

Version	5
Date of version:	10.11.2025

Information on Mintos portfolio management services

This document explains how Mintos provides portfolio management services to Investors through various investment settings on the Platform:

- Mintos Portfolio Settings for [loans](#) ("Core Loans" (ex- 'Mintos Core' or 'Diversified'), "conservative", "high-yield"),
- Custom Portfolio Settings for [loans](#) ("Custom Loans"),
- Mintos Portfolio Settings for [bonds](#) ("High-Yield Bonds")¹ and
- Mintos Portfolio Settings for [ETFs](#) (Core ETF 10, Core ETF 35, Core ETF 60, Core ETF 90).

This document explains Mintos' approach to providing portfolio management services, covering general topics like Suitability and Appropriateness (S&A) assessment, investor categorisation, execution of investment orders, portfolio diversification and rebalancing, how and how often financial instruments in the investor's portfolio are valued, and the investor compensation scheme.

Terms that are capitalized in the present document have the same meaning as the terms used in the [Terms and Conditions of Mintos Investment Platform](#), unless indicated differently in this document.

Suitability & Appropriateness assessment

As required by MiFID II, Mintos makes sure the Investors are properly informed about the risks of investing through portfolio management services. Mintos is obliged to collect information about the Investor's knowledge, experience, financial situation, and goals to assess if the portfolio management service with respective Financial Instruments is suitable and if the Investor is able to handle the risks.

Before using the portfolio management service, the Investors must complete an S&A assessment. The assessment has to be updated at least once a year or when there are major changes in the Investor's financial situation, goals, or risk tolerance.

If the S&A assessment confirms that the Mintos Portfolio Settings and/or Custom Portfolio Settings are suitable and appropriate, the Investor may use the portfolio management service to invest in Mintos products like loans, bonds, or ETFs.

Investor categorisation

To offer portfolio management services, Mintos must classify each Investor as a Retail Client, Professional Client, or Eligible Counterparty. By default, all individuals and legal entities are classified as Retail Clients, but Investors may request a different category in certain cases.

¹On Mintos, there are two ways to invest in bonds available: either by investing directly in bonds issued by a company or government entity, or by investing in bond-backed securities (notes). It is important to note that portfolio management service for bonds covers only direct bonds and not bond-backed securities (notes).

Execution of investment orders within the portfolio management service

Portfolio management services provided by Mintos cover executing the investment orders on behalf of the Investor, to purchase or sell the Financial Instruments in the respective Investor's Portfolio. These investment orders are executed in accordance with the [Order execution Policy](#). Portfolios under portfolio management service setup are managed by Mintos in the interests of the Investors and at their expense.

Portfolio diversification & rebalancing

Mintos Portfolio Settings and Custom Portfolio Settings for loans

Within Mintos Portfolio Settings and Custom Portfolio Settings for loans, Mintos provides investment opportunities in one type of Financial Instrument - Notes.

To provide diversification and reduce the risk that investments with Mintos Portfolio Settings are made in Notes related to only one lending company, diversification limits are used. For each portfolio under Mintos Portfolio Settings, Mintos' proprietary diversification algorithm considers which Notes are available on the Platform at any given moment, and which Notes the Investor has already invested in. Diversification limits are calculated from the respective Portfolio target that is set by the Investor, or from the sum of the Investor's available funds and outstanding investments in the respective Portfolio, or from the limit set within Mintos Portfolio Settings, whichever is lower.

Investors also have the opportunity to invest in Notes through the Custom Portfolio Settings. Custom Portfolio Settings allow to use portfolio management services of Mintos to automatically invest in Notes that meet the investment criteria selected solely by the Investor. The Investors may set diversification options similar to that one used with Mintos Portfolio Settings, and Investors may also (i) enable dynamic diversification, (ii) set individual diversification settings, (iii) apply Mintos preset values, or (iv) disable diversification entirely.

The dynamic diversification recalculates diversification indicators to achieve optimal diversification according to selected criteria and market conditions.

Mintos Portfolio Settings for ETFs

Each of Mintos Portfolio Settings aims to provide the best possible Portfolio diversification for a specific Investor's risk tolerance. Over time, Mintos may change which specific ETFs to invest in under the respective Portfolio, as long as they are aligned with the specific Mintos Portfolio Settings. If Mintos Portfolio Settings are changed, Mintos will notify respective Investors about the changes in advance.

To ensure that the Portfolio does not divert over time from its target settings, a dynamic rebalancing applies to the Portfolio with each additional investment in or withdrawal from the Portfolio. Dynamic rebalancing ensures that invested funds are proportionally allocated between different ETFs to reflect particular Mintos Portfolio Settings, bringing the Portfolio closer to targeted proportions. In case of withdrawals from the Portfolio, the same principle of dynamic rebalancing applies.

Mintos Portfolio Settings for bonds

Mintos Portfolio Settings for bonds are structured to provide effective diversification aligned with a defined investment criteria. When an Investor activates or creates a Portfolio, Mintos invests in bonds on the Investor's behalf according to predefined Portfolio Settings established by Mintos. Investors cannot select individual bonds or influence the composition of the Portfolio, but can add or withdraw funds at any time.

The Portfolio consists of bonds that meet Mintos' internal due diligence and listing criteria, including those already available on the Platform and those pre-approved for listing. Selected in line with the agreed Portfolio Settings, the Portfolio aims to provide diversified fixed-income exposure through a broad selection of bonds. Mintos seeks to include at least 20 different bonds and potentially up to 100 or more, depending on available capital and prevailing market conditions. The Portfolio invests in bonds with varying levels of credit risk, offering higher yields compared to traditional investment-grade bonds. Mintos aims to balance potential return with risk through issuer selection and diversification, but Investments may include higher-risk bonds.

Method and frequency of valuation of the Financial Instruments in the Investor's Portfolio

Mintos ensures the assessment of assets in the Investor's Portfolios, managed by means of:

- Mintos Portfolio Settings and Custom Portfolio Settings for loans - on at least a weekly basis;
- Mintos Portfolio Settings for bonds - on at least a daily (business day) basis;
- Mintos Portfolio Settings for ETFs - on at least a daily (business day) basis.

The assets in the Investor's Portfolios are assessed by their market or fair value in line with the Mintos respective internal procedures.

The Investor also receives a quarterly report (periodic statement, which contains information on each Portfolio under portfolio management service) from Mintos free of charge through email or on the Platform.

Investor compensation scheme

Mintos is a member of the national [investor compensation scheme](#) established according to the requirements of [EU Directive 97/9/EC](#). If Mintos fails to meet its obligations towards the Investor, retail Investors are entitled to compensation for the resulting permanent loss, up to a limit of €20 000.

Importantly, the investor compensation scheme doesn't protect against investment risk, such as poor performance or changes in the price or liquidity of Financial Instruments.

Disclaimer: Mintos does not delegate discretionary management in general or part of the Financial Instruments or funds in the Portfolio. Mintos does not apply any specific investment performance benchmark between Investors and Mintos, which would compare the performance of Investors' Financial Instrument Portfolios. Investors remain responsible for monitoring their Portfolios and understanding the associated risks.