

CLIENTS' FUNDS/SECURITIES PROTECTION RULES

PROTECTION OF CUSTOMER SECURITIES AND MONEY

1. For the purpose of protecting the interests of clients in securities and cash holdings, LANDMARK CAPITAL CJSC (hereinafter referred to as the Company) shall:

1.1. maintain information, maintain such records and accounts as may at any time, without delay, separate the assets of each Client from other clients, as well as from its own resources;

1.2. maintain information and maintain accounting and accounts in such a way as to ensure their accuracy and relevance to the Client's funds and securities transferred and / or managed;

1.3. periodically make comparisons, adjustments between the accounts, information, and records of clients' assets held by him and those with whom the client's assets are held;

1.4. Ensure that any customer securities held by a third party can be separated from securities owned by the investment services provider, as well as from third party securities under different names of securities accounts or other means of providing an equivalent level of protection. The requirement set forth herein shall not apply to the transfer of Government securities belonging to its Client to the Sub-Custodian if it is not possible to open separate (under a different account) investment securities and securities accounts with the Sub-Custodian;

1.5. take the necessary organizational measures to manage the risk of loss of rights to the Client's assets or assets as a result of improper or unauthorized use, misappropriation, misrepresentation, or neglect of the Client's assets.

CUSTOMER'S SECURITIES

2. The Company has the right to keep the Client's securities in the account (s) opened with the third party for the Client. In selecting, appointing, and periodically reviewing third-party and third-party custodial processes, the Company must act in good faith, with the best efforts, with due diligence and care. In the process of selecting and appointing third parties, the Company must take into account the experience and reputation of the third party, as well as the legal requirements relating to the custody of the client's securities and business turnover habits in order to avoid their adverse effect on the Customer's rights.

3. If the Company intends to hold the Client's securities with a third party in whose country there are special requirements and control over the custody of other securities, the Company shall not be entitled to hold the Client's securities with a person operating in that country which is not subject to such requirements or supervision.

4. The Company shall not be entitled to hold the Customer's securities with a third party located in another country where the custody of securities owned by other persons is not regulated, unless at least one of the following conditions exists:

4.1. the nature of the securities or related investment services requires that such securities be held by a person located in that country;

4.2. The securities are owned by the Customer as professionally classified and the Customer has given the Company a written instruction or consent to keep its securities with a person located in that country.

MAINTAINING AND USING CUSTOMER MONEY

5. The Company shall maintain the Client's funds in one or more accounts opened in a commercial bank.

6. The Company shall keep its own and the Client's funds in separate bank accounts.

7. The Company shall act in good faith, with due diligence and care in selecting the Commercial Bank for the purpose of keeping the Customer's funds in the best interest of the Customer. The Company should take into account the experience and reputation, reputation, and legal standing and market practice of such a commercial bank in order to ensure the necessary protection of the Customer's rights and to avoid any potential adverse impact on the Customer's rights. In addition, if the Company elects a foreign bank to maintain the Client's funds, the Company shall obtain the Client's written consent to hold the funds in that bank, unless the rating of the selected foreign bank is not below the BBB Group Standard and Poor's BBB rating. Moody's Baa Group Moody's Baa 3, AM Best of the B group, B +, Duff and Phelps' BBB-, Weiss's B- or Bitch-Fitch's BBB.

POSSESSION AND USE OF CUSTOMER SECURITIES

8. The Company is prohibited from conducting securities financing transactions with securities owned by the Customer or otherwise using such securities for the benefit of itself or its other customers, except as provided for in paragraphs 9 and 10.

9. The Company may use the Client's securities only if the following conditions exist simultaneously:

9.1. The Client has given his prior written consent to the use of the securities indicating the terms of use,

9.2. The use of the client's securities shall be limited to the terms and conditions specified by the customer.

10. The Company may execute securities financing transactions in a client-held securities account or similar account held with a third party or otherwise use or possess securities of a client held in a third-party account or similar account for the benefit of himself or his other clients. if the conditions set out in paragraph 9 are met and the Company has a proper control system ensuring that only in accordance with paragraph 9.1. supporting the customer's securities are 9 and 10 of the parts used in the form provided.

11. The Company shall maintain appropriate records and records of customers whose securities have been used in accordance with their terms and conditions, as well as the number of securities used by each customer.