

INVESTOR COMPENSATION FUND

TRILT Ltd (“TRILT” or the “Company”) is a member of the Investor Compensation Fund (hereinafter called the “Fund”). The Fund was put in place to secure any claims of covered clients against members of the Fund and to compensate covered clients for any claims arising from the failure by a member of the Fund to fulfill its obligations irrespective of whether that obligation arises from legislation, the Terms and Conditions accepted by the Client or from a breach occurring from a member of the Fund.

Under the principles comprising the Funds, a breach by a member of the fund means the following:

1. Failure by a Member of the Fund to return funds owed to a covered client, and failure to return funds which belong to the Client but are held by a member of the Fund, directly or indirectly. Funds include those a Member holds after providing a covered service to the Client, for which the Client has such right and has made a request that these funds are returned; or
2. Failure by a Member of the Fund to return Financial Instruments held, managed or kept in the account of the Member, which belong to a covered client. Such Funds include those Financial Instruments for which the Member has the administrative management.

The Client acknowledges their risk of losing assets held by third parties, especially in case of the third parties’ insolvency and in those cases where the third parties are not themselves under any Investor Compensation Scheme, or any other insurance cover.

Services Covered

The Services covered under the Fund are those included in on the Company’s license (license number 254/14) issued by the Cyprus Securities and Exchange Commission (“CySEC”).

Clients Covered

All of the Company’s Clients are covered by the Fund, save for those falling into these categories:

1. The following categories of institutional and professional investors
 - (a) Investment Firms
 - (b) Legal entities associated with TRILT 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 TRILT as professionals
2. States and supranational organizations
3. Central, federal, confederate, regional and local administrative authorities
4. Enterprises associated with TRILT
5. All staff of TRILT inclusive of Managerial and Administration staff
6. Shareholders of TRILT whose participation directly or indirectly in the capital of the

- Member of the fund amounts to 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 TRILT and in general of the group of companies to which TRILT belongs, positions or duties corresponding to the ones listed in paragraphs 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. Apart from investors convicted of a criminal offence pursuant to the Prevention and Suppression of Money Laundering Activities Law of 1996-2000, investor-clients of TRILT responsible for facts pertaining to TRILT that has caused its financial difficulties or has contributed to the worsening of its financial situation or which 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 a corresponding law of a Member State.

Procedure for Decision to Commence the Compensation Payment Process

Where:

1. CySEC, by way of Resolution, indicates that a Member is not able to meet the claims of the Client, where this inability results from the financial circumstances of the Member and there is no indication that the financial services of the Member shall improve;

Or

2. 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;

3. the Fund will commence the compensation payment process.

On CySEC's decision to initiate the compensation payment scheme, it shall publish, in at least three national newspapers, an invitation to the covered clients to make their claims. The notice given to covered clients must include the procedure for submission of the relevant applications, the deadline for such submission as well as the content of the procedure.

Amount of Compensation

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 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, regardless 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.