

**REMUNERATIONS POLICY  
FOR THE STAFF OF  
TRADING 212 EOOD INVESTMENT FIRM**

**(Title, as amended by resolution of the single owner of the capital dated July 10, 2017, and  
October 16, 2017)**

**GENERAL PROVISIONS**

Art. 1. (1) (Amended - approved by Resolution of the General Assembly from May 26, 2016) The subject of this Policy are the salaries and other financial and material stimuli for the following staff categories:

1. senior management personnel;
2. employees whose activity is related to risk-taking;
3. employees executing control functions and
4. all the employees whose remunerations are related to the remunerations of the employees according to items 1 and 2 whose activity significantly influences the risk profile of the investment firm.

(2) (Amended and supplemented - approved by Resolution of the General Assembly from January 29, 2021) The goals and principles of the current policy are to define clear, objective and legal criteria for the formation of the remuneration in the company, including to:

1. provide reliable and effective risk management and promotion of risk-taking that outstands the levels acceptable for the investment firm;
2. provide compliance with the strategy, aims, values and long-term interests of the investment firm as well as to support the promotion of responsible business behaviour, fair treatment of the client and to provide application of the measures for avoiding conflict of interests.

(3) (Amended - approved by Resolution of the General Assembly from May 26, 2016) This Policy is prepared by the managers and approved by the General Assembly of the Company.

(4) (Amended - approved by Resolution of the General Assembly from January 29, 2021) This Policy is adopted and applied by the Company pursuant to Article 65, Para. 1, Point 14 of the Law on the Market on Financial Instruments (LMFI), Chapter 3, Section 4 by Ordinance No. 50 of 19/06/2015 for capital adequacy, liquidity of the investment firms and carrying out supervision over their compliance (Ordinance No. 50) in connection with Article 1, Para. 2, point 4 of Ordinance No.50 and Chapter 4 of Ordinance No.58 for the requirements for protection of the financial instruments and funds of the clients, management of the products and provision or receipt of remunerations, commissions, other monetary or non-monetary benefits (Ordinance No.58).

Art. 2. (1) (Amended - approved by Resolution of the General Assembly from May 26, 2016) The Management of the investment firm executes periodic review of the basic principles of the Policy, they update it at least once per year until the 31st of December and provide it to the General Assembly along with the report for the activity. (2) (Amended - approved by Resolution of the General Assembly from May 26, 2016) If needed, the review mentioned in the previous paragraph, is done more often.

(3) (Amended - approved by Resolution of the General Assembly from May 26, 2016) The application of the policy for remuneration is subject to periodic and independent internal review at least once per year and by the department for internal audit.

(4) (Amended - approved by Resolution of the General Assembly from May 26, 2016) In case the audit establishes significant weaknesses, the department for internal auditing immediately presents to the managers recommendations for the necessary changes and monitors that the actions for the removal of the weaknesses are implemented.

(5) (Amended - approved by Resolution of the General Assembly from May 26, 2016) The managers of the investment firm directly supervise the remunerations according to the present policy.

(6) (New - approved by Resolution of the General Assembly from May 26, 2016) The investment firm announces publicly immediately after the approval by the managing authority at least the information under art. 450 of Regulation (EU)

№ 575/2013 concerning this policy.

**BASIC RULES FOR THE FORMATION OF REMUNERATIONS**

Art. 3. (1) (Amended - approved by Resolution of the General Assembly from May 26, 2016) When applying the present Policy, in view of its nature, scope and complexity of its activity, internal origination and the scope of the executed investment services and activities, the Company observes the following rules:

1. (Amended - approved by Resolution of the General Assembly from May 26, 2016) Providing reliable and effective risk management and promoting risk-taking that outpasses the levels acceptable for the investment firm;

1a. (New – approved by Resolution of the Managers dated 02.04.2014) For each of the transactions concluded for executing a client order via the e-trade platform (explained in detail in the special section of the General Terms and Conditions), the company acts as opposite party no matter the type of the client order - to buy or sell;

2. In compliance with the strategy, aims, values and the long-term interests of the investment firm, as well as the application of the measures for avoidance of conflicts of interests;

3. The remuneration formation shall motivate employees to perform their functions with quality that corresponds with the company's goals and strategy and its long-term interests;

4. No discrimination or unequal treatment of the persons under Art. 1, Para. 1 is allowed when determining and negotiating their remuneration;

5. Ensuring the policy transparency in the company through:

5.1. Providing employees with information on the process of development or revision of this policy;

5.2. Disclosing and informing all employees about this policy, respectively, its amendments.

(2)(Amended and supplemented - adopted with a resolution of the General Assembly from January 29, 2021) Pursuant to this policy, the company shall not determine and apply variable remunerations in any form and other financial and material incentives to form the remuneration in the Company within the meaning of Chapter II, Section IV of Ordinance No.50 or Chapter IV of Ordinance No. 58. Pursuant to this policy, the company shall determine and pay only a fixed remuneration under Art. 18, Para. 3 of Ordinance No. 50.

(3)(Amended - approved by Resolution of the General Assembly from January 29, 2021) Pursuant to this policy, the company does not intend to apply benefits related to retirement within the meaning of Chapter III, Section IV of Ordinance No. 50 or Chapter IV of Ordinance No. 58.

(4)(New - approved by Resolution of the General Assembly from May 26, 2016) Employees exercising supervisory functions shall receive remunerations consistent with the degree of achievement of the objectives related to their functions, regardless of the results achieved by the structural department they supervise.

**RULES AND CRITERIA FOR DETERMINING THE REMUNERATIONS  
OF THE MANAGERS, THE PROCURATOR AND MEMBERS OF THE SENIOR  
MANAGEMENT  
PERSONNEL, INCLUDING THE SUPERVISORY BODY OF THE INVESTMENT FIRM  
UNDER THE MEANING OF PARA.1, ITEM 1 OF  
THE SUPPLEMENTARY PROVISIONS OF**

**ORDINANCE № 50** (Amended title - approved by  
Resolution of the General Assembly from May 26,  
2016)

Art. 4. (Supplemented - approved by Resolution of the General Assembly from May 26, 2016) Pursuant to this policy, the rules and criteria that apply to the formation of the remunerations of the Managers, the procurator (if appointed) and the senior management personnel, incl. the supervisory body of the investment firm within the meaning of Para.1, item 1 of the Supplementary Provisions of Ordinance No. 50, are:

1. the remunerations of the managers shall be determined by the General Assembly of the shareholders - according to the provisions of Art. 137, para. 1, Point 5 of the Commerce Act;

2. the provision of item 1 shall also apply to the procurator of the company (if appointed), as the managers shall execute the powers of the General Assembly under item 1 to determine the remuneration;

2a. (New - adopted with a resolution of the General Assembly from May 26, 2016) the provision under item 1 shall also apply to the supervisory body of the investment firm within the meaning of Para.1, item 1 of the Supplementary Provisions of Ordinance No. 50;

3. The managers can be relieved of responsibility for the relevant year at a regular annual meeting of the shareholders if an audited annual financial statement for the preceding year is presented;

4. (New - adopted with a resolution of the General Assembly from May 26, 2016) the remuneration shall be formed based on the professional experience and the functional responsibilities of the position as defined in the employee's job description as part of the conditions of the employment contract, respectively of the conditions of the management contract.

**PRINCIPLES AND CRITERIA FOR DETERMINING THE REMUNERATIONS  
OF THE EMPLOYEES OF THE COMPANY, INCLUDING THE EMPLOYEES REFERRED  
TO IN ARTICLE 1, PARAGRAPH 1, ITEMS 2-4 OF THIS POLICY**

(Supplemented title - approved by Resolution of the General Assembly from May 26, 2016)

Art. 5. (Supplemented - approved by Resolution of the General Assembly from May 26, 2016)  
This policy defines the following principles and criteria that apply to the remunerations of the employees who work under a contract for the company:

1. correct implementation of the Labor Code and the secondary statutory instruments in the regulation of the labour remuneration, respectively statutory instruments regulating non-labour remunerations;

2. (Supplemented - adopted with a resolution of the General Assembly from May 26, 2016)  
Ensuring levels of the remuneration corresponding to the position, contribution and quality of the employee concerned and depending on the professional experience and the functional responsibilities of the position specified in the employee's job description as part of the terms of the employment contract;

3. setting clear and objective rules for determining the individual remuneration of each employee;

4. prevention of any form of discrimination and unequal treatment of employees in the determination and formation of their remuneration;

5. application of Art. 3, Para. 2 of this policy in order to avoid incentives for excessive risk-taking;

6. Individual remuneration is determined both by the duration of the job based on evaluation and ranking of the company's positions, taking into account the individual qualities and contributions of each employee, subject to the minimum rates laid down for each position;

7. (Amended - adopted with a resolution of the General Assembly from January 29, 2021) the remunerations of the Heads of the Risk Management Department and the Compliance Department shall be directly supervised by the Remuneration Committee.

8. Ensuring internal transparency of the manner and procedures for determination of remunerations in order to create conditions for motivation of the personnel for quality performance of the job functions and tasks.

9. Upon termination of an employment relationship, employees are paid indemnities in the cases, sizes and procedures prescribed in the Labor Code.

**SPECIALIZED BODY FOR THIS POLICY**

(New title - approved by Resolution of the General Assembly from May 26, 2016)

Art. 6. (New - adopted with a resolution of the General Assembly from May 26, 2016) In accordance with the present policy, the company shall create and maintain a Remuneration Committee.

Art. 7. (New - adopted with a resolution of the General Assembly from May 26, 2016) (1) The chairperson and the members of the Remuneration Committee shall be representatives of the supervisory body of the relevant institution.

(2) The panel of the Remuneration Committee referred to in the preceding paragraph shall be so defined as to enable it to make decisions regarding this policy competently and independently, as well as regarding incentives created by the investment intermediary for risk management, capital and liquidity.

(3) The body under Art. 6 shall be responsible for making decisions on remunerations, including those that have an impact on the risk and risk management of the investment intermediary and which are made by the management and supervisory body.

**FINAL PROVISIONS**

§ 1. The present policy was provided for information to all employees and senior management personnel of the company.

§ 2. The present policy was adopted by a resolution of the Managers from 25.11.2013, supplemented with a resolution of the Managers from 02.04.2014, amended and prepared by the Managers and adopted by the General Assembly with a resolution from 26.05.2016, amended and prepared by the Managers and adopted by a resolution of the sole owner of the capital from 10.07.2017, title amended and adopted by a resolution of the sole owner of the capital from 16.10.2017, amended and prepared by the Managers and adopted by a decision of the sole owner of the capital from 29.01.2021