



**INVESTMENTS
LIMITED**

CLIENT CATEGORIZATION POLICY

Approved by the Board of Directors
on December 12 , 2025
Limassol

POLICY REVISION HISTORY

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2	December 2018	Revision by Compliance
3	December 2019	Revision by Compliance
4	December 2021	Revision by Compliance
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RECIPIENTS:

- Board of Directors
- Senior Managers
- Department Heads
- Compliance Officer
- Risk Manager

CONTENTS

1. INTRODUCTION	4
2. CATEGORIZATION CRITERIA	4
A. RETAIL CLIENT	4
B. PROFESSIONAL CLIENT	4
C. ELIGIBLE COUNTERPARTIES	5
3. REQUEST FOR CHANGE OF CATEGORIZATION.....	5
4. PROCEDURE FOR CHANGE OF CATEGORIZATION	6
5. INFORMATION ON THE LEVEL OF PROTECTION	6
6. MONITORING AND REVIEW.....	7
7. RECORD KEEPING	7
8. CONCLUSION	7

1. INTRODUCTION

The Company operates under the Provision of Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017, as subsequently amended from time to time (hereinafter, the “Law”) and the Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU, as the same may be in force, modified or amended from time to time (the ‘Markets in Financial Instruments Directive (2014/65/EU)’ or ‘MiFID II’).

Client categorization is required under MiFID II to ensure that appropriate levels of regulatory protection are afforded. Clients are categorised as Retail Clients, Professional Clients, or Eligible Counterparties. Retail Clients receive the highest level of investor protection.

It is stressed that different rules and different levels of protection apply to Clients depending on their categorization.

For the provision of Investment services to its Clients, the Company requires the submission of information, prior to the provision of services, which is vital for the Company to understand the principal circumstances associated with the potential Client. Moreover, such submission of information is necessary for the Company to be provided with reasonable grounds to believe that the Client has the necessary knowledge and background experience to enable him/her to understand the risks associated with the product or investment service offered or requested by the Client.

This Client Categorization Policy (hereinafter, the “Policy”) describes the Company’s client categorization process and associated protections.

The Policy is provided to the Company’s Clients and potential Clients in accordance to the Law.

2. CATEGORIZATION CRITERIA

The criteria entailed for categorising Clients based on the relevant provisions of the Law are as follows:

A. RETAIL CLIENT

Retail Client is a Client who is neither Professional nor Eligible Counterparty. Retail Clients receive the highest level of investor protection.

B. PROFESSIONAL CLIENT

Professional Client is a client who possesses the experience, knowledge and expertise to make his own investment decisions and properly assess the risks that he incurs. Such Clients must fall under one of the following categories:

- 1) Entities which are required to be authorised or regulated to operate in the financial markets. The list below should be understood as including all authorised entities carrying out the characteristic activities of the entities mentioned: entities authorised by a member state under a European Community Directive, entities authorised or regulated by a member state without reference to such Directive, and entities authorised or regulated by a third country:
 - a) Credit institutions,
 - b) Investment Firms,

- c) Other authorised or regulated financial institutions,
 - d) Insurance undertakings,
 - e) Collective investment schemes and management companies of such schemes,
 - f) Pension funds and management companies of such funds,
 - g) Commodity and commodity derivatives dealers,
 - h) Local, and
 - i) Other institutional investors.
- 2) Large undertakings meeting two of the following size requirements, on a company basis:
 - a) Balance sheet total at least €20,000,000,
 - b) Net turnover at least €40,000,000, and
 - c) Own funds at least €2,000,000.
- 3) National and regional governments, including public bodies that manage public debt at national and regional level, central banks, international and supranational institutions such as the World Bank, the International Monetary Fund, the European Central Bank, the European Investment Bank and other similar international organizations.
- 4) Other institutional investors whose main activity is to invest in financial instruments, including entities dedicated to the securitization of assets or other financing transactions.

C. ELIGIBLE COUNTERPARTIES

Eligible Counterparties are any of the following entities to which a credit institution or an investment firm provides the services of reception and transmission of orders on behalf of clients and/or execution of orders and/or dealing on own account: CIFs, other IFs, credit institutions, insurance undertakings, UCITS and their management companies, pension funds and their management companies and other financial institutions authorised or regulated under European law or under the national law of a Member State, national governments and their corresponding offices, including public bodies that deal with public debt at national level, central banks and supranational organisations.

Eligible Counterparties are afforded the lowest level of investor protection, as certain MiFID II conduct-of-business rules do not apply (e.g., best execution reporting, appropriateness assessment, certain disclosures).

A Client may request to be treated as Professional or Retail (see Section 3).

3. REQUEST FOR CHANGE OF CATEGORIZATION

Retail Clients can request to be categorised and treated as **Professional Clients**, in which case they will be afforded a lower level of protection.

Professional Clients can request to be categorised and treated as **Retail Clients**, in which case they will be afforded a higher level of protection.

Eligible Counterparties can request to be categorised and treated as either **Retail** or **Professional Clients**, in which case they will be afforded a higher level of protection.

It is noted that the Company will assess specified quantitative and qualitative criteria in accordance with the provisions of the Law and the change of categorization will depend on its absolute discretion.

4. PROCEDURE FOR CHANGE OF CATEGORIZATION

Clients other than those mentioned in section 2(B) may request to be treated as **Professionals** provided that at least two of the following criteria are satisfied:

- a) The client has carried out transactions, in significant size, on the relevant market at an average frequency of 10 per quarter over the previous four quarters;
- b) The size of the client's financial instrument portfolio, defined as including cash deposits and financial instruments exceeds €500,000;
- c) The client works or has worked in the financial sector for at least one year in a professional position, which requires knowledge of the transactions or services envisaged.

The clients defined above may waive the benefit of the detailed rules of conduct only where the following procedure is followed:

- a) They must state in writing to the Company that they wish to be treated as professional clients, either generally or in respect of a particular investment service or transaction, or type of transaction or product;
- b) The Company must give them a clear written warning of the protections and investor compensation rights they may lose;
- c) They must state in writing, in a separate document from the contract, that they are aware of the consequences of losing such protections.

Before deciding to accept any request for waiver, the Company must take all reasonable steps to ensure that the client requesting to be treated as a professional client meets the relevant requirements stated above.

However, if clients have already been categorised as Professional under parameters and procedures similar to those above, it is not intended that their relationships with the Company should be affected by any new rules adopted pursuant to the Law.

5. INFORMATION ON THE LEVEL OF PROTECTION

The additional protection afforded to a Retail Client compared to a Professional Client or an Eligible Counterparty includes without limitation the following:

- a) Retail Clients are provided with more information regarding the Company's fees, charges, and expenses,
- b) Retail Clients provide more information regarding their knowledge and experience in the Investment field so as to enable the Company to assess whether the investment service or product envisaged is appropriate for the Client,
- c) The Company must take all reasonable steps to ensure that a Retail Client's order is executed as such in order to obtain best possible results,
- d) A Retail Client will receive information regarding his executed order timely and with more detail as to the content,

- e) A Retail Client who is provided the service of Portfolio Management will receive more detailed and frequent information,
- f) A Retail Client will be informed of the Company's liability in relation to possible solvency of the custodian where Clients' financial instruments are held,
- g) A Retail Client will be informed of the Company's Conflict of Interest Policy,
- h) A Retail Client will be informed of the Company's complaint handling procedures, and
- i) A Retail Client is eligible for possible coverage from the Investor's Compensation Fund.

Professional Clients and Eligible Counterparties receive reduced protections.

6. MONITORING AND REVIEW

The Company monitors whether Clients continue to meet categorization criteria. Reviews occur regularly or when material changes arise.

7. RECORD KEEPING

The Company maintains comprehensive records of categorization assessments, change requests, and supporting documents for at least five (5) years in accordance with Delegated Regulation 2017/565.

8. CONCLUSION

This Policy ensures compliance with MiFID II, MiFIR, and Law 87(I)/2017. Accurate client categorization supports investor protection, transparency, and regulatory compliance. The Company will continue to review categorization procedures and maintain robust assessment practices.