Trading 212 Markets Ltd.
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Crypto Custody Policy

1. Purpose of the Policy.

Under the Applicable Laws, Trading 212 Markets Ltd (hereafter referred to as "**Trading 212**" or "**we**") is required to have in place a Crypto Custody Policy and take all necessary measures to safeguard Crypto Assets held on behalf of its clients. This Crypto Custody Policy sets out the framework for how client Crypto Assets will be held, the safeguards in place to protect them, and the due diligence procedures applied to third-party custodians.

This Crypto Custody Policy does not impose any fiduciary responsibilities or duties beyond the specific regulatory obligations applicable to us or as may be otherwise agreed contractually between us. This Crypto Custody Policy, forms an integral part of our Agreement with you and applies whenever we hold Crypto Assets for you as part of the Crypto Services offered, as defined in the Crypto Terms. Any terms not defined herein shall have the meaning set forth in the Crypto Terms. In case of any inconsistencies, this Crypto Custody Policy shall take precedence over the Crypto Terms.

2. Custody Arrangements.

Trading 212 will provide custody and administration of Crypto Assets on behalf of its clients through its selected third-party custodian, Coinbase Inc ("**Custodian**"). The role of the Custodian will include, but is not limited to:

- Safeguarding and holding client Crypto Assets securely in dedicated wallets;

- Settling executed transactions to ensure that purchases and sales of Crypto Assets are accurately reflected in client accounts;
- Processing necessary actions such as responding to blockchain protocol updates, including soft or hard forks, where applicable;
- Recording and maintaining accurate client balances to ensure transparency and clear asset ownership; and
- Providing statements and reports to Trading 212 on client Crypto Asset holdings for full visibility over client accounts.

While we engage third-party Custodians for the safekeeping of client Crypto Assets, we remain fully responsible for ensuring that client Crypto Assets are held in accordance with the applicable laws and regulations. Trading 212 will implement safeguard measures to ensure that its custody arrangements are aligned with regulatory expectations under Applicable Law and any additional requirements imposed by CySEC.

3. Safeguarding Measures.

Trading 212 has implemented a series of safeguarding mechanisms designed to minimise risks and enhance the security of client Crypto Assets. These include:

- **Asset Segregation:** Client Crypto Assets will be held separately from our own funds and assets, and will be clearly identifiable at all times. The segregation of client Crypto Assets ensures that, in the event of insolvency, client holdings remain protected and distinct from Trading 212's own funds and assets.
- **Reconciliation and Record-Keeping:** Trading 212 will maintain clear and accurate internal records of client Crypto Assets' holdings and regularly reconcile these with the records of its third-party Custodian to ensure data accuracy and prevent discrepancies.

- **Security and Risk Management:** Trading 212 has implemented technical and organisational measures to minimise risks related to cyber threats, fraud, operational failures, and unauthorised access. This includes the use of multi-factor authentication, encrypted transactions, and secure custody solutions.

- **Regulatory Compliance:** Trading 212 will ensure that all custody arrangements adhere to applicable Applicable Law to provide a high standard of asset protection for clients.

Crypto Assets belonging to a client shall and will be kept separate from the assets belonging to Trading 212.

As provided by the Crypto Terms, client Crypto Assets may be held:

- together with assets belonging to other clients; and/or
- in an omnibus wallet.

Where Trading 212 holds client Crypto Assets in an omnibus wallet or a wallet opened in the name of Trading 212, it shall always maintain separate records of the Crypto Assets belonging to each individual client.

We may deposit client Crypto Assets into one or more of the following wallets:

Hot Wallets

A hot wallet is a wallet that remains connected to the internet, allowing for immediate access to Crypto Assetss to facilitate trading and settlement. While it is less secure than a cold wallet solution, it allows for immediate access to the Crypto Assets to facilitate trading orders and therefore hot wallets are used to facilitate buy and sell orders received from Trading 212 clients.

Cold Wallets

A cold wallet is a wallet that has no internet connection and where the legal owner or trustee of the crypto assets does not own the private keys. Such wallets are used for security reasons as they are less prone to cyber-attacks given the lack of internet connection.

Trading 212 may not pledge the Crypto Assets of clients in its own interest or in the interest of a third party. Trading 212 will not use Crypto Assets belonging to the clients for its own account in any way.

5. Due Diligence of third parties

Trading 212 shall conduct thorough due diligence on all third-party service providers it engages to ensure they meet the highest security, compliance, and operational standards. This applies to, but is not limited to, Custodians, execution brokers, technology providers, and any other third parties supporting T212's Crypto Services.

The due diligence process will include:

(a) Assessing whether the third party is authorized or registered under Applicable Law, and ensuring adherence to relevant laws and industry standards;
(b) Reviewing the third party's security framework, including data protection measures, cybersecurity protocols, and controls for safeguarding client assets;
(c) Evaluating the third party's ability to maintain service continuity, including business continuity plans, incident response protocols, and disaster recovery capabilities; and
(d) Conducting periodic reviews, audits, and performance assessments to ensure that the third party continues to meet contractual and regulatory obligations.

Only third-party providers that demonstrate robust compliance, security, and operational integrity will be selected to support T212's Crypto Services.

6. Client Reporting

Trading 212 is committed to maintaining transparency regarding client holdings in their Crypto Accounts. Clients will have access to real-time statements reflecting their Crypto Asset balances, transaction history, and any associated fees on the

Trading Platform. Statements will be available through the T212 Platform, allowing clients to monitor their holdings and activity at any time.