

# Safeguarding Statement

Ram Fintech s.r.o. · Draft for EMI licensing

Statement on the Safeguarding of Client Funds (Safeguarding Statement)

Company: Ram Fintech s.r.o. Version: 1.0 Date: [Add date]

The company Ram Fintech s.r.o., ID No.: 245 21 876, with its registered office at Vojtěšská 211/6, Nové Město, 110 00 Prague 1 (hereinafter referred to as the “Company”), as an applicant for an electronic money institution (EMI) license, hereby declares its procedures and mechanisms ensuring the protection of funds entrusted by Clients for the execution of payment transactions or as consideration for issued electronic money.

## 1. Princip separece (Segregation of Funds)

In accordance with Section 25 of Act No. 370/2017 Coll., on Payment Systems, the Company applies a strict model of asset segregation:

All funds received from Clients are held in bank accounts that are maintained separately from the Company’s operating accounts.

These funds may not be used to pay the Company’s debts; they are not part of the Company’s estate in the event of bankruptcy; and they may not be subject to enforcement proceedings or execution proceedings brought against the Company.

## 2. Partner Financial Institutions

For safeguarding purposes, the Company uses depository services provided by leading banking institutions in the Czech Republic. Funds are deposited in specially designated accounts with the following partners:

UniCredit Bank Czech Republic and Slovakia, a.s.

In banking systems, these accounts are designated as accounts intended for the safekeeping of funds belonging to clients of electronic money institutions.

## 3. Control mechanisms

The company has implemented robust internal processes to ensure compliance:

**Daily Reconciliation:** Every business day, automated and manual reconciliations are performed to compare the balances in client accounts within the Company’s system with the balances in safeguarding accounts at banks.

**Internal and external audits:** The adequacy of asset protection processes is regularly reviewed by the internal audit department and an independent external auditor as part of the annual financial statements.

**ICT Security:** Access to safeguarding accounts is protected by multi-factor authentication (MFA) and is restricted to designated finance department staff in accordance with AWS security standards (PCI DSS compliant).

#### 4. Risk Management

Funds are held exclusively in liquid form (cash in accounts) or in low-risk liquid assets, as defined in the relevant implementing decrees of the Czech National Bank. This ensures that funds are immediately available to meet Clients' needs.

#### 5. Disclosure Requirement

The company is required to immediately notify the Czech National Bank of any significant change in its safeguarding procedures or of a change in the financial institution where the safeguarding accounts are held.

This statement is publicly available on the Company's website and forms part of Ram Fintech s.r.o.'s transparent approach to protecting the interests of its clients.

On behalf of Ram Fintech s.r.o. [Name of the statutory representative] [Position]