



CLIENT CATEGORISATION POLICY

T MARKETS EU LIMITED

v.3 – 12/2025

T Markets EU Limited is a Cyprus Investment Firm, regulated by the Cyprus Securities and Exchange Commission (CySEC)

License Number: 208/13 / Registration Number: HE 291974

Registered Office Address: Agias Zonis & Thessalonikis, 1, NICOLAOU PENTADROMOS CENTER, Floor 7, Office 701-702, 3026, Limassol, Cyprus

1. INTRODUCTION

NOTICE: T MARKETS EU LIMITED (THE “COMPANY”) DOES NOT PROVIDE SERVICES TO RETAIL CLIENTS. ALL INFORMATION INCLUDED IN THIS DOCUMENT APPLIES TO PROFESSIONAL CLIENTS AND/OR ELIGIBLE COUNTERPARTIES.

In accordance with Applicable Regulations, including the Law 87(I)/2017 as well as the implementation of the MiFID II, the Company classifies its clients into one of the following categories: Retail, Professional (Per se Professional Client/Elective Professional Client) or Eligible Counterparty, by relying on information that the client provides during the account opening process and/or thereafter during the business relationship. The Company, prior to engaging in a business relationship, notifies its potential clients of their classification, and informs them about the category in which they are initially classified by. **As of November 2024, the Company no longer provides services to retail clients.**

This policy is an integral part of the Terms and Conditions. By accepting the Terms and Conditions, the client expressly accepts this Client Categorisation Policy, as well as all other binding policies listed on Company's website.

2. CLIENT CATEGORIES, AS PER THE LAW

- a. *Retail Client* is a client who is neither professional nor an eligible counterparty. Retail clients are afforded with the highest level of protection by the Law. ***Please be reminded that the Company does not service retail clients; this definition is included here simply for informational purposes and to illustrate the three different categorisations of clients under MiFID II.***
- b. *Professional Client* is a client who possesses the experience, knowledge, and expertise to make their own investment decisions and properly assess the risks that they incur.
- c. *Eligible Counterparty* is a type of professional client, applicable only if certain parameters apply, such as the service provided to such a professional client pertains to receiving and transmitting and/or executing orders.

2.1 Professional Clients by default

A professional client is a client who possesses the experience, knowledge and expertise to make his own investment decisions and properly assess the risks that it incurs. In order to be considered a professional client by default, the client must fall into the following categories:

- a. Entities which are required to be authorised or regulated to operate in the financial market, either from Member States under a European Community Directive, entities authorised or regulated by a Member State without reference to such Directive, and entities authorised or regulated by a non-Member State (i.e. third country):
 - i. Investment Firms
 - ii. Credit Institutions
 - iii. Other authorised or regulated financial institutions
 - iv. Insurance undertakings
 - v. Collective investment schemes and management companies of such schemes
 - vi. Pension funds and management companies of such funds

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- vii. Commodity and commodity derivatives dealers
- viii. Local Firms
- ix. Other institutional investors
- b. Large undertakings meeting two of the following size requirements, on a proportional basis:
 - i. balance sheet total at least: EUR 20,000,000,
 - ii. net turnover at least: EUR 40,000,000,
 - iii. own funds at least: EUR 2,000,000.
- c. National and regional governments and public bodies that manage public debt, Central Banks, international and supranational institutions such as the World Bank, the International Monetary Fund (IMF), the European Central bank (ECB), the European Investment Bank (EIB) and other similar international organisations.
- d. Other institutional investor whose main activity is to invest in financial instruments including entities dedicated to the securitisation of assets or other financing transactions.

3. ELIGIBLE COUNTERPARTY

The Company, when dealing with eligible counterparties, is exempted from important obligations under conduct of business rules, best execution rules, client order handling rules. For that purpose, eligible counterparties may consider to be any entity falling within the following categories:

- Investment firms
- Credit institutions
- Insurance companies
- UCITS and their management companies
- Pension funds and their management companies
- Other financial institutions authorised or regulated under community or national law
- Commodity and commodity derivative traders (dealing on own account)
- National governments and their corresponding offices including public bodies which manage public debt at national level.
- Central Banks, the Central Bank
- Supranational organisations

4. PROTECTION RIGHTS: ELIGIBLE COUNTERPARTIES

Where the Company treats a client as an eligible counterparty, the client will be entitled to fewer protections under the Law than it would be entitled to as a professional client. In particular, the following applies to eligible counterparties clients (the list is not exhaustive):

- a. The Company is not required to provide the client with best execution in executing the client's orders. Nevertheless, eligible counterparties may request, on a trade-by-trade basis or in general, treatment that would allow the Company to take all sufficient steps to achieve best execution.
- b. The Company 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.
- c. The ICF does not cover eligible counterparties.
- d. The Company 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.
- e. The Company is not required to assess the appropriateness of a product or service that it provides to client but can assume that the client have the expertise to choose the most appropriate product or service for itself and has the ability to bear losses.