

FIDELIS CM is an investment firm regulated by the Cyprus Securities and Exchange Commission (hereinafter called “Cysec”) with license number 208/13. Pursuant to section 17 of the Investment Services and Activities and Regulated Markets Law of 2007, a Cypriot Investment Firm must be a member of the Investment Compensation Fund (hereinafter called “ICF”). According to section 58 of the Law, a CIF is not allowed to provide investment services without participating in the Investors Compensation Fund.

The Fund was established under the Investment Firms (IF) Law 2002 as amended (hereinafter called “the Law”) and the Establishment and Operation of an Investor Compensation Fund for customers of CIFs Regulations of 2004 (hereinafter called “the Regulations”) which were issued under the Law.

The objective of the Fund is to secure any claims of covered clients against members of the Fund and the main essence of the Fund is to compensate covered clients for any claims arising from the malfunction by a member of the Fund 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 Fund.

#### Covered Services

Covered Services are the investment services listed on the Company’s license, issued by Cysec.

#### Covered Clients

The Fund does not compensate the following categories of Investors:

1. Institutional and professional investors including:
  - Investment firms
  - 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
2. States and international organizations
3. Central, federal, confederate, regional and local administrative authorities
4. Enterprises associated with the Company
5. All staff of the Company, inclusive of managerial and administration staff
6. Shareholders of the Company whose participation directly or indirectly in the capital of the member of the fund amounts at least 5% of its share capital, or its partners who are personally liable for the obligations of the member of the Fund, as well as persons responsible for the carrying out of the financial audit of the member of the fund as provided by the Law, such as qualified auditors
7. 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 paragraph 5 and 6 above

8. 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
9. Customers who file claims arising out of transactions involving individuals convicted of a criminal offence pursuant to the Prevention and Suppression of Money Laundering Activities Law or customers responsible for the financial difficulties of the Company or who have contributed to the worsening of the Company’s financial situation or who have profited from these facts
10. 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 corresponding law of a Member State

#### Amount of Compensation

The Company’s books will be used together with supporting evidence to ascertain the claims of 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 fund subject to set-off rules. 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, despite of the number of accounts of which it is a beneficiary, the currency and the place of provision of these services. If the claim exceeds €20,000 then the claimant is only entitled to receive a maximum of the equivalent of €20,000.

The investment firm providing services to its customers through the branch situated in a third country, the amount of maximum compensation payable to the customers of the said branch comes up, per customer, to the lump sum paid by any investor compensation scheme in operation in the third country, without however the amount exceeding the amount of €20,000.