

1. SCOPE OF THIS NOTICE

1.1 This **Investor Compensation Notice (Notice)** is addressed to retail clients (**Client** or **you**). You are required to read this information before doing business with us.

1.2 Roemer Capital (Europe) Limited (former Sinara Financial Corporation (Europe) Ltd) (**Company** or **Roemer, we, us, our, ours**), is a member of the Investor Compensation Fund (**ICF** or **Fund**) for the clients of investment firm, under the provisions of the Investment Services and Activities and Regulated Markets Law of 2017, as amended from time to time (**Law**).

2. WHAT IS THE ICF

2.1 The ICF is a Cyprus-established investor-compensation scheme as defined in the Directive 97/7/EC of the European Parliament and of the Council of 3 March 1997.

2.2 The object of the Fund is to secure the claims of covered clients against the Fund members, such as our Company, through the payment of compensation.

3. WHO CAN MAKE A CLAIM AGAINST ROEMER TO THE FUND?

3.1 A client of Roemer who is covered by the Fund for claims against us arising from the investment operations provided by us. The term for such person is «**covered client**». The Fund covers claims which may arise due to our failure:

- (a) to repay the funds owed to covered clients or belonging to them and held on their behalf in connection with investment operations; or
- (b) to return to covered clients any financial instruments belonging to them and held, managed or administered on their behalf in connection with investment operations; in accordance with the legal and contractual conditions applicable.

4. AMOUNT OF COMPENSATION

4.1 The Fund shall provide coverage for the total claims of the covered client against a Fund member and the amount shall be defined as the lower of 90% of the cumulative covered claims of the covered client and €20.000.

4.2 Compensation shall be paid in Euro, and, where the funds and/or financial instruments are expressed in a currency other than the Euro, the exchange reference rate of the said currency against the Euro fixed by the European Central Bank at the end of the day on which the compensation payment procedure was activated, shall be used.

5. HOW CAN YOU CLAIM COMPENSATION

5.1 Firstly, ICF shall initiate the compensation payment procedure. It may happen in two instances:

- CySEC will have determined that we appear, for the time being, for reasons directly related to our financial circumstances, to be unable to meet our obligations arising out of investors' claims and have no early prospect of being able to do so; or
- a Court of the Republic, will have made a ruling, for reasons directly related to our financial circumstances, which has the effect of suspending investors' ability to make claims against us.

5.2 After that, CySEC shall issue its decision for the initiation of the compensation payment procedure by the Fund within a reasonable time and publish the relevant information on its website.

5.3 Upon initiation of the compensation payment procedure, the Fund shall publish as soon as possible in at least two national newspapers, an invitation to submit applications for compensation, designating the procedure for the submission of the relevant applications, the deadline for their submission as well as their content.

5.4 The publication provided for in sub-paragraph will include at least:

- the name and address of the headquarters and the trade name of the involved Fund member;
- the deadline for the submission of the compensation applications, which cannot be less than five months or more than nine months from the date of initiation of the compensation payment procedure, or from the date of its publication.

In exceptional and justified cases, the Fund, with an announcement thereof, may extend the deadline for the submission of compensation applications up to three months, provided it obtains the approval of the Commission. The said announcement shall be published by the Fund in at least two national newspapers, and the Commission shall publish it on its website.

- the mode of submission of applications; and
- the address and/or website through which covered clients may obtain the relevant claim form provided by the Fund.

5.5 The publication of subparagraph will be communicated to the Commission, which will post

the publication on its website.

5.6 The Fund shall issue a claim form setting out the information and supporting evidence required in order to evaluate the claims of covered investors.

5.7 The Fund may record and assess the submitted claims, either internally or by designating at least one expert in capital market issues and at least one lawyer with knowledge on capital market issues, who shall evaluate the said applications and recommend to the Administrative Committee their acceptance or rejection, in whole or in part.

5.8 A covered client submitting a compensation application after the deadline, shall submit, in addition to the information forming the content of the application, a declaration explaining the reason, if any, for which he was not in a position to claim compensation in time, attaching all supporting evidence to that end.

6. CONDITION OF COMPENSATION PAYMENT

6.1 The payment of compensation by the Fund shall entail the following:

- (a) the initiation of the compensation payment procedure;
- (b) the existence of a valid claim by a covered client against the us, which derives from an investment operation;
- (c) the submission of an application form;
- (d) that the claims do not arise from transactions for which there has been a criminal conviction for money laundering;
- (e) there are no pending criminal proceedings against the said covered client for money laundering;
- (f) the right of a covered client has not been extinguished under the Limitation of Offenses Act.

7. COVERED CLIENTS

7.1 The ICF covers those clients who have been categorized as Retail clients, according to the Client Categorisation Policy of the Company.

7.2 It does not cover Professional Clients or Eligible Counterparties. If you are a retail client who has requested to be recategorized as an elective professional client, you will lose your status

as a Covered Client. A full list of client not covered by the ICF is provided in Section 8 below.

8. NON-COVERED CLIENTS

8.1 The Fund shall not compensate the following investor categories:

(a) The following categories of institutional and professional investors:

- Investment Firms;
- legal entities associated with a Fund member and generally belonging to the same group of companies;
- banks and cooperative credit institutions;
- insurance companies;
- collective investment undertakings in transferable securities and their management companies;
- social insurance institutions and funds;
- investors categorized by the Fund member as professionals upon their request

(b) Supranational institutions, government and central administrative authorities;

(c) Provincial, regional, local and municipal authorities;

(d) Enterprises that have close ties with the Fund member;

(e) Managerial and administrative staff of the Fund member;

(f) Shareholders of the Fund member whose participation directly or indirectly in the capital of the Fund member amounts to at least 5% of its share capital, or its partners who are personally liable for the obligations of the Fund member as well as persons responsible for the carrying out of the financial audit of the Fund member as provided by the Law, such as its qualified auditors;

(g) Investors in enterprises connected with the Fund member and, in general, with the group of companies to which the Fund member belongs, positions or duties corresponding to those listed in sub-paragraphs (e) and (f);

(h) Up to second-degree relatives and spouses of the persons listed in sub-paragraphs (e), (f)

and (g), as well as third parties acting for the account of such persons;

- (i) Investors-clients of a Fund member responsible for facts pertaining to the Fund member that have caused its financial difficulties or have contributed to the worsening of its financial situation or have profited from these facts;
- (j) Other firms in the same group;
- (k) 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;

Should you have additional questions related to investor-compensations schemes, please contact our Compliance team at compliance@roemer-finance.com