

## Telephone and Electronic Communications Recording (MiFID II)

### Purpose and Scope

This document outlines Nexent Bank N.V.'s (i.e., Head Office, branches and overseas liaison offices) obligations and practices regarding the recording of telephone conversations and electronic communications with clients, in accordance with applicable laws and regulations, including MiFID II and Dutch financial supervision legislation.

This document applies to:

- All investment services provided by Nexent Bank N.V.
- All communication channels, including telephone, email, and other electronic messaging systems.

### Legal Basis

In accordance with article 35 of the Decree on Conduct of Business Supervision of Financial Undertakings under the Financial Supervision Act (*Besluit Gedragstoezicht financiële ondernemingen Wft*), Nexent Bank is required to record telephone conversations and electronic communications that relate to the reception, transmission, and execution of client orders involving financial instruments. This obligation applies even if such communications do not result in the conclusion of a transaction.

This provision implements article 76 of Commission Delegated Regulation (EU) 2017/565, part of the MiFID II framework. Recordings must be retained for a minimum of five years, and up to seven years if requested by the competent authority.

### Client Rights and Obligations

- Upon written request, Nexent Bank will provide clients with details of the execution of their orders within a reasonable timeframe.
- Clients are requested to inform their employees and agents who conduct business with Nexent Bank via telephone or electronic communication that such interactions will be recorded.
- If a client or their agent does not consent to the recording, Nexent Bank will be unable to provide investment services via telephone or electronic communication.

### Recording Practises

- Telephone conversations may be recorded without the use of a warning tone.
- Electronic communications (e.g., emails, chat messages) may also be recorded.
- Recordings may be used as evidence in the event of a dispute or investigation.
- Copies of recordings are available upon request during the applicable retention period.
- For in-person meetings related to investment services, Nexent Bank is required to record the following details in a durable medium:
  - Date and time of the meeting
  - Location of the meeting
  - Identity of attendees
  - Initiator of the meeting
  - Relevant order information, including price, volume, order type, and timing of transmission or execution

### Data Protection

All recordings are stored securely and processed in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR). Access to recordings is restricted to authorized personnel only

### Internal Access and Use

Recordings may be accessed by authorized personnel for the purposes of:

- Compliance monitoring
- Internal audits
- Regulatory investigations
- Dispute resolution

Amsterdam, 24 October 2025