

## Procedure For Holding and Protecting Clients Assets

Effective as of 20.05.2025

### 1. Introduction

Admiral Markets AS ("the Company") is committed to ensuring the protection and safeguarding of client assets, including client money and financial instruments, in strict compliance with Estonian Financial Supervision and Resolution Authority (EFSA) regulations, MiFID II (Directive 2014/65/EU), and other applicable legislation.

This document provides clients with essential information about how their funds and assets are managed, stored, and protected under the Company's policies.

### 2. Client Money and Account Management

#### 2.1. Deposit of Client Funds

2.1.1. Segregated Accounts: Admiral Markets AS requires clients to deposit all funds related to their MetaTrader 4 and 5 and Wallet account into a designated financial institution where the Company maintains a segregated client account before executing any trading order.

#### 2.1.2. Handling of Client Funds:

- Any money paid by or received on behalf of a client will be deposited into a client segregated account.
- Client funds are held separately from the Company's operational funds, ensuring full compliance with client asset protection rules.

#### 2.1.3. Client Authorization for Withdrawals:

- Clients authorize the Company to withdraw funds from segregated accounts to cover any liabilities, obligations, or outstanding fees owed to the Company.
- The Company may deduct necessary amounts for charges related to trading activities, commissions, or administrative fees as per the client agreement.

#### 2.1.4. Interest on Client Money:

- Clients grant express consent that any interest earned on client segregated accounts will be retained by the Company, unless otherwise agreed in writing.

#### 2.1.5. Processing of Withdrawals:

- If a client requests a withdrawal, the Company will ensure payment is made directly to the client (not to third party), unless the client has provided explicit instructions otherwise, and a legitimate reason for the request.

- Clients must provide accurate payment instructions for withdrawals.

#### 2.1.6. Execution of Payment Instructions:

- The Company will take reasonable steps to follow client payment instructions but does not accept responsibility for failures caused by third-party banks or financial institutions.
- If an instruction cannot be completed, the client's money will remain in a segregated account, in line with applicable financial regulations.

#### 2.1.7. Currency Exchange and Foreign Transfers:

- Clients bear full responsibility for currency exchange risks related to deposits and withdrawals.
- Any currency conversion required for transactions will be executed at an exchange rate determined at the Company's discretion, in compliance with financial regulations.

#### 2.1.8. Funds Held Outside of Estonia:

- If a client's funds are transferred to an international financial institution or broker, they may be subject to the financial regulations of that jurisdiction rather than Estonian laws.
- Clients acknowledge that such funds will not benefit from protection applicable in Estonia but will be governed by the rules of the respective jurisdiction.

### 3. Client Money and Custody of Financial Instruments

#### 3.1. Safeguarding of Client Assets

##### 3.1.1. Mandatory Deposit for Trading Activities:

- Before placing a purchase order, clients must ensure that funds have been credited to a segregated client account designated for MT4 and MT5 and Wallet account.

##### 3.1.2. Ownership and Custody of Securities:

- The client must make payment in full or higher amount than purchase order, and at that point, the funds cease to be considered client money, as per MiFID II and other EU legislation.
- Once a purchase order is accepted, the Company is responsible for settling the transaction.

##### 3.1.3. Client Assets in Custody:

- The Company holds client securities in a segregated or omnibus account with a third-party custodian or broker.
- Client securities may be registered under a custodian's name but held for the benefit of the

client.

#### 3.1.4. Third-Party Custodians and Jurisdictional Risks:

- Securities may be held by custodians located outside of the European Economic Area (EEA), such as in the United States.
- In such cases, clients acknowledge that:
  - Foreign regulations may differ from Estonian or EU financial laws.
  - Client protection under Estonian legislation may not apply.

#### 3.1.5. Omnibus Accounts and Associated Risks:

- Clients' securities may be co-mingled with other client assets in an omnibus account.
- Due to the nature of omnibus accounts:
  - Segregation of individual client securities may not always be possible.
  - The account may be subject to netting arrangements, liens, or security interests imposed by third parties, custodians, or exchanges.
  - In the event of a custodian's insolvency, client assets may be at risk and subject to liquidation at prices that may not be favourable to the client.
- Clients acknowledge and accept the risks associated with omnibus accounts and potential exposure in the event of custodian default.

#### 3.1.6. Trading Restrictions on Securities:

- Clients may only buy and sell securities through their InvestMT5.
- Once securities are purchased, they cannot be transferred to another party, except by selling them through the trading platform.

### 4. Regulatory Compliance and Risk Disclosures

#### 4.1. Client Money Protection Rules

##### 4.1.1. Regulatory Framework:

- The Company complies with the applicable client money rules to ensure the safety of client funds.
- The Company follows MiFID II regulations regarding the safeguarding of financial instruments.

#### 4.1.2. Risk Disclosures for Custodian Holdings:

- Clients should be aware that securities held by a third-party custodian may be subject to:
  - Different investor protection laws, depending on the jurisdiction.
  - Settlement and custody risks, including possible delays in asset transfers.

#### 4.1.3. Regulatory and Financial Oversight:

- The Company conducts regular due diligence on all third-party custodians and financial institutions to assess financial stability.
- The Company submits periodic reports to EFSA confirming compliance with client asset segregation and reconciliation requirements.

### 5. Client Responsibilities and Acknowledgments

By using the financial services of Admiral Markets AS, clients acknowledge and accept the following:

- Client money will be deposited into segregated accounts, separate from the Company's funds.
- Securities purchased may be held in omnibus accounts, where individual ownership rights may not be explicitly distinguishable.
- Currency exchange risks and foreign transaction risks are the sole responsibility of the client.
- Funds held outside Estonia and EU may not be subject to EU protection.
- The Company has the right to retain interest earned on client money accounts unless otherwise agreed in writing.

### 6. Contact Information and Regulatory Details

For further inquiries regarding client money protection and asset safeguarding, please contact:

Admiral Markets AS  
Maakri 19/1, 10145 Tallinn, Estonia  
Email: [info@admiralmarkets.ee](mailto:info@admiralmarkets.ee)  
License Number: 4.1-1/46  
Registration Number: 10932555

This document serves as an external policy statement and disclosure for clients of Admiral Markets AS, ensuring transparency and compliance with regulatory standards governing client money and asset protection.