



XNT LTD

Product governance Summary Information and Target Markets Disclosures

Annex I
to Product
Governance Policy



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Introduction

Where XNT LTD. (the Company) manufactures or distributes financial instruments falling within the scope of MiFID II or related services, it has certain product governance obligations under Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and the Commission Delegated Directive (EU) 2017/593 of 7 April 2016 supplementing the MiFID II Directive.

The Company identifies target market for financial instruments which it manufactures and/or distributes, specifying the type of client who's needs, characteristics and objectives the financial instrument is compatible with. In some cases, the Company is not able to verify whether the specific client belongs to the identified target market of the financial instrument. With this document the Company provides a set of data required under the MiFID II regulations and the clients themselves should assess independently whether they belong to the target market of a specific instrument that they wish to purchase on their own initiative.

This document covers following aspects: Target Market evaluation; Product Distribution Strategy; General risks related to Financial Instruments; Instrument specific risks.

The provision of target market data does not constitute and should not be understood as marketing, personal recommendation, investment advice or other recommendation with regard to financial instruments. Any investment restrictions or sales restrictions applicable to the relevant financial instruments remain unaffected.



General risk description

Pursuant to the obligations of the Company under the Markets in Financial Instruments Directive (Directive 2014/65/EU) ("MIFID II") this document provides general description of the risks involved when trading financial instruments. Although current document contains information about significant risks, the investor must be aware that other risks may occur that are not included in this document

Investment services, investment ancillary services and financial transactions are related to various risks, which may influence the results of the financial transaction and thus also the achievement of the targets of the investor. In order to achieve the planned results, the investor shall pay special attention to all risks related to a particular financial instrument and transaction. Thus, this document shall introduce the investor to potential risks, which may arise from financial instrument transactions. Investment risk involves the possibility of gains or losses; however, this document seeks to inform primarily of risks that can result in potential losses and does not cover potential gains. These risk disclosures shall apply to all customers – Retail customers, Professional customers or Eligible counterparties.

Key risks generally related to all types of financial instruments (these include, but are not limited to):

Change in law risk

If there is a change in law or regulation which affects an investment, or the manner in which it is traded or held, additional costs might be incurred or, in extreme circumstances, investments lost.

Contingent Liability Transactions (Margin Trading, Short selling) risk

Contingent liability investment transactions or Margin trading can mean engaging in a transaction in which securities are purchased partially through a margin loan provided by a third party, for which the securities act as collateral, or borrowing Securities against cash collateral. Margin trading can also mean trading investment products such as futures, options, CFDs or FOREX in which an initial "margin" deposit is made to secure investor's obligations and further margin may be required to secure its obligations as the value of open positions changes. If investor trades using a "margin" it may sustain a total loss of the Margin or even a loss that exceeds the Margin which was deposited with to Broker to establish or maintain a position. If the market moves against the investor, the investor may be called upon to pay substantial additional Margin at short notice to maintain the position. If the investor fails to do so within the time required, open position(s) may be liquidated at a loss and the investor will be responsible for the resulting deficit.



Counterparty risk

The insolvency of any institution acting as party to a contract in a financial product (or otherwise providing a service) may expose the investor to financial loss.

Currency risk

If investments are denominated in a currency other than that in which the investor's initial investment was made, returns could be reduced, or losses incurred, due to currency fluctuations.

Cyber attack risk

An exposure to harm or loss resulting from breaches of or attacks on information systems, including unauthorised access to trading software, account and or personal information hijacking etc.

Data Quality risk

The quality and reliability of official data published by the governments and government agencies in Emerging Market countries is generally not equivalent to that of more developed countries.

Day Trading Risk

Day trading margin rules are generally less strict than overnight margin rules, therefore allowing the investor to open larger intraday positions. If market moves against the investor, the losses incurred may exceed initial deposit. Active day trading will also increase the amount of fees paid to the investment company, which will impact the returns from trading.

Fellow Customer Risk

Fellow customer risk arises when Client's funds are held based on Omnibus Client Segregation:

- At counterparty level, collateral/assets are not legally attributed to a Customer in terms of asset or value;
- One customer's margin can offset another's positions and gains offset another customer's losses; one customer margin decrease may offset another's decrease;
- Margin calls are all "netted" to a single call per omnibus account.

Fraud risk

If there is a fraud in relation to investments which the investor holds, the investor may be at risk of losing its investment.

Investment Restrictions risk

Investments in certain type of products and/or instruments may be legally restricted in some counties. Investors positions in restricted instruments may be scaled down on closed, causing potential losses.



Legal risk in other jurisdictions

Some markets investments may be subject to different or diminished investor protection, which may put investor's assets at additional risk.

Market order risk

A Market Order is an instruction to execute an order at any price available in the market. A Market Order is not guaranteed a specific execution price and may execute at an undesirable price. To have greater control over the execution prices, investor may use a Limit Order, which is an instruction to execute an order at or better than the specified limit price.

Market risk

General market risk must be distinguished from the risk attached to the financial instrument itself. At some point of time market conditions may be more favourable for a specific type of the instrument, for example when equity market is extremely volatile, investing in debt securities or money market instruments is generally considered to be lower risk.

Omnibus account risk

Financial Instruments at the Company's Counterparties level are being held in an account registered in the name of the Company (in favour of its Clients) which is used for holding Financial Instruments of multiple Clients of the Company (omnibus client segregation). This level of segregation ensures that the Financial Instruments belonging to the Company's Clients are held separately from those belonging to the Company. As a result, the Client is not identified at the Counterparty level but only at the Company level. In case of insolvency proceedings of the Company, insolvency resolution of the affected accounts might not be as efficient and fast as in case with a individually segregated account. Omnibus accounts are also subject to "fellow customer risk".

Past performance risk

Often, Financial Instruments future performance is derived from the Financial Instrument's performance in the past. However, when performance figures quoted refer to the past performance there is no guarantee that future performance will be the same. Past performance does not guarantee future results.

Price risk

As a result of this risk the investor may suffer losses from fluctuations of prices of financial instruments. Prices may undergo unforeseeable fluctuations causing risks of loss. Price increases and decreases in the short-, medium- and long-term alternate without it being possible to determine the duration of those cycles.

Risk of trading outside regulated market or trading venue (multilateral trading facility (MTF) or organized trading facilities (OTF))

When performing transactions outside of the regulated market, MTF or OTF, they are concluded directly



with the business partner. Such transactions are associated with a relatively higher risk in comparison with transactions concluded within the regulated market, as there is a possibility that trade with financial instruments outside of the regulated market, MTF or OTF may be suspended and the assessment and closing of open positions may become difficult.

Risk of using electronic communication means and software

When using electronic communication means, the investor may suffer direct or indirect losses, which have occurred due to damages in informative, electronic or remote service systems or errors related to shortages in market infrastructure, including shortages in transaction technologies and management, accounting and control systems, which are related to the unauthorized access of third persons to trade by using the name of the customer. In the case that refusals appear in the data transmission system or software operation, there is a risk of non-performance of the order of the investor as well as the investor will not be able to receive information on his account in a timely manner by using electronic Internet system or remote service systems.

Risk trading complex financial instruments

Trading of complex financial instruments are generally not suitable for Retail customers. Complex instruments transactions include transactions with simple financial instruments (ordinary shares, bonds with simple structure, some investment funds certificates) which are made using a margin loan; derivatives (futures contracts, short options, swaps, forwards, FOREX, CFDs); structured financial instruments (index linked bonds, financial instruments which contain characteristics of derivatives), as well as other financial instrument with a complex structure that makes it difficult to understand the risk. Trading of complex financial instrument carries a substantial risk of loss.

Settlement risk

A risk to which the investor is exposed to during settlement of financial instruments. The risk of technical malfunctioning may lead to interruptions in reporting systems or communication channels, resulting in inaccurate processing of transactions.

Suspension of trading risk

Under certain trading conditions, it may be difficult or impossible to liquidate a position. This may occur, for example, at times of rapid price movement if the price rises or falls in one trading session to such an extent that, under the rules of the relevant exchange, trading is suspended or restricted. Placing a stop-loss order will not necessarily limit your losses to the intended amounts, because market conditions may make it impossible to execute such an order at the stipulated price.

Subcontracting of safekeeping of financial instruments risk

The Company may deposit the investor's financial instruments or cash with a sub-custodian in a jurisdiction outside the European Economic Area. Consequently, they may be subject to the law of that jurisdiction and



to different regulatory requirements. Investor's rights relating to those financial instruments or cash may differ accordingly. The Company's liability towards the investor in respect of acts and omissions of the relevant sub-custodian and in case of insolvency of the relevant sub-custodian are set out in relevant agreements between the Company and the investor. Financial instruments held on behalf of the investor by the Company may be pooled with financial instruments belonging to other clients of the Company, and held in an omnibus account, and may be recorded in the name of the Company, in accordance with applicable laws.

Tax risk

A change in tax law to impose a new tax on the transfer or holding of an instrument could result in costs being incurred when realising one's investment. The level and basis of taxation on a particular product and on the investor and any reliefs from such taxation depend on the investor's individual circumstances and could change at any time. The tax and regulatory characterisation of the product may change over the life of the product. This could have adverse consequences for the investor.

Title transfer collateral arrangement risk

Where the investor provides funds under a title transfer collateral arrangement to the Company the investor undertakes the following Reuse risks and consequences:

- Any rights, including any proprietary rights that the investor may have had in funds will be replaced by an unsecured contractual claim for the return of funds subject to the terms of the relevant Collateral Arrangement;
- In the event of the insolvency or default of the Company under the relevant agreement the investor's claim against the Company for the return of funds will not be secured and will be subject to the terms of the relevant Collateral Arrangement and applicable law and, accordingly, the investor may not recover the full value of funds;
- In the event that a resolution authority exercises its powers under any relevant resolution regime in relation to the Company any rights the investor may have to take any action against the Company, such as to terminate the agreement, may be subject to a stay by the relevant resolution authority;
- The provision of title transfer collateral, the return of funds may give rise to tax consequences that differ from the tax consequences that would have otherwise applied in relation to the holding by the investor on his account.

Third party risk

Certain investments may need third parties to act in relation to investments traded or held by the investor (e.g. custodians, settlement agents, exchanges). Investments may be at risk in the event of failure and/or fraud in respect of one of these third parties.



Listed shares

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	Shares		
MiFID Categorization	I		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	Shares in companies and other securities equivalent to shares in companies, partnerships or other entities, and depositary receipts in respect of shares. Shares that are traded on regulated markets or in multilateral trading facilities, or in similar trading facilities where such facilities are located outside the EU.		
Product Categorization	Non-Complex Financial Instruments		
Underlying Asset Classes	Shares		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		
Leveraged Financial Instrument or Contingent Liability Instrument	No	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565.

Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. Target markets – Knowledge and/or Experience.



Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	No	Yes or No or Neutral	<p>Investors having the following characteristics:</p> <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses

Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.



Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	N/A	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPS methodology.
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for Non PRIIPS and Non UCITS	Low – Yes Medium – Yes High – Yes	Low/medium/high	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.

Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	Neutral	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	Yes	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Return Profile Income	Yes	Yes or No or Neutral	The aim of investor is to maximize current income from investments, surrendering capital appreciation potential.
Return Profile Hedging	No	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	No	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period

Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	Execution only for non-complex financial instruments



Category name	Category Description	Tag Description	Additional Comments
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	Execution only for clients for whom appropriateness test must be completed
Investment Advice	Neither	Retail or Professional or Both or Neither	N/A
Portfolio Management	Neither	Retail or Professional or Both or Neither	N/A

Commercial characteristics

Diversification

Vast amount of different shares available on the market provide broad diversification possibilities. Choosing different shares for the investment portfolio can help offset the risks associated with any one security or market sector.

Low costs

Trading shares is a cost-effective way to invest in specific companies.

Flexibility

Shares of companies representing various market sectors are available, they offer a flexible way to build a diversified portfolio.

Transparency

Information on traded companies is publicly available. It is possible to do a comprehensive research before investing.

Key financial instrument risks (these include, but are not limited to):

Company risk

A buyer of the share does not lend cash to the company, but becomes a co-owner of the company and thus participates in its development as well as in chances for profits and losses, which makes it difficult to forecast the precise yield on such an investment. An extreme case would be if the company went bankrupt, thereby wiping out the total sums invested.

Price risk

Share prices may undergo unforeseeable price fluctuations causing risks of loss. Price increases and decreases in the short-, medium- and long-term alternate without it being possible to determine the duration of those cycles. General market risk must be distinguished from the specific risk attached to the company itself. Both



risks, jointly or in aggregate, influence share prices.

Dividend risk

The dividend per share mainly depends on the issuing company's earnings and on its dividend policy. In case of low profits or losses, dividend payments may be reduced or not made at all.

Risk relating to market conditions

The price of a share and its disinvestment risk may each be affected by factors relating to wider market conditions, both positive and negative, and such market conditions will affect each company differently depending on the nature and size of the company, amongst other factors; a share cannot therefore be assessed as an investment in isolation.

Disinvestment risk

Shares may be affected by impediments to disinvestment (e.g. shares may prove illiquid or difficult to sell and/or may be difficult to sell at a price equal to or greater than the transaction price at the point in time that the purchaser wishes to sell).

Dilution risk

In the absence of any restrictions in the incorporation documents of the company or other agreement, an issuer may issue more of its shares, thereby potentially reducing the value of the holding and putting downward pressure on the amount of dividends per share.

Termination of listing

Where the shares are listed or admitted to trading, the relevant issuer will not be obliged to maintain the listing or trading. Shares may be suspended from trading and/or de-listed at any time in accordance with applicable rules and regulations of the relevant stock exchange(s). This may result in reduced liquidity or a reduction in the value of the shares.

Non-listed shares

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	Non-listed Shares		
MiFID Categorization	I		According to Section C of Annex I of DIRECTIVE 2014/65/EU



Category Name	Category Description	Tag Description	Additional Comments
Product Description	Shares that are not traded on regulated markets, organized trading facilities or in multilateral trading facilities, or in similar trading facilities where such facilities are located outside the EU.		
Product Categorization	Complex Financial Instruments		
Underlying Asset Classes	Shares		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		
Leveraged Financial Instrument or Contingent Liability Instrument	No	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565

Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	Neutral	Yes or No or Neutral	<p>Investors having the following characteristics:</p> <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	Neutral	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>



Category Name	Category Description	Tag Description	Additional Comments
Advanced Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses

Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.

Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	N/A	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPS methodology.
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for Non PRIIPS and Non UCITS	Low – No Medium – Neutral High – Yes	Low/medium/high Yes or No or Neutral	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.



Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	Neutral	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	Yes	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Return Profile Income	Yes	Yes or No or Neutral	The aim of investor is to maximize current income from investments, surrendering capital appreciation potential.
Return Profile Hedging	No	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	No	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period

Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	Execution only for non-complex financial instruments
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	Execution only for clients for whom appropriateness test must be completed
Investment Advice	Neither	Retail or Professional or Both or Neither	N/A
Portfolio Management	Neither	Retail or Professional or Both or Neither	N/A

Commercial characteristics

Diversification

Vast number of different shares available outside the trading venue or trading in trading facilities outside of EU provide broad diversification possibilities. Choosing different shares for the investment portfolio can help offset the risks associated with any one security or market sector.

Low costs

Trading shares is a cost-effective way to invest in specific companies.



Flexibility

Shares of companies representing various market sectors are available, they offer a flexible way to build a diversified portfolio.

Transparency

Information on traded companies is publicly available. It is possible to do a comprehensive research before investing.

Key financial instrument risks (these include, but are not limited to):

Company risk

A buyer of the share does not lend cash to the company, but becomes a co-owner of the company and thus participates in its development as well as in chances for profits and losses, which makes it difficult to forecast the precise yield on such an investment. An extreme case would be if the company went bankrupt, thereby wiping out the total sums invested.

Price risk

Share prices may undergo unforeseeable price fluctuations causing risks of loss. Price increases and decreases in the short-, medium- and long-term alternate without it being possible to determine the duration of those cycles. General market risk must be distinguished from the specific risk attached to the company itself. Both risks, jointly or in aggregate, influence share prices.

Dividend risk

The dividend per share mainly depends on the issuing company's earnings and on its dividend policy. In case of low profits or losses, dividend payments may be reduced or not made at all.

Risk relating to market conditions

The price of a share and its disinvestment risk may each be affected by factors relating to wider market conditions, both positive and negative, and such market conditions will affect each company differently depending on the nature and size of the company, amongst other factors; a share cannot therefore be assessed as an investment in isolation.

Disinvestment risk

Shares may be affected by impediments to disinvestment (e.g. shares may prove illiquid or difficult to sell and/or may be difficult to sell at a price equal to or greater than the transaction price at the point in time that the purchaser wishes to sell).



Dilution risk

In the absence of any restrictions in the incorporation documents of the company or other agreement, an issuer may issue more of its shares, thereby potentially reducing the value of the holding and putting downward pressure on the amount of dividends per share

Termination of listing

Where the shares are listed or admitted to trading, the relevant issuer will not be obliged to maintain the listing or trading. Shares may be suspended from trading and/or de-listed at any time in accordance with applicable rules and regulations of the relevant stock exchange(s). This may result in reduced liquidity or a reduction in the value of the shares.

Shares That Embed A Derivative

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	Shares that embed a derivative		
MiFID Categorization	I		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	Preference shares that embed a derivative, convertible shares and similar instruments traded outside the EU; subscription rights (including nil-paid rights) that have a complex share (such as a non-listed share or derivative-embedding share) as underlying and all subscription rights irrespective of their underlying if traded on secondary market (including similar instruments issued or traded outside the EU).		
Product Categorization	Complex Financial Instruments		
Underlying Asset Classes	Shares		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		
Leveraged Financial Instrument or Contingent Liability Instrument	Neutral	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565.



Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	Neutral	Yes or No or Neutral	Investors having the following characteristics: <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	Yes	Yes or No or Neutral	Investors having one, or more, of the following characteristics: <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	Yes	Yes or No or Neutral	Investors having one, or more, of the following characteristics: <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses

Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.



Category name	Category Description	Tag Description	Additional Comments
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.

Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	1-7	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPS methodology.
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for Non PRIIPS and Non UCITS	Low – No Medium – Neutral High – Yes	Low/medium/high Yes or No or Neutral	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.

Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	No	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	Yes	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Return Profile Income	Yes	Yes or No or Neutral	The aim of investor is to maximize current income from investments, surrendering capital appreciation potential.
Return Profile Hedging	No	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	Neutral	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period



Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	
Investment Advice	Neither	Retail or Professional or Both or Neither	
Portfolio Management	Neither	Retail or Professional or Both or Neither	

Commercial characteristics

Diversification

Vast amount of different shares available on the market provide broad diversification possibilities. Shares that embed a derivative can provide more custom approach to trading and can help offset the risks associated with any one security or market sector.

Low costs

Trading shares is a cost-effective way to invest in specific companies.

Flexibility

Shares of companies representing various market sectors are available, they offer a flexible way to build a diversified portfolio.

Transparency

Information on traded companies is publicly available. It is possible to do a comprehensive research before investing.

Key financial instrument risks (these include, but are not limited to):

Company risk

A share purchaser does not lend cash to the company, but becomes a co-owner of the corporation. He or she thus participates in its development as well as in chances for profits and losses, which makes it difficult to forecast the precise yield on such an investment. An extreme case would be if the company went bankrupt, thereby wiping out the total sums invested.

Price risk

Share prices may undergo unforeseeable price fluctuations causing risks of loss. Price increases and decreases



in the short-, medium- and long-term alternate without it being possible to determine the duration of those cycles. General market risk must be distinguished from the specific risk attached to the company itself. Both risks, jointly or in aggregate, influence share prices.

Dividend risk

The dividend per share mainly depends on the issuing company's earnings and on its dividend policy. In case of low profits or losses, dividend payments may be reduced or not made at all.

Risk relating to market conditions

The price of a share and its disinvestment risk may each be affected by factors relating to wider market conditions, both positive and negative, and such market conditions will affect each company differently depending on the nature and size of the company, amongst other factors; a share cannot therefore be assessed as an investment in isolation.

Disinvestment risk

Shares may be affected by impediments to disinvestment (e.g. shares may prove illiquid or difficult to sell and/or may be difficult to sell at a price equal to or greater than the transaction price at the point in time that the purchaser wishes to sell).

Dilution risk

In the absence of any restrictions in the incorporation documents of the company or other agreement, an issuer may issue more of its shares, thereby potentially reducing the value of the holding and putting downward pressure on the amount of dividends per share.

Termination of listing

Where the shares are listed or admitted to trading, the relevant issuer will not be obliged to maintain the listing or trading. Shares may be suspended from trading and/or de-listed at any time in accordance with applicable rules and regulations of the relevant stock exchange(s). This may result in reduced liquidity or a reduction in the value of the shares.

Leverage risk

Subscription rights such as warrants involve leverage, the price of a warrant can be highly volatile. A relatively small movement in the price of the underlying security can result in a disproportionately large movement, favourable or unfavourable, in the value of the warrant.

Derivatives risk

Shares like preferred shares may include an embedded derivative, making the shares redeemable, giving the issuer the right to redeem the share at a date and price specified in the prospectus.



Conversion risk

Preferred shares may also be convertible. The timing for conversion and the conversion price specific to the individual issue will be laid out in the prospectus.

Non-complex mutual funds

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	UCITS Funds (Mutual funds and ETF), other non-complex mutual funds		
MiFID Categorization	1,3		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	Mutual funds and ETFs created under the UCITS Directive; other mutual funds created in EU or outside of it if they are not derivatives and do not embed derivatives, they can be sold frequently at market prices or other independently determined prices, they do not involve any liabilities that exceed their acquisition costs, their nature, risk or payout cannot be altered significantly (such as via conversion), their exit costs do not make them effectively illiquid, and there is sufficient public information available that enables an average client to make an informed investment decision about them.		
Product Categorization	Non-Complex Financial Instruments		
Underlying Asset Classes	Transferable securities		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		
Leveraged Financial Instrument or Contingent Liability Instrument	No	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565

Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.



Category Name	Category Description	Tag Description	Additional Comments
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	Yes	Yes or No or Neutral	Investors having the following characteristics: <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	Yes	Yes or No or Neutral	Investors having one, or more, of the following characteristics: <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	Yes	Yes or No or Neutral	Investors having one, or more, of the following characteristics: <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses

Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.



Category name	Category Description	Tag Description	Additional Comments
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.

Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	1-7	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPS methodology.
Risk Tolerance UCITS Methodology	1-7	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for Non PRIIPS and Non UCITS	Low – Yes Medium – Yes High – Yes	Low/medium/high	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.

Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	Neutral	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	Yes	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Return Profile Income	Yes	Yes or No or Neutral	The aim of investor is to maximize current income from investments, surrendering capital appreciation potential.
Return Profile Hedging	No	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	No	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period



Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	
Investment Advice	Neither	Retail or Professional or Both or Neither	
Portfolio Management	Neither	Retail or Professional or Both or Neither	

Commercial characteristics

Diversification

UCITS Funds offer broad diversification. That can help offset the risks associated with any one security or market sector. Professional asset managers carefully select the securities in which they invest. Asset managers also employ a group of analysts and experts that produce detailed information set on which the managers rely in order to select securities.

Low costs

Trading UCITS Funds is a cost-effective way to invest in financial instrument managed by professionals.

Flexibility

UCITS Funds can provide broad exposure to different asset classes or market sectors, they offer a flexible way to build a new portfolio or restructure an existing one.

Transparency

Information on UCITS Funds (including KIID and KID) is publicly available. It is possible to do a comprehensive research before investing.

Key financial instrument risks (these include, but are not limited to):

Market risk

The value of a fund depends on the value of the assets it holds. If general market conditions deteriorate, it is likely that the value of the investment in the fund will also deteriorate. Typically, an ETF will seek to replicate a stock market index, market sector, commodity or other basket of assets. Accordingly, the investor is exposed to the market risk of the underlying assets.



Liquidity risk

Interests in UCITS are intended to be easily transferable and redeemable, but in the event of poor performance of the fund, liquidity may be drastically reduced and investors may be unable to realise their investments without incurring losses or reduced returns.

Country risk

the value of a foreign investment may decline because of political changes or instability in the country where the foreign investment was issued.

Changes to portfolio

The composition of the fund's portfolio of investments may change from time to time. Such changes may have an impact on the value of the fund.

Counterparty risk and service provider risk

The insolvency of any institution providing services to the fund, such as safekeeping of assets or acting as counterparty to the fund in derivatives or other instruments, may expose the fund to financial loss.

Limited diversification risk

As UCITS can only invest in certain assets, they are therefore highly exposed to market conditions affecting those investments.

Performance risk

No assurance can be given relating to the present or future performance of a fund and any underlying asset or instrument in which the fund may invest, that any analytical model used by the fund will prove to be correct or that any assessments of the short-term or long-term prospects, volatility and correlation of the types of investments in which a fund has or may invest will prove accurate. Investors in an ETF may rely on the manager to track the performance of the underlying indices or assets, or the ETF may track the underlying assets passively (i.e. without the active involvement of the manager). In practice, the ETF's performance will differ from the performance of those indices or assets. More specifically, this may be the result of an ETF tracking error (being the difference between the returns of the ETF and its reference index or asset) may occur owing to a number of factors including rebalancing, restrictions/limitations (e.g. emerging market accessibility), method of replication and the costs/expense ratio (higher costs may lead to a greater tracking error). Therefore, an investor may receive lower returns than it would have had it invested directly in those underlying assets.

Tracking risk

Changes in the price of the fund are unlikely to match the exact performance of the relevant/underlying instrument or group of instruments. Factors such as fees and expenses payable in respect of the ETF, liquidity



of the market, failure of the tracking strategy, currency effect, policies etc., may affect the correlation with the underlying instruments.

Composition risk

While two funds may track the same index or sector, their performance may not be equal due to different holdings in the underlying basket. For example, two funds may track particular industry, but rely on a completely different basket of companies or segments.

Complex mutual funds

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	Complex mutual funds that are listed or non-listed (Complex UCITS, Non-UCITS, Leveraged or structured or synthetic ETF, AIF, other similar funds)		
MiFID Categorization	1.3		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	Structured UCITS, AIFs or complex ETFs, and similar collective investment undertakings recognized outside the EU (real estate funds, private equity funds, hedge funds, venture capital funds and funds with other unusual underlying).		
Product Categorization	Complex Financial Instruments		
Underlying Asset Classes	Any		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		
Leveraged Financial Instrument or Contingent Liability Instrument	Neutral	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565

Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.



Category Name	Category Description	Tag Description	Additional Comments
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	Neutral	Yes or No or Neutral	Investors having the following characteristics: <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	Neutral	Yes or No or Neutral	Investors having one, or more, of the following characteristics: <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	Yes	Yes or No or Neutral	Investors having one, or more, of the following characteristics: <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses

Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.



Category name	Category Description	Tag Description	Additional Comments
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.

Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	1-7	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPS methodology.
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for Non PRIIPS and Non UCITS	Low – Neutral Medium – Yes High – Yes	Low/medium/high	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.

Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	No	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	Yes	Yes or No or Neutral	The aim of investor is to achieve growth of capital value, surrendering current income potential.
Return Profile Income	Yes	Yes or No or Neutral	The aim of investor is to maximise current income from investments, surrendering capital appreciation potential.
Return Profile Hedging	Neutral	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	Neutral	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period



Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	
Investment Advice	Neither	Retail or Professional or Both or Neither	
Portfolio Management	Neither	Retail or Professional or Both or Neither	

Commercial characteristics

Diversification

Complex funds offer broad diversification including investments in non-financial instruments. That can help offset the risks associated with any one security or market sector or asset class. Professional asset managers assets in which they invest. Asset managers also employ a group of analysts and experts that produce detailed information set on which the managers rely in order to select securities.

Low costs

Trading Complex funds is a cost-effective way to invest in different asset classes managed by professionals.

Flexibility

Complex funds can provide broad exposure to different asset classes or market sectors, they offer a flexible way to build a new portfolio or restructure an existing one.

Transparency

Fund manager will provide fund prospectus or other information on Complex funds. Information for some Complex funds is publicly available. It is possible to do a comprehensive research before investing.

Key financial instrument risks (these include, but are not limited to):

Market risk

The value of a fund depends on the value of the assets it holds. If general market conditions deteriorate, it is likely that the value of the investment in the fund will also deteriorate. Typically, an ETF will seek to replicate a stock market index, market sector, commodity or other basket of assets. Accordingly, the investor is exposed to the market risk of the underlying assets.



Liquidity risk

Open-ended funds may not be able to liquidate their assets and return funds to investors in the event that there is poor liquidity in the market generally or in the specific sector in which the fund invests. Ongoing costs to service those investments could lead to increased losses or reduced profits for investors in the fund. Closed-ended funds can be subject to risks of low trading and therefore provide limited liquidity, making it difficult for an investor to realise its investment. Some AIFs have lock-up periods or may otherwise be illiquid, so realising your investment can be difficult.

Country risk

The value of a foreign investment may decline because of political changes or instability in the country where the foreign investment was issued.

Changes to portfolio

The composition of the fund's portfolio of investments may change from time to time. Such changes may have an impact on the value of the fund.

Interest rate risk

A leveraged fund will be exposed to interest rate rises. This could reduce the returns that investors receive, or even lead to losses.

Currency risk

If investments in the fund are denominated in a currency other than that in which the investor's initial investment was made, returns could be reduced (or losses incurred) due to currency fluctuations.

Derivatives risk

A fund may utilise instruments in the form of warrants, futures, options, forward contracts and swaps to seek to enhance investment returns. While this can potentially have the effect of enhancing the fund's performance, it can also be detrimental if there are losses on the derivatives.

Restrictions on subscription

An investor in the fund's units/shares may be prevented from subscribing and redeeming such units/shares, either at the official net asset value (for example, as a result of the imposition of any charges by the fund) or at all, or the prescribed notice period, timing cut-offs and minimum/maximum amounts in respect of subscriptions and redemptions for the fund's units/shares may be changed.

Compulsory redemption risk

The fund may compulsorily redeem the shares/units upon the occurrence of certain events (for example, if, following the insolvency of the investment manager, the fund becomes unable to fulfil its investment objections).



Counterparty risk and service provider risk

The insolvency of any institution providing services to the fund, such as safekeeping of assets or acting as counterparty to the fund in derivatives or other instruments, may expose the fund to financial loss.

Limited diversification risk

Unless the fund is subject to investment restrictions and diversification requirements, the number and diversity of investments held by a fund may be limited. AIFs may not be subject to investment restrictions and diversification requirements, and therefore they may have limited diversification meaning that an investor may be highly exposed to poor market conditions in the relevant sector.

Performance risk

No assurance can be given relating to the present or future performance of a fund and any underlying asset or instrument in which the fund may invest, that any analytical model used by the fund will prove to be correct or that any assessments of the short-term or long-term prospects, volatility and correlation of the types of investments in which a fund has or may invest will prove accurate. Investors in an ETF may rely on the manager to track the performance of the underlying indices or assets, or the ETF may track the underlying assets passively (i.e. without the active involvement of the manager). In practice, the ETF's performance will differ from the performance of those indices or assets. More specifically, this may be the result of an ETF tracking error (being the difference between the returns of the ETF and its reference index or asset) may occur owing to a number of factors including rebalancing, restrictions/limitations (e.g. emerging market accessibility), method of replication and the costs/expense ratio (higher costs may lead to a greater tracking error). Therefore, an investor may receive lower returns than it would have had it invested directly in those underlying assets.

Sub-funds segregation

The sub-funds of the fund may be segregated as a matter of the law of the fund's home jurisdiction and, as such, the assets of one sub-fund will not be available to satisfy the liabilities of another sub-fund. However, the fund may operate or have assets held on its behalf or be subject to claims in other jurisdictions other than its home jurisdiction which may not necessarily recognise such segregation. There can be no guarantee that the courts of any jurisdiction outside its home jurisdiction will respect the above limitations on liability.

Composition risk

While two funds may track the same index or sector, their performance may not be equal due to different holdings in the underlying basket. For example, two funds may track particular industry, but rely on a completely different basket of companies or segments.

Asset allocation



AIFs can invest in a very wide range of investments. Some AIFs will invest in highly speculative or very illiquid assets; this may increase the risk of losing some or all of the investment in the AIF or making it difficult to relive the value of the investment.

Leverage risk

AIFs can be highly leveraged. This means that small falls in the value of the investments they hold can have significant impact on the value of the fund.

Derivatives risk

ETF managers may employ a synthetic structure to provide the stated return, whereby the return is based on a derivative executed with a counterparty. The return may therefore be dependent on the credit quality of the counterparty and/or the collateral held to support the position. Investors may also be exposed to the risks outlined below in respect of derivatives.

Authorised participant (AP) concentration risk

in the ETF market, only an AP is permitted to engage in the creation/redemption of transactions directly with the ETF. Since the ETF may only permit for a limited number of institutions to act as an AP, there is the risk that, where an AP exits the business, or is otherwise unable to proceed with the creation/redemption transactions, it was instructed to carry out, and no other AP is able to step in to give effect such creation/redemption transactions, the ETF shares/units may be more likely to trade at a premium price or a discount to the net asset value of index or assets it seeks to replicate, and as a result the ETF may be subject to trading halts and/or delisting.

Index-linked risk

An ETF may seek to track and replicate a specific index (e.g. a stock index) to achieve returns that correspond to value of that underlying index. There is a risk that, where the provider of such index has not compiled, composed or calculated the index accurately, the investor may be exposed to the risks associated with that index and its inaccurate or erroneous composition.

Listed debt securities

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	Listed Bonds and Money Market instruments		



Category Name	Category Description	Tag Description	Additional Comments
MiFID Categorization	1.2		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	Bonds and other debt securities that are traded on regulated markets or in multilateral trading facilities, or in similar trading facilities where such facilities are located outside the EU. Money market instruments may include treasury bills, certificates of deposit or commercial papers that are usually traded on money market where such instruments have a value that can be determined at any time, they are not derivatives and they have a maturity of 397 days or less at issuance.		
Product Categorization	Non-Complex Financial Instruments		
Underlying Asset Classes	Debt securities		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		
Leveraged Financial Instrument or Contingent Liability Instrument	No	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565.

Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	Yes	Yes or No or Neutral	<p>Investors having the following characteristics:</p> <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>



Category Name	Category Description	Tag Description	Additional Comments
Informed Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses

Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.

Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	N/A	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPs methodology.



Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for Non PRIIPS and Non UCITS	Low – Neutral Medium – Yes High – Yes	Low/medium/high	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.

Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	Neutral	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	Yes	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Return Profile Income	Yes	Yes or No or Neutral	The aim of investor is to maximize current income from investments, surrendering capital appreciation potential.
Return Profile Hedging	No	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	No	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period

Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	
Investment Advice	Neither	Retail or Professional or Both or Neither	
Portfolio Management	Neither	Retail or Professional or Both or Neither	



Commercial characteristics

Investment returns

Fixed rate or interest is paid to a bond holder and the principal is returned when bond matures. Bond holder knows exactly the amount of return.

Risk

In general risk is lower than holding the shares. In the event of liquidation, bond holders are paid first over shareholders.

Volatility

While bond prices fluctuate reflecting market conditions, they are generally more stable compared to shares.

Credit Ratings

Bonds are widely rated by credit rating agencies, such as S&P and Moody's. This provides guidance to investors when selecting a bond. However, it is still necessary to conduct own research and due diligence before investing.

Money market safety

Money market securities are considered extraordinarily safe.

Money market liquidity

Money market instruments are extremely liquid and can be converted into cash immediately.

Key financial instrument risks (these include, but are not limited to):

New Issuances risk

Investors should be aware that they may not receive the full allocation they apply for, and that any debt instruments they do receive may decline in value from the par value of issuance.

Bail-in risk

Debt instruments issued by banks, certain other financial services firms and, in some cases, their parents and other affiliates may, depending on the rank of the debt security in the resolution creditor hierarchy, be vulnerable to “bail in” or equivalent measures, where the issuer undergoes a resolution procedure. In a bail in, a governmental or other regulatory body may require investor’s rights under such securities to be written off in whole or part, or converted into equity, or the terms of such securities to be altered (e.g. date of maturity or interest rates payable) or payments suspended. The purpose of such a bail-in is to prevent the issuer from entering into insolvency proceedings, and will therefore precede formal insolvency. This means that the holders of the bank and related debt securities may lose some or all of their investment, where the issuer is in financial difficulty, even outside an insolvency scenario and absent the technical default of the issuer.



Insolvency risk

The issuer may become temporarily or permanently insolvent, resulting in its incapacity to repay the interest or redeem the bond. The solvency of an issuer may change due to one or more of a range of factors including the issuing entity, the issuer's economic sector and/or the political and economic status of the countries concerned. The deterioration of the issuer's solvency will influence the price of the securities that it issues.

Interest rate risk

Uncertainty concerning interest rate movements means that purchasers of fixed rate securities carry the risk of a fall in the prices of the securities if interest rates rise. The longer the duration of the loan and the lower the interest rate, the higher a bond's sensitivity to a rise in the market rates.

Credit risk

The value of a bond will fall in the event of a default or reduced credit rating of the issuer. Generally, the higher the relative rate of interest (that is, relative to the interest rate on a risk free security of similar maturity and interest rate structure usually a government bond or certificate of deposit, generally considered to be free from risk of monetary loss), the higher the perceived credit risk of the issuer.

Risk relating to market conditions

The price of a bond and its disinvestment risk may each be affected by factors relating to wider market conditions, both positive and negative, and such market conditions will affect each issuer differently depending on the nature and size of the issuer, amongst other factors; a bond cannot therefore be assessed as an investment in isolation.

Disinvestment risk

Bonds may be affected by impediments to disinvestment (e.g. the liquidity of a bond may affect the market value of a bond despite its projected yield based on its coupon and expected maturity). Market may become less liquid, meaning that the bond holder is unable to exit this investment before the maturity date. This exposes the bond holder to inflation and/or interest rate risk, as the return on the bond may become lower than the rate of inflation or interest rates available elsewhere.

Termination of listing risk

Where the bonds are listed or admitted to trading, the relevant issuer will not be obliged to maintain the listing or trading. Bonds may be suspended from trading and/or de listed at any time in accordance with applicable rules and regulations of the relevant stock exchange(s). This may result in reduced liquidity or a reduction in the value of the bonds.

Market risk

When the equity and debt markets are extremely volatile, investing in money market instruments is generally



considered to be lower risk. Conversely, during normal market conditions you may be prevented from achieving your objective during any period in which assets are not substantially invested in accordance with your principal investment strategies as a result of being invested in such money market instruments.

Risks affecting the issuer

Investors in money market instruments are exposed to the political, market and operational risks that affect the issuers of the underlying assets. They are also exposed to currency risk insofar as underlying assets are denominated in a currency other than the one in which their investment was made.

Non-listed or complex debt securities

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	Non-listed debt securities or debt securities that have a complex structure that makes it difficult to understand the risk		
MiFID Categorization	I		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	Bonds and other debt instruments that are not traded on regulated markets, multilateral trading facilities or organized trading facilities, or in similar trading facilities where such facilities are located outside the EU such as fixed-rate or floating rate bonds, inflation-linked bonds, step-up bonds and covered bonds (including other similar instruments issued or traded outside the EU). As well as Bonds and other debt instruments which return is dependent on the performance of an asset pool; that are subordinated; where issuer can modify cash flows; that have no maturity date; that have unusual or unfamiliar underlying; that have complex return calculation methodology, where the principal may not be fully repaid or may be bailed-in; where the name of issuer or guarantor may mislead the investors; that have conditional or complex guarantee mechanism. (including other similar instruments issued or traded outside the EU).		
Product Categorization	Complex Financial Instruments		
Underlying Asset Classes	Debt securities		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		



Category Name	Category Description	Tag Description	Additional Comments
Leveraged Financial Instrument or Contingent Liability Instrument	No	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565

Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	Neutral	Yes or No or Neutral	Investors having the following characteristics: <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	Neutral	Yes or No or Neutral	Investors having one, or more, of the following characteristics: <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	Yes	Yes or No or Neutral	Investors having one, or more, of the following characteristics: <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>



Target markets – Ability to Bear Losses

Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target; product should not be sold to investors that cannot bear losses.
Limited Capital Loss	Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.

Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	1-7	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPs methodology.
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for Non PRIIPS and Non UCITS	Low – No Medium – Neutral High – Yes	Low/medium/high	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.

Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	No	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	Yes	Yes or No or Neutral	The aim of investor is to achieve growth of capital value, surrendering current income potential.
Return Profile Income	Yes	Yes or No or Neutral	The aim of investor is to maximize current income from investments, surrendering capital appreciation potential.



Category name	Category Description	Tag Description	Additional Comments
Return Profile Hedging	No	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	Neutral	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period

Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	
Investment Advice	Neither	Retail or Professional or Both or Neither	
Portfolio Management	Neither	Retail or Professional or Both or Neither	

Commercial characteristics

Investment returns

Higher rate or interest returns compared to non-complex debt instruments at cost of higher risk losing all or part of the investments.

Flexibility

Complex debt securities allow to build custom portfolios with complex structure for specific investor needs.

Transparency

Bond prospectus which is either publicly available or may be obtained from an executing broker outlines key characteristics of the bond structure. If bond falls under PRIIP regime, KID may be available.

Credit Ratings



Bonds are widely rated by credit rating agencies, such as S&P and Moody's. This provides guidance to investors when selecting a bond. However, it is still necessary to conduct own research and due diligence before investing.

Key financial instrument risks (these include, but are not limited to):

All risks related to Listed debt securities

Please see section "Listed debt securities"

Risks specific to certain types of bond

Additional risks may be associated with certain types of bond, for example floating rate notes, reverse floating rate notes, zero coupon bonds, foreign currency bonds, convertible bonds, reverse convertible notes, indexed bonds, and subordinated bonds. For such bonds, it is advised to make inquiries about the risks referred to in the issuance prospectus, and not to purchase such securities before being certain that all risks are fully understood. In the case of subordinated bonds, it is advised to enquire about the ranking of the debenture compared to the issuer's other debentures. Indeed, if the issuer becomes bankrupt, those bonds will only be redeemed after repayment of all higher ranked creditors and, as such, there is a risk that bond holder will not be reimbursed. In the case of reverse convertible notes, there is a risk that bond holder will not be entirely reimbursed, but will receive only an amount equivalent to the underlying securities at maturity.

Asset backed Securities (ABS) operational risk

An ABS is a debt security in respect of which the income payments, and therefore the value, are derived from and collateralised (or "backed") by a specified underlying asset or pool of underlying assets. The asset can be a loan, a lease, a pool of secured loans or receivables relating to assets such as cars, aircraft or real estate or revenue streams. Often, an ABS is issued by a special purpose vehicle ("SPV") which is specifically formed for the purpose of issuing the ABS and purchasing the relevant asset or assets. An SPV is highly dependent on third parties such as corporate service providers, servicers/asset managers, paying agents, trustees and other service providers to meet its own obligations. It is therefore exposed to the operational and credit risk of those third parties.

ABS Credit risk

The holder of an ABS is exposed to the credit risk of the issuer of the ABS and the borrower against the underlying asset. These two risks may be related. Wide spread default by underlying obligors may lead to the insolvency of the issuer of the ABS.

ABS Ownership risk

The holder of the relevant ABS does not have any ownership rights over the underlying assets and will therefore have no claim over the underlying obligor(s) in the event of its or their insolvency.



Perpetual bond risk

Perpetual bonds do not have a maturity date, which means that there is no point in time when issuer will return principal amount to a bond holder. Bond must be sold to another investor in order to receive the money.

Complex debt securities that embed a derivative

Target market assessment

General Financial Instrument information

Caetegory Name	Category Description	Tag Description	Additional Comments
Product name	Debt securities that embed a derivative		
MiFID Categorization	I		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	Bonds and other debt instruments of the following type: convertible and exchangeable bonds, indexed bonds and turbo certificates, contingent convertible bonds, callable or puttable bonds, credit-linked notes, warrants (including similar instruments issued or traded outside the EU).		
Product Categorization	Complex Financial Instruments		
Underlying Asset Classes	Debt securities		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		
Leveraged Financial Instrument or Contingent Liability Instrument	Neutral	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565.

Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.



Category Name	Category Description	Tag Description	Additional Comments
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	Neutral	Yes or No or Neutral	<p>Investors having the following characteristics:</p> <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	Neutral	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses

Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.



Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	1.7	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPs methodology.
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for Non PRIIPS and Non UCITS	Low – Neutral Medium – Yes High – Yes	Low/medium/high	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.

Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	No	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	Yes	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Return Profile Income	Yes	Yes or No or Neutral	The aim of investor is to maximize current income from investments, surrendering capital appreciation potential.
Return Profile Hedging	No	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	No	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period

Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	
Investment Advice	Neither	Retail or Professional or Both or Neither	



Category name	Category Description	Tag Description	Additional Comments
Portfolio Management	Neither	Retail or Professional or Both or Neither	

Commercial characteristics

Investment returns

Higher rate or interest returns compared to non-complex debt instruments at cost of higher risk losing all or part of the investments.

Flexibility

Complex debt securities allow to build custom portfolios with complex structure for specific investor needs.

Transparency

Bond prospectus which is either publicly available or may be obtained from an executing broker outlines key characteristics of the bond structure. If bond falls under PRIIP regime, KID may be available.

Credit Ratings

Bonds are widely rated by credit rating agencies, such as S&P and Moody's. This provides guidance to investors when selecting a bond. However, it is still necessary to conduct own research and due diligence before investing.

Key financial instrument risks (these include, but are not limited to):

All risks related to Listed debt securities and Non-listed or complex debt securities

Please see section "Listed debt securities" and "Non-listed or complex debt securities"

Early redemption risk

The issuer of a bond may include a provision allowing early redemption of the bond if market interest rates fall. Such early redemption may result in a change to the expected yield.

Tax call risk

The issuer of the bond may have the right to call the bond should there be an adverse change to the tax laws that affect it. This may mean that the yield on the bond is lower than anticipated.

Derivatives risk

As these bonds include an embedded equity derivative, investors should consider the effect of the embedded derivative on the value of the bond, which may be to amplify any losses.

Equity risks



On exercise of the conversion rights, holders are exposed to the risks relating to shares in respect of the relevant equity securities.

Conversion risk

Conversion of the bond into equities may only be possible during certain periods of time and may also be subject to certain other conditions. This may mean that the holder is unable to exercise its conversion right at the most advantageous time, which may result in reduced profits or increased losses.

Margin trading, contingent liability transactions

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	Margin (leveraged) trading and contingent liability transactions		
MiFID Categorization	N/A		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	Margin trading refers to the practice of using borrowed funds from a broker to trade a financial asset, which forms the collateral for the loan from the broker. A contingent liability transaction should involve any actual or potential liability for the client that exceeds the cost of acquiring the instrument.		
Product Categorization	Complex Financial Instruments		
Underlying Asset Classes	Any		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		
Leveraged Financial Instrument or Contingent Liability Instrument	Yes	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565.

Target markets – Investor Type



Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	Neutral	Yes or No or Neutral	<p>Investors having the following characteristics:</p> <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses

Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	No	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.



Category name	Category Description	Tag Description	Additional Comments
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.

Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	N/A	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPS methodology.
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for NonPRIIPS and Non UCITS	Low – No Medium – No High – Yes	Low/medium/high	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.

Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	No	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	No	Yes or No or Neutral	The aim of investor is to achieve growth of capital value, surrendering current income potential.
Return Profile Income	No	Yes or No or Neutral	The aim of investor is to maximize current income from investments, surrendering capital appreciation potential.
Return Profile Hedging	Neutral	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	Neutral	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.



Category name	Category Description	Tag Description	Additional Comments
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period

Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	
Investment Advice	Neither	Retail or Professional or Both or Neither	
Portfolio Management	Neither	Retail or Professional or Both or Neither	

Commercial characteristics

Leverage

Margin trading allows the investor to get exposed to a larger position than he normally would by borrowing money from a broker or an exchange.

Short selling

Short selling strategy provides an opportunity to profit from depreciation of a security.

Diversification

Existing portfolio can be diversified by using it as collateral for margin trading, meaning that no additional funds will be necessary to open new positions.

Line of credit

It is possible to borrow money under margin rules and use them for purposes other than trading.

Repayment flexibility

As long as margin requirements are met, the investor may repay the margin loan on his own schedule.

Key financial instrument risks (these include, but are not limited to):



Leverage risk

Margin trading can magnify losses just as dramatically as it can boost returns.

Margin risk

A relatively small market movement will have a proportionately larger impact on the margin an investor has deposited or will have to deposit: this may work against the investor as well as for them. An investor may sustain a total loss of required maintenance margin and any additional margin deposited with the firm to maintain the position. If the market moves against the position or margin levels are increased, the investor may be called upon to pay substantial additional collateral on short notice to cover losses incurred from price fluctuations to maintain the position. Failure to provide additional margin may lead to the position being closed out which could crystallise a loss position.

Negative balance risk

Under certain market conditions such as increased volatility or market gapping there may be a situation when the loss on the position exceeds the amount of deposited margin. The brokerage company will close the position out (stop-loss) leaving a negative balance on the account and the investor will be responsible to cover it. and the investor will be responsible to cover it.

Futures

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	Futures contracts (Exchange traded)		
MiFID Categorization	4,5,6,7,10		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	Exchange traded standardized contracts tracking price of underlying assets, where a buyer and a seller have an obligation to settle transaction at specified time in the future.		
Product Categorization	Complex Financial Instruments		
Underlying Asset Classes	Derivative contracts		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		



Category Name	Category Description	Tag Description	Additional Comments
Leveraged Financial Instrument or Contingent Liability Instrument	Yes	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565.

Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	Neutral	Yes or No or Neutral	Investors having the following characteristics: <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	Yes	Yes or No or Neutral	Investors having one, or more, of the following characteristics: <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	Yes	Yes or No or Neutral	Investors having one, or more, of the following characteristics: <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses



Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	No	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Neutral	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.

Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	7	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPS methodology.
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for Non PRIIPS and Non UCITS	Low – No Medium – Neutral High – Yes	Low/medium/high	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.

Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	No	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	No	Yes or No or Neutral	The aim of investor is to achieve growth of capital value, surrendering current income potential.
Return Profile Income	No	Yes or No or Neutral	The aim of investor is to maximize current income from investments, surrendering capital appreciation potential.



Category name	Category Description	Tag Description	Additional Comments
Return Profile Hedging	Yes	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	Yes	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period

Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	
Investment Advice	Neither	Retail or Professional or Both or Neither	
Portfolio Management	Neither	Retail or Professional or Both or Neither	

Commercial characteristics

Leverage

Futures are highly leveraged instruments. The investor can expose himself to a much greater value of underlying asset than trading the underlying asset itself.

Liquidity

Future contracts (especially front month contracts) are very liquid. The constant presence of buyers and sellers in the future markets ensures market orders can be placed quickly. Also, this entails that the prices do not fluctuate drastically, especially for contracts that are near maturity. Thus, a large position may also be cleared out quite easily without any adverse impact on price.

Low costs

Trading futures is a cost-effective way to trade leveraged instruments.

Short positions

Shorting a futures contract is allowed, therefore investor may also benefit from a falling market.



Hedging

Futures are widely used to hedge risks. Companies engaged in foreign trade use futures to manage foreign exchange risk, interest rate risk by locking in an interest rate in anticipation of a drop in rates if they have a sizeable investment to make, and price risk to lock in prices of commodities such as oil, crops, and metals that serve as inputs.

Transparency

Exchange traded contracts are standardised. Contract specifications are publicly available on the exchange homepage. KIDs are also available for many futures contracts.

Key financial instrument risks (these include, but are not limited to):

Leverage risk

Futures contracts are leveraged instruments as the amount of initial margin required is smaller relative to the potential gains or losses under the contracts.

Margin risk

A relatively small market movement will have a proportionately larger impact on the margin an investor has deposited or will have to deposit: this may work against the investor as well as for them. An investor may sustain a total loss of initial margin funds and any additional margin deposited with the firm to maintain the position. If the market moves against the position or margin levels are increased, the investor may be called upon to pay substantial additional collateral on short notice to cover losses incurred under the futures contracts and maintain the position. Failure to provide collateral may lead to the contracts being closed out which could crystallise a loss position.

Clearing risk

Most Exchange Traded Derivatives are accepted for clearing by a clearing house. Such cleared derivatives are subject to the rules of the clearing house, including collateral arrangements required by the clearing house. Therefore, participants may be required to post collateral on short notice to cover losses incurred under the cleared Exchange Traded Derivatives contracts. Failure to post collateral may lead to the contracts being closed out, which could crystallise a loss position.

Changes to exchange or clearing house rules

The terms and conditions of exchange traded contracts can be modified by the exchange or clearing house



to reflect changes or events in respect of the underlying asset or otherwise.

Market risk

'Stop loss' or 'stop limit' orders intended to limit losses may not be effective if market conditions make it impossible to execute such orders. Market conditions (e.g. illiquidity) and/or the operation of the rules of certain markets (e.g. the suspension of trading in any contract or contract month because of price limits or 'circuit breakers') may increase the risk of loss by making it difficult or impossible to effect transactions or liquidate/offset positions.

Operational risk

Trading facilities utilise computer systems for the order routing, execution, matching, registration or clearing of trades. As with all facilities and systems, they are vulnerable to temporary disruption or failure. An investor's ability to recover certain losses may be subject to limits on liability imposed by the system provider, the market, the clearing house and/or member firms.

Options

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	Options contracts (Exchange traded)		
MiFID Categorization	4,5,6,7,10		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	Exchange traded standardized agreements that give the buyer, who pays a premium, the right, but not the obligation, to buy or sell a specified amount of an underlying asset at an agreed strike price on or before the expiry date of the contract. Options contracts may have various futures contracts, shares, and other instruments as an underlying.		
Product Categorization	Complex Financial Instruments		
Underlying Asset Classes	Derivative contracts		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		
Leveraged Financial Instrument or Contingent Liability Instrument	Yes	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565.



Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	Neutral	Yes or No or Neutral	<p>Investors having the following characteristics:</p> <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses

Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	No	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.



Category name	Category Description	Tag Description	Additional Comments
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.

Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	7	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPS methodology.
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for Non PRIIPS and Non UCITS	Low – No Medium – Neutral High – Yes	Low/medium/high	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.

Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	No	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	No	Yes or No or Neutral	The aim of investor is to achieve growth of capital value, surrendering current income potential.
Return Profile Income	No	Yes or No or Neutral	The aim of investor is to maximize current income from investments, surrendering capital appreciation potential.
Return Profile Hedging	Yes	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	Yes	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.



Category name	Category Description	Tag Description	Additional Comments
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period

Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	
Investment Advice	Neither	Retail or Professional or Both or Neither	
Portfolio Management	Neither	Retail or Professional or Both or Neither	

Commercial characteristics

Leverage

Options are leveraged instruments. The investor can expose himself to a much greater value of underlying asset than trading the underlying asset itself by paying options premium upfront.

Limited risk

When an option contract is purchased, the investor risks the amount of premium that is paid to an option seller; thus meaning that maximum amount of loss is known when the options contract is traded.

Low costs

Trading options is a cost-effective way to trade leveraged instruments.

Short positions

When the investor sells (writes) an option, the option premium is paid by the options buyer. If market is favourable, option seller keeps the premium, if not, underlying asset must be delivered to the option buyer. It is essential that sold options are covered by underlying asset, otherwise, the losses to option seller (writer) may be virtually unlimited.

Hedging

Options are widely used to hedge risks. This is done by establishing a position in the options market as a means of offsetting an exposure to price fluctuations in an underlying asset. In this way, options act like an insurance policy on that investment.



Transparency

Exchange traded contracts are standardised. Contract specifications are publicly available on the exchange homepage. KIDs are also available for many options contracts.

Key financial instrument risks (these include, but are not limited to):

Leverage risk

Options contracts are leveraged instruments as the amount premium paid is smaller relative to the value of the underlying asset. Options buyer risk is limited to the amount of premium which is paid. Selling (writing) an option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount.

Pricing risk

Option pricing theory uses variables (current underlying price, exercise price, volatility, interest rate, time to expiration) to theoretically value an option. Essentially, it provides an estimation of an option's fair value which traders incorporate into their strategies to maximize profits. Direct observation of volatility is impossible, so it must be estimated or implied. Therefore for an unexperienced investor it is very hard to predict how option price will react to price change of an underlying asset.

Changes to exchange or clearing house rules

The terms and conditions of exchange traded contracts can be modified by the exchange or clearing house to reflect changes or events in respect of the underlying asset or otherwise.

Market risk

'Stop loss' or 'stop limit' orders intended to limit losses may not be effective if market conditions make it impossible to execute such orders. Market conditions (e.g. illiquidity) and/or the operation of the rules of certain markets (e.g. the suspension of trading in any contract or contract month because of price limits or 'circuit breakers') may increase the risk of loss by making it difficult or impossible to effect transactions or liquidate/offset positions. If an investor has sold (written) options, this may increase the risk of loss.

Operational risk

Trading facilities utilise computer systems for the order routing, execution, matching, registration or clearing of trades. As with all facilities and systems, they are vulnerable to temporary disruption or failure. An investor's ability to recover certain losses may be subject to limits on liability imposed by the system provider, the market, the clearing house and/or member firms.



Contracts for difference (CFD), rolling spot forex

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	Contract for Difference (CFD), including Rolling Spot Forex		
MiFID Categorization	9		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	A CFD is an arrangement made in financial derivatives trading where the differences in the settlement between the open and closing trade prices are cash settled. There is no delivery of physical goods or securities with CFDs.		
Product Categorization	Complex Financial Instruments		
Underlying Asset Classes	Derivative contracts		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		
Leveraged Financial Instrument or Contingent Liability Instrument	Yes	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565.

Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience



Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	Neutral	Yes or No or Neutral	<p>Investors having the following characteristics:</p> <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	Yes	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses

Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	No	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.

Target markets – Risk Tolerance



Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	7	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPS methodology.
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
Risk Tolerance Internal Methodology for Non PRIIPS and Non UCITS	Low – No Medium – Neutral High – Yes	Low/medium/high	For NON PRIIPS and NON UCITS. Low – Investor is cautious and prepared to accept some value fluctuation in return for long-term growth but will invest mainly in low-volatility financial instruments. Medium – Investor is willing to endure a short-term loss of principal and lower degree of liquidity in exchange for long-term appreciation. High – Investor is willing to accept high degree of volatility up to full loss of capital in exchange for maximizing return potential.

Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	No	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
Return Profile Growth	No	Yes or No or Neutral	The aim of investor is to achieve growth of capital value, surrendering current income potential.
Return Profile Income	No	Yes or No or Neutral	The aim of investor is to maximize current income from investments, surrendering capital appreciation potential.
Return Profile Hedging	Yes	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.
Option or Leveraged Return Profile	Yes	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period

Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	



Category name	Category Description	Tag Description	Additional Comments
Investment Advice	Neither	Retail or Professional or Both or Neither	
Portfolio Management	Neither	Retail or Professional or Both or Neither	

Commercial characteristics

Simplicity

Trading CFDs is rather easy to understand (although involving high degree of risk) way to trade a wide variety of assets.

Tax Efficiency

Subject to jurisdiction, but in most cases taxes such as stamp duty tax are not applied to CFD trading.

Leverage

CFDs provide higher leverage than traditional trading. Standard leverage in the CFD market is subject to regulation. Lower margin requirements mean less capital outlay for the investor, and greater potential returns. However, increased leverage can also magnify losses. CFDs give access to instruments to investors even with small trading capital.

Hedging

CFD is an efficient way to hedge an existing physical portfolio.

Less strict trading rules

Certain markets have rules that prohibit shorting, require the investor to borrow the instrument before selling short or have different margin requirements for short and long positions. CFD instruments can be shorted at any time without borrowing costs because the investor doesn't own the underlying asset. Certain markets require minimum amounts of capital to day trade, or place limits on the amount of day trades that can be made within certain accounts. The CFD market is not bound by these restrictions and the investor can day trade if they wish.

Low costs

Trading CFD is a cost-effective way to trade leveraged instruments. In many cases the fees are even smaller than trading physical instruments or may fees may not apply at all.

Short positions



Shorting a CFD contract is allowed, therefore the investor may also benefit from a falling market.

Key financial instrument risks (these include, but are not limited to):

ESMA risk warning (Based on ESMA's restriction on the marketing, distribution or sale of contracts for differences to retail clients)

CFDs are complex instruments and come with a high risk of losing money rapidly due to leverage. 74–89 % of retail investor accounts lose money when trading CFDs. The customer should consider whether he understands how CFDs work and whether he can afford to take the high risk of losing his money.

Leverage risk

CFDs are leveraged instruments as the amount of initial margin required is smaller relative to the potential gains or losses under the contracts. Under negative market conditions it is possible to lose more money than the initial deposit. (Subject to applicable regulations, such as negative balance protection)

Margin risk

A relatively small market movement will have a proportionately larger impact on the margin an investor has deposited or will have to deposit: this may work against the investor as well as for them. An investor may sustain a total loss of initial margin funds and any additional margin deposited with the firm to maintain their position. However, if the market moves against their position or margin levels are increased, the investor may be called upon to pay substantial additional collateral on short notice to cover losses incurred under the CFDs and maintain their position. Failure to provide collateral may lead to the contracts being closed out which could crystallise a loss position.

Counterparty risk

When buying or selling a CFD, the only asset being traded is the contract issued by the CFD provider. This exposes the investor to the provider's other counterparties, including other clients the CFD provider conducts business with. The associated risk is that the counterparty fails to fulfill its financial obligations. If the provider is unable to meet these obligations, then the value of the underlying asset is no longer relevant.

Holding costs risk

Depending on the positions and how long they are held for, the holding costs are applied to the account on a daily basis. In some cases, particularly if the positions are held for a long time, the sum of these holding costs may exceed the amount of any profits, or they could significantly increase losses. It is important to have sufficient funds in the trading account to cover holding costs.

Volatility risk (including market gapping)

Financial markets may fluctuate rapidly and the prices of CFD will reflect this. Gapping is a risk that arises as



a result of market volatility. Gapping occurs when the prices of CFDs suddenly shift from one level to another, without passing through the level in between. There may not always be an opportunity for the investor to place an order or for the platform to execute an order between the two price levels. One of the effects of this may be that stop-loss orders are executed at unfavourable prices, either higher or lower than anticipated, depending on the direction of the trade.

Securities financing transactions (SFT)

Target market assessment

General Financial Instrument information

Category Name	Category Description	Tag Description	Additional Comments
Product name	Securities Financing Transactions (SFT) – bilateral transactions		
MiFID Categorization	N/A		According to Section C of Annex I of DIRECTIVE 2014/65/EU
Product Description	<p>Repurchase transactions (including sell/buy-back and buy/sell-back transactions) and securities lending transactions. Under a repurchase transaction ("Repo"), the parties enter into two simultaneous transactions:</p> <p>(i) one party (the "Seller") transfers title to securities to the other party (the "Buyer") for immediate settlement (or for settlement on a forward start date) at an agreed purchase price paid by the Buyer to the Seller, and (ii) with the agreement for the Seller to repurchase equivalent securities from the Buyer on a specified future date, or on demand, at an agreed repurchase price (representative of the purchase price plus the 'Price Differential' or 'repo rate' reflective of the financing charge during the term of the Repo).</p> <p>Under a shares lending transaction, one party (the "Lender") transfers title to securities (normally shares) to the other party (the "Borrower") for a defined period of time, or open and terminable on demand, in return for a fee paid by the Borrower to the Lender during the term of the loan (based on market value of the securities). The Borrower provides cash or securities collateral (by way of title transfer) to the Lender on commencement of the loan. On termination of the loan, the Borrower delivers equivalent securities to the Lender and, simultaneously, the Lender returns to the Borrower any collateral provided by the Borrower.</p>		
Product Categorization	Complex Financial Instruments		
Underlying Asset Classes	Debt Securities, Shares, Funds		
Investment Service	Reception and transmission of orders in relation to one or more financial instruments; Execution of orders on behalf of clients.		



Category Name	Category Description	Tag Description	Additional Comments
Leveraged Financial Instrument or Contingent Liability Instrument	Yes	Yes or No or Neutral	To enable reporting on the depreciation of leveraged financial instruments or contingent liability transactions in accordance with Art. 62 of the MiFID II's Delegated Regulation 2017/565.

Target markets – Investor Type

Category Name	Category Description	Tag Description	Additional Comments
Investor Type Retail	No	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.
Investor Type Professional	Yes/Both	Yes or No or Neutral or Professional Per Se or Elective Professional or Both	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market. P, E or B only if the distinction Per Se or/and Elective is done in the Prospectus.
Investor Type Eligible Counterparty	Yes	Yes or No or Neutral	Neutral means that the manufacturer/distributor estimates that there is neither negative nor positive target market.

Target markets – Knowledge and/or Experience

Category Name	Category Description	Tag Description	Additional Comments
Basic Investor	No	Yes or No or Neutral	<p>Investors having the following characteristics:</p> <ul style="list-style-type: none"> • basic knowledge of relevant financial instruments (a basic investor can make an informed investment decision based on the regulated and authorized offering documentation or with the help of basic information provided by point of sale); • no financial industry experience, i.e. suited to a first time investor <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Informed Investor	No	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • average knowledge of relevant financial products (an informed investor can make an informed investment decision based on the regulated and authorized offering documentation, together with knowledge and understanding of the specific factors/risks highlighted within them only) • some financial industry experience <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>
Advanced Investor	No	Yes or No or Neutral	<p>Investors having one, or more, of the following characteristics:</p> <ul style="list-style-type: none"> • good knowledge of relevant financial products and transactions • financial industry experience or accompanied by professional investment advice or included in a discretionary portfolio service <p>When providing an investment service to a Professional Client the Investment Firm is entitled to assume that for the products and services for which it is classified, the client has the necessary level of experience and knowledge.</p>

Target markets – Ability to Bear Losses



Category name	Category Description	Tag Description	Additional Comments
No Capital Loss	No	Investor can bear no loss of capital. Minor losses especially due to costs possible. Yes or No or Neutral	N for negative target: product should not be sold to investors that cannot bear losses.
Limited Capital Loss	No	Investor seeking to preserve capital or can bear losses limited to a level specified by the product. Yes or No or Neutral	Investor seeking to preserve capital or can bear losses limited to a level specified by the product.
Limited Capital Loss Level	N/A	Loss up to XX%	It is just for structured products or structured funds. To be used only when a clear partial capital guarantee is provided on the primary market and the product is held until maturity. The level of potential losses is the one that could be calculated according to the offering documentation.
No Capital Guarantee	Yes	No Capital Guarantee nor protection. 100% capital at risk. Yes or No or Neutral.	No Capital Guarantee nor protection. Investor has 100% capital at risk.
Loss Beyond Capital	Yes	Loss Beyond the Capital. Yes or No or Neutral.	Loss Beyond the Capital. Investor has unlimited loss potential.

Target markets – Risk Tolerance

Category name	Category Description	Tag Description	Additional Comments
Risk Tolerance PRIIPS Methodology	N/A	SRI	If PRIIPS KID is available. Summary Risk Indicator value between 1 (least risky) and 7 (most risky) as per PRIIPS methodology.
Risk Tolerance UCITS Methodology	N/A	SRRI	For funds. Synthetic Risk and Reward Indicator value between 1 (least risky) and 7 (most risky) as per UCITS methodology.
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Target markets – Client Objectives & Needs

Category name	Category Description	Tag Description	Additional Comments
Return Profile Preservation	No	Yes or No or Neutral	The aim of investor is to prevent loss of value of capital, requiring high degree of liquidity with little to no volatility.
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Return Profile Hedging	No	Yes or No or Neutral	The aim of investor is to reduce market risk of some underlying asset exposure.



Category name	Category Description	Tag Description	Additional Comments
Option or Leveraged Return Profile	Neutral	Yes or No or Neutral	Investor seeks non-linear return profile due to leveraged nature of the investment.
Return Profile Other	Yes	Yes or Neutral	Any other objectives, not captured by other relevant categories above.
Time Horizon	Neutral	RHP in years or Very Short Term (<1Y) or Short term (<3Y) or Medium term (<5Y) or Long term (>5Y) or Neutral	RHP: Minimum Recommended Holding Period

Distribution strategy

Category name	Category Description	Tag Description	Additional Comments
Execution Only	Professional	Retail or Professional or Both or Neither	
Execution with Appropriateness Test or Non-Advised Services	Professional	Retail or Professional or Both or Neither	
Investment Advice	Neither	Retail or Professional or Both or Neither	
Portfolio Management	Neither	Retail or Professional or Both or Neither	

Commercial characteristics

Liquidity

Repos provide the ability to invest cash overnight, making them a critical component in the effort to manage liquidity. The size of the market and supply of repos provide for strong liquidity.

Yield Advantage

Repos generally provide additional yield as compared to traditional money market instruments, such as Treasury bills, time deposits or agency discount notes. The yield advantage depends on such factors as the repo's maturity date and the credit quality of the repo's collateral.

Flexibility

The principal amount of repos can be adjusted up or down as fund cash flows dictate, and transactions can be conducted late in the day.

Security

A repo or security lending is a secure type of loan. If borrower fails to repay, the lender may sell the collateral



or use cash collateral to buy back the security.

Key financial instrument risks (these include, but are not limited to):

Credit risk

A party to a repo or shares lending transaction is exposed to credit risk because its counterparty may become insolvent or otherwise unable to meet its obligations and such party may not be adequately collateralised in order to mitigate this counterparty credit risk.

Settlement risk

Operational risk may arise due to the non settlement or delay in settlement of securities, or failure to deliver securities due to illiquid market conditions in respect of the specific securities at any given time, with the securities difficult to source. Delivery failure could result in an event of default and termination of the repo or shares lending transaction.

Market risk

The economic risks and rewards remain with the Seller (or Lender). Therefore, there is also a potential opportunity cost to a repo or shares lending transaction. If the value of the securities transferred to Buyer (or Borrower) has fallen before equivalent securities are returned, the Seller (or Lender) may have missed the opportunity to dispose of those securities for a higher price which may exceed the price received for the use of its securities under the transaction.

Interest rate risk

For longer dated repos, there can be interest rate risk, in that parties are locked into paying/receiving a specific interest rate that is higher/lower than the prevailing rate.

Collateral risk

Repo and shares lending transactions also involve risks relating to the re-use of collateral provided to the counterparty.

General provisions

Risk management

The Company has established, implements and maintains adequate risk management policies and procedures, which identify the risks relating to its activities. A Risk Manager has been appointed by the Board of Directors, who is responsible for the implementation of the Company's relevant policies. The Company has embedded explicit and robust risk management practices across its entire business operations, to ensure that the level of



risk it faces is consistent with its corporate objectives and its level of risk tolerance. This is achieved through the implementation of a comprehensive risk management framework for the identification, assessment, monitoring and control of all relevant risks, including the risks related to the provision of investment services. The framework also enables the Company to continually align its business objectives against a background of changing risks and uncertainty. This risk management framework:

1. Enables the Company to proactively manage its risks in a systematic manner;
2. Ensures that appropriate measures are in place to mitigate risks;
3. Creates a culture of risk awareness within the Company;
4. Ensures that risk management is an integral part of the Company's decision-making process.

Product Testing

Under its capacity as a product distributor the Company has no obligation to stress-test the products distributed. However, the Company will assess (as defined in the Product Governance Policy) whether distributed products meet the identified needs, characteristics and objectives of the target market by examining the following elements:

1. Whether the financial instrument's risk/reward profile is consistent with the target market;
2. Whether the financial instrument design is driven by features that benefit the client.

Fee charging structure

The Company (acting as an Investment firm) will disclose all costs and associated charges charged for the investment service(s) and/or ancillary services provided to the client that should form part of the amount to be disclosed:

- One-off charges related to the provision of an investment service – All costs and charges paid to the investment firm at the beginning or at the end of the provided investment service(s).
 - Deposit fees
 - Termination fees
 - Switching costs (costs of switching investment firms)



- Ongoing charges related to the provision of an investment service – All ongoing costs and charges paid to investment firms for their services provided to the client.
 - Management fees (charged by an investment firm providing the service of portfolio management to its clients)
 - Advisory fees
 - Custodian fees
- All costs related to transactions initiated in the course of the provision of an investment service – All costs and charges that are related to transactions performed by the investment firm or other parties.
 - Broker commissions (charged for execution of orders and incurred by the investment firm when trading on behalf of its clients)
 - Entry and exit charges paid to the fund manager
 - Platform fees
 - Mark ups (embedded in the transaction price)
 - Stamp duty
 - Transactions tax and foreign exchange costs.
- Any charges that are related to ancillary services – Any costs and charges that are related to ancillary services that are not included in the costs mentioned above.
 - Research costs
 - Custody costs
- Incidental costs
 - Performance fees

The Company (acting as product manufacturer or an investment fund manager) will disclose all costs and associated charges related to the financial instrument that should form part of the amount to be disclosed:

- One-off charges – All costs and charges (included in the price or in addition to the price of the financial instrument) paid to product suppliers at the beginning or at the end of the investment in the financial instrument.
 - Front-loaded management fee
 - Structuring fee (charged by manufacturers of structured investment products for structuring the products)



- Distribution fee
- Ongoing charges – All ongoing costs and charges related to the management of the financial product that are deducted from the value of the financial instrument during the investment in the financial instrument.
 - Management fees (charged by an investment fund manager to its investor)
 - Service costs
 - Swap fees
 - Securities lending costs and taxes
 - Financing costs
- All costs related to the transactions – All costs and charges that incurred as a result of the acquisition and disposal of investments.
 - Broker commissions (refer to commissions paid by investment funds when trading on behalf of the fund)
 - Entry and exit charges paid by the fund
 - Mark ups embedded in the transaction price
 - Stamp duty
 - Transactions tax and foreign exchange costs.
- Incidental costs
 - Performance fees

Distribution strategy overview

The Company will consider the distribution strategy defined by the product manufacturer whenever possible. If a product manufacturer is an entity not subject to MiFID II and thus it is not obliged to identify a distribution strategy, the Company will define its own distribution strategy in light of information on its client base and type of services provided.

The Company, under its capacity as distributor, will take reasonable steps to ensure that its financial products are distributed to the identified target market. The primary distribution channel will be through an online trading platform within the scope of the following investment services: "Reception and transmission of orders in relation to one or more financial instruments" and/or "Execution of orders on behalf of clients". The Company's products will be distributed directly to professional clients and eligible counterparties in any country which lies within the context of its authorization to freely provide/perform services/activities for Member States and for Third Countries where the Company has a legal opinion or can justify beyond any reasonable doubt with substantive evidence that it can offer such services and products.



Conflicts of interests

The Company has established, implements and maintains procedures and measures to ensure that the distribution of financial instruments complies with the requirements on proper management of conflicts of interest, including remuneration. The following conflicts of interest have been identified:

1. Personal Account Dealing;
2. Inside and Proprietary Information;
3. Inducements;
4. Selection of Service Providers;
5. Remuneration of Staff;
6. Access to electronic data;
7. Supervision and segregation of departments.

In respect of these conflicts, the Company maintains and operates procedures with a view to taking all appropriate steps to prevent conflicts of interest from constituting or giving rise to material risk of damage to the interests of the Company's clients.

Review and oversight

Under its capacity as a product distributor, the Company will review products as described in the Product Governance Policy, by considering any event that could materially affect the potential risk of the identified target market. The Company shall consider if:

1. The financial instrument remains consistent with the needs, characteristics and objectives of the target market;
2. The financial instrument is being distributed to the target market;
3. The financial instrument is reaching clients for whose needs, characteristics and objectives the financial instrument is not compatible.

The Company's Board of Directors will have effective control over the Company's product governance process. The Company's compliance officer will be responsible for the monitoring and the periodic review of the Company's product governance arrangements, to detect any risk of failure by the Company to comply with its relevant obligations. In this respect, the compliance reports submitted to the Company's Board on an annual or an ad-hoc basis will include information about the products and services offered.