

CLIENT CATEGORISATION POLICY

ORO Fintech Limited is a limited liability company incorporated and registered under the laws of Seychelles with company number 8425077-1. The registered office of the company is located at Suite 3, Global Village, Jivan's Complex Mont Fleuri, Mahe, Seychelles. The Company is authorised by the Financial Services Authority of Seychelles with Securities Dealer's License Number SD046.

REGULATORY FRAMEWORK

This Policy is prepared in accordance with the Securities (Conduct of Business) (Amendment) Regulations, 2024, hereinafter as the "Regulation" and is formally adopted as of the 30th of June 2026. In particular, Article 35 (1) of the Regulation, provides the following:

"A licensee, before offering a service to or for a person, in accordance with the requirements under this regulation, shall classify that person as a —

- (a) retail client; or**
- (b) professional client."**

Consequently, client classification is to be performed by ORO Fintech Limited, before a client commences the trading activity. This is of course provided that an appropriateness assessment has been performed during the registration process and clients have recorded a positive outcome showing that they have adequate skills and experience to trade leveraged financial products and/or the ability to absorb significant losses.

It is to be noted that the appropriateness assessment is relevant for clients that are registering for a trading account, after the 30th of June 2026. For existing clients (registered before the 30th of June 2026), these will be classified by default as "Retail Clients", except for the Clients that already fulfill the professional clients' requirements.

Retail clients are offered the option to request re-classification to professional clients. The same for a professional client that no longer meets the applicable classification requirements.

CLIENTS CLASSIFICATION

- **Retail Clients**

Regulation provides that a retail client is someone who is not classified as a professional client.

Retail clients will be provided with negative balance protection and as such, they may not lose more than the total amount deposited in their trading account. Professional clients will not be provided with negative balance protection.

- **Professional Clients**

Regulation provides that a professional client is a client that fulfills at least one of the following regulatory requirements and in particular Articles 35(2) and (3) of the Regulation, as further defined below:

(2) For the purpose of these regulations, the following shall be deemed professional clients -

- (a) an entity required to be authorised or regulated by the relevant body to operate in the financial markets as —
- (i) a credit institution;
 - (ii) an investment firm;
 - (iii) any other authorised or regulated financial institutions;
 - (iv) an insurance company;
 - (v) a collective investment scheme and management company of such scheme;
 - (vi) a pension funds and management company of such fund;
 - (vii) a commodity and commodity derivatives dealer;
 - (viii) a local company;
 - (ix) any other institutional investor;
- (b) an entity who satisfies at least two of the following conditions —
- (i) its balance sheet total is at a minimum of US\$ 20 million or the equivalent in any other currency;
 - (ii) or its net turnover is at a minimum of US\$ 40 million or the equivalent in any other currency; or
 - (iii) its own funds are at a minimum of US\$2 million or the equivalent in any other currency.
- (c) governments, including public bodies managing public finance and debt and licensed financial institutions;
- (d) other institutional investors whose main activity is to invest in financial instruments, including entities dedicated to the securitisation of assets or other financing transactions; and
- (e) individuals who can be classified as a Professional Client only if they meet the specified net assets and expertise requirements pursuant to subregulation (4) and (5).

- (3) For the purpose of a classification referred in paragraph (e) of subregulation (2), a licensee shall assess an individual and following the assessment, classify the individual as a professional client if the licensee is satisfied that the individual has net assets worth at least US\$ 1 million.

If during the registration process, the Company has established that an applicant client meets the requirement of the Regulation, then the Company will immediately classify the Client as professional and will accordingly inform the Client, in writing.

PROCEDURE FOR CLASSIFICATION TO PROFESSIONAL CLIENT

A client can request to change its classification, from Retail to Professional Client, if the aforementioned conditions are met.

In such a case, the Client shall send an email to the Company (compliance@fxoroglobal.com), clearly denoting their decision to request re-classification. As part of the request submitted to the Company, the Client shall provide adequate information and supporting documentation in order to enable the Company to assess the request.

The Company might request additional clarifications. The Company will inform the Client in writing if the request is approved or rejected. In the event that the request is approved, client's classification will change immediately after.

It is to be noted that Professional Clients are not entitled to receive negative balance protection.

Regular monitoring of the Professional Client's status will be performed, and the Company might request to be provided with updated information in order to further assess the Client's classification status. The Company shall perform monitoring controls on an ongoing basis, and the Client is required to maintain communication with the Company to this extent and in line with Article 35 (6) which provides the following:

“If a licensee becomes aware that a professional client no longer fulfils the requirements pursuant to subregulation (3), and no longer qualifies as such, the licensee shall, as soon as possible, inform the professional client of this fact and of the measures that are available to the client to facilitate his compliance to the requirements.”

Consequently, if the Company is not satisfied that the Client still fulfills the requirements of its classification, the Company will proceed with re-classification and inform the Client accordingly.