FINANCIAL SERVICE PROVIDER DISCLOSURE STATEMENT

September 2024

SNB Finance Holdings Limited (NZBN 9429046386212), trading as Snowball-X, Snowball Securities, or 雪盈证券, is a registered financial service provider in New Zealand (FSP: 594389). You can verify the company's registration on the New Zealand Companies Office website at <u>https://companies-register.companiesoffice.govt.nz</u>.

A. Contact Details

SNB is a New Zealand incorporated limited liability company and can be contacted at the following address:

Tenancy 1, Level 11, Tower 2, 205 Queen Street, Auckland 1010, New Zealand

Email: <u>service@snowball-x.com</u> Telephone: +64 9 520 1919

B. Fees

The fees and charges associated with our services can be viewed through the link below. Any updates or changes to these fees and charges will also be reflected there.

Pricing on official website: <u>https://snowball-x.com/</u>

The fees and charges for the services we provide to you will be:

(a) The fees and charges agreed upon in writing for specific services; or

(b) For any other services not covered by a written agreement, the fees and charges as notified by us from time to time.

We may notify you of these fees and charges through our client service agreement, by posting them on our website, or by informing you through other means in accordance with the terms and conditions of our client service agreement.

Our fees and charges include:

-Client money and property services, along with other fees, charges, duties, and taxes, at the rates we notify you of from time to time, either through a schedule of fees and charges or via the contract note for a specific transaction.

-Any fees charged by an agent or other charges incurred in executing a transaction.
-Charges or penalties imposed by another service provider, agent, or stock exchange, including, but not limited to, those resulting from late or non-delivery of scrip, holder identification details, or other required information.

-Reasonable fees and charges we may impose to comply with our obligations under the AML/CFT Act in relation to you or your account.

We may debit our fees and charges either:

(a) From your account (including any client funds held in the SNB client funds account); or(b) From your online multi-currency account. For this purpose, you irrevocably authorize us to instruct the account issuer to pay any such amount from your online multi-currency account as directed by us.

Currency Exchange Fees and transfer fees

When a client deposits funds with SNB in a foreign currency or a currency other than the denominated currency, banks may charge a fee for the inward payment or currency conversion. This fee is not charged by SNB and is beyond our control.

Default Interest

In an event of a failure to settle by you, interest may be charged on any unpaid amount at the default rate. Default rate means the interest rate selected by SNB in its discretion, not being more than 10% per annum above the overdraft rate charged by the SNB's bankers on the SNB's current account overdraft facility at the relevant time.

C. Material Interests, Relationships and Associations

SNB is wholly owned by Snowball Finance International Limited, a company based in Hong Kong. For more shareholding information, you may visit the New Zealand Companies Office Website at https://companies-register.companiesoffice.govt.nz/.

For client money and property services obligations, SNB is regulated by the Financial Markets Authority (FMA). For Anti-Money Laundering and Counter Financing of Terrorism purposes, SNB is a reporting entity and is supervised by the FMA.

SNB collaborates with Interactive Brokers LLC (Interactive Brokers), our execution and clearing broker, to offer both fully disclosed account services and consolidated account services.

Fully Disclosed Account Service: client funds will be deposited with Interactive Brokers, who will hold and protect these funds in a special reserve bank account for the exclusive benefit of the client. You will receive guidance on how to deposit funds into Interactive Brokers' designated bank accounts upon completing the account opening process. Interactive Brokers is regulated by the U.S. Securities and Exchange Commission (SEC) as a registered Broker-Dealer, and by the U.S. Commodities Futures Trading Commission (CFTC) as a registered Futures Commission Merchant. Funds received, segregated and delivered by Interactive Brokers on behalf of clients are protected by the applicable laws and regulations, including but not limited to Securities Exchange Act Rule 15c3-3.

Consolidated Account Service: client funds will be received and will be held by SNB in client fund accounts on trust until they are disbursed to settle transactions on your behalf or

distributed according to your instructions. You will receive guidance on how to deposit funds into SNB client fund accounts upon completing the account opening process.

Any account holding client funds will be a trust account for the benefit of SNB clients. The bank is not entitled to combine this account with other accounts or exercise any right of set-off or counterclaim against the funds in this account for any sums owed on other SNB accounts or those of any other person. All SNB client fund accounts are subject to supervision and review by New Zealand regulatory authorities, and SNB regularly fulfills its reporting obligations.

Currently, all securities in custody are held by Interactive Brokers and its sub-custodians. The choice of sub-custodian depends on the market where the trades are executed. Each sub-custodian is authorized in its respective jurisdiction to provide custodial services. SNB remains responsible under New Zealand law for ensuring compliance with all legal and regulatory obligations related to the treatment of client assets, including securities. The applicable terms and conditions are outlined in the SNB client service agreements.

D. Remuneration

In the course of transactions, SNB may receive or earn fees and brokerage commissions, including client money and property services from third parties, and/or margins on foreign exchange transactions. For new issues of securities, SNB may also receive placement and firm allocation fees from issuers. The fees, client money and property services, and other commissions paid to SNB by third parties will vary depending on the product provider and product type. The details of these fees and commissions are typically outlined in the relevant product offer documentation.

E. Dispute Resolution Arrangements

If you wish to make a complaint, please contact SNB. We will make every effort to resolve your complaint promptly and to your satisfaction. If you remain unsatisfied, you are encouraged to submit your complaint in writing to:

The Compliance Officer

SNB Finance Holdings Limited

Registered Office Address: Tenancy 1, Level 11, Tower 2, 205 Queen Street, Auckland 1010, New Zealand Telephone number: +64 9 520 1919 For making a complaint: complaints@snowball-x.com

If we cannot agree on how to resolve the issue, or if you decide not to use SNB's internal complaints scheme, you can contact Financial Dispute Resolution Service ("FDRS"). FDRS is

an independent approved dispute resolution scheme for settling disputes between people and businesses, and the organizations that provide them with financial services and advice. This service will cost you nothing.

You can contact Financial Dispute Resolution Service at:

Financial Dispute Resolution Service

Freepost 231075 P.O. Box 2272 Wellington 6145 Level 9, 109 Featherston Street Wellington 6011 Telephone: 0508 337 337 International calls: +64 4 381 5047 Website: <u>https://fdrs.org.nz</u> Email <u>enquiries@fdrs.org.nz</u>

Opening hours FDRS is open between 8:30am and 5pm weekdays, excluding national holidays.

If you are not satisfied with our response to your complaint, as an alternative to FDRS, you may contact the FMA directly on the following telephone number and email address:

Financial Markets Authority

Telephone: 0800 434 566 International calls: +64 3 962 2698 The FMA lines are open Monday to Friday - 8:30am to 5:00pm Website: <u>www.fma.govt.nz/contact/make-a-complaint/</u> Email: questions@fma.govt.nz

F. Criminal Convictions and Related Matters

Neither SNB, its directors, nor principal officers have been:

 \cdot convicted of a crime involving dishonesty (as defined in Section 2(1) of the New Zealand Crimes Act 1961);

 \cdot the subject of an adverse finding by a court or the FMA in any proceeding that has been taken against them in their professional capacity; or

· adjudicated bankrupt.

G. Information relating to the Client Money and Property Services Provided by SNB

The services which SNB currently provides to clients include, without limitation:

 \cdot client money and property services (including a custodial service) in relation to share trading and other financial products;

· Arranging for investments into Initial Public Offerings ("IPOs").

H. Professional Indemnity Insurance

SNB maintains insurance coverage at a level deemed appropriate for the nature and risks of its business. The insured interests include Directors and Officers Liability Insurance and Statutory Liability Insurance, both provided by Huatai Property & Casualty Insurance Co., Ltd., Shanghai Branch. These policies are in effect from 1 February 2024 to 31 January 2025 and are renewed annually. As with all insurance, these policies have limitations and are subject to certain exclusions.

I. Record Keeping

SNB maintains comprehensive accounting records that document the receipt and disbursement of all funds, as well as the movement of all securities and other property held on your behalf. You may request details of your transactions at any time. We retain account records for at least seven years. A fee may apply for requests for historical information.

J. Privacy

SNB collects personal information from you as required by applicable laws, such as antimoney laundering and taxation laws, to provide financial services and verify your identity. Except in the exceptional circumstances outlined in our Privacy Policy, SNB will not disclose your personal information without your consent.

SNB is committed to protecting your privacy and complies with the Privacy Act 2020 and New Zealand privacy principles when collecting your personal information. We encourage you to review our Privacy Policy, available at <u>https://snowball-x.com/terms</u>, to understand how we safeguard your information.

The personal information we collect may include, but is not limited to, your name, address, contact details (including email address), ID/passport/driving license number, IRD number, banking details, and information on transactions conducted through SNB by you or your appointed agent. We may also use cookies to collect additional information. You can update your personal details online via the Snowball-X app.

In certain circumstances, SNB may be legally required to disclose your information to external parties, including regulatory bodies, and must fully cooperate with such requests.

Please note that withholding certain information may prevent SNB from providing you with financial services.