then it may demand the ICF corrects the payable compensation.
- 7.9. The ICF is obliged to pay each covered client – claimant, the compensation due to him by deposit into his bank account within three months from sending the minutes mentioned above to the CySEC.



7.10. The payment by the ICF entails a subrogation of the Fund to the rights of the compensated covered client against the member of the ICF for an amount equal to the compensation payable to it.

8. UPDATES

8.1 The Company will perform a periodical review of this Policy, at least once a year. The Policy is in line with the Company's operational model, and therefore in case of any changes in the operations, these will be properly reflected in this Document.
