



INVESTOR COMPENSATION FUND (ICF) POLICY

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1. Introduction

This Investor Compensation Fund Policy (the “Policy”) is issued by DPRG IM Ltd (Registration Number: HE433850) (the “Company”), a Cyprus Investment Firm (CIF) authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under License Number 454/25

This Policy provides Clients with information regarding the Investor Compensation Fund (“ICF”), its purpose, and the circumstances under which Clients may or may not be entitled to compensation.

The Company, as a member of the ICF, is committed to complying with the Investment Services and Activities and Regulated Markets Law 87(I)/2017, the Directive DI87-07 for the Operation of the Investor Compensation Fund, and any applicable rules or circulars issued by CySEC.

2. Purpose

The purpose of this Policy is to inform Clients about the Investor Compensation Fund (“ICF”), its purpose, the coverage of eligible claims, and the conditions under which Clients of the Company may be entitled to compensation in the event of the Company’s insolvency or inability to meet its financial obligations.

The ICF aims to provide a level of protection to Clients in the event that the Company is unable to return funds or securities owed to them due to its financial failure. The compensation provided under the ICF serves to safeguard the interests of Clients, ensuring that they are compensated for claims up to a specified limit, as established by CySEC regulations.

The Company will provide its Clients with information regarding the ICF in its Client Agreement, and the ICF compensation limit, which is subject to periodic review and adjustment by CySEC.

3. Scope

This Policy applies to Clients of DPRG IM Ltd who are eligible to receive compensation under the Investor Compensation Fund (ICF) in the event of the Company’s insolvency or inability to meet its financial obligations.

However, certain categories of clients are excluded from the protection of the ICF, including but not limited to Professional Clients and Eligible Counterparties, as defined under MiFID II and CySEC regulations.

The detailed list of excluded clients is provided in Section 4 of this Policy.

4. Excluded Clients

The Investor Compensation Fund (ICF) does not apply to all types of clients. Specifically, the following clients are excluded from the compensation scheme:

- Professional Clients: Entities or individuals classified as Professional Clients under MiFID II, including:
 - Entities required to be authorised or regulated to operate in the financial markets (e.g., credit institutions, investment firms, insurance companies).
 - Large undertakings meeting at least two of the following size requirements: total balance sheet of EUR 20,000,000; net turnover of EUR 40,000,000; or own funds of EUR 2,000,000.
 - National and regional governments, central banks, and international and supranational organisations.
- Eligible Counterparties: Clients classified as Eligible Counterparties under applicable regulations, including investment firms, credit institutions, insurance companies, and similar entities.
- Group Companies: Any company within the same group as DPRG IM Ltd or closely linked affiliates.
- Large Companies: Entities that exceed the thresholds set by CySEC for the ICF and are considered capable of bearing financial losses without significant impact.

These exclusions ensure that the ICF protection is reserved for smaller, non-professional clients who are more vulnerable to financial losses.

5. Compensation Coverage and Limit

The Investor Compensation Fund (ICF) provides coverage to eligible Retail Clients for claims arising from a member firm's failure to return money or financial instruments owed to them.

However, DPRG IM Ltd offers services exclusively to Professional Clients and Eligible Counterparties. Therefore, its clients are not eligible to receive compensation under the ICF.

As of the date of this Policy, the Company does not have any Retail Clients.

For eligible Retail Clients (if applicable in the future), the compensation limit would be as follows:

- €20,000: The maximum compensation available to any single client under the ICF.

The compensation is intended to cover claims relating to non-returned funds or financial instruments owed to the client, up to this limit. The Fund does not provide compensation for any losses or claims that exceed this amount. If the total claims exceed the available funds, the compensation amount will be proportionally reduced.

6. Claims and Procedures for Compensation

6.1 Submission of Claims

To initiate a claim under the Investor Compensation Fund, eligible clients must submit a formal request to the Company or directly to CySEC, as appropriate. The procedure involves:

- Claim Registration: Clients must complete and submit a claim form to the Company or to CySEC, detailing their claim for compensation.
- Verification: The Company will assess the validity of the claim and confirm the eligibility of the client. In cases of uncertainty, the Company may request additional documentation or clarification.
- CySEC's Role: Once verified, the claim will be forwarded to CySEC, which oversees the distribution of compensation and may act as an intermediary.

6.2 Deadlines for Claims

Clients must file their claims within the time frame specified by CySEC's regulations, which generally provides a window of three months from the date the Company is declared insolvent or unable to meet its obligations.

7. Communication of Information

The Company will provide its clients with necessary and timely information about their eligibility for compensation under the ICF. This includes:

- Annual Disclosure: The Company will inform clients about the ICF's coverage and the compensation limits through Client Agreements and periodic communications.
- Notification of Changes: Any changes to the coverage or compensation limits will be promptly communicated to clients.

8. Compensation Limits

The maximum amount of compensation available for eligible clients is subject to the following limits:

- The Fund provides compensation up to a maximum of €20,000 per eligible client, in accordance with CySEC regulations.
- This limit applies regardless of the number of accounts or financial instruments involved.

9. Eligibility Criteria for Compensation

In order to be eligible for compensation under the Investor Compensation Fund (ICF), the following criteria must be met:

- The client must have suffered a financial loss due to the Company's inability to return funds or financial instruments belonging to the client.
- The client must be classified as a Retail Client according to MiFID II and CySEC regulations.
- The client must not fall under any of the excluded categories listed in Section 4 of this Policy (e.g., Professional Clients, Eligible Counterparties, Group

Companies, Large Companies).

- The client's claim must fall within the eligibility period set by the ICF and must be submitted within the deadlines specified by CySEC regulations.

As of the date of this Policy, the Company does not have any Retail Clients. Therefore, no clients of the Company are currently eligible for compensation under the ICF.

10. Process for Filing a Claim

If an eligible client believes they have grounds for compensation, they must follow the claims process outlined below:

- Notification: The client must notify the Company within a reasonable time after the incident that led to the loss of funds or financial instruments.
- Filing a Claim: The client must submit a formal claim through the Company's designated procedures, providing all required documentation.
- Review and Approval: The Company will review the claim and forward the eligible claim to the ICF for assessment and determination of the compensation amount.

11. Payment of Compensation

Once a claim is approved, compensation will be paid to the eligible client as follows:

- Payment Processing: The compensation will be processed in the form of a bank transfer or other suitable method as agreed with the ICF.
- Timely Settlement: The Company will ensure that any valid compensation claims are paid promptly, in compliance with CySEC and ICF regulations.

12. Review of Policy

This policy will be reviewed periodically, at least annually, to ensure that it remains in compliance with the ICF requirements and CySEC regulations. If any significant changes are made, clients will be informed in a timely manner.

13. Version Control

- Version: 1.0
- Prepared by: Compliance Department
- Approved by: Board of Directors
- Date of Approval: 14/04/2025

14. Disclaimer

This Investor Compensation Fund Policy (“Policy”) is part of the Client Agreement between DPRG IM Ltd (the “Company”) and its clients. This Policy is subject to change and may be amended at any time. The Company reserves the right to update the Policy as required by applicable laws, regulations, and its business needs.

In case of any inconsistency between the terms of this Policy and the Client Agreement, the terms of the Client Agreement will prevail, unless otherwise specifically stated.

The Company shall not be liable for any claims outside of the coverage and limitations described in this Policy. Clients should carefully review the terms of the Policy and their eligibility for compensation under the ICF.