



INVESTOR COMPENSATION FUND NOTICE

ABF Trade EU Limited

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Document Control

Version	Date	Description	Approved By
v1.0	12 May 2026	Initial version for ABF Trade EU Limited	Board of Directors

1. Introduction

By accepting this Investor Compensation Fund Notice ("Notice"), you acknowledge and confirm that the official legally binding language of ABF Trade EU Limited is English. Where this Notice is made available in other languages for convenience, the English version shall prevail in the event of any discrepancy.

ABF Trade EU Limited ("the Company") is a Cyprus Investment Firm ("CIF") with business address at 162 Fragklinou Rousvelt, 1st & 2nd Floors, Limassol 3045, Cyprus, registered under Company Registration No. HE 291958 and authorised and regulated by the Cyprus Securities and Exchange Commission ("CySEC") under CIF Licence No. 171/12.

The Company is a member of the Investor Compensation Fund (the "Fund") for the Clients of Cyprus Investment Firms ("CIFs"), established and governed by the Investment Services and Activities and Regulated Markets Law of 2017 (L.87(I)/2017) as amended (the "Law") and the relevant CySEC Directive (DI144-2007-02 as amended). Membership of the Fund is a mandatory requirement for all Cyprus Investment Firms licensed to provide investment services to retail clients.

2. Object of the Fund

The object of the Fund is to secure the claims of covered clients of regulated CIFs that are members of the Fund ("Fund Members") in the event that a Fund Member is unable to fulfil its obligations to its clients arising out of the investment services it provides.

The Fund compensates covered clients in respect of claims arising from the services provided by the Fund Member, specifically the failure of the Fund Member:

- To return client funds owed to them, or funds which belong to them but are held by the Fund Member, directly or indirectly, in the framework of the provision of investment services.
- To hand over to covered clients the financial instruments which belong to them and which the Fund Member holds, manages, or administers on behalf of its clients.

Clients bear the risk of losing their assets which are held by third parties, especially in the case of the insolvency or default of such third parties. The ICF does not cover losses arising from market movements or adverse investment outcomes.

3. Covered Services

Covered services are the investment and ancillary services listed on the Company's CySEC licence (Licence No. 171/12). These include the reception and transmission of orders, the execution of orders on behalf of clients, and portfolio management, as authorised by the Company's CySEC licence.

The ICF covers claims arising from the provision of covered services by the Company where the Company has been determined to be unable to fulfil its obligations to its clients.

4. Covered Clients

The Fund covers Retail Clients of the Company. It does not cover Professional Clients or Eligible Counterparties. For more information on client categorisation, please refer to the Company's Client Categorisation Policy, available on the Company's website.

5. Non-Covered Clients

As mentioned above, the Fund does not cover Professional Clients or Eligible Counterparties. In addition, under applicable regulations, the ICF does not compensate the following categories of investors:

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

- Investment firms
- Legal entities associated with the Company and, in general, belonging to the same group of companies
- Banks
- Cooperative credit institutions
- Insurance companies
- Collective investment organisations in transferable securities and their management companies
- Social insurance institutions and funds
- Investors categorised by the Company as professionals upon their own request
- States and international organisations
- Central, federal, confederate, regional, and local administrative authorities

(b) The following additional categories:

- Enterprises which have close ties with the Company.
- Managerial and administrative staff of the Company.
- Shareholders of the Company whose participation directly or indirectly in the capital of the Company amounts to at least 5%, as well as partners and persons responsible for the statutory audit of the Company.
- Investors having interests in enterprises connected with the Company, and in general, of the group of companies to which the Company belongs, who hold positions or bear responsibilities similar to those described above.
- Second-degree relatives and spouses of the persons listed above, as well as third parties acting on their behalf.
- Clients who file claims arising out of transactions in connection with which a criminal offence of money laundering has been committed, or in respect of which there have been convictions for such offences.
- 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 of Cyprus or its equivalent law in any other EU Member State.

In the cases of shares held by certain connected parties, the Fund may suspend the payment of compensation, informing the claimant accordingly, until the relevant judicial or other proceedings are concluded.

6. Compensation Payment Procedure

The Fund compensates covered clients for claims arising from covered services provided by the Company when the Company is unable:

- To return client funds to its covered clients which are held by the Company directly or indirectly in the framework of the provision of investment services.
- To return to covered clients the financial instruments which belong to them and which the Company manages or administers.

The Fund initiates the compensation payment process in one of the following situations:

- CySEC has determined by Resolution that the Company is unable, at present, to meet its obligations arising out of investors' claims related to investment services and there are no immediate prospects of being able to do so.

CySEC may issue such a decision when at least one of the following preconditions is fulfilled:

- The Company submits to the ICF or to CySEC a written statement declaring its failure to fulfil its obligations towards its clients.
- The Company files an application for liquidation in accordance with the provisions of the Companies Law of Cyprus.
- CySEC has revoked or suspended the Company's authorisation to provide investment services and ascertains that the Company is unable to meet its obligations to clients arising out of investment services.
- A judicial authority has, on reasonable grounds directly related to the financial circumstances of the Company, issued a ruling that client claims against the Company are suspended or postponed.

Upon issuance of a decision by the Court or by CySEC on the commencement of the compensation payment procedure, the Administrative Committee of the Fund publishes and announces details of how covered clients may submit their compensation applications.

Compensation applications must include the following information:

- The full name of the claimant.
- The address, telephone number, and email address of the claimant.
- The Client code that the claimant held with the Company.
- The particulars of the covered services agreement between the Company and the claimant.
- The type and amount of the alleged claim.
- The particulars from which the alleged claim and its amount are derived.
- Any other information the ICF may request.

The Administrative Committee of the Fund reviews each application to determine whether the claimant is a covered client, whether the application was timely submitted, and whether all conditions for valid submission are fulfilled.

The Administrative Committee will reject the compensation application in the following cases:

- The claimant does not fulfil the conditions for being a covered client.
- The claimant used fraudulent means to secure the payment of compensation by the ICF, including by knowingly submitting false information.
- The damage suffered by the claimant substantially derived from concurrent negligence or offence on the claimant's behalf in relation to the Fund Member.

7. Payable Compensation

The amount of compensation payable to each covered client is calculated in accordance with the legal and contractual terms applicable, with the overall limit of EUR 20,000 per covered client (irrespective of the number of accounts the client holds or the number of instruments and services involved), in accordance with the Law.

In the event that multiple persons are beneficiaries of a joint account and the majority are covered clients:

- Insofar as the amount of the claim exceeds EUR 20,000, the claimant receives as compensation the proportion of EUR 20,000 which corresponds to their share in the joint account.
- The compensation is fixed in total for all co-beneficiaries of the joint account and is divided among them in the proportions to which they are entitled to the funds in the account.

The compensation is paid in euros. Where the claim is denominated in a currency other than euros, the compensation is calculated using the exchange rate prevailing at the date on which the compensation procedure was initiated.

8. Further Information

For further information about the Investor Compensation Fund and its operation, you may contact:

Investor Compensation Fund

c/o Cyprus Securities and Exchange Commission

P.O. BOX 24996, 1306 Nicosia, Cyprus

Website: <https://www.cysec.gov.cy/>

Should you require any further information about this Notice or the Company's membership of the Fund, please contact ABF Trade EU Limited at support@abftrade.com or by telephone at +357 25 262002. Additional information is available on the Company's website at www.abftrade.com/eu.