

CUSTOMER CATEGORIZATION

1. General

1.1. In compliance to Law L. 87(I)/2017, each Client is categorized by the Company as a “Retail Client” or a “Professional Client”. In addition, certain professional Clients may be further categorized as “Eligible Counterparties”. Categorization is undertaken on the basis of objective criteria. A Client may be placed in different categories for particular investment services or transactions or types of transactions or products. The Company notifies each Client of his categorization as a Retail Client or Professional Client or, as the case may be, Eligible Counterparty.

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

2. “Retail Client”

2.1. “Retail Client” is a Client who is neither a Professional Client nor an Eligible Counterparty. Except for Clients who meet the requirements set out in point 3 below or unless informed otherwise in writing, all Clients are categorized as Retail Clients.

3. “Professional Client”

3.1. “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. In order to be considered a Professional Client, a Client must comply with one of the following criteria:

(1) Entities which are required to be authorized or regulated to operate in the financial markets. The list below should be understood as including all authorized entities carrying out the characteristic activities of the entities mentioned: entities authorized by a Member State under the Markets in Financial Instruments Directive, entities authorized or regulated by a Member State without reference to the above Directive, and entities authorized or regulated by a non-Member State:

- (a) Credit Institutions;
- (b) Investment Firms;
- (c) Other Authorized or regulated financial institutions;
- (d) Insurance Companies;
- (e) Collective Investment Schemes and management companies of such schemes;
- (f) Pension funds and management companies of such funds;
- (g) Commodities and commodity derivatives dealers;
- (h) Locals;
- (i) Other Institutional Investors (like Portfolio Investment Companies).

(2) Large undertakings meeting two of the following size requirements on a company basis:

- (a) balance sheet total: EUR 20,000,000

(b) net turnover: EUR 40,000,000

(c) own funds: EUR 2,000,000

(3) National and regional governments, public bodies that manage public debt, Central Banks, international and supranational institutions such as the World Bank, the IMF, the ECB, the EIB 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.

(5) Clients who may be treated as professionals on request, following approval by the Company (please see further below under 'Opt-up for retail Clients').

The entities mentioned above from (1) to (4) are considered to be professionals in relation to all investment services and activities and financial instruments. They must however be allowed to request non-professional treatment and investment firms may agree to provide a higher level of protection. Where the client of the Company is an undertaking referred to above, the Company will inform it prior to any provision of services that, on the basis of the information available to the Company, the client is deemed to be a professional client, and will be treated as such unless the Company and the client agree otherwise. The client will be informed that he/she can request a variation of the terms of the agreement in order to secure a higher degree of protection.

It is the responsibility of the client, considered to be a professional client, to ask for a higher level of protection when it deems it is unable to properly assess or manage the risks involved.

This higher level of protection will be provided when a client who is considered to be a professional enters into a written agreement with the Company to the effect that it shall not be treated as a professional for the purposes of the applicable conduct of business regime. Such agreement shall specify whether this applies to one or more particular services or transactions, or to one or more types of product or transaction.

The Clients mentioned in (5) may be treated as professionals generally or in respect of a particular investment service or transaction, or type of transaction or product.

4. "Eligible Counterparty"

4.1. "Eligible Counterparty" is any of the following entities to which an investment firm provides the services of reception and transmission of orders on behalf of Clients and/or execution of such orders and/or dealing on own account: Cyprus Investment Firm/Greek Investment Firm, other investment firms, credit institutions, insurance companies, UCITS and their management companies, pension funds and their management companies and other financial institutions authorized by a Member State of the European Union law national government and their corresponding offices, including public bodies that deal with public debt at national level, central banks, the Central Bank and supranational organizations.

4.2. Classification as an eligible counterparty under paragraph is without prejudice to the right of such entities to request, either on a general form or on a trade-by-trade basis, treatment as clients whose business with the Company is subject to sections 25, 26, 28 and 29 of the Law L. 87(I)/2017.

5. Opt-down

5.1. In accordance with the Customer Categorization and the applicable legislation, the following Opt-Down requests may be submitted to the Company:

- (a) A Client that has been categorized as a Professional Client may, at any time, request from the Company to be treated as a Retail Client (and hence benefit from the higher level of protection of retail Clients).
- (b) Likewise, an Eligible Counterparty may, at any time, request from the Company to be treated as a Professional Client or as a Retail Client, and therefore, obtain a higher level of protection.

5.2. If the Company accepts such a request, the Client shall enter into a written agreement with the Company. The agreement will specify the particular services or transactions, or the types of products or transactions to which the opt-down applies.

6. Opt-up

6.1. In accordance with the Customer Categorization and the applicable legislation, the following Opt-Up requests may be submitted to the Company:

6.1.1. Opt-up for Retail Clients.

A Client who has been categorized as a Retail Client by the Company may ask the Company in writing to be treated as a Professional Client (and hence may lose certain protection and investor compensation rights), either generally or in respect of a particular investment service or transaction, or type of transaction or product. When the Company receives such a request, it evaluates whether the Client meets the objective opt-up conditions.

6.1.2 The Company will further assess the expertise, experience and knowledge of the Client and any other element that it deems appropriate. In the course of the above assessment, as a minimum, two of the following criteria should be 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 EUR 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.

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

The Company will notify the Client if and when it agrees to categorize the Client as a Professional Client. Moreover, if the Company agrees to such categorization, the Company will give a clear written warning of the protections and investor compensation right they might lose. When the Client receives a written warning, he/she must state in writing, in a separate document from the contract, that they are aware of the consequences of losing such protection.

The protection afforded by law that the Client might lose may include, but is not limited to:

- (a) the Company's obligation to provide appropriate information to the Client before providing the Services;

- (b) the restriction on the payment or receipt by the Company of any inducements
- (c) the Company's obligation to ensure that all information the Company provides to the Client is fair, clear and not misleading;
- (d) the requirement that the Client receives from the Company adequate reports on the services provided to him; and
- (e) the Client's coverage under the Investor Compensation Fund.

6.2. Opt-up for Professional Clients

Clients that have been categorized as Professional Clients and that meet the opt-up conditions may, with their express consent, be treated as Eligible Counterparties either for all services for which such opt-up is permitted by law or in respect of a particular investment service or transaction, or type of transaction or product.

6.2.1. If the Company agrees to take into consideration such a request, it will upon receipt of such a request assess whether the Client meets the objective opt-up conditions. The Company will further assess the expertise, experience and knowledge of the Client and any other element that it deems appropriate. In the course of the above assessment, as a minimum, two of the following criteria should be 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 EUR 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.

6.2.2. If the company agrees to categorize the Professional Client as an Eligible Counterparty, the Company will give a clear written warning of the protections and investor compensation right they might lose. When the Client receives a written warning, the Client must state in writing, in a separate document from the contract, that they are aware of the consequences of losing such protection. The protection afforded by law that the Client will lose may include, but is not limited to:

- (a) the Company's obligation to provide appropriate information to the Client before providing the Services;
- (b) the restriction on the payment or receipt by the Company of any inducements;
- (c) the Company's obligation to ensure that all information the Company provides to the Client is fair, clear and not misleading;
- (d) the requirement that the Client receives from the Company adequate reports on the services provided to him; and
- (e) the Client's coverage under the Investor Compensation Fund.

7. Changes to Professional Client / Eligible Counterparty categorization

7.1. Professional Clients and Eligible Counterparties are responsible for keeping the Company informed of any change which could affect their categorization as such. If the Company becomes



aware that a Professional Client or Eligible Counterparty no longer fulfils the initial conditions that made him eligible for a Professional Client/Eligible Counterparty treatment, it may take appropriate action, including re-categorizing the Client as a Professional Client or a Retail Client.

8. Treatment of Elective professional clients

8.1 It is not possible to treat an elective Professional Client as an Eligible Counterparty and such opt-up is not possible according to the applicable regulations. For example, a Retail Client who has opted up to professional client status is not allowed to opt-up another step to eligible counterparty status.