

Published: February 27, 2025

## **Public Disclosures**

These Public Disclosures are provided to you by Apola Finance Limited (the “Company”), BIN 250140900030, a private company incorporated in Astana International Financial Centre (“AIFC”), which is duly licensed by the Astana Financial Services Authority (“AFSA”) under FintechLab license number AFSA-LA-2025-0006 on 06 February 2025 for carrying out the following Regulated Activities in relation to Digital Assets:

- Dealing in Investments as Principal
- Dealing in Investments as Agent
- Advising on Investments
- Arranging Deals in Investments
- Providing Money Services.

## **CONFLICTS OF INTEREST**

Apola Finance Ltd. recognizes that actual or potential conflicts of interest may arise in the course of providing its services. With the complexity and scale of its business and reliance on third parties for providing its services, situations may emerge where the Company may have an interest, relationship, or arrangement that conflicts with a client's interests. Such interests may not always be disclosed to clients before or at the time of entering into any agreement or transaction until the Company becomes aware of the potential or existing conflict of interest. In such cases, Apola Finance Ltd. will take all reasonable steps to ensure that client interests are not adversely affected and that fair treatment is maintained in accordance with the Company's internal policies. Transactions will be executed with priority given to client interests over those of the Company, its employees, shareholders, and affiliates.

To effectively manage conflicts of interest, Apola Finance Ltd. has established comprehensive policies and systems that prevent the misuse of confidential information. Employees handling client affairs are required to maintain confidentiality and to act in the best interests of clients without being influenced by other business relationships. The Company will not advise clients on transactions in Digital Assets or financial instruments if such transactions would create an unmanageable conflict of interest.

## **DATA PROTECTION**

Apola Finance Ltd. is dedicated to protecting client data and ensuring compliance with applicable data privacy regulations, including the AIFC Data Protection Regulations and Data Protection Rules (collectively the “Data Protection Law”). To fulfill its obligations, the Company collects, uses, shares, and stores personal data necessary to perform its services. This may include information about clients, or where applicable, their officers, employees, or representatives. The Company ensures the confidentiality and security of personal data through secure storage methods, restricted access, and regular audits. Personal data will be processed only for the purposes required under the Company's obligations and will be retained only as long as necessary. Upon achieving the purpose of processing, data will be either destroyed or anonymized in accordance with the Data Protection Law and other applicable regulations. Additional details are available in the Company's Privacy Policy on its website or in the client agreement.

## **COMPLAINTS HANDLING**

The Company has investor grievances redressal mechanism in place according to which customers may report their grievance, feedback or complaint. All complaints should be made in writing / e-mail and directed in the first instance to the responsible officer of the Company at the following e-mail: [compliance@apola-finance.kz](mailto:compliance@apola-finance.kz). A Complainant could use the Client complaint form or submit a request in a free format. A copy of the Company's Complaints Handling Policy shall be available free of charge upon your request.

The Customer Support confirms, within 7 (seven) working days the receiving of the Complaint to the Complainant. Within 60 (sixty) calendar days of the investigation of the Complaint, the Company must inform the Complainant in writing about the outcome of the investigation. In the event where the Company is unable to respond within 60 (sixty) calendar days, it must inform the Complainant of the reasons for the delay and indicate the expected period within which the investigation will be completed. This period cannot exceed 90 (ninety) calendar days from the submission of the Complaint. A Complainant may file an appeal to AFSA against a final decision or in cases of a delay in a final decision:

Astana Financial Services Authority

Astana, 55/17 Mangilik El Avenue, C 3.2

P.O. Box 010000, Republic of Kazakhstan

Telephone: +7 7172 91 90 01 or 8 800 080 08 01

Website: <http://www.afsa.aifc.kz>

## **WHITSLEBLOWING POLICY**

Apola Finance Ltd. is committed to maintaining honesty, integrity, and professionalism. All employees must comply with the Company's Business Code of Conduct and Ethics, which prohibits fraudulent activities, corruption, bribery, conflicts of interest, market abuse, and other misconduct inconsistent with our values.

We encourage third parties, including suppliers and business partners, to report any misconduct, such as bribery, kickbacks, corruption, conflicts of interest, market abuse, fraudulent activities, or violations of laws or Company policies. Reports can be submitted to [compliance@apola-finance.kz](mailto:compliance@apola-finance.kz). Anonymous reports are accepted, but providing contact information helps with thorough investigation and follow-up. All reports must be made through official Company channels. The Compliance Officer handles all reports independently, objectively, and confidentially. If allegations are substantiated, the Company will take appropriate disciplinary or remedial action in line with our policies and applicable laws.

The outcome of a full investigation is recorded in a report submitted to the Board of Directors for necessary action. This report typically includes an executive summary, background information, findings with supporting evidence, conclusions on whether the allegations are substantiated, and recommendations for disciplinary action, financial recovery, or referral to law enforcement authorities. It also contains relevant exhibits, including copies of documentary evidence, interview records, and other supporting materials. The Compliance Officer must report to the Board of Directors regularly and to the AFSA within five business days on the progress and outcomes of investigations.

## **CLIENT REFERRAL AND CUSTODY ARRANGEMENTS**

Apola Finance Ltd. does not currently engage in referring or introducing clients to other Digital Asset Service Providers or third parties. Should such arrangements arise in the future, the Company will provide a detailed description of the terms and any monetary or non-monetary benefits received, including reciprocal arrangements for business or services.

The Company holds client funds and Digital Assets with reputable third-party custodians to ensure the protection of client ownership. These custodians are carefully selected based on their regulatory standing, security protocols, and operational integrity. The current custodian of Apola Finance Ltd. is \_\_\_\_\_, a licensed entity authorized to provide custody services under the regulations of \_\_\_\_\_ jurisdiction, ensuring compliance with all applicable legal and regulatory frameworks.

## **CLIENT ASSET PROTECTION**

Apola Finance Ltd. prioritizes the protection of clients' ownership of Digital Assets. Client assets are held with carefully selected third-party custodians who meet rigorous standards for regulatory compliance, security, and operational integrity. These custodians are licensed under the relevant jurisdiction and operate in accordance with applicable laws and regulations.

To safeguard client ownership, digital assets are maintained in segregated accounts, ensuring they are clearly distinguished from the Company's own assets. This segregation prevents the use of client assets for any purpose other than on behalf of the client. Additionally, custodians implement advanced security measures, including multi-signature wallets, encryption protocols, and regular audits to protect against unauthorized access, loss, or theft.

Apola Finance Ltd. regularly monitors custodial arrangements to ensure compliance with legal obligations and to uphold the highest standards of client asset protection. In the event of insolvency or other disruptions, these safeguards are designed to ensure that client assets remain separate and identifiable, preserving client ownership rights at all times.

Apola Finance Ltd. is also authorized to provide Money Services in relation to Digital Assets. As part of these services, the Company adheres to stringent compliance measures and operational protocols to ensure secure, transparent, and lawful handling of Digital Asset transactions. The Company monitors all Digital Asset transactions for compliance with Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) regulations. Clients engaging in Digital Asset transactions are required to provide necessary identification and undergo thorough due diligence to ensure regulatory compliance.

Apola Finance Ltd. remains committed to maintaining the highest standards of transparency and client protection. Any updates or changes to these disclosures will be promptly published on this website or made available through other publicly accessible means.