

Client Asset Safeguarding Disclosure



As of April 2026

Client Asset Safeguarding Disclosure
Clear Street Europe B.V.
Last Updated: March 2026

Overview

Clear Street Europe B.V. (CSE) is committed to protecting client assets in accordance with MiFID II requirements and Dutch regulations. We maintain robust arrangements to safeguard client funds and financial instruments by keeping them separate from our own assets.

Segregation of Client Funds

Cash deposits provided by clients for trading purposes are held in a separate legal entity called Stichting Bewaarbedrijf CS Europe B.V. (the "Foundation"). The Foundation is an independent entity with its own board, legally segregated from CSE.

Client funds held by the Foundation are:

- Deposited in a dedicated bank account separate from CSE's own funds
- Transferred to a Money Market Fund when not actively used for trading (after five business days) or when held as margin
- Protected in the event of CSE's insolvency, as they are not available to CSE's creditors

CSE does not directly hold client funds. All client cash is held via the Foundation structure.

Segregation of Financial Instruments

Securities and derivatives purchased by clients are held with third-party custodians in omnibus accounts. These accounts are clearly designated as holding client assets and are kept separate from CSE's proprietary assets.

We maintain separate omnibus accounts for:

- Securities available for lending: For clients who have explicitly consented to securities lending arrangements
- Securities not available for lending: For all other client securities

This ensures that financial instruments belonging to clients who have not consented to securities lending are kept completely separate from those that may be used for such purposes.

Your Rights and Protections

Under the Dutch Securities Giro Act (*Wet giraal effectenverkeer*), client financial instruments are held in collective deposits (*verzameldepot*). Clients have a pro-rata claim to the financial instruments held collectively for them, in proportion to their individual holdings. These assets are not available to other creditors of CSE.

Records and Reconciliation

We maintain accurate and up-to-date records that enable continuous identification of:

- Financial instruments held for each client
- Client funds held via the Foundation

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Clear Street Europe BV (Company Number: 94809402)

www.clearstreet.io

- Separation between client assets and CSE's own assets
- Separation between different client asset categories

Daily reconciliations are performed to ensure that our records match those of third-party custodians and the Foundation.

Third-Party Custodians

Client securities are held with regulated third-party custodians, including Clear Street UK Ltd and other institutions. These custodians are subject to regulatory requirements for the safeguarding of client assets in their respective jurisdictions.

Securities Lending

CSE may facilitate securities lending arrangements for clients who have explicitly consented in advance. Securities lending is only conducted:

- With the client's prior written consent
- Under contractual terms that specify the applicable risks and returns
- With client securities segregated based on lending consent status

Clients who do not consent to securities lending have their assets held entirely separately from those in the lending program.

Client Asset Protection Officer

CSE has appointed a dedicated Client Assets Protection Officer responsible for overseeing the safeguarding arrangements for client funds and assets. This role ensures ongoing compliance with regulatory requirements and monitors the effectiveness of our segregation arrangements.

External Assurance

Our external auditors provide an annual assurance report on the measures we have taken to protect client assets and funds. A copy of this report is provided to the Dutch Authority for Financial Markets (AFM).

Questions

If you have questions about how your assets are safeguarded, please contact us at csecompliance@clearstreet.io