

## **CLIENT CATEGORISATION**

The rules of the Financial Conduct Authority (the “FCA Rules”) require Oppenheimer Europe Ltd. (“Oppenheimer”) to notify you of your client categorisation. Your client categorisation determines the level of protection you are to be afforded under the FCA Rules. Under the FCA Rules you can be categorised as a retail client, a professional client or an eligible counterparty. Retail clients receive the highest level of protection under the FCA Rules and eligible counterparties the lowest. On the basis of the information available to Oppenheimer, Oppenheimer has categorised you under the FCA Rules as an **ELIGIBLE COUNTERPARTY**.

For your reference, please refer to the following definitions of a professional client and an eligible counterparty:

### **Professional Client**

1. An entity required to be authorised or regulated to operate in the financial markets. The following list includes all authorised entities carrying out the characteristic activities of the entities mentioned, whether authorised in a Member State of the European Economic Area (the “EEA”)<sup>1</sup> or a non-EEA country and whether or not authorised by reference to a European Community directive:
  - a credit institution;
  - an investment firm;
  - any other authorised or regulated financial institution;
  - an insurance company;
  - a collective investment scheme or the management company of such a scheme;
  - a pension fund or the management company of such a scheme (save in relation to a local government authority pension scheme);
  - a commodity or commodity derivatives dealer;
  - a local;
  - any other institutional investor.
2. A large undertaking meeting two of the following size requirements on a company basis:
  - balance sheet total of EUR 20,000,000;
  - net turnover of EUR 40,000,000;
  - own funds of EUR 2,000,000.
3. A national or regional government, a public body that manages public debt, a central bank, an international or supranational institution (such as the World Bank, the IMF, the ECP, the EIB) or another similar international organisation.

<sup>1</sup> The Member States of the EEA comprise the 27 Member States of the European Union plus Iceland, Liechtenstein and Norway

4. Another institutional investor whose main activity is to invest in financial instruments, including entities dedicated to the securitisation of assets or other financing transactions.
5. A person who has elected to be treated as a Professional Client and who has been opted-up as such by a firm regulated by the Financial Conduct Authority in accordance with the FCA Rules in respect of all investment services and which has not subsequently agreed to be treated as a Retail Client (as defined by the FCA Rules).

#### Eligible Counterparty

Each of the following is an eligible counterparty (including an entity that is not from an EEA Member State that is equivalent to any of the following) unless and to the extent it is given a different categorisation under the FCA Rules:

- an investment firm;
- a credit institution;
- an insurance company;
- a collective investment scheme authorised under the UCITIS Directive or its management company;
- a pension fund or its management company;
- another financial institution authorised or regulated under European Community legislation or the national law of an EEA Member State;
- an undertaking exempted from the application of the Markets in Financial Instruments Directive under either Article 2(1)(k) (which exempts certain own account dealers in commodities or commodity derivatives) or Article 2(1)(l) (which exempts locals) of that directive;
- a national government or its corresponding office, including a public body that deals with the public debt;
- a central bank;
- a supranational organisation.

#### Opt-up to Eligible Counterparty Status

Where Oppenheimer has initially categorised you as a professional client, you may request re-categorisation as an eligible counterparty for business covered by this client category. Before doing so, Oppenheimer must satisfy various requirements set out in the FCA Rules, including a requirement to obtain express confirmation from you that you agree to be treated as an eligible counterparty.

#### Client Requests for Re-categorisation

While you are permitted to request re-categorisation to a different client category, it is Oppenheimer's policy not to transact business with retail clients, and consequently, Oppenheimer cannot accept a request from you to be treated as a retail client.

Please note that any re-categorisation from a professional client to an eligible counterparty for business covered by this category would reduce the level of client protection to which you are entitled under FCA Rules. In particular, where you have been re-categorised from a professional client to an

eligible counterparty, Oppenheimer would no longer be subject to best execution requirements in relation to any orders received from you.

Should you have any questions regarding your client categorisation, or the protections afforded to you under FCA Rules by virtue of such categorisation, please contact your registered representative at Oppenheimer.