

**INFORMATION REGARDING
THE CLIENT ASSETS PROTECTION MEASURES
OF TRIPLE A EXPERTS INVESTMENT SERVICES S.A.
(FX and CFD products)**

1. GENERAL INFORMATION

1.1. Purpose of this document

By this document, TRIPLE A EXPERTS INVESTMENT SERVICES S.A. (“AAAFX”) provides to you information regarding the measures that it has implemented in order to comply with the requirements to protect the assets that it holds on behalf of its clients, in the context of providing investment and ancillary services to its them, in accordance with the applicable legal and regulatory framework. You are advised to read this document so that you can make an informed decision about whether to invest through AAAPx.

1.2. Regulatory Framework

For the above purpose, AAAPx has established and applies measures and procedures for the protection of its clients’ assets pursuant to, and in compliance with the requirements of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (“MiFID II”), the Greek Law no 4514/2018 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets which transposed MiFID II into Greek legislation and Delegated Directive (EU) 2017/593 as transposed in Greece Resolution 1/808/7.2.2018 of the Hellenic Capital Market Commission (HCMC).

1.3. Scope and function of the Conflicts of the client protection measures

In the context of the Applicable Regulations, AAAPx is required, when holding financial instruments belonging to clients, to make adequate arrangements so as to safeguard the ownership rights of clients, especially in the event of its insolvency, and to prevent the use of a client’s financial instruments on own account except with the client’s express consent. In addition, AAAPx has an obligation, when holding funds belonging to clients, to make adequate arrangements to safeguard the rights of clients and prevent the use of client funds for its own account. The client assets protection rules do not relate to the increase or decrease of the value of an investment.

2. CONTENT OF THE MEASURES

In compliance with the above obligations, as further specified in Resolution 1/808/7.2.2018 of the HCMC, AAAPx applies the following measures for the protection of your assets.

Segregation

AAAPx keeps records and accounts enabling it to distinguish assets held for one client from assets held for any other client and from its own assets.

Accuracy of records

AAAPx maintains its records and accounts in a way that ensures their accuracy, and in particular their correspondence to the financial instruments and funds held for clients and that they may be used as an audit trail. AAAPx applies arrangements to ensure that it is at all times in a position to identify the beneficiaries of the amounts and financial instruments

held in pooled accounts with third parties (credit institutions or Liquidity Providers) and the amount / quantity allocated to each customer in order to be able to contribute to the protection of the rights of its clients in the event of its insolvency or insolvency of the third party, by providing the necessary information to the competent authorities if necessary.

Reconciliation

AAAFx conducts, on a regular basis, reconciliations between its internal accounts and records and those of any third parties by whom clients' assets are held.

Third party accounts

AAAFx takes the necessary steps to ensure that any client financial instruments deposited with a third party is identifiable separately from the financial instruments belonging to AAAFx and from financial instruments belonging to that third party, by means of differently titled accounts on the books of the third party or other equivalent measures that achieve the same level of protection;

Client funds deposit

AAAFx holds client money in bank accounts, held with credit institutions operating within the European Union or, when necessary to support the clearing and settlement of clients' transactions, outside the European Union. The above accounts, are identified separately from any accounts used to hold funds belonging to AAAFx and AAAFx notifies the relevant credit institutions that the said accounts are used for depositing clients' money.

A part of the funds belonging to our clients may be also deposited to bank accounts belonging to our Liquidity Providers, in order to ensure the availability of any amount required to cover margin requirements without undue delay. In such cases AAAFx informs the Liquidity Providers that the relevant amounts are held on behalf of our clients.

When we hold bank accounts in countries out of the EU, the legal and regulatory regime applying to banks may be different from the legal and regulatory regime in the European Union and in the event of the insolvency or any other analogous proceedings in relation to that bank or person, clients' assets money may be treated differently from the treatment which would apply in the European Union.

Audit and compliance monitoring

The client asset procedures and controls are subject to audit by AAAFx internal audit function, as well as (periodically) by its external auditors. In addition, the compliance function reviews the application of client asset procedures as part of the compliance monitoring programme. The above measures aim at minimizing the risk of the loss or diminution of client assets, or of rights in connection with those assets, as a result of misuse of the assets, fraud, poor administration, inadequate record-keeping or negligence.

It is however stressed that, while the purpose of the client assets protection rules is to safeguard the client assets held by investment firms, it can never fully eliminate all risks relating to client assets, such as fraud, negligence etc.

Cooperation with financial institutions' insolvency and liquidation authorities

Under article 2 par. 5 of Resolution Resolution 1/808/7.2.2018 of the HCMC, AAAFx is under an obligation to make information pertaining to clients' financial instruments and funds readily available to the HCMC, to appointed insolvency practitioners and those responsible for the resolution of failed institutions.

In particular as regards funds deposited in Greek credit institutions, AAAFx is under the obligation to provide information on the end clients to which belong the amounts deposited

in the said accounts to the Greek Deposit Guarantee and Investment Fund, for the purpose of ensuring that the beneficiaries of the relevant amounts will benefit from the guarantee provided by the said guarantee fund in the event of insolvency of the financial institution. To this end, and for the identification of the final beneficiaries of each specific client money bank account, AAAFx applies the "pro rata" principle, whereby it allocates to its clients depositing money to Greek credit institutions for transactions in financial instruments that are listed on Greek markets, the cash balances of each account client relationship held by a credit institution on the basis of the proportion of each client's credit balance on the total client funds held by AAAFx.

Use of clients' assets

AAAFx does not use clients' assets for its own account.