



SSC SMART FX LTD

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VERSION 1.6

CLIENT CATEGORISATION POLICY



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1. Introduction

SSC Smart FX (“the Company”, “we”, “us”) classifies its clients in accordance with the requirements of MiFID II Directive 2014/65/EU and applicable Cyprus legislation.

Client categorisation is important as it determines the level of regulatory protection afforded to each client.

The Company provides investment services exclusively to Professional Clients and, where applicable, Eligible Counterparties. The Company does not onboard or provide services to Retail Clients.

2. Client Categories

Under applicable legislation, clients are categorised as:

- Retail Clients
- Professional Clients
- Eligible Counterparties (ECPs)

These categories reflect different levels of knowledge, experience, and regulatory protection.

3. Retail Clients

Retail Clients are afforded the highest level of regulatory protection.

However, the Company does not provide services to Retail Clients.

Retail Clients would typically benefit from:

- enhanced disclosure requirements;
- appropriateness and suitability assessments;
- stricter best execution rules;
- potential eligibility for compensation under the Investor Compensation Fund (ICF).

As the Company does not service Retail Clients, these protections do not apply within the Company’s client base.

4. Professional Clients

Professional Clients are considered to possess the necessary experience, knowledge, and expertise to make their own investment decisions and properly assess the risks involved.

The Company accepts only Professional Clients, which may include:

- regulated financial institutions (e.g. investment firms, banks, insurance companies);
- large undertakings meeting at least two of the following criteria:
 - balance sheet total of at least €20 million;
 - net turnover of at least €40 million;
 - own funds of at least €2 million;
- national and regional governments, central banks, and supranational institutions;
- other institutional investors.

The Company may also accept **Elective Professional Clients**, provided they meet the relevant qualitative and quantitative criteria set out under applicable legislation.

Professional Clients are responsible for keeping the Company informed of any changes that may affect their classification.

5. Eligible Counterparties

Eligible Counterparties (ECPs) are clients who receive the lowest level of regulatory protection due to their experience and financial capacity.

ECPs may include:

- investment firms;
- credit institutions;
- insurance companies;
- governments and central banks;
- other authorised financial institutions.

Where the Company deals with ECPs, certain conduct of business obligations (such as best execution and appropriateness) may not apply, as permitted under applicable regulation.

6. Reclassification

Clients may request reclassification in writing; however, the Company is not obliged to accept such requests.

- Professional Clients may request to be treated as Retail Clients to obtain a higher level of protection.
- Eligible Counterparties may request to be treated as Professional or Retail Clients.

The Company will assess such requests on a case-by-case basis and inform the client of its decision and the implications of any change.

As the Company does not provide services to Retail Clients, any request for reclassification to Retail Client status may be declined.

7. Regulatory Protection Differences

Professional Clients and Eligible Counterparties receive a lower level of regulatory protection compared to Retail Clients.

In particular:

- the Company may assume that Professional Clients have the necessary knowledge and experience to understand risks;
- appropriateness assessments may not be required;
- disclosures may be less detailed;
- **clients are not eligible for compensation under the Investor Compensation Fund (ICF).**

8. Review of Classification

The Company monitors client classifications on an ongoing basis.

If the Company becomes aware that a client no longer meets the criteria for its classification, it will take appropriate action and notify the client accordingly.