

Trade Republic's Crypto Custody Policy

Trade Republic provides its Customers, among other crypto-asset services, with the service of the *custody and administration of Crypto-Assets on behalf of its clients*. Trade Republic has established and maintains this "Custody and Administration Policy" outlining internal rules and procedures to ensure the safekeeping or control of crypto-assets, or the means of access to those crypto-assets.

I. Custody Structure and Segregation

Trade Republic holds Crypto-Assets on behalf of its Customers in collective crypto custody by maintaining the Crypto-Assets of all Customers in an omnibus digital account per tradeable crypto-asset (an "**Omnibus Wallet**"). This means that the Crypto-Assets held for different Customers are not segregated on the distributed ledger network (Blockchain), but only in Trade Republic's internal books and records.

Trade Republic does not provide Private Keys to Customers. Individual Public Keys are made available upon request to enable Crypto Transfers.

Trade Republic maintains crypto-asset segregation arrangements to protect the ownership rights of its Customers — including in the event of Trade Republic's insolvency — and to prevent the use of Crypto-Assets for its own account, for the account of other Customers, or for the account of any third party. Customers can view their respective Crypto-Asset holdings in the Application.

II. Delegation of custody services

Trade Republic may delegate the custody of Crypto-Assets to crypto-asset service providers that are duly authorized to provide custody and administration services under MiCAR ("**Sub-Custodians**"). In such cases, Trade Republic will oversee and monitor the services provided by the Sub-Custodian.

III. Private Key Security

Trade Republic uses a cryptographic method in which no single individual has full control over Private Keys. Transactions can only be authorized through the coordinated actions of multiple parties.

By not providing customers with Private Keys, the risk of loss of Private Keys by customers as well as unauthorized access by third parties to customers' crypto assets is minimized.

Additionally, Trade Republic has implemented emergency recovery mechanisms for Private Keys, which provide an extra layer of security for customers' crypto-assets.

IV. Internal Record Keeping and Reconciliation

Trade Republic maintains detailed internal ledgers reflecting all customer activity. Internal and external daily reconciliations ensure that asset movements align with the records of Crypto Execution Venues and Sub-Custodians (where applicable), enabling prompt detection and resolution of any discrepancies.

V. Order Execution and Client Communication

Customers can place buy and sell orders via the Application. Executed orders are settled using pre-approved allowlisted wallets only, minimizing the risk of unauthorized transfers. Customers are notified of the transaction status directly in the Application.

VI. Security, Controls and Risk Mitigation

Where appropriate, Trade Republic has implemented operational processes subject to the four-eyes principle, requiring dual approval from two individuals to reduce human error and fraud.

Trade Republic has implemented internal rules and guidelines for wallet security, incident response, access control, and business continuity.

VII. Insolvency

In accordance with statutory law, and in the unlikely event of Trade Republic's insolvency, Customers' crypto-assets will be excluded from Trade Republic's insolvency estate and transferred to a licensed third-party custodian. Customers may opt out of this transfer; in such cases, any individual segregation and transfer costs will be borne by the Customer, unless the terms and conditions of the new custodian are deemed unreasonable.

VIII. Transparency and Reporting

Customers can access crypto position reports electronically via the App, showing balances and valuations of their crypto-asset holdings.

IX. Review Cycle

The Custody and Administration Policy are subject to regular review and updates to ensure continued compliance with MiCAR and to reflect operational or regulatory developments.