

CLIENT CLASSIFICATION POLICY

In accordance to the Investment Services and Activities and Regulated Markets Law of 2007 (Law 144(I)/2007), Leverate Financial Services Ltd (the “Company”) is required to categorize its clients into one of the following three categories: *retail*, *professional* or *eligible counterparty*.

“**Retail client**” is a client who is not a Professional client by default, as defined in Part 1 further below. Retail clients are afforded with the highest level of protection.

“**Professional client**” is a client who possesses the experience, knowledge and expertise to make its own investment decisions and properly assess the risks that it incurs, as further detailed below (see Parts 1 and 2 below).

“**Eligible counterparty**” is a subset of professional clients, applicable only when the service provided to such professional client is of receiving & transmitting and/or executing orders (see Part 3 below).

1. Categories of clients who are considered to be Professionals by default

Prospective clients that satisfy one or more of the following criteria shall be classified as *Professional clients*:

- (a) Entities which are required to be authorized or regulated to operate in the financial markets such as:
- Credit institutions
 - Investment firms
 - Other authorized or regulated financial institutions
 - Insurance undertakings
 - Collective investment schemes and management companies of such schemes
 - Pension funds and management companies of such funds
 - Commodity and commodity derivatives dealers
 - Locals; firms which provide investment services and/or perform investment activities **consisting exclusively in dealing on own account** on markets in financial futures or options or other derivatives and on cash markets **for the sole purpose of hedging positions** on derivatives markets or which deal for the accounts of other members of those markets or make prices for them and which are **guaranteed by clearing members** of the same markets, where responsibility for ensuring the performance of contracts entered into by such firms is assumed by clearing members of the same markets Other institutional investors.
- (b) Large undertakings meeting two of the following size requirements, on a proportional basis:
- Balance sheet total at least EUR 20.000.000
 - Net turnover at least EUR 40.000.000
 - Own funds at least EUR 2.000.000.
- (c) National and regional governments, public bodies that manage public debt, central banks, international and supranational institutions such as the World Bank, the

International Monetary Fund (IMF), the European Central Bank (ECB), the European Investment Bank and other similar international organizations.

- (d) Other institutional investors whose main activity is to invest in financial instruments, including entities dedicated to the securitization of assets or other financing transactions.

The entities mentioned above are considered to be professionals. They are however allowed to request non-professional treatment and the Company may agree to provide a higher level of protection. Where the client fulfils one of the criteria referred to above, the Company shall inform the client 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 Company shall also inform the client that he 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.

2. Non-Professional clients who may be treated as professionals on request:

(a) Identification criteria

clients other than those mentioned in Part 1 above, including public sector bodies and private individual investors, are also allowed to waive some of the protections afforded by the conduct of business rules of the Company.

The Company shall treat any of the above clients as professionals provided the relevant criteria and procedures mentioned below are fulfilled. These clients should not, however, be presumed to possess market knowledge and experience comparable to that of the categories listed above. Any such waiver of the protection afforded by the standard conduct of business regime shall be considered valid only if an adequate assessment of the expertise, experience and knowledge of the client, undertaken by the Company, gives reasonable assurance, in light of the nature of the transactions or services envisaged, that the client is capable of making his own investment decisions and understanding the risks involved.

The fitness test applied to managers and directors of entities licensed under European Union Directives in the financial field could be regarded as an example of the assessment of expertise and knowledge. In the case of small entities, the person subject to the above assessment should be the person authorized to carry out transactions on behalf of the entity.

In the course of the above assessment, as a minimum, two of the following criteria should be satisfied:

- 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;
- the size of the client's financial instrument portfolio, defined as including cash deposits and financial instruments exceeds 500,000 Euros;
- 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.

(b) Procedure

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

- The client must state in writing to the Company that it wishes to be treated as a professional client, either generally or in respect of a particular investment service or transaction, or type of transaction or product.
- The Company shall give the client a clear written warning of the protections and investor compensation rights they may lose.
- The client must state in writing, in a separate document from the contract, that it is aware of the consequences of losing such protections.

Before deciding to accept any request for waiver, the Company shall take all reasonable steps to ensure that the client requesting to be treated as a professional client meets the relevant requirements stated in Part 2(a) above.

The Company maintains appropriate written internal policies and procedures to categorize clients. Professional clients are responsible for keeping the Company informed about any change which could affect their current categorization. However, should the Company become aware that the client no longer fulfils the initial conditions which made him eligible for a professional treatment, the Company shall take appropriate action.

3. Eligible Counterparties

An Eligible Counterparty is an undertaking which falls within categories (a), (b) and (c) of the clients who are considered to be Professionals by default (stated in Part 1 further above).

Further, the Eligible Counterparty category is applicable only for the following investment services and activity:

- Reception and transmission of client orders
- Execution of orders on behalf of clients.

On request, the Company may also recognize as an Eligible Counterparty corporate undertakings which fall within a category of clients who are to be considered professional clients in accordance to the fitness test (see Part 2 above). In such cases, however, the undertaking concerned shall be recognized as an Eligible Counterparty only in respect of the services or transactions for which it could be treated as a professional client.

In the event of a transaction where the prospective counterparty is located in another Member State of the European Economic Area (EEA), the Company shall defer to the status of the other undertaking as determined by the legislation of the Member State in which that undertaking is established.

4. Request for different categorization and protection rights

The following requests may be submitted to the Company should a client wish to change its categorization:

- (a) A retail client can request to be categorized as a professional client, by following the procedure described in Part 2(b) above. In this situation, the client accepts a lower level of protection.
- (b) A professional client can request to be categorized as a retail client. In this situation, the client may be provided with a higher level of protection.
- (c) An eligible counterparty can request to be categorized as a professional client or a retail client. In this situation, the client may be provided with a higher level of protection.

It is noted that the Company is not required to agree with a request for non-professional or non-Eligible Counterparty treatment. In addition, the Company may, on its own initiative, treat as a professional or retail client an eligible counterparty or treat as a retail client a professional client.

5. Protection Rights

(a) Retail clients / Professional clients

Where the Company treats the client as a Retail client, the client is entitled to more protections under the law than if the client was treated as a Professional client. In summary, the protections Retail clients are entitled to, are as follows (the list may not be exhaustive):

- (a) A Retail client will be given more information/disclosures with regard to the Company, its services and any investments, its financial instruments and their performance, the nature and risks of financial instruments, its costs, commissions, fees and charges and the safeguarding of client financial instruments and client funds, including summary details of any relevant investor compensation or deposit guarantee scheme, as applicable.

- (b) Where the Company is providing the services of Reception & Transmission of orders and/or Executing client order, the Company shall ask a Retail client to provide information regarding his knowledge and experience in the investment field relevant to the specific type of product or service offered or demanded so as to enable the Company to assess whether the investment service or product envisaged is appropriate for the client. In case the Company considers, on the basis of the information received, that the product or service is not appropriate to a Retail client, it shall warn the client accordingly. *Please note that the Company is not required to assess appropriateness in certain cases specified by the Law (for example but not limited to the situation where on an execution only basis the financial instrument concerned is not complex).*

The Company shall be entitled to assume that a Professional client has the necessary experience and knowledge in order to understand the risks involved in relation to those particular investment services or transactions, or types of transaction or product, for which the client is classified as a Professional client.

Consequently, and unlike the situation with a Retail client, the Company should not generally need to obtain additional information from the client for the purposes of the assessment of appropriateness for those products and services for which they have been classified as a Professional client.

- (c) When executing orders, investment firms and credit institutions providing investment services must take all reasonable steps to achieve what is called “best execution” of the client’s orders. That is, to obtain the best possible result for their clients.

Where the Company executes an order of a Retail client, the best possible result shall be determined in terms of the total consideration, representing the price of the financial instrument and the costs related to execution, which shall include all expenses incurred by the client which are directly related to the execution of the order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order. The Company shall also send a notice to a Retail client confirming execution of the order as soon as possible and no later than the first business day following execution or, if the confirmation is received by the Company from a third party, no later than the first business day following receipt of the confirmation from the third party, as applicable. Professional clients are also entitled to a confirmation for the execution of their orders however there is no specific timeframe involved as to when the Professional client will receive this information. Nevertheless, this confirmation shall be provided promptly.

- (e) The Company must inform Retail clients of material difficulties relevant to the proper carrying out of their order(s) promptly upon becoming aware of the difficulty.
- (f) The Company is required to provide Retail clients with more information than Professional clients as regards the execution of their orders.
- (h) The Company is obliged to enter into a written basic agreement with the Retail clients, setting out the essential rights and obligation of the Company and the client.

- (i) Retail clients may be entitled to compensation under the Investor Compensation Fund for clients of Investment Firms, while, Professional clients are not entitled to compensation under the said fund.

(b) Eligible Counterparties

Where the Company categorizes the client as an Eligible Counterparty, the client will be entitled to fewer protections under the law than he would be entitled to as a Professional client. In particular, and in addition to the above (the list may not be exhaustive):

- (a) The Company is not required to provide the client with best execution in executing the client's orders.
- (b) The Company is not required to implement procedures and arrangements which provide for the prompt, fair and expeditious execution of its client orders, relative to other client orders.
- (c) The Company is not required to assess the appropriateness of a product or service that it provides to the client but can assume that the client has the expertise to choose the most appropriate product or service for him.
- (d) The Company is not required to provide the client with information about the Company, its services, financial instruments and proposed investment strategies, execution venues, the arrangements through which the Company will be remunerated and other relevant information.
- (e) The Company is not required to provide reports to the client on the execution of his orders.
- (f) The Investors Compensation Fund does not cover Eligible Counterparties.