



MIFID2 – CLIENT CATEGORIZATION PROCEDURE

Procedure name	Client Categorization Procedure
Status	Released
Department	All
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Former Procedure	13 January 2025:First Release 07 October 2025: review. Alignment of naming convention of retail clients to private clients as per CCM philosophy.
Procedure responsible	Management
Other involved departments	All



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1. Definitions

The procedure describes the process of Client Categorization as defined by 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.

For the purpose of this document, the following definitions are applied:

Private Client	Private Client (Retail clients as defined by regulation) is a client who is not a Professional Client or an Eligible Counterparty. Core Capital shall treat as a Private Client any Client which does not satisfy the requirements of either the classification of an Eligible counterparty or of the Professional Investor, or any client who requests to be treated as a Private Client. For details, see Annex I.
Professional Client	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. In order to be considered to be a professional client, the client must comply with certain criteria which have explained in the Annex I.
Eligible Counterparty	Eligible counterparties are entities that are authorized or regulated to operate in the financial markets, including but not limited to credit institutions, investment firms, insurance companies and pension funds. They are considered to have the highest level of expertise and risk awareness and therefore receive the lowest level of protection and information. Eligible counterparties can either be Per Se Eligible Counterparties or Elective Eligible Counterparties. In order to be considered to be an eligible counterparty client, the client must comply with certain criteria which have explained in the Annex I.
Services	an investment service, an ancillary service or another activity provided by Core Capital and listed in Sections A and B of Annex 1 of the MiFID Directive 2014/65/UE of 15 May 2014
Transaction(s)	any transaction carried out between the Parties comprising one or more Services and/or one or more Financial Instrument
Financial Instrument	a financial instrument listed in Section C of Annex 1 of the MIFID Directive 2014/65/UE of 15 May 2014 as such list has been transposed into the various local legislation and/or regulations.
Opt-Down	a change of category by a Professional Client to Private Client, or by an Eligible Counterparty to Professional Client or Private Client
Opt-Up	a change of category by a Private Client to Professional Client, or by a Professional Client to Eligible Counterparty.
Parties	Core Capital Management S.A. and the Client



Tied Agent	an individual or a legal entity that, under the full and unconditional responsibility of Core Capital on whose behalf it acts, promotes Services, receives and transmits instructions or Clients' orders in respect of Financial Instruments or Services, places Financial Instruments and/or provides advice to Clients on those Financial Instruments or Services
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2. Client Categorization

Core Capital Management S.A. (“**Core Capital**” or “**the Company**”) will classify Clients into the following categories according to the type of investment service provided to and the information that the the Company has about the Client: ***Private Client***, ***Professional Client*** or ***Eligible Counterparty***.

2.1. Objectives and consequences of client classification

Each Client must be classified by Core Capital because we provide a Discretionary Management and Advisory services to that Client, and we must do so in accordance with specific conditions and or according to methods that differ for each category of Client. Consequently, we will treat each Client in a manner that fulfils the requirements of the category into which the Client has been classified when we provide our services. This treatment will be different for each category particularly in terms of:

- information to be communicated to the Client,
- assessment of the suitability or the appropriateness of the service to be provided to the Client,
- information to be communicated to the client regarding the reporting in relation to a service,
- duty to act in the best interests of the Client in relation to transmission, execution¹ and/ or handling of orders, or,
- contractual documents to be provided to the Client.

The regulations provide that the level of protection afforded to the different categories of client varies according to the presumed experience and expertise ascribed to that category. So, a Private Client receives a greater level of protection than a Professional Client, and an Eligible

¹ Core Capital Management S.A. is not licensed to provide “execution only” services to its clients, nor is providing any such services.



Counterparty gets very little or no protection in relation to the provision of an Eligible Service by Core Capital. A Client is classified as an Eligible Counterparty only in relation to the provision of Eligible Services. In providing an Eligible Service to an Eligible Counterparty, we can disapply the following requirements that we must apply to any Professional Client: its conduct of business rules, its best execution policy, and its procedures and arrangements for prompt, fair and expeditious execution of client orders, in relation to the orders of its other Clients or its trading interests.

2.2. Methods of client classification

Core Capital will inform the Client of its category before we provide any service. The classification of the Client is carried out in compliance with applicable regulation and in consideration of information that we have about the Client. A Client can request a change in its classification and Core Capital may, in certain cases, suggest a change in category to the Client. Opt-Down and Opt-Up are discussed further in paragraphs 3 and 4 below, and the consequences of seeking to Opt-Down or Opt-Up are set out in paragraph 5 below. Professional Clients and Eligible Counterparties must inform Core Capital of any changes in their circumstances that might have an effect on their categorization. If Core Capital becomes aware that the Client's circumstances have changed such that a change in category is required according to the regulations, we may take any measures that we deem appropriate and we may notify the Client of its reclassification. Core Capital must obtain the express consent of some Clients to classify them as Eligible Counterparties, and those clients will be notified that they have to give their consent. The Parties can agree that the classification as an Eligible Counterparty will apply:

- (i) generally, with regard to all Eligible Services or Transactions² carried out in connection with those services and Financial Instruments; or,
- (ii) specifically in respect of one of those services, to a type of Transaction or to a particular Transaction in relation to one or all these Services.

² Transactions that are strictly limited to definition of order transmission on behalf of a Client to Client's chosen Custodian Bank for execution purpose. All executions are handled by selected custodian bank and according to the Bank's Best Execution Policy.



3. Client Opting-Down

Where a client is categorized as either a Professional Client or Eligible Counterparty, they may choose to opt-down to a lower tier if they would like to benefit from additional protections available. This is also known as an “Opt-in” in some jurisdictions.

3.1. Opting-Down from Professional Client to Private Client

A Professional Client can ask to be classified or can be so classified at Core Capital’s option, as a Private Client according to the following procedure.

3.1.1. Opt-Down at the Client’s request

A Professional Client can ask Core Capital to be classified as a Private Client if it believes that it does not have sufficient experience or expertise to properly assess and manage the risks that it incurs. The Client should provide a written request to change categories to Core Capital setting out whether the change is required (i) generally in relation to all Services, Financial instruments and Transactions, or (ii) specifically, in respect of particular types of Financial Instruments or Transactions, or in connection with a particular Service, Financial Instrument or Transaction. Core Capital will consider the request and advise the Client whether or not the request is accepted. If Core Capital accepts the request, it will provide the Client with specific information about the new classification and its scope. MiFID II allows a Client’s Classification to be modified on a transaction by transaction basis if required. Unless there is a specific agreement otherwise the new classification will become effective as at the date of Core Capital's letter confirming the new category.

3.1.2. Opt-Down at the option of the Company

If Core Capital determines that it is necessary to change a Client's category from Professional Client to Private Client, we will notify the Client of this decision and will provide information about the new classification and its scope, i.e. whether it applies to all Services, Financial Instruments and/or transactions. We will also advise the Client of the date from which the new classification will take effect.



3.2. Opting-Down from Eligible Counterparty to Professional Client or Private Client

An Eligible Counterparty can be reclassified, at its request or at Core Capital's option as a Professional Client or a Private Client according to the following procedure.

3.2.1. Opt-Down at the Client's request

An Eligible Counterparty can ask Core Capital to be reclassified as a Professional or Private Client if that Client believes that it does not have sufficient experience or expertise to properly assess and manage the risks that it incurs. The request should specify the Client's requested category (Professional or Private) and (i) whether the re-classification is requested generally i.e. in relation to all Eligible Services or all Transactions in connection with the aforementioned Services and all Financial Instruments, or (ii) whether the request is in relation to particular Services or a specific type of Transaction or a particular Transaction in relation to one Service or all Services. If the Client does not specify a category, Core Capital may reclassify the Eligible Counterparty as a Professional Client for all investment Services, Financial Instruments and / or Transactions. Core Capital will notify the Client whether it accepts or refuses the reclassification request. If Core Capital accepts the request, it will provide the Client with specific information about the new classification and its scope, i.e. whether it applies to all Services or only to specific Services, Transactions and Financial Instruments. Unless there is a specific agreement otherwise, the new classification will become effective as at the date of the Core Capital's letter confirming the new category.

4. Opting-Up

The regulations do not intend to restrict investment services firms provide to Private Clients but instead seek to ensure that Private Clients receive appropriate additional protections. However, due to practical considerations there may be examples where Private Clients would be restricted from accessing certain investment services. As such, where Private Clients feel they have the necessary expertise they may choose to Opt-up to the Professional Investor status for either all or part of the services. This is also known as an “Opt-out” in some jurisdictions.



4.1. Opting-Up Criteria

A Private Client can request a change to Professional Client status or to Eligible Counterparty status if two or more of the following criteria are satisfied:

- Has carried out more than 10 investments in Financial Instruments each quarter over the previous four quarters each one of significant size.
- Has an investment portfolio with a value in excess of Euros 500,000; or
- 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 contemplated.

Eligible Counterparties are the most sophisticated capital markets participants; typically, investment firms, credit institutions, insurance companies or UCITS. Clients wishing to opt-up to this status must be willing to forgo the higher levels of protection and meet at least two of the following criteria, as categorised by:

- Balance sheet total of at least 20 million Euros.
- Net turnover of at least 40 million Euros.
- Own funds of at least 2 million Euros.

4.2. Opting-up from Private client to Professional client

A Private Client who meets the expertise criteria set out above can ask Core Capital to be reclassified as a Professional Client according to the following procedures. Any request to Core Capital must be in writing and must set out whether the reclassification is requested (i) generally and for all investment Services, Financial Instruments or Transactions, or (ii) specifically, in relation to a particular type of Financial Instrument or Transaction or a particular investment Service, Financial Instrument or Transaction. Core Capital will accept or decline a request after an assessment of the expertise, the experience and the knowledge of the Private Client. This assessment should be based (i) on the nature of the Services, Financial Instruments and/or Transactions that are contemplated and (ii) on the particular criteria(s) set out in this document that are in compliance with applicable rules. If Core Capital accepts the request, we will notify the Client in writing and will include information on the consequences of the change in category, and the date from which the reclassification will be effective. A written agreement between the Parties will set out particularly (i) the scope of the new classification taking into account the terms of the request, (ii) that the Client is aware of the above-mentioned consequences, and (iii) the effective date of the reclassification. Unless there is a specific provision in the agreement



otherwise, the new classification will become effective as at the date of the agreement. If Core Capital declines the request, Core Capital will notify the Client of its decision.

4.3. Opting-up of Private or Professional Clients to Eligible Counterparty Status

A request for a change of category from Private or Professional Client to Eligible Counterparty can only be made in relation to Eligible Services. Any request must be made in writing and must set out whether the reclassification is requested (i) generally for all Eligible Services or for all Transactions in relation with those Eligible Services and on all Financial Instruments or (ii) specifically, in relation to one of those Services, a type of Transaction or a particular Transaction with regard to one or all of those Services. Core Capital can accept or decline this request and will inform the Client of its decision. If we accept the request, a written agreement between the parties will set out particularly (i) the scope of the new classification (taking into account the terms of the request), (ii) the consequences of the change of classification, with the client acknowledging in writing that he is aware of these consequences, and (iii) the date of the change of classification. The effective date will be the date of the written agreement between the parties.

5. Consequences

All Clients should inform themselves of the consequences of an Opt-Up (opt-out) or an Opt-Down (opt-in) prior to requesting a change in category.

5.1. Opting-Down

When Opting-Down, a client will receive a higher protection from Core Capital than previously under its original classification.

5.2. Opting-Up

Core Capital draws all Clients' attention to the consequences of Opting-Up. When Opting-Up, a client will not be protected as under its original category. Thus, for example, when providing an Eligible Service to an Eligible Counterparty, Core Capital does not have to apply its conduct of business rules or its procedures in relation to order handling. In relation to these order handling procedures, Core Capital can decide not to set up and not to apply procedures and arrangements for prompt, fair and expeditious execution of client order, in relation to the orders



of its other Clients or its trading interests. The Client should contact its professional advisors before requesting an Opt-Up.

6. Communication about client classification

Clients' requests in relation to a change in category, the Parties may communicate between themselves via a durable medium which may include emails. Clients can also send their requests for a change in category to Core Capital at the address set out below:

**Core Capital Management S.A.
46 Pl. Guillaume II
L-1648, Luxembourg**

Where a Client requests to Opt-Up, Core Capital will provide them with a clear written warning of the protections and compensation rights they may lose. The Client must acknowledge this, by stating in writing that they are aware of the consequences of losing such protections.

Core Capital encourages all parties to use the **Client Re-Classification Application**, found at the end of this document.

**Annex I – Criteria for Client Classification:**

Private Client	<p>A Private Client is a client who does not fall into either of the below categories. He is considered to have the lowest level of expertise and risk awareness and therefore receives the highest level of protection and information. Core Capital treats as a Private Client any Client which does not satisfy the requirements of either the classification of an Eligible counterparty or of the Professional Investor, or any client who requests to be treated as a Private Client.</p>
Professional Client	<p>I. Categories of Clients who are considered to be Professionals:</p> <p>(1) Entities which are required to be authorized or regulated to operate in the financial markets. The list below shall be understood as including all authorized entities carrying out the characteristic activities of the entities mentioned: entities authorized by a Member State under a Directive, entities authorized or regulated by a Member State without reference to a Directive, and entities authorized or regulated by a third country:</p> <ul style="list-style-type: none">(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) Commodity and commodity derivatives dealers.(h) Locals.(i) Other institutional investors. <p>(2) Large undertakings meeting two of the following size requirements on a company basis:</p> <ul style="list-style-type: none">(a) balance sheet total: EUR 20 000 000(b) net turnover: EUR 40 000 000 <p>(3) National and regional governments, including public bodies that manage public debt at national or regional level, Central Banks, international and supranational institutions such as the World Bank, the IMF, the ECB, the EIB and other similar international organisations.</p> <p>(4) Other institutional investors whose main activity is to invest in financial instruments, including entities dedicated to the securitisation of assets or other financing transactions.</p> <p>The entities referred to above are considered to be professionals. 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 an</p>



	<p>investment firm is an undertaking referred to above, the investment firm must inform it prior to any provision of services that, on the basis of the information available to the investment firm, the client is deemed to be a professional client and will be treated as such unless the investment firm and the client agree otherwise. The investment firm must also inform the customer 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 investment firm 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 products or transaction.</p> <p>II. Client who <u>may be</u> treated as Professionals on request and meet <u>two</u> of the following criteria:</p> <ul style="list-style-type: none">- Clients that have carried out transactions, in significant size, on the relevant market at an average frequency of 10 per quarter of the previous four quarters.- Clients that have a portfolio of Instruments and cash deposits worth more than EUR 500 000.- Client that has a professional background that gives you knowledge of the transactions or Services you want to use.- Clients that have worked for at least one year in a professional position in the financial sector.
Eligible Counterparty	<p>Each of the following is a per se Eligible Counterparty including an entity that is not from a Member State or an EEA State that is equivalent to any of the following:</p> <ul style="list-style-type: none">- an investment firm.- a credit institution.- an insurance company.- a UCITS or a UCITS Management Company.- a pension fund or a pension fund management company.- another financial institution authorized or regulated under EU Law or the national law of an EU Member State.- undertakings which are exempt from the requirements of the MIFID in terms of Article 2 (1) (k) and (l) thereof.- a national government and its corresponding offices including public bodies that deal with public debt.



	- central bank and supranational organization.
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Annex 2 – Rules applicable to each client category and consequences

Protection Rules Application		Private Client	Professional Client	Eligible Counterparty
1. Information to be provided by Core Capital Management S.A. to a Client				
1.1	Information about Core Capital Management S.A.	✓	✓	✓
1.2	Information about the nature and characteristics of Financial Instruments	✓	✓	
1.2.1	Information to all Clients	✓	✓	✓
1.2.2	Information concerning only the Private Client	✓		
1.3	Information about cost and charges charged to the Client	✓		
1.3.1	Information about Tied Agents	✓	✓	✓
1.3.2	Information about inducements received by core Capital Management S.A.	✓	✓	✓
1.4	Communication to Private Clients	✓		
2. Assessment by Core Capital Management S.A. of the suitability or appropriateness of a Service or a Financial Instrument				
2.1	Assessment of the suitability of the investment advice service	✓	✓	✓
2.1.2.1	Assumption of experience and knowledge of products and services	✓		
2.1.2.2	Information about investment objectives	✓	✓	
2.2	Assessment of the appropriateness of the services provided by Core Capital Management S.A. (other than investment advice) or of Financial Instruments	✓		
2.2.1.1	Assessment of services, other than reception and transmission of orders	✓		
2.2.1.2	Non assessment for the reception and transmission for “vanilla” products		✓	✓
3. Transmission of orders by Core Capital Management S.A.				
3.1	Core Capital Management S.A.’s obligations regarding transmission of orders	✓	✓	✓
3.2	Core Capital Management S.A.’s obligations regarding the execution of orders by custodian bank(s)	✓	✓	✓
3.2.1	Obligation to obtain best execution of orders by custodian bank(s)	✓	✓	✓
3.2.2	Information to all Clients	✓	✓	✓
3.2.3	Information to Private Clients	✓		
3.2.4	Fair and prompt handling of Client orders (to be executed by custodian banks)	✓	✓	✓
3.2.5	Transaction reporting (by custodian banks) to clients in Service or Transaction	✓	✓	✓
4. Contractual relations between Parties				
4.1	Establishment of record where there is a description of various rights and obligations of the	✓	✓	✓



	Parties			
4.2	Agreement with Private Clients	✓		

Annex 3 – General information

1. Information to be communicated by Core Capital Management to the Client

In relation to the Services and Transactions provided by Core Capital, we will supply the following information to the Client, if required to do so. This information may be adapted for a particular Service, Transaction and / or according to the Client's circumstances. In most cases, this information must be communicated before a Service is provided to or a Transaction agreed with any Client. However, in exceptional circumstances, Core Capital can provide this information later.

1.1. Information about Core Capital Management S.A.

Core Capital will provide Private Clients with general information about the Company, in particular:

- Information about contact details necessary to communicate effectively with Core Capital, as well as the languages and the communications methods to be used between the Parties.
- Information about Core Capital's license as well as the name(s) and the address(es) of its regulator(s).
- Information about any protection of Financial Instruments.
- Information in relation to any Tied Agents and details of the member state(s) in which the agent is registered.
- Information about the nature, frequency and the dates of the reports regarding the execution of the Services provided to the Client.
- Information about Core Capital's conflicts of interest policy and further details on this policy at the Client's request.



1.2. Information about the nature and the characteristics of Financial Instruments and Associated Risks

1.2.1. Information to all Clients

The description of the risks is adapted to the particular Financial Instrument, the category and knowledge of the Client, and contains the following elements:

- Risks associated with the relevant Financial Instruments, including an explanation of leverage and its effect and information on the risk of total loss of the investment.
- Volatility of the price and/or the lack of liquidity of the Financial Instrument.
- Financial commitments and the other obligations including the debts that a Client may incur in addition to the acquisition cost of the Financial Instrument.
- Deposit, margin call or any similar obligation that might be required.
- Information on impediments or restrictions for disinvestment.

If a Financial Instrument is composed of two or more underlying instruments, Core Capital will give the Client a description of those underlying instruments and a description of the ways in which their interaction may increase the risks.

1.2.2. Information to Private Clients

When Core Capital supplies a Private Client with information about a Financial Instrument which is offered to the public (and if the offering documents are published in accordance with regulation (UE) n°2017/1129, Core Capital will inform this Client where copies of the documents can be obtained. If a Financial Instrument is guaranteed by a third party, Core Capital will give the Client information about the guarantor and its guarantee.



1.3. Information about costs and charges

1.3.1. Information to all Clients

Core Capital will provide Clients with an aggregated summary of their costs and charges, both pre & post trade with pre-trade costs being estimated where required.

The following information concerning costs and charges will be included:

- One-off charges related to the provision of the Service or Financial Instrument Total price of a Financial instrument or a Service (including fees, commissions, charges and related expenses, as well as all taxes payable through Core Capital), and if the total price cannot be indicated, information on the basis of calculation of the total price.
- Currency, exchange rates and costs applicable, if any part of the total price must be paid or denominated in another currency.
- Other costs such as research, custody or distributor fees.
- Arrangements for payment or other performance, if any.

1.3.2. Information to Professional Clients

Professional Clients have the right to agree to limited disclosures of costs and charges should they request it provided the Services provided do not include investment advice or portfolio management, and that the Financial Instruments do not contain an embedded derivative. Further to this Eligible Counterparty Clients may also agree to the limited disclosure of costs and charges, irrespective of the services offered, provided the Financial Instruments do not contain an embedded derivative that the Eligible Counterparty intends to offer to its Clients.

1.4. Information about Tied Agents of Core Capital Management S.A.

Core Capital remains fully and unconditionally liable for any act or omission of a Tied Agent acting on the Core Capital's behalf. Core Capital must ensure that its Tied Agents disclose to Clients, at the time that a Client is contacted or before dealing with any Client, (i) the capacity in which they act and (ii) that they represent Core Capital.

Core Capital monitors the activities of its Tied Agents when Core Capital acts through such Tied Agents.



1.5. Information about Inducements

In some cases, the Client must be notified beforehand that Core Capital has paid or received any fee, commission or other benefits to/from a third party. In particular, the Client must receive information about the nature and the amount of any such payment or benefit if such payment or benefit has been made for the purpose of improving the quality of the Service provided to the Client.

1.6. Communication to Clients

Information provided by Core Capital to a Private Client must be fair, clear and not misleading. Particularly when the information is related to:

- The benefits of a Service or a Financial Instrument.
- A comparison between Services, Financial Instruments or persons providing Services.
- Past performance, simulations of past performance or future performance.
- Fiscal treatment.
- In addition, Core Capital must not use the name of a competent authority to imply that this authority endorses or approves Core Capital's products or Services.

2. Assessment by Core Capital Management S.A. of the Suitability or Appropriateness of a Service or a Financial Instrument

2.1. Assessment of the Suitability of the Investment Advice Service

2.1.1. Private Clients

Core Capital requests information from the Private Client about its knowledge and its experience as regards investments, as well as its financial situation and its investment objectives, so that it can recommend Financial Instruments that are suitable for that Client. If a Client does not provide the required information, Core Capital must not recommend Financial Instruments.



2.1.2. Professional Clients

Core Capital can assume that a Professional Client is financially capable of facing any risk linked to his investment and that he has the experience and the necessary knowledge to understand the risks of Financial Instruments, Transactions or Services. Core Capital must obtain from Professional Client information about its investment objectives in relation to a contemplated Transaction.

2.2. Assessment of the appropriateness of the Services provided by Core Capital Management S.A. (other than investment advice) or of Financial instruments

2.2.1. Private Clients

2.2.1.1. Assessment of services other than reception and transmission of orders.

Core Capital must request from the Private Client information about its knowledge and experience as regards investment, so that it can determine whether the Service or the Financial Instrument contemplated by the Client is appropriate for that Client. If the Client does not provide the necessary information or if Core Capital considers, on the basis of the supplied information, that the Service or the Financial instruments are not appropriate, Core Capital will warn the Client, before the provision of the any such Service.

2.2.1.2. No assessment required for the reception and transmission or orders on simple products.

For the Services of reception and transmission of orders on simple products provided at the request of the Client and under certain conditions, Core Capital has no obligation to obtain information from the Private Client about its knowledge and experience neither as regards investment nor to assess if the Services or Financial Instruments are appropriate to that Client. However, the Client must be informed that Core Capital is not carrying out an appropriateness test on the contemplated Financial Instrument or the service and that the Client will not benefit from the protection afforded by the relevant conduct of business rules.



2.2.2. Professional Clients

Core Capital can assume that a Professional Client has the experience and the necessary knowledge to understand the risks of Financial Instruments, Transactions or Service.

3. Transmission and / or handling of Orders by Core Capital Management S.A.

The obligations set out below are applicable in relation to the provision by Core Capital of an Eligible Service, as the case may be, other than for portfolio management.

3.1. Core Capital Management S.A.'s obligation regarding transmission of orders

When Core Capital transmits Client orders to other entities for execution (to custodian banks), Core Capital must act in the best interests of its Client.

3.2. Core Capital Management S.A.'s obligation regarding execution of orders by custodian bank(s)

3.2.1. Obligation to obtain best possible result on the custodian bank(s) result on execution of orders

Core Capital must take all sufficient steps to obtain, when executing order, the best possible result for its Clients taking into account price, costs, speed likelihood of execution and settlement, size, nature of the order or any other consideration relevant to the execution of the order.

3.2.2. Fair and prompt handling of Client orders

3.2.2.1. All Clients

Core Capital adopts and applies procedures to ensure the fast and prompt execution of the orders of its Clients by custodian banks. Core Capital ensured that custodian banks treat execution of orders of Core Capital clients the same way as they would treat any other clients (custodian banks clients).



3.2.2.2. Private Clients

Core Capital must inform Private Clients of any material difficulty that might affect the proper carrying out of orders by custodian banks as soon as it becomes aware of the difficulty.

3.2.3. Transaction reporting to Clients on the Service or the Transaction

3.2.3.1. All Clients

Custodian banks transmit to the Client on a durable medium the important information about the execution of its order(s) or Core Capital Clients.

3.2.3.2. Private Clients

Core Capital Clients will receive a report from Core Capital or Custodian report, or a confirmation notice about the execution of the Client's order as soon as possible following execution of the order. The report includes information about the costs linked to the Transactions and to the Services, as the case may be. Clients will be informed of any loss exceeding a predetermined threshold agreed with the Client, in cases where the Custodian Bank operates the accounts of the Client that include an uncovered open position in a contingent liability transaction.

4. Contractual Arrangements between Parties

Core Capital's records may comprise several documents agreed by the Parties that set out their rights and obligations. Conclusion of an agreement between Core Capital and each new Private Client in relation to the provision of an investment Service.



Application for reclassification and treatment as a professional client

CLIENT NAME: _____

The Markets in Financial Instruments Directive (MiFID) require that clients be assigned to one of the following client categories in order to provide them with investment services and ancillary investment services:

- Private client (Retail client as defined by the regulation)
- Professional client
- Eligible counterparty

You are currently classified by us as a Private client. This classification provides you with the highest level of legal protection.

You have the option of requesting professional-client status for the purposes of investment services, ancillary investment services and financial instruments. As a professional client, your level of protection is lower. A reclassification to professional client will, in particular, have the following implications for you:

- You may receive a reduced amount of information from Core Capital Management in respect of our services and investments (e. g. regarding commissions, costs, fees and expenses).
- If Core Capital Management has to assess whether a product or service is suitable for you, Core Capital Management will presume that you possess sufficient knowledge and experience to understand the associated risks.
- If Core Capital Management has to assess whether an individual investment recommendation or decision is suitable for you within the framework of an asset management mandate, Core Capital Management will presume that you possess sufficient knowledge and experience to understand the risks associated with the investment and the financial capacity to bear these risks.
- In terms of executing financial-instrument transactions, Core Capital Management is not obliged to identify the best possible result on the basis of overall remuneration, that is, on the basis of the financial instrument's price and on the costs directly related to executing the order (including clearing and settlement costs or other fees).
- If Core Capital Management has to provide clients with regular statements (e. g. as part of the asset management mandate), Core Capital Management may not send these to you as often as the Company would do so if you were a Private client.
- Core Capital Management will only inform you in standardised form about the costs (commissions, fees, expenses, etc.) of our services and in connection with financial instruments, for example on a one-time basis, for multiple transactions with financial instruments which are described only generically. In particular, Core Capital Management will not provide advanced transaction-based disclosure of the costs associated with an individual transaction.



MIFID 2 – Client Categorization Procedure

- Should any debt-based financial instruments in your portfolio suffer a loss in value, or if any financial instruments with contingent liabilities in your portfolio reach certain thresholds, you will not receive immediate notification. Any changes such as these will be shown on your asset statement, which is issued at regular intervals and details the performance of all your financial instruments.

Confirmation and application

I hereby confirm that I meet at least two of the following criteria and request that I be treated by Core Capital Management as a professional client with immediate effect and in respect of all investment services, ancillary investment services and financial instruments under MiFID.

- ☐ I have carried out transactions, in significant size, on the relevant markets at an average frequency of 10 per quarter over the previous four quarters.
- ☐ I hold total cash deposits and financial instruments exceeding EUR 500,000 or the equivalent.
- ☐ I have worked in the financial sector for at least one year in a professional position, which requires knowledge of the transactions or services envisaged.

I am aware and agree that reclassification as a professional client means I will be subject to a lower level of protection. I confirm that I have sufficient knowledge, experience and specialist understanding to make investment decisions and to be able to assess the related risks adequately. I confirm that I have been informed by Core Capital Management of the consequences of reclassification.

In addition, I am aware that Core Capital Management is obliged to remain active and to adjust my client classification if it learns that I no longer meet the above conditions. I agree to notify Core Capital Management immediately if circumstances arise which could affect my classification.

Date and Signature

Client advisor plausibility check

Based on my knowledge and experience, the client is able to make his own investment decisions and to understand the risks involved.

Date and Financial Advisor Signature