

## **SANCTIONS CLAUSE**

We shall not provide any services and shall not be liable to pay any sums or provide any benefit to the extent that the provision of such services, payment of such sums or provision of such benefit would breach or expose Mega Equity Securities and Financial Services Public Ltd to any enforcement or other adverse action under sanctions, prohibitions or restrictions under United Nations resolutions or the trade or economic sanctions, laws or regulations of the European Union, United Kingdom or United States of America.

Mega Equity Securities and Financial Services Public Ltd shall maintain, and comply with, sanctions, prohibitions or restrictions under United Nations resolutions or the trade or economic sanctions, laws or regulations of the European Union, United Kingdom or United States of America. This includes the implementation of measures to accomplish effective and timely reviews of all relevant data with respect to its clients and with respect to incoming or outgoing assets or transactions. A key part of most sanctions measures is an asset freeze against named individuals, companies and other entities. This means that their funds and economic resources are frozen and it is prohibited to make funds or economic resources available to them. Sanctions may require Mega Equity Securities and Financial Services Public Ltd to freeze the assets of clients held by Mega Equity Securities and Financial Services Public Ltd. In such an event Mega Equity Securities and Financial Services Public Ltd shall comply with such requirement and Mega Equity Securities and Financial Services Public Ltd shall not be able to perform any transfer of funds/securities to/from clients that would result in being in breach of applicable sanctions as described above.

The imposition of sanctions that directly affect a client of Mega Equity Securities and Financial Services Public Ltd or directly affect Mega Equity Securities and Financial Services Public Ltd's ability to provide its services without breaching such sanctions are to be considered as force majeure and the performance of any contract for the provision of financial services by Mega Equity Securities and Financial Services Public Ltd is suspended for the duration of such sanctions. Mega Equity Securities and Financial Services Public Ltd, shall apply an administrative fee of 1,00 % per annum payable in advance (starting from the date that such sanctions are applied) on client assets frozen under applicable sanctions, for the purpose of covering related sanction compliance, anti-money laundering compliance, legal compliance and general administrative services relating to the administration of the frozen assets. Mega Equity Securities and Financial Services Public Ltd maintains the right to liquidate any open market positions held by the client unilaterally and without any prior authorization from the client in order to cover the administrative fee arising from the asset freeze in the event that the funds held by the affected client do not suffice. Such liquidation is compliant with the Commission Opinion dated 27 May 2021 "on changes to the feature of frozen funds".

For any further clarifications please feel free to contact us at [info@megaequity.com](mailto:info@megaequity.com).