



CLIENT ASSETS SAFEGUARDING POLICY

March 2024

A. Purpose and Context

This norm establishes the measures for protection and safeguarding of client assets of **Plural Markets – Empresa de Investimento, SA** (“Plural Markets”) as provided for in MiFID II - Directive 2014/65/EU of May 15, 2014, which relates to financial instruments markets (“MiFID II” or the “Directive”).

All employees of Plural Markets must be familiar and comply with this Policy in the scope of the provision of investment services to all clients, whether Non-Professional, Professional or Eligible Counterparties, and it should also be made available to Plural Markets’ clients.

B. General Principles

The financial intermediary shall adopt procedures and implement measures that allow, in all acts it performs, as well as in accounting and transaction records, to ensure a clear distinction between the investment firm’s own and the client assets, so that the insolvency proceedings, company recovery or reorganization of the financial intermediary does not have any effect on the acts performed by the financial intermediary on behalf of its clients.

The financial intermediary may not, in its own interest or in the interest of third parties, dispose of its clients’ financial instruments or exercise the rights attached thereto, unless the holders agree. Likewise, investment firms may not use money received from clients in their own interests or in the interests of third parties.

In order to correctly safeguard client assets, that is, their custody (or, in the case of book-entry assets, the maintenance of the respective records), the financial intermediary shall:

- Keep the records and accounts that are necessary to allow it, at any time and immediately, to distinguish the assets belonging to a client from those belonging to any other client, as well as from its own assets;
- Maintain records and accounts organized to ensure their accuracy and, in particular, their correspondence with financial instruments and client funds;
- Conduct, as frequently as necessary and at least monthly, reconciliations between the records of its internal client accounts and accounts opened with third parties, for the deposit or registration of assets of those clients;
- Take the necessary measures to ensure that any financial instruments of clients deposited or registered with a third party are separately identifiable from financial instruments belonging to the financial intermediary, through accounts opened in the name of the clients or in the name of the financial intermediary with mention of being client accounts, or through equivalent measures that guarantee the same level of protection;

- Take the necessary measures to ensure that clients' money is held in an account or accounts identified separately from any accounts used to hold the financial intermediary's money; and
- Adopt organizational arrangements to minimize the risk of loss or decrease in value of clients' assets or rights relating to those assets, as a consequence of abusive use of assets, fraud, mismanagement, inadequate record keeping or negligence.

When the registration or deposit of clients' financial instruments is carried out in one or more accounts opened with a third party, the financial intermediary shall observe duties of care and use high standards of professional diligence in the selection, appointment and periodic assessment of the third party, considering its technical capacity and its reputation in the market, as well as the legal or regulatory requirements and market practices relating to the holding, registration and deposit of financial instruments by these third parties, which may negatively affect the rights of clients.

Plural Markets considers that it complies with the legally defined requirements and that it has defined the procedures and implemented the necessary measures to ensure the protection and safeguarding of its clients' assets.

Plural Markets undertakes to continually review the effectiveness of the procedures and measures adopted, updating and improving them, whenever it deems it appropriate and in accordance with legal and regulatory provisions.

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