

**RULES
FOR ACCOUNTING , STORAGE OF INFORMATION AND STORAGE OF THE FINANCIAL INSTRUMENTS
AND MONEY OF CUSTOMERS OF
" AXIOM INVEST " OOD**

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Art . 1. (1) These Rules ("the Rules ") are adopted on the basis of Art . 65, para . 1 , item 9 of the Tæ\^o/Á
Ø a 8æ/0 • d { ^ } o Ác (MFIA) and Art . 72-76 of Delegated Regulation (EU) No. 2017/565 of the EW.

(2) The objectives of the rules are to :

- ✓ ensure the protection of the clients of the investment intermediary (II) , as well as provide true , complete and up-to-date information about the investment and additional services provided by the II and the way to store cash and financial instruments of clients . The information under the above accentuated stipulation is necessitated for the management of the II , the resolution of disputes and reporting to the supervisory authorities .
- ✓ ensure the minimization of the risk of loss or diminution of client assets or rights in relation to these assets as a result of abuse , fraud , mismanagement , lack of appropriate accountability or negligence on the part of the investment intermediary or its employees .

3 Abbreviations used:

- ✓ Markets in Financial Instruments Act - MFIA;
- ✓ Financial Supervision Commission - FSC ;
- ✓ Deputy Chairman , Head of the " Supervision of Investment Activity department at the FSC - Deputy Chairman ;
- ✓ (**amended by decision of 30.06.2022**) Investment intermediary " Axiom Invest " OOD - II

II.ACCOUNTING AND STORAGE OF INFORMATION

Art . 2. (1) The II keeps records of the circumstances provided for in the MFIA , Delegated Regulation 2017/565 and in its internal acts , and the documentation is stored on a medium that allows the storage of the information in a way that is accessible for future reference by the competent supervisor authority , and in such a form and manner that the following conditions are met :

- a) the competent supervisory authority can obtain it easily and recover all the main stages of processing of each transaction ;
- b) it is possible to easily check all corrections or other changes , as well as the content of the documents before such corrections and changes ;
- c) manipulation or modification of the documents in any other way is impossible ;
- d) it is possible to use information technology or other effective means when data analysis cannot be easily performed due to the volume and nature of these data ;
- e) the rules of the investment intermediary correspond to the requirements for the storage of the documentation regardless of the technology used .

(2) The reporting and storage of the information is carried out by employees of the " Trading in Financial Instruments " department or the relevant department , which is entrusted with the keeping of the relevant reporting .

2.1. Principle of content in the reporting - the reporting of the II is based on the principle that the occurrence of a circumstance that is subject to reporting and registration , according to the applicable legislation , is necessary in order to prepare such reporting in electronic or paper form . The II does not prepare and does not submit to its Managers and / or regulatory

government bodies , references , reports and others , without factual and digital content .

Art . 3. Employees of the " Trading in Financial Instruments " department maintain on electronic media a duplicate of the database for the reporting carried out by the II to prevent loss of information in the event of a technical accident .

Art . 4. The II maintains on paper and electronically all policies and procedures that it should maintain in accordance with the MFIA , Regulation (EU) No. 600/2014, Directive 2014/57/ EU and Regulation (EU) No. 596/2014.

Art . 5. (1) Documentation (archive) regarding the rights and obligations of the II and the client should meet the following requirements :

1. the documentation that defines the respective rights and obligations of the investment intermediary and the client under an agreement for the provision of services or the conditions under which the investment intermediary provides services to a client shall be kept at least as long as the relationship with the client continues , but not less than 5 years from establishing relations with the client .
2. The documentation covers all contracts , annexes , agreements , tariffs , orders and other documents reflecting the rights and obligations of the parties .
3. Keeping a register (documentation) regarding customer orders and trading decisions (transactions) .

(2) In relation to each initial order received from a client and in relation to each initial trading decision (transaction) made, the II immediately registers and maintains at the disposal of the FSC at least the data specified in section 1 of Annex IV to Delegated Regulation 2017/565, insofar as they are applicable to the order in question or the trading decision in question .

(3) When the data specified in section 1 of Annex IV to Delegated Regulation 2017/565 are also required under Articles 25 and 26 of Regulation (EU) No. 600/2014, these data are maintained in a consistent manner and in accordance with the same standards that are established under Articles 25 and 26 of Regulation (EU) No. 600/2014.

(4) The register (documentation) for orders contains the following data :

1. name and other identification of the client ;
2. name and other designation of each relevant person acting on behalf of the client ;
3. designation that identifies the trader (trader identifier) within the investment intermediary responsible for the investment decision ;
4. designation that identifies the algorithm (algorithm identifier) within the investment intermediary on which the investment decision is based ;
5. " buy "/" sell " indicator ;
6. instrument identification ;
7. unit price and monetary unit ;
8. price ;
9. price multiplier ;
10. currency 1;
11. currency 2;
12. initial quantity and quantitative unit ;
13. validity period ;
14. type of order ;
15. any other data , conditions and specific instructions from the client ;
16. the date and exact time of receiving the order or the date and exact time of making the trading decision . the exact time must be determined in accordance with the methodology prescribed by the standards for the synchronization of clocks according to the Federal Law Implementing Art . 50, paragraph 2 of Directive 2014/65/ EU .

(5) Register (documentation) for concluded transactions . immediately after receiving an order from a client , or making a decision to trade , the II registers and maintains at the disposal of the FSC at least the data specified in section 2 of Annex IV of Delegated Regulation 2017/565, insofar as they are applicable to the order in question or the decision in question for trading . When the data specified in section 2 of Annex IV to Delegated Regulation 2017/565 are also required under articles 25 and 26 of Regulation (EU) No. 600/2014, these data are maintained in a consistent manner and in accordance with the same standards established by Articles 25 and 26 of Regulation (EU) No. 600/2014.

(6) The register (documentation) for concluded transactions contains the following data :

1. name and other identification of the client ;

2. name and other designation of each relevant person acting on behalf of the client ;
3. designation that identifies the trader (trader identifier) within the investment intermediary responsible for the investment decision ;
4. designation that identifies the algorithm (algorithm identifier) within the investment intermediary on which the investment decision is based ;
5. transaction reference number ;
6. designation that identifies the order (order identifier);
7. order identification code assigned by the trading venue upon receipt of the order ;
8. unique identification of each group of consolidated (grouped) client orders (which will subsequently be issued as one common order on a given trading venue). This ID should show " aggregated_x " (aggregated_x), where x indicates the number of customers whose orders are aggregated .
9. mic code of the trading venue segment where the order was submitted ;
10. name and other designation of the person to whom the order was delivered ;
11. designation that identifies the seller and the buyer ;
12. the capacity in which the person trades ;
13. designation that identifies the merchant (merchant identifier) who is responsible for the execution ;
14. designation that identifies the algorithm (algorithm identifier) on which the implementation is based ;
15. " buy "/" sell " indicator ;
16. instrument identification ;
17. main base tool ;
18. identifier of a put option or a call option (put/call);
19. exercise price ;
20. advance payment ;
21. type of delivery ;
22. type of the option ;
23. Maturity ;
24. unit price and monetary unit ;
25. price ;
26. price multiplier ;
27. currency 1;
28. currency 2;
29. remaining quantity ;
30. changed amount ;
31. executed quantity ;
32. the date and exact time of submission of the order or trading decision .

the exact time must be determined in accordance with the methodology prescribed by the standards for the synchronization of clocks according to the MFRS implementing Article 50, paragraph 2 of Directive 2014/65/ EU ;

33. the date and exact time of any message that was transmitted to and received by the trading venue in connection with events that affect the order . the exact time must be determined in accordance with the methodology prescribed by Commission Delegated Regulation (EU) 2017/574 supplementing Directive 2014/65/ EU of the European Parliament and of the Council with regard to regulatory technical standards for business accuracy the clocks ;

34. the date and exact time of each message that was transmitted to and received by another investment intermediary in connection with events that affect the order . the exact time must be determined in accordance with the methodology prescribed by the clock synchronization standards pursuant to Article 50, paragraph 2 of Directive 2014/65/ EU ;

35. any message that is transmitted to and received by the trading venue in connection with orders issued by the investment intermediary ;

36. any other data and conditions submitted to and received by another investment intermediary in connection with the order ;

37. the sequence of statuses of each issued order in order to reflect the chronology of events that affect the order , including change , cancellation , execution, etc .;

38. designation for short sale ;

39. designation of exception according to the regulation on short sales ;

40. refusal designation .

Art . 6. (1) The sole proprietor keeps a register of his clients (keeping a client file), which includes at least the following data :

1. unique identification code /lei code ;
2. the three names (company name),
3. uniform civil number (if any), foreigner's number ,
4. permanent address ,
5. VAT number (if there is such a registration),
6. headquarters and address of the client's management , and if the client is a foreign person - similar identification data .

(2) In the register under para . 1 , the relevant identification data for the customer representative or proxy , number and date of the power of attorney are also entered , and the II can assign a unique number to the representative or the proxy as well .

(3) II creates a file for each client . a file is opened for each individual client (batch), containing at least the following information :

- a) the contract concluded with the client for the provision of an investment or additional service ,
- b) copies of identity documents or data on the legal entity and its representative , if the client is a legal entity ,
- c) the information provided to the client , according to the requirements of Delegated Regulation (EU) No. 2017/565,
- d) submitted orders for transactions with financial instruments , e) power of attorney , if the client is represented by a power of attorney ,
- f) notifications about the order execution policy and the relevant risks , as well as a written confirmation from the client that he has received all the required information , according to the current legislation ,
- g) provided information about II and potential conflicts of interest , h) correspondence with the client ,
- i) confirmations and / or reports on concluded transactions / performed portfolio management actions or provided additional service .

Art . 7. The II maintains an archive and record of the necessary data and documents related to service evaluations (relevance and expediency), which include the following :

- a) the result of the suitability assessment ;
- b) any warning sent to the client when the investment service or purchase of a product is assessed as potentially unsuitable for the client , whether the client has requested to proceed with the transaction regardless of the warning and , where applicable , whether the investment intermediary has accepted the client's request to proceed with the transaction ;
- c) any warning sent to the client where the client has not provided sufficient information for the investment intermediary to carry out the suitability assessment , whether the client has requested to proceed with the transaction regardless of this warning and , where applicable , whether the investment intermediary has accepted the client's request to proceed with the transaction .

Art . 8. The II maintains an archive and record of the necessary data and documents related to the stored and administered financial instruments for the account of clients , if any . The following data is supported :

- a) name and / or unique number of the client ;
- b) type of securities or financial instruments , in the case of bonds – maturity , number , date of issue , yield to maturity ;
- c) issuer or ISIN code of the issue ;
- d) client's funds - amount and method of storage ; e) description of the custody services provided to the client .

Art . 9. The II maintains a register for customer complaints , in which is entered :

1. the date of receipt and the unique number of the complaint in the II ;
2. the unique number of the client and of his representative or proxy - complainant ;
3. the corresponding number of the primary documents stored in the II archive , as well as other additional information ;
4. the name and signature of the person who made the entry under item 1 - 3;

5. the date of consideration of the appeal by the II ;
6. the measures taken in relation to the complaint ;
7. the name and signature of the person who made the entry under item 5 and 6.

Art . 10. The II maintains a register of the personal transactions carried out by the relevant persons and by the persons who work under a contract for the investment intermediary , of which the investment intermediary has been notified or has otherwise established . Personal transactions are registered and accounted for with the content and in the order established for all other customer transactions .

Art . 11. In cases where the II provides the portfolio management service , the II maintains a register of the transactions that the II carries out when managing portfolios of financial instruments . In cases where the sole proprietor carries out transactions in connection with portfolio management, he is also obliged to keep an account of the amount of losses , in order to fulfill his obligation under Art . 62 of Delegated Regulation 2017/565 for notifying the client that the total value of the portfolio is depreciated by 10% or multiples of 10 % .

Art . 12. The II maintains an archive and record of the necessary data and documents related to the provided additional services . When providing additional services on behalf of clients, the investment intermediary maintains the following information as part of the client's file :

1. name or number of the client ;
2. type of additional service provided ;
3. initial and final period of provision , if such has been agreed upon ;
4. indication of the investment service with which the additional service is tied (if there is such a tie);
5. indication of the type / types of financial instruments to which the additional service applies .

Art . 13. The II maintains the legally required accounting reporting , incl . keeps records also regarding : balance sheet and off-balance sheet assets and liabilities of the intermediary ; income and expenses ; capital adequacy and liquidity in accordance with the requirements of Regulation No. 50 of the Financial Supervisory Service and in accordance with the requirements of Regulation 2019/2033 (EU) on prudential requirements for investment intermediaries and amending Regulations (EU) No. 1093/2010, (EU) No. 575/2013, (EU) no600/2014 and (EU) No. 806/2014.

Art . 14. The II stores all documentation and information related to its activity on a magnetic (electronic) medium .

Art . 15 . The II stores the documentation and information for 5 years , in an accessible and suitable place for use and in a way that ensures their preservation on a second medium or their restoration in case of loss for technical reasons . Documents and information that establish the rights and obligations of the investment intermediary or the client in relation to the services provided or the conditions under which the investment intermediary provides services to clients are stored for the entire period of existence of the relationship with the client , but no longer a little over 5 years .

Art . 16. In exceptional circumstances and according to the order of the Deputy Chairman of the FSC , the investment intermediary is obliged to keep documents and information for a longer period in view of the nature of the instruments or transactions , if this is necessary for the exercise of its supervisory powers , but the period it cannot be longer than 7 years from their creation , unless the same is required by another applicable normative act .

Art . 17. The storage of the documentation and information by the II is carried out in a way that allows :

1. of the FSC , respectively the Deputy Chairman , to make inquiries , to have quick access to it and to be able to obtain information on each stage of the execution of each transaction ;
2. to make changes or additions , but the content of the documentation and information before the changes or additions can be easily ascertained ;
3. protection against any manipulation or tampering .

Art . 18. The reporting conducted on an electronic medium makes it possible to generate reports containing the information for each client (submitted orders , transactions concluded on behalf of the client, etc.) .

Art . 19. (1) The II keeps a register of telephone calls and electronic messages , in accordance with the requirements of Art . 76 of Delegated Regulation 2017/565.

(2) The II registers on a durable medium all essential information relating to the relevant direct conversations with customers . The registered information contains at least the following :

a) date and time of meetings ; b) meeting place ;

c) identification of the participants ;

d) meeting initiator ; and

e) significant information about the client's order , including price , volume , type of order and when it should be transmitted or executed .

(3) Recordings are stored on a durable medium that allows their reproduction or copying , and in a format that does not allow the original recording to be altered or deleted . The term of storage of a given record starts from the date on which the record was created .

(4) (cancelled by decision of 15.06.2021)

<p>Art . 19 a . (new , with a decision dated 15.06.2021) The II prepares and stores records of all telephone conversations and messages or of conversations and messages through electronic means of communication , which relate to transactions in connection with the acceptance , transmission and execution of orders of customers , regardless of whether the transaction is concluded . This includes phone calls as well as with customers of the II , as well as between the employees of the II .</p>
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<p>Art . 19 b . (new , with a decision dated 15.06.2021) (1) Before providing investment services or activities related to the acceptance , transmission and execution of orders to new and existing clients , the II informs the client that :</p>
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<p>a) conversations and messages are recorded ; and</p>
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<p>b) a copy of the recordings of these conversations with the customer and messages with the customer will be available on request for a period of five years and , when requested by the competent authority , for a period of up to seven years , unless another applicable legal act requires their storage for a longer period .</p>
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<p>(2) The information under para . 1 shall be provided in the language or languages used for the provision of investment services to clients .</p>
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<p>Art . 19 c . (new , with a decision dated 15.06.2021) All relevant telephone calls and electronic communication made through , sent from or received from technical devices provided by the investment intermediary to its employees or persons working under contract are subject to recording, or the use on which devices by employees or a person working under contract has been accepted or authorized by the II .</p>

<p>Art . 19 e (new , with a decision of 15.06.2021) (1) It is forbidden for employees or persons working under an II contract to make , send or receive relevant telephone calls and electronic messages through private equipment and private devices (computer systems , phones , tablets and others) , the communication from which equipment or devices the investment intermediary is not able to record or copy .</p>
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<p>(2) The investment intermediary keeps and regularly updates registers of persons who have official or own devices approved for use by the investment intermediary .</p>

<p>Art . It's 19 . (new , with a decision from ... 2021) In order to monitor compliance with the requirements for registration (recording) and keeping records of the relevant communication , the " Internal Control " Department periodically monitors transactions and orders subject to these requirements , including relevant conversations . This monitoring is based on the risks identified by the II and the risk profile of the clients and is proportional to the services and activities offered .</p>
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Art . 20. Keeping records , archiving information and the relevant control over these activities is carried out in accordance with the present rules and in accordance with the Rules for internal organization and the Rules for the activities of the department " Internal control " of the II .

Art . 21. In case of loss of information in the event of a technical accident, the II immediately takes action to eliminate the accident and restore the information and notifies the FSC of the actions taken and the result .

Art . 22. In the event of violations of the normative acts or these rules , of non-fulfillment of the Managers' orders regarding the reporting and storage of information, or in the event of conditions for erasure or replacement of data during the reporting , the relevant employee of the II shall immediately notify the head of department " Internal control " , which takes the necessary actions according to competence .

I II. MEASURES FOR THE PROTECTION AND PRESERVATION OF FINANCIAL INSTRUMENTS AND / OR MONEY OF CUSTOMERS AND FOR THE SEPARATION OF THE ASSETS OF THE II FROM THOSE OF THE CUSTOMERS

Art . 23. This section aims to :

1. ensure minimization of the risk of loss or diminution of client assets or rights in relation to these assets as a result of abuse , fraud , mismanagement , lack of appropriate accountability or negligence on the part of the investment intermediary or its employees ;

2. ensure the creation and preservation of true , complete and up-to-date information about the investment services provided by the II , both for the needs of the II's management and for the resolution of disputes that have arisen .

Art . 24. (1) (amended by decision of 15.06.2021) The rules for the storage of financial instruments and / or cash of clients have been adopted in accordance with Ordinance No. 58 of 28.02.2018 . for the requirements for protection of financial instruments and clients' cash , for product management and for providing or receiving remuneration , commissions , other monetary or non-monetary benefits (Ordinance No. 58)

(2) When an II holds financial instruments and cash of clients , it keeps records and keeps accounts for the held client assets in a way that allows it to immediately distinguish the assets held for one client from the assets of the other clients of the investment intermediary and from its own at any moment. assets .

(3) Accounts and accounts are maintained in a manner that ensures their accuracy and consistency with the financial instruments and cash held for clients and enables them to be used as an audit trail .

(4) The II compares the accounts and records kept by him with those of the person under Art . 93, para . 1 and Art . 94, para . 1 of the MFIA , in which the assets of the intermediary and its clients are kept , and the reconciliation for cash is daily , and for financial instruments - once a week .

(5) The II shall establish adequate organizational arrangements to minimize the risk of loss or diminution of the client's assets or rights in relation to those assets as a result of asset misuse , fraud , mismanagement , inappropriate record keeping or negligence .

(6) The provision of investment and additional services related to the holding and storage of financial instruments and / or cash to the client is carried out only after the II has received the client's express consent for this at the conclusion of the contract between them .

Art . 25. (1) The II keeps financial instruments and / or cash only for clients with whom it has a contract for the provision of investment or additional services on their behalf .

(2) The sole proprietor cannot keep the cash of his clients with him .

Art . 26. (1) Financial instruments are stored as follows :

a) in the client's sub-account in a depository institution opened to the account of the II ;

b) **(amended by decision of2021) in the** customer's sub-account opened to the account of a third party in compliance with the requirements of Ordinance No. 58 and these rules ;

c) foreign financial instruments - in the client's sub-account with the II in the relevant depository institution abroad or with a third party .

(2) The storage and registration of government securities issued on the domestic market is carried out under the conditions and according to the procedure of the Law on the State Debt and the acts on its implementation .

Art . 27. (1) The sole proprietor deposits the funds of his clients in :

1. central bank ;

2. a credit institution licensed to carry out activities according to the Law on Credit Institutions , respectively according to the requirements of Directive 2013/36/ EU ;
3. a credit institution licensed in a third country ;
4. qualified money market fund .

This rule does not apply to a credit institution authorized under Directive 2013/36/ EU with respect to deposits within the meaning of that directive held by that institution .

(2) The sole proprietor can deposit the funds of his clients in the persons mentioned above , with whom he is a related person , only if the clients have given written consent to this .

(3) The II deposits the funds provided by clients or received as a result of investment services performed on their behalf , in the relevant designated entity by the end of the next business day at the latest .

(4) The II , when depositing its client's funds with an entity that is not a central bank , shall exercise all due skill , care and diligence in the selection , appointment and periodic review of the credit institution , bank or money market fund in which they are deposited. cash , and the arrangements for holding that cash , also considering the need to diversify that cash as part of its due diligence .

(5) In fulfillment of the obligations under para . 4, the II takes into account the experience and market reputation of these institutions or funds in the money market , with a view to guaranteeing the protection of the rights of clients , as well as any legal and regulatory requirements or market practices related to the holding of cash funds of a client , which could adversely affect the rights of customers ..

(6) When clients give their express consent to the investment of their money in a specialized fund in the money market , the II informs the clients that the money invested in a specialized fund in the money market will not be held in accordance with the requirements for the protection of clients' money , defined in delegated Directive 2017/593. The II has no right to invest the client's funds in a specialized money market fund if the client opposes such a way of storing the funds provided by him .

(7) The II shall take the necessary actions to ensure that the deposited funds of clients are kept in individual accounts or the client 's account , separate from the funds of the investment intermediary .

(8) In the event that the legislation applicable to the activity of the person where the client's funds are stored does not allow compliance with the requirements for keeping individual accounts , the II takes appropriate measures to guarantee the client's rights in relation to the deposited funds , including by opening a general account for clients' funds , which this person maintains in the name of the investment intermediary , but for a third party's account .

(9) When the II deposits the clients' funds with a credit institution or money market fund that are in the same group as the investment intermediary , the II should limit the funds it deposits with each such entity of the group or combination of such entities of the group , so that the amount of funds does not exceed 20% of all such funds . The II does not intend to deposit customer funds with a related party .

(10) The sole proprietor is not obliged to comply with this restriction when he can prove that , given the nature , scale and complexity of his activity , as well as the safety offered by the third parties , considered in the previous paragraph , including in any case considering the small amount of funds of the client that the investment intermediary holds , the requirement under the previous paragraph is not proportional . The II performs a periodic review of the assessment made in accordance with this paragraph ,and reports its initial and revised assessments to the FSC .

Art . 28. (1) The II complies with the following requirements for storing client financial instruments with a third party (third party):

1. The sole proprietor has the right to open an account for financial instruments of his client with a third party . In this case, the investment intermediary must exercise all due skill , care and diligence in the selection , appointment and periodic review of the third party and the arrangements for holding and safekeeping of these financial instruments , but at least once a year , review the selection with the same care of this person and the conditions under which he keeps the client's financial instruments .

2. In fulfillment of the obligations under item 1 The II takes into account the experience and market reputation of the third party , as well as any legislative requirements or market practices related to the holding of these financial instruments , which could adversely affect the rights of clients .

3. The II in its practice allows the storage of financial instruments of a client with a third party in a country whose legislation provides for special regulation and supervision regarding the storage of financial instruments for the account of another person . The II cannot provide the client's financial instruments for safekeeping with a person from the same country under the first sentence , which is not subject to regulation and supervision .

4. The sole proprietor has no right to store financial instruments of a client with a third party in a third country whose legislation does not regulate the storage of financial instruments for the account of a third party .

(2) The restriction under para . 1 , item 4. does not apply if any of the following conditions are present :

1. the nature of the financial instruments or the investment services provided in connection with these instruments requires their storage with a third party in a third country under paragraph 1 , item 4;
2. professional client , requested in writing that his financial instruments be stored with a third party in a third country under para . 1 , item 4.

(3) The requirements under para . 1 and 2 apply even when the third party has delegated some of the functions related to the holding and storage of financial instruments to another third party (cases of re-delegation and chain storage).

Art . 29 . (1) The entrepreneur is obliged to take the necessary actions to ensure that the storage of financial instruments of his clients with a third party is carried out in a way that guarantees identification of the client's financial instruments separately from the financial instruments of the investment intermediary and of the third party . by keeping separate accounts from this third party or by applying other measures providing the same level of protection .

(2) The sole proprietor can store financial instruments of his clients with persons with whom he is a related party , if the clients have given their consent to this . The II does not intend to store the client's financial instruments with persons related to the intermediary .

(3) In the event that the legislation applicable to the activity of the third party does not allow compliance with the requirements under para . 2, the II is obliged to take appropriate measures to guarantee the client's rights in relation to the financial instruments stored with the third party , including as :

- a) opens accounts separate from his account for clients' financial instruments ,
- b) the accounts under b . " a " are conducted by the third party in the name of the investment intermediary , but for another's account .

Art . 30 . The II is obliged to allocate :

1. the portfolios of financial instruments and / or money of their clients from each other ;
2. (**repealed by decision of 15.06.2021**) ;
3. its funds from those of its customers ;
4. The sole trader is not liable to his creditors with the financial instruments and cash of his clients , as well as with securities that are the basis of depository receipts .

Art . 31. When concluding a contract with the client , the II opens for the client a sub-account to his account for financial instruments in a depository institution .

Art . 32. No transfer of financial instruments from the client's personal account to a client sub-account of the II in a depository institution is carried out , if there are legal circumstances preventing this transfer , regardless of the contract concluded with the client .

Art . 33 . When concluding a contract with a client , the sole proprietor assigns the same unique number , keeps a register of his clients with the data specified in the rules for keeping records .

Art . 34 . The activity of the II is carried out in premises that are equipped with signaling and security equipment , meet the requirements for security and fire safety .

Art . 35 . In order to carry out its activities and keep and keep records , the II has computer equipment and the necessary licensed software .

Art . 36 . The order of work , protection and control of the information and computer systems is governed by separate rules adopted by the Managers of the II .

Art . 37 . (1) The II appoints an employee with sufficient skills and powers , with specific responsibility for matters related to compliance with the obligations for the protection of financial instruments and clients' funds .

(2) The II determines that the obligation under para . 1 will be credited to the department " Accounting " .

(3) The measures under this article are intended to provide guarantees for the preservation of the property rights of the clients of the II , such as the financial instruments and / or funds provided by them :

1. are stored by the II in a way that does not allow misuse by the Managers , respectively by persons who work under a contract for it , or the carrying out of thefts ;
2. will not be used by the II as its assets or as assets of its other clients , except under conditions and according to the order determined by regulation ;

3. are protected from the creditors of the sole proprietor in the event that the latter is declared bankrupt .

(4) The financial instruments of the clients are stored by the II as follows :

1. non-available financial instruments within the meaning of the MFIA , which exist as an electronic record in the CD's register , are kept on a sub-account opened by the client to the II's account for non-available financial instruments in the CD ;

2. non-available government securities issued on the domestic market , which exist as an electronic record in the registers of the Bulgarian National Bank, are kept at a primary government securities dealer ;

3. available securities and other similar documents :

a) in a bank , under the conditions of an ordinary bank deposit under Art . 420 of the Commercial Code in the name of the individual , under the terms of the safe rental contract under Art . 605 of the Commercial Code or under the terms of a bank deposit under Art . 425 of the Civil Code in favor of the client ;

b) in a cash register or in the II's own vault , if the customer has given his prior consent to this

(5) When the available securities and other documents of customers are stored in a common bank box , in the cash register or in the vault of the II , the latter physically separates them from his own , as well as from those of his partners , managers and persons who work under a contract for him .

Art . 38. (1) The sole proprietor intends to keep the cash of clients in a credit institution in a general account specially opened by the sole proprietor for clients' money for transactions with financial instruments .

(2) When the owner of the account is an II , it is intended to store the funds of all the II's clients or only one of his clients who requested it .

(3) The II does not intend to accept cash payments . However, if there is such an exceptional case , cash received from or on behalf of customers shall be deposited in the credit institution by the end of the next business day at the latest .

(4) When a customer provides an II with cash or financial instruments in fulfillment of the contract concluded between them , the II :

1. opens analytical accounting accounts for the financial instruments and for the client's funds in accordance with the accounting legislation ;

2. opens for the client a sub-account for non-available financial instruments to his account for such instruments in the relevant depository institution .

Art . 39. (1) The obligations of the II for management assets received from clients (financial instruments and cash) are monitored at an analytical level under a unique code to the synthetic accounting accounts for " Accounts with clients " .

(2) The disposition and receipt of financial instruments and cash on behalf of clients are reflected immediately on the accounts , in accordance with the requirements of the accounting legislation .

Art . 40 . Except in the cases specified in the regulation , the II does not allow to use :

1. for his own account, the cash and financial instruments of his clients ;

2. for the account of its client cash or the financial instruments of other clients ;

3. **(repealed by decision of 15.06.2021)**

Art . 41. (1) At the end of each period of internal reconciliation department " Accounting " performs a check to what extent the actual stocks of financial instruments and cash of clients correspond to the kept accounting accountability .

(2) Upon detection of non-conformities under the previous point, the relevant persons are obliged to immediately notify the head of the " Internal Control " department to take the necessary measures for their elimination .

FINAL PROVISIONS

§ 1. Words and expressions with a legal - technical meaning used in these rules have the meaning given to them by the MFIA and Regulation (EU) No. 2017/565 and Delegated Directive 2017/593 of the European Commission .

§ 2. The managers of the II annually, by January 31 of each year , review and assess the compliance of the present rules with the services and activities performed by the investment intermediary , and in the event of

deficiencies and / or the need to improve the internal organization, they adopt amendments and additions to the rules . Regardless of the requirement under the previous sentence , the Managers accept amendments and additions to the present rules upon finding the need for it .

§ 3. The II managers may issue orders and instructions on the application of these rules .

§ 4. These rules are presented for the information and implementation of the relevant persons in the II and to all persons working under a contract for the II .

§ 5. (amended by decision dated 30.06.2022) These Rules were adopted by decision of the Managers of II " Aksiom Invest " OOD dated 19.11.2020 . and were amended by the decision of the Managers from 15.06.2021 . and 30.06.2022

Managers :

- 1. Boryana Dimitrova**
- 2. Ventsislav Filipov**