CLIENT CATEGORISATION POLICY

1. General

ZETANO (hereinafter „Zetano“) is registered brand name of the company WONDERINTEREST TRADING LTD.

In compliance with the Investment Services and Activities and Regulated Markets Law of 2017 L. 87(I)/2017 (“the Law”), WONDERINTEREST TRADING LTD (“the Investment Firm”) is required to classify its Clients into one of the following three categories: **retail, professional or eligible counterparty.**

“Retail Client” is a Client who is not a Professional Client or an eligible counterparty. It is noted that Retail Clients are afforded with the highest level of protection.

“Professional Client” is a Client who possesses the experience, knowledge and expertise to make its own investment decisions and properly assess the risks that it incurs. The list of entities that shall be regarded by default as Professionals is provided in the I. Section of Annex II of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets financial instruments and amending Directive 2002/92EC and Directive 2011/61EU (“MiFID II”).

“Eligible counterparty” is a type of professional Clients, applicable only when the service provided to such Professional Client is of receiving & transmitting orders (see paragraph 5 below).

2. Professional Clients by Default

The entities listed in the I. Section of Annex II of MiFID II are considered to be Professional Clients by default. So, where the Client fulfils one of the criteria referred in the I. Section of Annex II of MiFID II , the Investment Firm shall inform it prior to any provision of services that, on the basis of the information available to the Investment Firm, the Client is deemed to be a professional Client and will be treated as such unless the Investment Firm and the Client agree otherwise (see paragraph 4 below).

3. Non-Professional Clients who may be treated as Professional on Request

3.1. General

Clients not mentioned in the I. Section of Annex II of MiFID II may also be allowed to be treated as Professional Clients and hence waive some of the protections afforded by the Law.

3.2. Assessment

The Investment Firm is allowed to treat any such Clients as Professionals provided the relevant criteria and procedures mentioned herein below are fulfilled. These Clients should not, however, be presumed to possess market knowledge and experience comparable to that of the categories listed in the I. Section of Annex II of MiFID II. .

So, any waiver of the protection afforded to them shall be considered valid only if an adequate assessment of the expertise, experience and knowledge of the Client, undertaken by the Investment Firm, gives reasonable assurance, in light of the nature of the transactions or services envisaged, that the said Client is capable of making his own investment decisions and understanding the risks involved.

For this reason, the Investment Firm will apply a fitness test to assess their expertise and knowledge.

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

- the Client has carried out transactions, in significant size, on the relevant market at an average frequency of 10 per quarter over the previous four quarters;
- the size of the Client's financial instrument portfolio, defined as including cash deposits and financial instruments exceeds 500,000 Euros;

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- the Client works or has worked in the financial sector for at least one year in a professional position, which requires knowledge of the transactions or services envisaged.

3.3. Procedure

- The Client states in writing to the Investment Firm that it wishes to be treated as a Professional Client, either generally or in respect of a particular investment service or transaction, or type of transaction or product.
- The Investment Firm must give it a clear written warning of the protections and investor compensation rights it may lose.
- The Client must state in writing, in a separate document from the main Agreement, that it is aware of the consequences of losing such protections.
- Before deciding to accept any request for waiver, the Investment Firm must take all reasonable steps to ensure that the Client requesting to be treated as a Professional Client meets the relevant requirements stated above.

Clients wishing to be treated as Professionals may use the "Application to Change of Client Status" form found on the Investment Firm's website.

3.4. Keeping the Investment Firm Informed

All Clients are responsible for keeping the Investment Firm informed about any change which could affect their current categorisation.

However, if the Investment Firm becomes aware that the Client no longer fulfils the initial conditions which made it eligible for a professional treatment, the Investment Firm should take appropriate action.

4. Professional Clients Requesting to be treated as Retail

It is noted that Professional Clients listed in the I. Section of Annex II of MiFID II are allowed to request non-professional treatment and instead be treated as Retail Clients, so as to enjoy a higher level of protection. It is the responsibility of the Client, considered to be a Professional Client, to ask for a higher level of protection when it deems it is unable to properly assess or manage the risks involved.

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

5. Eligible Counterparties

An Eligible Counterparty is an undertaking which falls within categories (a), (b) and (c) of the Clients who are considered to be Professionals by default (listed in the I. Section of Annex II of MiFID II).

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

- Reception and transmission of Client orders
- Execution of orders on behalf of Clients

On request, the Investment Firm may also recognise as an Eligible Counterparty which fall within a category of Clients who are to be considered professional Clients in accordance to the fitness test (see paragraph 3 above). In such cases, however, the undertaking concerned shall be recognised as an Eligible Counterparty only in respect of the services or transactions for which it could be treated as a Professional Client.

In the event of a transaction where the prospective counterparty is located in another EU Member State, the Investment Firm shall defer to the status of the other undertaking as determined by the legislation of the said Member State in which that undertaking is established.

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6. Types of Requests for Different Categorisation

The following requests may be submitted to the Investment Firm should a Client wish to change its categorisation:

(a) A Retail Client can request to be categorised as a Professional Client. The Client therefore accepts a lower level of protection (see paragraph 3 above).

(b) A Professional Client can request to be categorised as a Retail Client. The Client therefore obtains a higher level of protection (see paragraph 4 above). A Professional Client can request to be treated as an Eligible Counterparty, obtaining therefore a lower level of protection (see paragraph 5 above).

(c) An Eligible Counterparty can request to be categorised as a Professional Client or a Retail Client. The Client therefore obtains a higher level of protection (see paragraph 5 above).

It is noted that the Investment Firm is not required to agree with a request for non-professional or non-Eligible Counterparty treatment. In addition, the Investment Firm may, on its own initiative, treat as a Professional or Retail Client an Eligible Counterparty or treat as a Retail Client a Professional Client.

Clients wishing to change their Client Categorisation may use the "Application to Change of Client Status" form found on the Investment Firm's website.

7. Protection Rights

7.1. Retail and Professional Clients

Where the Investment Firm treats a Client as a Retail Client, the Client is entitled to more protections under the Law, than if the Client was treated as a Professional Client. In summary, the protection Retail Clients are entitled to is following (the list may not be exhaustive):

(a) A Retail Client will be given more information disclosures with regards to the Investment Firm, its services, its financial instruments and their performance, the nature and risks of financial instruments, its costs, commissions, fees and charges.

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

On the other hand, the Investment Firm shall be entitled to assume that a Professional Client has the necessary experience and knowledge in order to understand the risks involved in relation to those particular investment services or transactions, or types of transaction or product, for which the Client is classified as a Professional Client. Consequently, and unlike the situation with a Retail Client, the Company should not generally need to obtain additional information from the Client for the purposes of the assessment of appropriateness for those products and services for which they have been classified as a Professional Client.

(c) When executing Client orders, the Company must take all sufficient steps to achieve what is called "best execution" of the Client's orders that is to obtain the best possible result for its Clients.

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Where the Company executes an order of a Retail Client, the best possible result shall be determined in terms of the total consideration, representing the price of the financial instrument and the costs related to execution, which shall include all expenses incurred by the Client which are directly related to the execution of the order, including execution venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order.

(d) The Investment Firm must inform Retail Clients of material difficulties relevant to the proper carrying out of their order(s) promptly upon becoming aware of the difficulty.

(e) Retail Clients may be entitled to compensation under the Investor Compensation Fund ("ICF") for Clients of Investment Firms, while Professional Clients are not entitled to compensation under the ICF.

(f) When providing investment advice, the Investment Firm will, before the transaction is made, provide the retail client with a statement/report in a durable medium specifying the advice given and how that advice meets the preferences, objectives and other characteristics of the retail client.

7.2. Eligible Counterparties

Where the Investment Firm treats the Client as an Eligible Counterparty, the Client will be entitled to fewer protections under the Law than it would be entitled to as a Retail or Professional Client. In particular and in addition to the above of paragraph 7.1 (the list may not be exhaustive):

(a) The Investment Firm is not required to implement procedures and arrangements which provide for the prompt, fair and expeditious execution of its Client orders, relative to other Client orders or its trading interests.

(b) The Investment Firm is not required to assess the appropriateness or suitability of a product or service that it provides to Client but can assume that the Client has the expertise to choose the most appropriate product or service for itself and that he/she has the ability to bear losses.

(c) The Investment Firm is not required to provide the Client with information about the Company's execution venues, the arrangements through which the Company will be remunerated and other relevant information.

(d) The Investors Compensation Fund does not cover Eligible Counterparties.

(e) The Investment Firm is not required to act honestly, fairly and professionally when providing investment services to eligible counterparties in accordance with their best interests.

(f) The Investment Firm is not required to ensure that its financial instruments are designed to meet the needs of an identified target market of eligible counterparties.

(g) The Investment Firm is not required to ensure that all information, including marketing communications, addressed to eligible counterparties, are fair, clear and not misleading.

(h) Where the Investment Firm informs the Client that investment advice is provided on an independent basis, the Company is not required to assess a sufficient range of financial instruments available to ensure that the Eligible Counterparty's investment objectives can be met.

(i) The Investment Firm, when dealing with Eligible Counterparties, is not required to ensure that it does not remunerate its staff in a way that conflicts with its duty to act in the best interests of its clients and that it does not accept any fees/commissions in relation to the provision of services to clients.

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However, eligible counterparties will be entitled to the same reporting obligations as they apply to Retail and Professional Clients.

8. **Questions on this Policy**

If you require any further information and/or have any questions about this Client Categorisation Policy please direct your request and/or questions to support@zetano.com

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