



CLIENT CATEGORIZATION POLICY AND PROCEDURE

APPENDIX 18 TO THE AGREEMENT FOR THE PROVISION OF INVESTMENT AND ANCILLARY SERVICES

VERSION CONTROL

No	Revision Date	Revision Description	Author	Approved By	Distribution Date
1.0	11.12.2018	Creation	AMLCO	Board of Directors	19.12.2018
2.0	30.08.2021	Policy update	AMLCO	Board of Directors	

I GENERAL

1.1 Following the implementation of the newly reformed Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments (hereinafter - MiFID II) in the European Union and in accordance with Investment Services and Activities and Regulated Markets Law of 2017 (hereinafter - Law 87(I)/2017) in Cyprus SKANESTAS INVESTMENTS LIMITED (the "Company") is required to inform and categorise its Clients into one of the following three categories: Retail, Professional or Eligible Counterparty.

1.2 The purpose of this document is to inform Clients in a durable medium about the procedures for classifying Clients and the level of investor protection rights arising from such classification as well as to explain that in certain cases, the Client has the right to request a different categorisation and about any limitations to the level of client protection that a different categorisation would entail.

1.3 This document describes how the Company classifies its clients into the categories available under applicable laws and regulations as defined herein below.

II. DEFINITIONS

"Eligible counterparty" means a client who falls in one of the categories set out in the MIFID II and Law87(I)/2017;

"Professional client" means a client meeting the criteria laid down in the Second Appendix of Law87(I)/2017

"Retail client" means a client who is not a professional client.

III. CATEGORIES OF CLASSIFICATION

3.1 Pursuant to applicable law, upon entering into an investment services agreement, the Company proceeds with the categorisation of the Client in respect of the Services to be offered. The Client categorisation is performed according to the criteria provided by the applicable law in respect of the Services and types of Financial Instruments requested and on the basis of the information made available by the Client to the Company.

3.2 The Law recognises that investors have different levels of knowledge, experience and skills in the investment field relevant to the specific type of product or services offered or requested and are classified in three categories; as a retail client, a professional client or an eligible counterparty. Within this context, a Retail Client benefits of the highest level of protection, compared to a Professional Client or an Eligible Counterparty, which bare a reduced level of protection due to the fact that they are considered more experienced and knowledgeable in carrying out transactions in Financial Instruments. The Client protection memo, which is the Annex 3 to this Client Categorisation Policy and procedure, consists of more detailed information about level of protection depending of type of client's categorization.

3.3 If a Client has already been categorised as Professional Client under parameters and procedures similar to those referred to in this document, it is not intended that his relationships with the Company shall be affected by the new rules adopted by the MiFID II.

A. Retail Clients

Retail clients are considered as those clients who do not fulfil the criteria to be treated as professional clients or eligible counterparties. A retail client receives the highest level of protection and information from us, compared to a professional client or an eligible counterparty. In accordance with the Company's documents, in particular, the Client's Trade Orders Handling Procedure and Product Governance Policy the

Retail Clients have the opportunity to make transactions with shares, exchange Traded Funds (ETFs), simple cash bonds and other non-complex products, provided that the transactions with complex financial instruments as well as title transfer financial collateral arrangements are forbidden for the Retail Clients.

B. Professional Clients

Professional clients are clients who are considered to possess the experience, knowledge and expertise to make their own investment decisions, as well as to properly assess the risks that they will incur.

Professional Clients can be divided into two categories in accordance with Part I of the Second Appendix of the Law 87(I)/2017 “Professional Client Per Se” and in accordance with Part II of the Second Appendix of the Law 87(I)/2017 as “Elective Professional Clients”.

The following are regarded as professional clients **Per Se**:

a) Entities which are required to be authorised or regulated to operate in the financial markets, including all authorised entities carrying out the characteristic activities of the entities mentioned below: entities authorised by a member state of the EU under legislation of the EU, entities authorised or regulated by a member state of the EU without reference to legislation of the EU, and entities authorised or regulated by a country which is not a member state of the EU, such as:

- Credit institutions;
- Investment firms;
- Other authorised or regulated financial institutions;
- Insurance companies;
- Collective investment schemes and management companies of such schemes;
- Pension funds and management companies of such funds;
- Commodity and commodity derivatives dealers;
- Locals;
- Other institutional investors.

b) Large undertakings meeting two of the following size requirements, on a company basis:

- Balance sheet total: €20.000.000
- Net turnover: €40.000.000
- Own funds: €2.000.000

c) National and regional governments, public agencies managing public debt, central banks, international and multinational organisations such as the World Bank, the International Monetary Fund, the European Central Bank, the European Investment Bank and other similar international organisations.

d) Other institutional investors, whose main activity is investing in Financial Instruments, including companies, which deal exclusively with securitising assets or other financing transactions.

Any clients falling within the list above are considered to be professionals and, the Company will categorise such clients, on the basis of the information available to the Company, as Professional Clients, and will be treated as such unless the Company and the client agree otherwise. However, the Client is allowed to request the Company to be classified as Retail Client and the Company may agree to provide a higher level of protection. The Request to treat the Client as a Retail Client can be made by the Professional Client in any format.

Clients other than those mentioned in points a, b, c, d in the Section III of this Appendix. including public sector bodies, local public authorities, municipalities and private individual investors, may also be allowed to waive some of the protections afforded by the conduct of business rules.

The Company shall therefore be allowed to treat any of those clients as professionals provided the relevant criteria and procedure mentioned below are fulfilled. Those clients shall not, however, be presumed to possess market knowledge and experience comparable to that of the categories listed in points a, b, c, d in the Section III of this Appendix.

Any such waiver of the protection afforded by the standard conduct of business regime shall be considered to be valid only if an adequate assessment of the expertise, experience and knowledge of the client, undertaken by the investment firm, gives reasonable assurance, in light of the nature of the transactions or services envisaged, that the client is capable of making investment decisions and understanding the risks involved.

The following are regarded as **Elective Professional Clients**:

In the course of the assessment, as a minimum, two of the following criteria shall 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 EUR 500 000;
- 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.

In case the Retail Client wants to be treated as Professional Client, the Client shall file an Request to be treated as a Professional Client presented in the prescribed form, which is Annex 1 to this Client Categorisation Policy and procedure. The Company will assess the Client's Request and send the Reply to the Client's Request as well as the Notice of categorization as a professional client under the MIFID II, all of the above-mentioned documents are Annexes to this Client Categorisation Policy and procedure. When the Client is aware of all the consequences of waving some of the protections afforded by law to Retail clients and send to the Company the Request to be treated as a Professional Client presented in the prescribed form, which is Annex 5 to this Client Categorisation Policy and procedure, the Company may categorise such Client as Elective Professional Client.

During the process of the changing categorization from the Retail Client to the Professional Client, the Company shall ask the Client to complete all applicable questionnaires that are necessary at the time of the change.

Any clients not falling within the list above are, by default, classified as Retail Clients.

Professional Clients are responsible for keeping the Company informed about any change, which could affect their current categorisation. Should the become Company aware however that the Client no longer fulfils the initial conditions which made them eligible for a professional treatment, the Company must take appropriate action.

C. Eligible Counterparties

Eligible Counterparties are Professional Clients, which operate in the financial sector and are therefore deemed to have the necessary investment expertise, and for the purposes of the Law are:

- Investment Firms;
- Credit Institutions;
- Insurance Undertakings;
- UCITS and their management companies;
- Pension Funds and their management companies;
- Other financial Institutions authorized by a member state or regulated under community legislation or the national law of a member state;
- National governments and their corresponding offices including public bodies that deal with public debt;
- Central Banks;
- Supranational Organizations.

A Client can only be classified as an Eligible Counterparty when the Company provides the investment services of the reception and transmission of Client's trade orders, or the execution of orders on behalf of Clients, or any ancillary services directly related to such transactions. In such cases, the Company is not obliged to comply with the following:

- a) Comply with certain investor protection requirements; we are obliged, however, to provide appropriate information to you;
- b) Assess the suitability and appropriateness of certain products or services, before providing them to you; we are obliged, however, to provide you with adequate reports on the service provided;
- c) Take all sufficient steps to obtain the best possible result for you when executing orders on your behalf;
- d) Have in place procedures to provide for the prompt, fair and expeditious execution of your orders, relative to other client orders or our own trading interests.

In addition, the Company may accept as an Eligible Counterparty an undertaking, which falls within a category of clients who are to be considered as Professional Clients in accordance with the description above and the identification criteria. The Company will require the Client's express consent regarding the categorisation as Eligible Counterparties, presented in the prescribed form, which is Annex 6 to this Client Categorisation Policy and procedure.

The Company shall be obligated to update information about categorisation for all type of Clients at every "Know Your Client" procedure is carried out.

IV. DIFFERENCES IN CLIENT PROTECTION

4.1 The different treatment per client classification relates mainly to the following:

- (a) the information communicated to the client;
- (b) the assessment of appropriateness and suitability of the investment service/financial instrument provided to the client;
- (c) the reports sent to the client regarding the investment service or financial instrument offered;
- (d) the manner in which execution of orders is performed achieving the best possible result for the client.

The Retail Client benefits of the highest level of protection and information received compared to a Professional Client and an Eligible Counterparty.

4.2 The additional protection and information provided to a Retail Client is summarised below:

- (i) A Retail Client will be given more information with regards to the Services and Financial Instruments offered costs, commissions, fees, charges and the services of safekeeping of client's financial instruments and funds.
- (ii) the Company will ask the 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. The Company requires this information in order to assess whether the Service or Financial Instrument envisaged is appropriate for the client. In case, on the basis of the information received, the product or service is deemed as not appropriate for the Retail Client, the Company will warn the client accordingly.

Please note that the Company is not required to assess appropriateness of Financial Instruments in certain cases specified by applicable laws.

On the contrary, the Company is entitled to assume, according to applicable laws that a Professional Client has the necessary experience and knowledge in order to understand the risks involved in relation to the particular Services or Financial Instruments he is requested to be provided.

(iii) When executing Client's Trade Orders the Company 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 its clients (please refer to the information on Order Execution Policy applied by the Company).

In principle, where the Company executes an order on behalf 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 Client's Trade Order.

When providing Professional Clients with Best Execution the Company is not required to prioritise the overall costs of the transaction as being the most important factor in achieving best execution for them. However, the Company considers that the most important execution factor for its Professional Clients is also the Total Consideration.

The Company cannot guarantee that it will be always possible to execute an order at the best price available due to market conditions and liquidity of the market, but the Company will always strive to execute an order in accordance with this Policy.

The Company is obliged to inform Retail Clients of material difficulties relevant to the proper carrying out of their order(s) promptly upon becoming aware of the difficulty.

(iv) Retail Clients may be entitled to compensation under the Investor Compensation Fund.

V. NOTE ON RESULTS OF BEING CATEGORISED AS ELIGIBLE COUNTERPARTY

5.1 When the Company classifies a Client as an Eligible Counterparty, its obligations regarding the information provided on the nature and risks of financial instruments, transactions reporting, assessment of appropriateness, best execution, transmission or placement of orders with other entities for execution, and inducements, shall not apply to that client in respect of the investment services/activities of reception and transmission of orders, execution of orders on behalf of clients, and/or any ancillary service directly related to such transactions.

5.2 As regards the remaining of the Company obligations, those shall apply to Eligible Counterparties only to the extent required by applicable law. Generally, in relation to business other than reception and transmission of orders, execution of orders on behalf of a client and/or any ancillary service directly related to such transactions, an Eligible Counterparty will receive the same treatment as Professional Clients unless such Eligible Counterparty requests to be reclassified and treated as a Retail Client and the Company agrees to such request. The Request to treat the Client as a Retail Client can be made by the Eligible Counterparty in any format. Acceptance of such request is at the Company's discretion. In its relationship with eligible counterparties, Company will act honestly, fairly and professionally and communicate in a way, which is fair, clear and not misleading, taking into account the nature of the eligible counterparty and its business.

VI. RECLASSIFICATION

6.1 As stated above, a Client is entitled to request a different categorisation, i.e. a Reclassification at any time. The Company reserves the right not to accept such request or only to be able to undertake such reclassifications if the necessary regulatory requirements have been met. For the purpose of offering the

client a higher level of protection, a change of categorization may also occur at the initiative of the Company, but only on this occasion.

6.2 The following categorisation changes are permissible under the Law:

Retail Client	→	Elective Professional Client
Elective Professional Client/ Professional Client Per Se	→	Retail Client
Professional Client Per Se	→	Eligible Counterparty
Eligible Counterparty	→	Professional Client
Eligible Counterparty	→	Retail Client

Reclassifications always leads to a change in the level of protection afforded to a client.

VII. RETAIL CLIENTS WHO MAY BE TREATED AS PROFESSIONAL CLIENTS ON REQUEST

7.1 Skanestas may treat any Retail Client as Professional Client provided the relevant criteria and procedure mentioned below are prima facie satisfied. Any such request for waiver of the protection afforded by the standard conduct of business regime will be considered and may be accepted by the Company only if an adequate assessment of the expertise, experience and knowledge of the Client, undertaken by the Skanestas, provides reasonable assurance, in the light of the nature of the transactions or services recommended, that the Client is capable of making investment decisions and understanding the risks involved. In the course of such categorisation assessment, as a minimum, two (2) of the following criteria shall be satisfied:

- (i) the Client has carried out transactions, in significant size, on the relevant market at an average frequency of ten (10) per quarter over the previous four (4) quarters;
- (ii) the size of the client's financial instrument portfolio, defined as including cash deposits and financial instruments exceeds EUR 500 000;
- (iii) the Client works or has worked in the financial sector for at least one (1) year in a professional position, which requires knowledge of the transactions or services envisaged.

Further the Client shall:

- (i) state in writing to the Company that they wish to be treated as a Professional Client;
- (ii) that he is aware of the consequences of losing any protections afforded as Retail Client.

7.2 Professional Client obligation to request for Reclassification: In case a Client is classified as a Professional Client, he is entitled to request to be treated as a Retail Client, in order to receive a higher degree of protection, if he considers that he is not able to properly assess or manage the risks involved.

7.3 Professional client per se to Eligible counterparty: Only a Professional Client per se may request to be treated as an Eligible Counterparty. By changing client categorisation from Professional Client to Eligible Counterparty, the Client will waive the higher level of protection and information provided to Professional Clients in comparison to Eligible Counterparties.

7.4 Eligible counterparty to Professional client or Retail client: In case a Client has been categorised as an Eligible Counterparty, he has the right to request to be treated as a Retail Client or as a Professional Client, in order to receive a higher degree of protection, if he considers that he is unable to properly assess or manage the risks involved.

VIII. CLIENT INVESTOR PROFILE

8.1 In addition to the categorisation referred above, it is essential for the Company to be provided with such information to enable to assess the Client's Investor Profile. The applicable law requires that the Company when is providing Investment Services to clients to request certain information from their clients. In this context, the Company requests that prior to entering into an investment services agreement a questionnaire be completed so as to assess the knowledge and experience of a Client in Financial Instruments, his investment objectives, financial constraints and financial situation to determine his ability to bear losses.

8.2 If the Client's Investor Profile has already been established with the Company, the same will be required and will be requested by the Company from time to time to be updated or confirmed so as to enable the Company to continue providing the Services as per the applicable legislation.

The current Client Categorization Policy of the Company was developed in accordance with the MiFID II and Law 87(I)/2017 for the provision of investment services.

8.3. During the onboarding process, front office department carries out client's categorization procedure. The data of categorization is imported to the CRM software. As a result of placing this data in the CRM software, the data of the client's categorization are available to the following departments of the Company: front office department, operations department, brokerage department, Cyprus Stock exchange Trading member department, portfolio management department and dealing with own account department as well as Information technology department. The financial instruments, which are not available for the Retail Clients, are blocked for the Retail Clients in the trading system of the Company.

Annex 1 to the Client Categorisation Policy and procedure

To: **Skanestas Investments Limited**

Arch. Makariou III Ave. 226, Office No 1,
3030 Limassol, Cyprus

Date:

SUBJECT: REQUEST TO BE TREATED AS A PROFESSIONAL CLIENT

In accordance with the Investment Services and Activities and Regulated Markets Law of 2017 (L.87(I)/2017) of the Republic of Cyprus and paragraph 4 of the Terms of Business for Provision of Brokerage Services with Skanestas Investments Limited ("Company"), I kindly ask you to treat Brokerage Account No -BR as a Professional Client in connection to all services and financial instruments provided by your Company and I hereby confirm the following:

- Person authorised to carry out transactions has a working experience in financial sector for more than 20 years
- The size of the portfolio, including also the deposits in cash and in financial instruments > 500.000 Euros

Please do not hesitate to contact us for any additional information you may require.

Kind regards,

(client name)

(authorised person)

(position)

Annex 2 to the Client Categorisation Policy and procedure

To: (client name)

(address)

Date:

Dear Sirs,

RE: REQUEST TO BE TREATED AS A PROFESSIONAL CLIENT: BROKERAGE ACCOUNT NO -BR

In reply to your request, dated __/__/____ please find enclosed **Notice of Categorisation as a Professional Client**. Please note that your account will be excluded from the some of the protections and investment compensation rights available to Retail Clients. Please refer for more details to **Annex – Client Protection Memo**.

We assume that you have the necessary experience and knowledge in order to understand the risks involved in relation to investment services and/or products, for which you are classified as a professional client and you are able financially to bear any investment risks consistent with your investment objectives.

Finally, you are responsible for keeping us informed about any change, which can affect your current categorisation.

Kind regards,

Kirill Kuchinskiy

Director

Annex 3 to the Client Categorisation Policy and procedure

Client protection memo

Retail Clients / Professional Clients

Where Skanestas Investments Limited (further – the “Company”) treats the client as a retail client, the client will be entitled to more protections under the law than it would be entitled to as a professional client. In summary, the additional protections retail clients are entitled to are as follows:

a) A retail client will be given more information and disclosures with regard to the Company, its services and any investments, its costs, commissions, fees and charges and the safeguarding of client financial instruments and client funds.

b) Under the law, where the Company provides investment services other than investment advice (in the form of personal recommendations) or discretionary portfolio management, 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 law.

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, the Company 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 its clients.

Where the Company executes an order on behalf 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.

When providing professional clients with best execution, the Company is not required to prioritise the overall costs of the transaction as being the most important factor in achieving best execution for them.

d) The Company must obtain from clients such information as is necessary for it to understand the essential facts about the client and to have a reasonable basis for believing, giving due consideration to the nature and extent of the service provided, that the specific transaction to be recommended in the course of providing the service of investment advice, or entered into in the course of providing a portfolio management service, satisfies the following criteria:

i. it meets the investment objectives of the client in question;

- ii. it is such that the client is able financially to bear any related investment risks consistent with his/her investment objectives;
 - iii. it is such that the client has the necessary experience and knowledge in order to understand the risks involved in the transaction or in the management of his/her portfolio. Where the Company provides an investment service to a professional client it shall be entitled to assume that, in relation to the products, transactions and services for which it is so classified, the client has the necessary level of experience and knowledge for the purposes of paragraph (iii) above. In addition, under certain circumstances, the Company shall be entitled to assume that a professional client is able financially to bear any investment risks consistent with its investment objectives.
- 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:
- i. with more information than professional clients with regards to the execution of orders, other than for portfolio management;
 - ii. with periodic statements in respect of portfolio management activities carried out on their behalf, more frequently than for professional clients.
- g) Where the Company provides portfolio management transactions for retail clients or operate retail client accounts that include an uncovered open position in a contingent liability transaction, it shall also report to the retail client any losses exceeding any predetermined threshold, agreed between the Company and the client, no later than the end of the business day in which the threshold is exceeded or, in a case where the threshold is exceeded on a non business day, the close of the next business day.
- h) If the Company provides an investment service other than investment advice to a new retail client for the first time after 1 November 2007, it must enter into a written basic agreement with the client, setting out the essential rights and obligation of the firm and the client.
- i) The Company shall not use financial instruments held by it on behalf of a client for its own account or the account of another client of the Company, without the client's prior express consent to the use of the instruments on specified terms, as evidenced, in the case of a retail client, by his signature or equivalent alternative mechanism.
- j) Retail clients may be entitled to compensation under the Investor Compensation Fund for Clients of Investment Firms.

Eligible Counterparties

Where the Company treats the client as an eligible counterparty, the client will be entitled to fewer protections under the law than it would be entitled to as a professional client. In particular, and in addition to the above:

- a) The Company is not required to provide the client with information in relation to its conduct of business obligations, rules for handling client's orders or best execution in executing client's orders;

b) The Company is not required to assess the appropriateness of a product or service that the Company provide to the client;

The above information is based on the MIFID II and Regulated Markets Law of 2007 (L144(I)/2007). For more detail information you can visit the Cyprus Securities and Exchange Commission website at <http://www.cysec.gov.cy> For any further information regarding Client Categorisation Notice, please contact us at: info@skanestas.com or through you respective client manager.

Annex 4 to the Client Categorisation Policy and procedure

To: (client name)

(address)

NOTICE OF CATEGORIZATION AS A PROFESSIONAL CLIENT UNDER THE MIFID II

The European Union has introduced new legislation designed to strengthen the framework for the regulation of markets in financial instruments in order to increase transparency, better protect investors, reinforce confidence and address unregulated areas. This legislation is the MiFID II and member states in the European Economic Area¹ are required to implement it through their national laws as from 3rd of January 2018.

Client Categorization

We at Skanestas Investments Limited are required under the MiFID II to categorize you as Eligible Counterparty, Professional Client or Retail Client so that when carrying out business with you we can provide the level of information, services and protection that is appropriate to and consistent with your categorization.

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.

This Notice is to inform you that we will, based on the information available to us, treat you as **a Professional Client** under the MiFID II in providing our services to you. This is the general agreement, which also applies to any and all individual transactions for your account opened with us.

This categorization will apply to all of our the MiFID II related business with you.

You may however request to be treated as a Retail Client at any time.

It is your responsibility to inform us if we have not categorized you correctly and if any change occurs which could affect your categorization as a Professional Client, it is also your responsibility to ask for higher level of protection when it deems you are unable to properly assess or manage the risks involved.

By signing this notice and returning it to us, you consent to our Conflicts of Interest Policy, Best Execution Policy and present Categorization Notice and acknowledge that you familiarized yourself with our Client Protection Memo and understood the differences of protection levels under different categories of clients.

Please refer to attached Client Protection Memo for more information on levels of protection attributed to Eligible Counterparties, Professional Clients and Retail Clients.

By signing this notice and returning it to us, you also consent to the following in particular:

- We may execute your orders for financial instruments which may be admitted to trading on a regulated market or Multilateral Trading Facility (MTF) outside of such regulated market or MTF;

¹ The European Economic Area (EEA) comprises EU member states (Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and United Kingdom) together with Norway, Iceland and Liechtenstein.

- We shall be entering into, responding to continuing communications with you by e-mail and via www.skanestas.com;
- We shall not be making public any client Limit orders in respect of the shares admitted to trading on an EEA regulated market, which are not immediately executed under prevailing market conditions up to a normal market size.

In this regard, we kindly ask you to sign and return the Present Notice.

Should you have any questions, please do not hesitate to contact us by e-mail: info@skanestas.com or by telephone: (+357) 25 212 293.

Yours sincerely,

Kirill Kuchinskiy
Director

(name, position)

Date

Annex 5 to the Client Categorisation Policy and procedure

To: **Skanestas Investments Limited**

Arch. Makariou III Ave. 226, Office No 1,
3030 Limassol, Cyprus

Date:

RE: REQUEST TO BE TREATED AS A PROFESSIONAL CLIENT: BROKERAGE ACCOUNT NO -BR

In reply to your letter dated _ _/ _ _/ _ _ _ _ we do appreciate satisfying our request to be treated as a Professional client and confirm that we are aware of all the consequences of waiving some of the protections afforded by law to Retail clients.

Please do not hesitate to contact us for any additional information you may require.

Kind regards,

(Client name)
(authorised person)
(position)

Annex 6 to the Client Categorisation Policy and procedure

To: **Skanestas Investments Limited**

Arch. Makariou III Ave. 226, Office No 1,

3030 Limassol, Cyprus

Date:

CONSENT OF CATEGORIZATION AS ELIGIBLE COUNTERPARTY UNDER THE MIFID II

We, _____

(Client name and address), **hereby confirm our intension and express our consent to be categorize as Eligible Counterparty.**

We acknowledge and agree that we are a client who possesses the experience, knowledge and expertise to make its own investment decisions and properly assess the risks that we incur, consequently, we express our consent to be treated as Eligible Counterparty in the meaning of the MIFID II.

We hereby confirm our responsibility to ask for higher level of protection and re-categorisation in case we deem it necessary.

Date

(name, position)

Date