



Client Categorisation

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PREPARED BY

DMA Europe B.V.

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Client Categorisation at DMA Europe B.V.

DMA Europe B.V. (DMA EU) operates under various trade names, including Today's Wealth Management, Noble & Partners, Easybroker, DMA One and formerly also Fountain Capital, Mijn Effecten, Today's Group and Vladeracken Vermogensbeheer. As a licence holder, DMA EU is required to categorise its Clients into categories with the corresponding statutory requirements and conditions.

DMA EU distinguishes three categories:

1. Retail (non-professional) client;
2. Professional client;
3. Eligible counterparty ("ECP").

1. Retail (non-professional) client

A Retail Client is a legal entity or natural person who, under the applicable laws and regulations, cannot be regarded as a professional Client as described in section 2.

A non-professional Client may request DMA EU to be treated as a Professional Client ("opt-up"). In that case, DMA EU will determine, in accordance with the rules imposed by MiFID II, whether the Client meets at least two of the three required conditions:

- the Client has, on average, carried out 10 transactions of significant size per quarter over the past year;
- the Client has a portfolio of at least EUR 500,000, which may be made up of, for example, financial assets and/or bank deposits;
- the Client has worked in the field of investment services for at least one year.

If the Client meets these conditions, the Client may opt to be treated as a Professional Client. Once this has taken place, the Client can no longer rely on the investor compensation scheme.

2. Professional client

A Professional Client is a Client who meets the requirements described above and who wishes to be treated as such by DMA EU. Such a Client has the necessary experience and knowledge to make decisions independently and to assess the associated risks properly and correctly.

In addition to the conditions set out in section 1 for being classified as a Professional Client (professional investor), DMA EU also recognises the following Professional Clients:

- undertakings that are required to be authorised or that are subject to supervision in order to be active on the financial markets, such as investment firms and insurance companies;
- large undertakings that meet two of the following three requirements:
 - a) a balance sheet total of at least EUR 20 million;
 - b) a net turnover of at least EUR 40 million;
 - c) own funds of EUR 2 million.
- governments, public bodies, central banks and other institutional investors whose main activity is investing.

If desired, at the express request of the Client, a Professional Client may be treated as a non-professional investor ("opt-down"). This is permitted under the applicable laws and regulations. Professional Clients have a lower level of protection.

3. Eligible counterparty (ECP)

An eligible counterparty is a professional client who works in the financial sector and who is assumed, by virtue of their professional objectives, to have the necessary expertise in investment decision-making.

How we interpret the execution policy

In order for DMA EU to comply with 'Best Execution', an execution policy must be drawn up. In this respect, DMA EU refers to its "Order Execution Policy", which incorporates its Best Execution policy. In

that policy, DMA EU has taken into account various elements that determine the ultimate Best Execution. Price, costs and liquidity play a role here.

DMA EU takes into account the following criteria in order to determine the relative importance of the above-mentioned elements with regard to the Client groups referred to:

- Is the Client a professional or a non-professional Client?
- The characteristics of the order in question, in other words whether the order is 'at best' (market order) or with a limit, and the possible impact of the order in and on the market.
- The characteristics of the available trading venues where the financial instruments can and may be executed.

For Retail clients, the best result will be determined by executing the order at the best possible price against the lowest possible costs. The transaction costs are charged directly to the Client. They are directly related to the execution of the order. In this regard, the Client may think of, for example, trading venue costs, clearing and settlement costs or local taxes.

For Professional Clients and ECPs, the above is of lesser importance in determining the best possible result. In certain circumstances, for both non-professional Clients and professional Clients, DMA EU may decide to deviate from the policy if this is in the Client's interest for the correct execution of the order. This may apply, for example, in relation to the size of the order and the liquidity in the market, or a highly illiquid financial instrument. Where this applies, DMA EU is authorised to execute the order at its own discretion, taking into account the speed of execution and the likelihood that the order will be executed. All of this is done with due regard for the best interests of the Client.

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Signed following approval at the board meeting of May 2026.

G.K. van Dommelen

Compliance & Risk Officer DMA EU