

Money Market Strategy (further "Strategy")

Effective from May 16, 2025

Risk-level:	2,5 % loss of NAV at any time during the implementation of the Strategy*
Base Currency	USD /EUR
Minimum Initial Investment	0 in Base Currency
Minimum Additional Investment:	0 in Base Currency
Minimum NAV	Aligned with the Risk-level requirements
Partial withdrawal	Funds can be withdrawn at any time, fully or partially, and transferred either out to the Client's personal bank account or to the trading account within 5 (five) business days from the date of submission of the relevant instruction to the Company
Success Fee Rate	0%
Hurdle Rate	0 %
Management Fee Rate	0.1%
Margin Rate (per day)	n/a
Reporting Period	The Company provides its clients with access to an online system, which qualifies as a durable medium, where up-to-date valuations of the client's portfolio can be accessed
First Reporting Period	shall begin on the Strategy Commencement Date, shall end on the last date of the calendar quarter, or the Strategy Termination Date

* In the case of reaching the maximum allowable loss in one position, the entry of the USA into military action or the occurrence of a default, an extraordinary meeting of the Risk Committee of "Freedom Finance Europe" takes place in order to decide on the possible closure of positions or shutdown of the algorithm.

Investment Goals of the Strategy

The Strategy aims to preserve capital and provide stable income with minimal risk exposure. It is suitable for clients preferring moderate to low-risk investment approaches.

Characteristics of the Strategy

Investment Strategy:

- Control style: portfolio decisions are made by the portfolio manager by way of assets allocations in Money Market and comparable instruments..
- Products involved: long positions in complex and non-complex bonds, money-market instruments, complex and non-complex ETFs
- Exposure to markets: money-market, fixed-income
- The Strategy does not provide any capital protection or guaranteed returns. The Strategy aims to preserve capital and provide stable income with minimal risk exposure. It is as a main strategy for low-risk investors and as an auxiliary way of money placement for any other type of investor. The Strategy is managed by a professional portfolio manager based on money market analysis.

Asset Allocation Structure

Asset Class	Allocation Range
Cash in account currency	0–100%
Investment-grade bonds (BBB or higher)	0–100%
Debt instruments of Freedom Finance Holding Corp. (FRHC) companies	0–100%
Money Market Instruments	0–100%
Collective Investment Schemes with Money Market profile	0–100%
Derivatives with Money Market profile	0–100%

No hard limits on diversification across instruments.

Up to 100% cash allocation is permitted in adverse market conditions.

Restrictions on the nature of transactions and the terms of circulation of securities

1. The Company has the right to trade securities OTC.
2. The Company does not use margin for purchases of and does not sell short securities in the portfolio.

Hereby the Client confirms that he has been notified by the Company that the Company does not guarantee the achievement of the expected return determined in the Client's investment profile.

Disclosure of Conflict of Interest

We are a wholly owned subsidiary of Freedom Holding Corp. (FRHC), a public company listed on the Nasdaq stock exchange, and as such, our parent company and other FRHC Group companies are related parties. By accepting this Strategy, the Client acknowledges and accepts that there may be inherent conflicts of interest when an FRHC Group company's financial instrument is included in the Client's portfolio.

Risk Disclosure

In a general sense, risk is the possibility of losses in financial transactions due to possible adverse effects of various kinds of factors. The main risks that the transactions in the Client's portfolio on the securities' markets will involve are described in Appendix 5 Risk Disclosure Notice to the General Term of Business.

Hereby, the Client confirms that he has been notified of the mentioned risks, and the provisions of the Risk Declaration have been explained to the Client.

RISK MANAGEMENT

The Company manages and controls the risks by setting limits and stopping the implementation of the Strategy, in particular:

- Market and liquidity risks are limited by the requirement to use investment-grade bonds (BBB and higher)
- The risks of margin trading are eliminated as the terms of the Strategy do not provide for it.
- The credit risks if holding funds in credit institutions (including exchanges) or on the transactions with the counterparties (including exchanges) are limited to the due diligence of the counterparties by the Company. Risk of default of issuers in this Strategy is limited by the requirement to use investment-grade bonds (BBB and higher).
- Operational risks are mitigated by the introduction of additional manual controls and checks by various departments.