

President of the Management Board of WHITE BRIDGE ASSET MANAGEMENT d.o.o. for the management of alternative investment funds, with its registered office in Osijek, Šetalište P. Preradovića 3, registered with the Commercial Court in Osijek, OIB: 24139029403, Feđa Krivošić, issued on 06.12.2021.

## RULEBOOK ON CLIENT CLASSIFICATION

(hereinafter: the Ordinance)

### GENERAL PROVISIONS

#### Article 1

White Bridge Asset Management d.o.o. from Osijek, Šetalište P. Preradovića 3, registered with the Commercial Court in Osijek, OIB: 24139029403 (hereinafter: the “Company”), is a company authorized to manage alternative investment funds based on the approval of the Croatian Financial Services Supervisory Agency (hereinafter: the Agency) .

These rules prescribe the rules of business conduct and obligations of the company for managing alternative investment funds (hereinafter the Company) in relation to acquainting the client with all activities performed by the Company and all forms of investment of managed funds, classification of clients and investment risks for certain types of clients. all with regard to their knowledge, experience, financial situation and investment goals, which they are obliged to adhere to when assessing clients.

### CLIENT CLASSIFICATION

#### Article 2

The Company classifies its clients into professional investors, qualified investors and small investors according to their knowledge, experience, financial situation and investment goals.

### PROFESSIONAL INVESTORS

#### Article 3

A professional investor is an investor who, in accordance with the law governing the capital market, is considered a professional investor or can be treated as a professional investor at his own request.

A professional investor is any client who has sufficient experience, knowledge and expertise to independently make investment decisions and properly assess the risks associated with the investment.

For the purposes of this Ordinance, an entity that is considered a professional investor in the performance of all investment services and activities referred to in Article 5 of the Capital Market Act in relation to all financial instruments is:

1. an entity that must have the appropriate approval or be subject to the supervision of the competent supervisory authority in order to operate on the financial market:

investment company

credit institution

another financial institution with an operating license issued by a competent authority or regulated by special regulations

insurance company

the joint venture entity and its management company

pension fund management company and pension funds

pension insurance company

merchant of goods and commodity derivatives

local legal entity and

another institutional investor whose main activity is not covered under points a) to h) of this paragraph, and are subject to the obligation of approval or supervision for operation on the financial market

2. a large enterprise which, at the level of an individual legal entity in relation to the previous business year, meets at least two of the following conditions:

total assets amount to at least HRK 150,000,000.00

net income in the amount of at least HRK 300,000,000.00 i

capital in the amount of at least HRK 15,000,000.00

3. national and regional government, public debt management body, central bank, international and supranational institution such as the World Bank, International Monetary Fund, European Central Bank, European Investment Bank and similar international organizations

4. another institutional investor whose main activity is investing in financial instruments, including entities engaged in securitization of assets or other financing transactions.

PROFESSIONAL INVESTOR ON REQUEST

#### Article 4

(1) A client who is not explicitly mentioned in the previous article, including a public institution, local or regional self-government unit, legal or natural person, may apply to an investment firm for the status of a professional investor under the conditions prescribed by this Article.

(2) The company is obliged, based on the requirements referred to in paragraph 1 of this Article, to assess whether the client can make an investment decision and understand the risks associated with a particular transaction or service.

(3) The assessment referred to in paragraph 2 of this Article must include the expertise, experience and knowledge of the client. The knowledge and experience of the client cannot be assumed to be identical to the knowledge and experience of the client referred to in Article 3 of this Ordinance, but must be determined separately.

(4) When applying for the status of a professional investor, the client must prove to the investment firm that he meets at least two of the following conditions:

1. has executed on average 10 transactions of significant volume within each quarter, in the past one year, on the relevant market
2. the size of the client's portfolio of financial instruments exceeds the value of HRK 4,000,000.00 and
3. has worked or has worked in the financial sector for at least one year in professional activities that require knowledge of the transactions or services for which professional investor status is sought.

(5) The relevant market referred to in paragraph 4, item 1 of this Article is the market on which financial instruments for which the client wishes to obtain the status of a professional investor are traded.

(6) The portfolio of financial instruments referred to in paragraph 4, item 2 of this Article shall include both cash and financial instruments.

(7) The Company may treat clients referred to in paragraph 1 of this Article as professional investors, if the conditions and procedure for waiving the higher level of protection referred to in this Article and Article 104 of the Capital Market Act are met.

#### DISCLAIMER OF A HIGHER LEVEL OF PROTECTION

##### Article 5

(1) Clients referred to in Article 3 of this Ordinance may waive a higher level of protection of small investors guaranteed by the rules of business conduct only if all the following conditions are met:

1. the client requests the status of a professional investor in writing from the investment firm, stating whether he seeks this status in general or in relation to a particular investment service, transaction, type of transaction or product
2. The Company warns the client of the rights and protection he loses by choosing the status of a professional investor and

3. the client confirms in writing, in a document separate from the contract, that he is aware of the consequences of loss of rights and protection of small investors, all consequences of loss of protection, including changes in the calculation of fees for certain types of investments.

Only after receiving the above statement, and determining the prescribed conditions, the Company will notify the client of the acceptance of the request to waive the protection of the rules of business conduct intended for retail investors, and that it will, based on information provided, but also on other available data, be considered a professional investor, and will be treated as a professional investor with a lower level of protection.

(2) Prior to the decision on accepting the application for granting the status of a professional investor, the Company shall take all reasonable measures to determine whether the client meets the conditions referred to in Article 4 of this Ordinance.

(3) The professional investor is obliged to inform the Company of any change that could affect its status.

(4) If the Company in any way and from any source reliably learns about the data on the basis of which it can determine that the client no longer meets the conditions that enabled him to treat a professional investor, it is obliged to take appropriate steps but not be liable for any damage which could be for a professional investor who does not act in time in accordance with Article 6 of this Ordinance.

## STATUS CHANGE

### Article 6

The company will provide professional investors, at their written request, on which the signature of the authorized person is notarized, with treatment with a higher level of protection, which it provides to small investors.

Any client who is informed in accordance with these rules that he is considered a professional investor is obliged to request a higher level of protection if he considers that he would not be able to properly assess or manage the risks. The Company shall not be liable for any damage that may result from the client's failure to act at all or in a timely manner in accordance with the obligation prescribed in this paragraph.

## QUALIFIED INVESTOR

### Article 7

A qualified investor is an investor who meets the following criteria:

a) has sufficient experience and expertise to be able to understand the risks involved in investing in the AIF, investing in the AIF is in line with its investment objectives, and

b) for the purpose of investing in one AIF, is willing to pay a minimum of HRK 400,000.00 or equivalent in another currency, in the manner prescribed by the rules of the AIF, and which meets at least one of the following two conditions:

- the value of its net assets is at least HRK 2,000,000.00 or the equivalent value in another currency
- has worked or has worked in the financial sector for at least one year in professional activities that require knowledge of investments comparable to investments in AIFM, or its operations, either for its own account or for the account of others, includes managing, acquiring or disposing of assets types as well as AIF assets

## SMALL INVESTORS

### Article 8

A retail investor is an investor who is not a professional or qualified investor.

## ASSESSMENT OF SUITABILITY OR SUITABILITY

### Article 9

Prior to acquiring the status of a client, the Company collects data on knowledge and experience in the field of investment for a potential client, and which data it is obliged to

to be true and complete.

Based on the collected data on the client, the Company prepares the client's profile and assessment of its suitability, classifies the client in accordance with Article 2 of this Ordinance according to knowledge, experience, financial situation and investment objectives, and assesses how suitable the service is for the client.

The Company may rely on information received from the client as true and complete and shall not bear the damage that would occur because the information obtained is not true or complete, unless it was known or should have known that the information provided by the client is outdated, inaccurate or incomplete.

If the Company, based on the data collected about the client, considers that the service is not suitable for the client, it will warn the client, and if the client does not want to provide all necessary information or if he did not provide enough information about his knowledge and experience, the Company will warn that it is not possible to determine whether the services or products envisaged are suitable for him and that he cannot therefore use them.

## TRANSITIONAL AND FINAL PROVISIONS

### Article 10

This Ordinance shall enter into force on the day of its adoption.

