Approved by the resolution N Ո-25-001 of sole partcipant of “Aktina Capital” limited liability company

Director: Tigran Davtyan

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PROCEDURE

OF AKTINA CAPITAL LIMITED LIABILITY COMPANY ON ORGANIZATION OF DOCUMENT CIRCULATION RELATED TO THE PROVISION OF INVESTMENT AND NON-CORE SERVICES

YEREVAN 2025

1. GENERAL PROVISIONS

1.1. The procedure for organizing document circulation related to the provision of investment and non-core services (hereinafter the "**Procedure**") of Aktina Capital Limited Liability Company (the "**Company**") has been developed by the legislation regulating the securities market of the Republic of Armenia, in particular, the RA Law "On Securities Market", other regulatory legal acts adopted on its basis, and the Company's charter.

1.2. This Procedure governs the operation of the Company's unified document circulation system, the proper management of document circulation related to the provision of services by the Company, as well as the execution of instructions given by the Company's Director, at all levels of the Company.

1.3. The main concepts used in this Procedure are:

1) "**Company**" - Aktina Capital LLC investment company;
2) "**CB**" – the Central Bank of the Republic of Armenua;
3) "**Client**" - a person who uses the services provided by the Company;
4) "**Investment services**" - the services defined in Article 25(1) of the Law;
5) "**Non-core services**" – the services defined in Article 26 of the Law;
6) "**Contract**" - a document signed between the Client and the Company within the framework of the provision of investment services, which includes the rights and obligations of the parties related to the conclusion and execution of a transaction with the securities and funds of the given person;
7) "**Reliable Means of Information Exchange**" – the reliable means of information exchange as provided for by the Company's Procedure on the Provision of Securities Portfolio Management Services;
8) "**Law**" – the law of the Republic of Armenia "On Securities Market".

1.4. All other concepts used in this Procedure have the meaning established by the Law.

1.5. The provisions of this Procedure are mandatory for all employees of the Company.

1.6. The goal of the Company's unified document circulation system is to ensure the proper process of monitoring compiling, preparing, circulating, recording, storing and maintaining and grouping the official documents.

1.7. The movement of documents within the scope of the Company's provision of investment and non-core services is regulated by this Procedure unless otherwise specified by the Procedure on the Provision of Securities Portfolio Management Services.

1.8. The implementation of the actions and/or operations described in this Procedure, communication between the Company and the Client may be carried out through the exchange of information or messages (documents) through the software solutions proposed or designated by the Company for this purpose, and/or via postal communication, and/or electronic communication, and/or other means of communication.

2. ORGANIZATION OF DOCUMENT CIRCULATION

2.1. The following main types of correspondence are distinguished in this Procedure:

2.1.1. correspondence (incoming) received from other individuals and organizations (excluding the orders received from Clients within the framework of the provision of services by the Company);

2.1.2. correspondence (outgoing) sent to other individuals and organizations (excluding the reports sent to Clients by the Company within the framework of the provision of services by the Company);

2.1.3. documents created, circulated, and used by the employees in the Company (internal).

2.2. Acceptance and movement of incoming correspondence:

2.2.1. After receipt, all correspondence addressed to the Company shall be presented to the relevant employee to whom it is addressed, and if the addressee's details are not specified, to the Company's director, by the end of the working day on which it was received.

2.2.2. All envelopes received are opened, except those marked "personally". Envelopes marked "personally" are handed over to the addressee in a closed state. If, after opening the letter, the recipient determines that it pertains to the Company's activities, they are obligated to forward it to the Company's director.

2.2.3. When opening the envelope, any employee of the Company is obliged to check the presence of documents (including attachments) in it, as well as compare the document numbers with those indicated on the envelope.

2.2.4. If an envelope contains mistakenly included documents, they shall be forwarded to the appropriate recipient in new envelopes.

2.2.5. Documents that are not formatted in the prescribed manner (not signed, not stamped, etc.), severely damaged, or incorrectly addressed shall be returned to the sender or redirected to the appropriate recipient.

2.2.6. Letters accompanying correspondence received from abroad are translated by the relevant employee if necessary.

2.2.7. The initial familiarization with the accepted documents is carried out by the director of the Company for the purpose of their further distribution.

2.2.8. It is prohibited to make any notes, corrections, and/or deletions in the original text of the received documents.

2.2.9. The provisions of this clause do not apply to orders received from Customers.

2.3. Preparation, formulation, and delivery of outgoing documents:

2.3.1. When compiling and drafting outgoing documents, the following requirements and rules must be observed:

2.3.1.1. A4 paper format paper must be used for printing documents;

2.3.1.2. outgoing documents are drafted on the Company's form (as necessary);

2.3.1.3. when preparing outgoing documents, the date and an outgoing serial number shall be assigned to them;

2.3.1.4. the second and further pages of the documents shall be numbered;

2.3.1.5. The content of the documents must be concise and free from excessive complexity.

2.3.2. The document output serial number has the following structure:

2.3.2.1. CBxxx, BDxxx, or Rxxx, where CB indicates that the exit document is addressed to the Central Bank of the Republic of Armenia, BD suggests that the exit document is addressed to the "Armenian Stock Exchange" OJSC or the "Central Depository of Armenia" OJSC, R indicates that the outgoing document is addressed to other individuals or legal entities, and xxx indicates the serial number of the outgoing document. The serial numbering starts from 001 each calendar year.

2.3.3. Before arranging the delivery of outgoing documents, the following must be checked by the Company's director or a relevant employee with such authority:

2.3.3.1. the accuracy of the correspondent's address;

2.3.3.2. the presence of the necessary signatures on the document and attached annexes;

2.3.3.3. the presence of annotations regarding attachments on documents (a mandatory note is made in the main text: "Attached is…" or "Enclosed…").

2.3.4. Outgoing response letters to received official correspondence shall be prepared and delivered within the time limit specified or prescribed in the respective letter (in the absence of the latter, as soon as possible).

2.3.5. The provisions of this clause do not apply to the reports provided to the Clients.

2.4. Authentication of documents:

2.4.1. The document becomes legally binding after authentication, which is carried out through signing and sealing.

2.4.2. Generally, the first copy of the document is authenticated. If the document is sent to several persons at the same time, all copies of the document are authenticated.

2.4.3. Generally, a document is signed by one person. Two or more signatures are affixed in cases where several persons are responsible for the content of the document.

2.4.4. Documents sent from the Company are authenticated by the director of the Company. The document may also be authenticated by the person performing the duties of the director of the Company by placing a slash before the title of the position or indicating their actual position, the first letter of the name and surname. If necessary, the documents may be authenticated by other responsible persons or persons performing the duties of the latter.

2.5. Storage and archiving of documents

2.5.1. All documents related to the Company's activities are filed and stored in appropriate folders. Documents within the Company are retained for the periods specified by applicable laws and other legal acts governing the retention of such documents.

2.5.2. After the expiration of the specified retention period for the Company's documents, these documents are archived in accordance with the procedure established by the legislation of the Republic of Armenia.

3. FINAL PROVISIONS

3.1. Supervision over the maintenance of the unified document circulation system provided for by this Procedure is carried out by the director of the Company, who is responsible for improper performance or non-performance of the duties imposed on him by this Procedure in accordance with the procedure established by the Labor Code of the Republic of Armenia.

3.2. Amendments and supplements to this Procedure shall be approved by the General Meeting of Participants of the Company (if a Board has not been formed in the Company) and shall enter into force within the period specified by the decision of the meeting.