

CRYPTO-ASSET CUSTODY AND ADMINISTRATION POLICY

FUMBI, s. r. o. is a limited liability company, Company ID No.: 55 651 232, with its registered office at Suché Mýto 6, Bratislava – Staré Mesto District, 811 03, Slovak Republic, registered in the Commercial Register maintained by the City Court Bratislava III, Section: Sro, Insert No.: 177108/B, LEI Code: 097900CAKA0000269926, which was established, incorporated, and conducts business in accordance with the legal regulations in force in the Slovak Republic (hereinafter the “**FUMBI**”).

FUMBI provides crypto-asset services on the basis of a decision of the National Bank of Slovakia dated 17 December 2025, which became final on 17 December 2025, and which was issued pursuant to Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937. The National Bank of Slovakia, with its registered seat at Imricha Karvaša 1, Bratislava – Staré Mesto District, 813 25, exercises supervision over FUMBI in connection with the provision of crypto-asset services.

Terms with a capital initial letter that are not defined in this Crypto-Asset Custody and Administration Policy have the meaning assigned to them in the Terms and Conditions available at www.fumbi.sk.

FUMBI holds Clients’ Crypto-Assets and financial funds separately from Crypto-Assets belonging to FUMBI. Clients’ Crypto-Assets are never held at the same public address as FUMBI’s Crypto-Assets, and Clients’ financial funds are never held in the same account as FUMBI’s financial funds.

If FUMBI enters bankruptcy, insolvency, or enforcement proceedings are brought against it, Clients’ Crypto-Assets and financial funds will not be affected. FUMBI holds financial funds and Crypto-Assets belonging to Clients separately from its own and may not use them for its own purposes under Article 70(1) of the MiCA Regulation. This segregation is ensured through internal technical and accounting procedures.

Clients’ Crypto-Assets are held using technology that distributes access to keys among multiple persons and sets signature rules.

Crypto-asset custody and administration services are provided under two business models: “**Brokerage Services**” and “**Active Management**”. In the Brokerage Services model, custody is provided only to the minimum extent necessary to facilitate the exchange of Crypto-Assets for financial funds and vice versa; within this model, it is not possible to transfer Crypto-Assets into FUMBI from other sources or transfer Crypto-Assets from FUMBI to external personal addresses. In the Active Management model, it is possible to transfer Crypto-Assets to personal addresses created or verified on the FUMBI Platform, and vice versa.

After logging into their Account on the FUMBI Platform (via the website fumbi.network or the FUMBI mobile application), the Client may submit various transactions involving Crypto-Assets, including purchases, sales, or, in the Active Management model, Transfers to a personal address generated or verified on the FUMBI Platform. The Client may activate two-factor authentication for login purposes. For the purposes of selling Crypto-Assets (Withdrawal) or Transferring Crypto-Assets to the Client’s address, two-factor authentication is mandatory.

FUMBI is liable to Clients for the loss of any Crypto-Assets or means of access to Crypto-Assets resulting from an incident that can be attributed to FUMBI. FUMBI’s liability is limited to the market value of the Crypto-Asset lost at the time the loss occurred. Incidents that cannot be attributed to FUMBI include any event in which FUMBI demonstrates that it occurred independently of FUMBI, such as an issue related to the operation of a distributed transaction database that FUMBI does not control.