



## SIA “Viainvest”

### Portfolio Management Policy

VI-INA-2025/006

Version 04

18.02.2025.

Approved by the decision of the shareholders meeting of SIA “Viainvest”:	18.02.2025.
Is in force as of:	04.04.2025.
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Next review date:	March 2026

## Organizational administrative regulations

Version Nr.	Description of changes made
04	The document has been approved by a decision of the shareholders meeting. There are no changes in substance.

### Related documents

Document type	Document title
EU Regulation	Commission Delegated Regulation (EU) 2017/565 of 25 April 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organizational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive
European Securities and Markets Authority	ESMA 35-43-3448 Guidelines on MiFID II product governance requirements
LR law	Financial Instruments Market Law
LR law	Law on Investment Firms
Regulatory provisions of Latvijas Banka	Nr. 258 Investment product governance requirements
Internal document	Customer Status Determination Policy
Internal document	Product suitability and appropriateness assessment procedure

### The aim

In this document, SIA "Viainvest", registration No. 40203015744 (hereinafter – "Viainvest" or "Company"), discloses to its Investors and potential Investors information about the Viainvest portfolio management service – an investment service for which the designation "Auto Invest" (hereinafter – "Service") is used on the Company's investment platform in accordance with Regulation (EU) 2017/565 and the Republic of Latvia Financial Instrument Market law. Viainvest describes the nature and scope of the portfolio management service in this document.

### Assessment of suitability and appropriateness

Before Viainvest starts providing the Service, Viainvest evaluates whether the Service is suitable and appropriate for the Investor in accordance with the Product suitability and appropriateness assessment procedure and the Customer Status Determination Policy.

Viainvest evaluates whether the Investor can be classified as a “Private client”, “Professional client” or “Eligible Counterparty”. By default, Viainvest classifies all individuals and legal entities as private clients, however, Investors may apply to change their assigned category (client status) in accordance with the Customer Status Determination Policy.

The purpose of product suitability and appropriateness assessment is to determine the suitability of the relevant product and/or service for the specific Investor. Viainvest is obliged to inform the Investor about the applicable risks related to the Service and to provide the necessary information so that the Investor can assess whether the Investor’s financial situation allows to take such risks (*risk tolerance*). When evaluating the Service’s suitability and appropriateness, Viainvest assesses whether the offered Service meets the Investor’s investment objectives, including risk tolerance and sustainability preferences and is suitable for his/ her knowledge and experience of the relevant Service. If the Service is recognized as suitable and appropriate, the Investor can invest according to the parameters of the Service chosen by the Investor, taking into account the limits assigned by the Company to the Investor. If the functionality of the Service is not suitable or appropriate for the Investor, Viainvest refuses to provide the Service to the Investor.

### **The nature of the portfolio management service**

As part of the Service, Viainvest can purchase financial instruments on behalf of the Investor. The mentioned transactions with financial instruments are carried out with asset - backed securities published on Company’s investment platform. The Service does not include short selling or transactions with borrowed funds.

By choosing the Service, the Investor authorizes Viainvest to purchase financial instruments on behalf of the Investor, in accordance with the Investor’s predetermined criteria for investing in financial instruments and the Service strategy chosen by the Investor:

- 1) If the Investor has chosen the strategy of the offered Service, Viainvest performs the Service according to the previously defined strategy.
- 2) If the Investor himself has chosen the criteria for making investments within the portfolio management service, Viainvest ensures making investments within the Investor’s manual strategy.

The Company offers two investment strategies for portfolio management - Diversified Strategy and Active Strategy:

- 1) In the portfolio of the Diversified Strategy, securities are purchased that are attached to any loans of the lenders available on the Company’s investment platform, with a buy-back obligation, in EUR currency. The following criteria are used for the inclusion of securities in the Diversified Strategy portfolio:
  - a. Lender – anyone;
  - b. The remaining term of the security – any;
  - c. Buy-back Obligation – yes;
  - d. Currency of the security – EUR;
  - e. Income interest rate – any;
  - f. The maximum amount of investment in one issue – up to 100 EUR;

- g. The maximum limit of the portfolio – is not greater than determined as a result of the assessment of suitability and appropriateness.
- 2) In the portfolio of the Active Strategy, securities are purchased that are linked to loans issued by lenders, with the highest yield, with a buy-back obligation, in EUR currency. The following criteria are used for the inclusion of securities in the Active Strategy portfolio:
- a. Income interest rate – priority is given to securities with the highest interest rates;
  - b. Lender - anyone;
  - c. The remaining term of the security – any;
  - d. Buy-back Obligation – yes;
  - e. Currency of the security – EUR;
  - f. The maximum amount of investment in one issue – up to 500 EUR;
  - g. The maximum limit of the portfolio – is not greater than determined as a result of the assessment of suitability and appropriateness.

The Company ensures that the Investor uses the following criteria for including securities in the Manual Strategy portfolio:

- a. Income interest rate (minimum and maximum);
- b. Lender;
- c. Remaining term of the security;
- d. Buy-back Obligation;
- e. Maximum investment amount per issue.
- f. The maximum limit of the portfolio – is not greater than determined as a result of the assessment of suitability and appropriateness.

Investor can stop using the Service at any time, by suspending it on the Company's investment platform.

The Company manages portfolios of financial instruments in the interests of Investors and at their expense.

The Company does not outsource the management of Investors investment portfolios.

### **Valuation and reporting of financial instruments**

The calculation of the fair value of financial instruments is not additionally performed, because the Company uses the purchase value of the financial instrument as the fair value and performs it in accordance with the accounting procedure for financial instrument transactions. Reporting to Investors takes place in accordance with European Union Regulation 2017/565.

Regular portfolio reports are available to the Investor on the Company's investment platform, in accordance with the concluded agreement. The Investor can contact the Company and receive portfolio reports in another form (for example, in printed form) upon request.

### **Investor protection scheme within financial instruments**

Viainvest is a member of the national Investor protection scheme, established in accordance with EU Directive 97/9/EC. If Viainvest, as an investment brokerage company, is unable to

fulfill its obligations towards the Investor in full and on time, for retail Investors the amount of compensation is determined according to the total amount of unfulfilled obligations, but no more than EUR 20 000, regardless of the number of Investor's financial instruments or investment accounts.

The Investor protection scheme does not grant compensation to Investors for losses caused by:

1. Changes in the price of an investment.
2. The default of a borrower, lending company, or issuer.
3. The lack of a market for the purchase or sale of an investment.

The Investor protection scheme does not apply to investments in loans through an assignment agreement.

Disclaimer: Viainvest does not delegate to third parties the management of the Investor's portfolio of financial instruments in whole or in any part thereof. Viainvest does not apply any investment performance standard (*benchmark*) with which the return of Investors' portfolio of financial instruments would be compared. There is no consideration of adverse impacts of investment decisions on sustainability factors.