

AlpCaps Safe Custody Regulations

PART 1 – GENERAL PROVISIONS

1. Scope of Application

1.1 These Safe Custody Regulations (the "Regulations") apply to all custody services (the "Custody Assets") provided by AlpCaps to its Clients.

1.2 The Regulations form part of the contractual agreement between AlpCaps and its Clients, supplementing the General Terms and Conditions.

2. Definitions

2.1 "Custody Assets" refers to all financial instruments and assets held in safekeeping by AlpCaps on behalf of the Client.

2.2 "Administration Services" refers to all services related to the safekeeping, management, and reporting of Custody Assets.

3. Acceptance of Regulations

3.1 By utilizing AlpCaps' custody services, the Client acknowledges and agrees to these Regulations.

PART 2 – DUTIES AND RESPONSIBILITIES

4. Safekeeping of Custody Assets

4.1 AlpCaps ensures the safekeeping of Custody Assets by employing high industry standards.

4.2 Custody Assets may be deposited with third-party custodians or sub-custodians in accordance with applicable laws and regulations.

5. Administration Services

5.1 AlpCaps provides periodic reporting and other administrative functions related to Custody Assets.

5.2 Administration Services do not include portfolio management unless explicitly agreed.

6. Allocation and Recordkeeping

6.1 AlpCaps maintains clear and accurate records for all Custody Assets, ensuring these are distinguishable from AlpCaps' own assets

7. Client Instructions

7.1 All instructions from the Client must be clear, complete, and comply with applicable regulations.

PART 3 – STATEMENTS AND VALUATIONS

8. Annual Statements

8.1 AlpCaps provides annual statements of Custody Assets, including valuation, typically at the beginning of the following calendar year.

8.2 Clients can access real-time overviews of Custody Assets via their AlpCaps Account.

9. Valuations

9.1 Valuations are based on non-binding market data from customary sources. AlpCaps is not liable for discrepancies arising from such data.

PART 4 – FEES AND BENEFITS

10. Custody Fees

10.1 Custody service fees are outlined in AlpCaps' fee schedule or agreed upon separately. Fees may include VAT or other taxes as required.

10.2 Non-standard services incur additional charges, as stipulated in the General Terms and Conditions.

11. Financial Benefits

11.1 AlpCaps may receive financial benefits associated with services provided to the Client, detailed in the relevant disclosure documents.

PART 5 – OPERATIONS ON CUSTODY ASSETS

12. Execution of Transactions

12.1 Unless otherwise agreed, AlpCaps executes transactions as a riskless principal.

12.2 AlpCaps may act as a counterparty to the Client, provided no conflict of interest exists.

13. Best Execution

13.1 AlpCaps adheres to "best execution" principles, selecting the venue most favorable to the Client.

13.2 Large orders may be split to ensure market stability and optimal execution.

14. Treatment of Orders

14.1 AlpCaps reserves the right to reject, cancel, or reverse orders deemed non-compliant with applicable laws, market standards, or Client agreements.

PART 6 – MARGIN REQUIREMENTS

15. Margin Policies

15.1 AlpCaps sets margin requirements to mitigate risks associated with Client transactions.

15.2 Clients must ensure sufficient assets in their accounts to meet margin requirements at all times.

15.3 Failure to meet margin requirements may result in the liquidation of Custody Assets without prior notice.

PART 7 – CLIENT DUTIES

16. Compliance with Laws

16.1 Clients must comply with all applicable laws and regulations in relation to Custody Assets.

16.2 Clients indemnify AlpCaps against any damages resulting from breaches of legal obligations.

17. Market Conduct

17.1 Clients must adhere to rules governing market conduct, including prohibitions against insider trading and market manipulation.

PART 8 – MISCELLANEOUS

18. Liability

18.1 AlpCaps is only liable for damages arising from gross negligence or willful misconduct.

19. Amendments

19.1 AlpCaps reserves the right to amend these Regulations in accordance with the General Terms and Conditions.

20. Governing Law

20.1 These Regulations are governed by Swiss law, and any disputes shall be resolved under the exclusive jurisdiction of Swiss courts.

AlpCaps remains committed to ensuring the safety, compliance, and effective management of all Custody Assets entrusted to us.

