



**INFORMATION ON CLIENT CATEGORIES AND POSSIBILITIES OF TRANSFER
BETWEEN THESE CATEGORIES**

Generali Investments CEE, investiční společnost, a.s.
Na Pankráci 1720/123, 140 21 Praha 4, Czech Republic
Company ID No.: 43873766



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1 Introduction

Information on Client Categories and Possibilities of Transfer between these Categories of the Company Generali Investments CEE, investiční společnost, a.s. (hereinafter the "**Information on Client Categories**") has been prepared in compliance with the law of the Czech Republic and with the EU legislation as of the **15th January 2020**. The Information on Client Categories is available on request in the registered office of the company or at its website <http://www.generali-investments.cz>.

Generali Investments CEE, investiční společnost, a.s. reserves the right to change or amend the Information on Client Categories at any time without prior notice.

The Client will be informed in advance on any important changes.

The terms with initial letters written in capital letters, mentioned in this document, have, for the purpose of this document, the meaning defined in the Business Terms and Conditions Regulating the Provision of the Investment Services of Client Asset Management and Investment Advisory Generali Investments CEE, investiční společnost, a.s. if not further stipulated otherwise. The terms mentioned in this document in a singular have also the meaning of a plural of the same term.

2 Summary of Terms and Abbreviations

Company – Generali Investments CEE, investiční společnost, a.s., with its registered office in Prague 4, Na Pankráci 1720/123, Post Code 140 21, Czech Republic, Company ID No.: 43873766, entered into the Commercial Register maintained by the Municipal Court in Prague, file number B 1031

ACBCM - Act No. 256/2004 Coll., on Conducting Business on the Capital Market, as amended

AICIF - Act No. 240/2013 Coll., on Investment Companies and Investment Funds, as amended

Client – natural or legal person to whom the Company provides the Investment Service

Investment Service – management of the client's assets, receiving and transmitting orders relating to investments instruments and investment advisory services in terms of Section 11 par. 1 letter c) and f) of AICIF irrespective of the Client's categorization

3 Client Categories

The applicable European legislation and the related implementing regulation (ACBCM), in connection with the Investment Service, classify the clients into two categories:

- Retail Client
- Professional Client

As concerns the Professional Client, the Company, as an investment services provider, is obliged to provide him or her with the basic level of protection corresponding to the knowledge, experience and financial situation of the Professional Client. The Retail Client receives from Company, as an investment services provider, the maximum protection prescribed in detail by the applicable laws and regulations. The basic reasons for and differences in the treatment of Retail Clients as opposed to Professional Clients consist especially in the following:

- more detailed specification of the information communicated and guidance supplied to the Client
- detailed implementation of tests of suitability or adequacy of investment instruments or services without the possibility of the automatic presumption of certain responses



- more detailed structure of transactions reporting

Professional Client

The following entities are considered Professional Clients ipso facto in terms of Section 2a subsection 1 of the ACBCM

- a) banks
- b) savings and credit cooperatives
- c) investment firms
- d) insurance companies
- e) reinsurance companies
- f) investment companies
- g) investment funds
- h) pension companies
- i) another persons who undertake on financial market based upon license granted by financial market supervisory authority or based upon entry in the registry of financial market supervisory authority, in particular a payment institution, electronic money institution, electronic money issuer, non-bank provider of consumer credit, central administrator, investment intermediary, insurance agent, insurance broker, independent consumer credit intermediary, independent loss adjuster, payment system operator with settlement finality, settlement system operator with settlement finality and central securities depository, but with the exception of a tied agent of investment intermediary, tied agent under the Consumer Credit Act, tied agent of an investment firm, tied agent of pension company, tied insurance intermediary, subordinate insurance intermediary and exclusive insurance agent
- j) persons that perform securitization as their main activity
- k) persons that perform dealing on own account with investment instruments for the purpose of limitation of risks (hedging) from trades in investment instruments specified in Section 3 subsection 1 letters d) to k) of the ACBCM and said activity belongs among the persons' main activities
- l) persons that perform dealing on own account with investment instruments specified in Section 3 subsection 1 letters g) to i) of the ACBCM or with commodities and said activity belongs among the persons' main activities
- m) legal persons with competence to manage state assets as concerns purchase, sale or management of the state's receivables or other assets, or as concerns the restructuring of corporations or other legal persons in which the state has equity holdings
- n) foreign persons performing activities analogous to those performed by any of the persons listed under a) to m)
- o) states or member states of a federation
- p) Czech National Bank, foreign central banks or the European Central Bank and
- q) the World Bank, the International Monetary Fund, the European Investment Bank or other international financial institutions.

The following entities are also considered Professional Clients in terms of Section 2a subsection 2 of the ACBCM

- a) legal person established for the purpose of conducting business which meets as least two of the following three criteria according to the person's latest financial statements
 1. total assets correspond to at least 20,000,000 EUR,
 2. annual total net turnover corresponds to at least 40,000,000 EUR,



3. shareholders' equity corresponds to at least 2,000,000 EUR,
- b) foreign person established for the purpose of conducting business that meets the conditions listed under a).

Professional Client on Request

Any Retail Client who submits a written request to the Company asking for classification in the category of Professional Clients and who at the same time meets at least two of the following three criteria, may become a Professional Client on Request in terms of Section 2b subsection 1 of the ACBCM:

1. in each of the last 4 consecutive quarters, the Client executed in relevant financial market area a significant volume of trades in investment instruments, which are the subject matter of the request, and the average number of said trades equalled at least 10 per quarter,
2. the volume of the Client's assets consisting of funds and investment instruments corresponds to at least 500,000 EUR,
3. the Client performed for at least one year or has performed in connection with the Client's employment, occupation or office activities in the area of financial market which require the knowledge of trades or services that are the subject matter of the request.

The request must be in writing and must clearly indicate which trade or trades with investment instruments or which investment services it concerns. The request must be accompanied by a written declaration of the applicant stipulating that he or she is aware that

- a) this change may result in a loss of any compensation from a foreign guarantee system the purpose of which is analogous to the system secured by the Securities Brokers Guarantee Fund,
- b) the obligations stipulated in Sections 15 to 15r of the ACBCM vis-à-vis Professional Clients shall be discharged by the Company to a lesser extent than vis-à-vis Clients who are not Professional Clients; the Company is obliged to expressly warn the applicant of said circumstances.

The Company is not obliged to grant the request. The Company shall not grant the request if, after evaluation of the request, the Company finds out that the applicant does not meet the criteria mentioned above or does not have sufficient experience and expert knowledge as concerns trade or trades with the investment instruments or investment services which the request concerns, or if the applicant is not able to make his/her own investment decisions or does not understand the related risks.

Retail Client

Every Client who is a natural person and any Client who is neither a Professional Client, nor a Professional Client on Request, nor a Professional Client on Request.

4 Transfers between Client Categories

Professional Client → Retail Client

Any Professional Client may become a Retail Client in terms of Section 2a subsection 3 of the ACBCM on the basis of an agreement with the Company, to the extent of trades with investment instruments or investment services. The Company is not obliged to enter into such an agreement.

Professional Client on Request → Retail Client

Any Professional Client on Request becomes a Retail Client if he or she files a corresponding request with the Company in terms of Section 2b subsection 4 of the ACBCM, to the extent of the trade or trades with investment instrument or investment service defined by the Client. The request must be in writing and must clearly indicate which trade or trades with investment instrument or which investment service it concerns. The Company shall grant such a request.