

Levels of client protection

This document contains data about main measures implemented by the Company to protect Client interests depending on the Client Category to which the Client is assigned.

Hereby the Company notifies that depending on the category to which the Client is assigned, he/she will benefit from the respective measures of protection, regardless of any clauses or announcements contained in the Regulations contrary to this notification.

Regardless of the Client's category, the Company shall fulfill its organizational obligations in relation to its activities related to the provision of services to the Client under the Regulations including obligations to prevent conflict of interests, responsibilities on continuity and regularity of investment services and measures directed to protect the Client's assets transferred by the Client to the Company according to the terms of the Regulations.

RETAIL CLIENTS

Retail clients enjoy the highest level of protection provided by the Company. Main protection parameters include:

Best Execution of Orders

As part of the requirement to execute orders on the most profitable terms, the Company executes the Client's orders directly or instructs a third party to execute them on the most profitable terms for such Clients.

Assessment of suitability of product or service provided

In order to receive/transmit and execute a Client Order, the Company should determine whether a financial instrument or service suits the Client. To this end, the Company should receive from the Client information about its knowledge and experience in order to understand whether the Client is able to realize the risks inherent in a financial instrument and/or service under consideration.

Information provided to Clients

The Company provides to the Client information provided by law and the Agreement before the service is provided. The company will also send the Client statements about the transaction immediately after the transaction is executed.

Notification about fees and expenses

When investment and/or additional services are provided under the Regulations, the Company discloses to the Client

information about the Company's commission, other expenses, and fees charged by third parties in relation to execution of Orders, that should improve quality of the services provided to the Client by the Company and shouldn't prevent the Company from acting in the best interests of the Client with maximum benefit.

Provisions on execution of Client's Orders

The Company guarantees to the Client that the Company uses procedures and provisions which guarantee timely and unbiased execution of Client Orders in relation to other Clients or in relation to the Company's own transactions and trading operations.

PROFESSIONAL CLIENTS

Best Execution of Orders

This protection measure for Professional Clients is adopted in order to inform professional clients about the Order execution policy. In particular, criteria taken into account for the execution of Orders on the most profitable terms (price, expenses, and promptness of execution) can differ from those which usually apply to retail Clients.

Information provided to Clients

The Company shall provide the Client with information, stipulated by law and specified in the Regulations, before the provision of service. The Company shall immediately send the Client reports about a transaction after a transaction is executed.

Notification about fees and expenses

When investment and/or additional services are provided under the Regulations, the Company discloses to the Client information about the Company's commission, other expenses, and fees charged by third parties in relation to execution of Orders also as any changes in commissions and fees charged by third parties.

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Provisions on execution of Client's Orders

When investment and/or additional services are provided under the Regulations, the Company shall provide the Client with information about commission, other expenses, fees charged by third parties in relation to execution of Client's Orders that should improve the quality of services provided by the Company to the Client and should not prevent the Company from acting in the Client's best interests with maximum benefit.

Notification about fees and expenses

When investment and/or additional services are provided under the Regulations, the Company shall disclose to the Client information about commission, other expenses, and fees charged by third parties in relation to the execution of the Client's Orders.

ELIGIBLE COUNTERPARTIES

Information provided to the Clients

The Company provides the Client with information stipulated by law and specified in the Regulations before the provision of service. The company shall send the Client reports about a transaction immediately after execution of transaction.