PRIME DESK

MULTI-ASSET INSTITUTIONAL-GRADE BROKERAGE

Client Categorisation Policy

How Clients Are Categorised, What Each
Category Receives, and How to Change It

Company Registration Number 2026-00429
Saint Lucia International Business Company
Version 1.0 · Reference PD·LEG·11

FORMS PART OF THE CLIENT AGREEMENT

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1 — Purpose

The Company categorises every client so that the protections, disclosures, and execution treatment applied are proportionate to that client's knowledge, experience, and capacity to bear loss. Your category is notified to you at account opening and is recorded in your client portal.

The Company is not authorised by a Tier-1 regulator and is not subject to a statutory categorisation regime. This Policy is adopted voluntarily and applies the substance of the standard used in regulated markets.

2 — The Categories

CATEGORY	WHO FALLS INTO IT
Retail Client	**The default.** Every client is categorised as retail unless they meet the criteria at Section 3 and elect otherwise. Retail clients receive the highest level of protection the Company offers.
Professional Client	A client who meets the criteria at Section 3 and who has asked in writing to be treated as professional, or an entity that is professional by nature — a licensed financial institution, a fund, or a large undertaking.
Eligible Counterparty	Regulated institutions, liquidity providers, and similar entities dealing with the Company in a professional capacity. This category is not available to individuals.

3 — Becoming a Professional Client

A client may request professional categorisation only if they satisfy **at least two** of the following three criteria, and the Company is satisfied on assessment that the client has the knowledge and experience to make their own investment decisions and to understand the risks involved.

a) The client has carried out transactions of significant size in the relevant market at an average frequency of **ten (10) per quarter over the previous four quarters**.

b) The size of the client's financial instrument portfolio, comprising cash deposits and financial instruments, exceeds **EUR 500,000** or the equivalent.

c) The client works, or has worked, in the financial sector for at least **one (1) year** in a professional position requiring knowledge of leveraged products.

3.1 The Procedure

a) The client makes a written request identifying the criteria satisfied and provides supporting evidence.

b) The Company assesses the request, and may decline it. It is not obliged to give reasons for declining.

c) Where the request is accepted, the Company issues a written warning setting out the protections that will be lost.

d) The client confirms in a separate written statement that they understand the consequences and still wish to proceed.

e) The change takes effect only once that confirmation is received and recorded.

4 — What Each Category Receives

PROTECTION	RETAIL	PROFESSIONAL
Full risk disclosure before opening	Yes	Yes
Total consideration as the leading execution factor	Always	Leading, but other factors may be weighted more heavily
Communications in plain, non-technical terms	Yes	Assumed technical knowledge
Appropriateness assessment at onboarding	Yes	Not applied
Discretionary reset of a negative balance	Considered	Not applied
Access to the DMA account and FIX API	Not available	Available, subject to criteria
Complaints handling under PD·LEG·08	Yes	Yes
Client money segregation under PD·LEG·10	Yes	Yes

BEFORE YOU ASK TO BE TREATED AS PROFESSIONAL

A professional client is assumed to understand the products, to be able to assess risk without assistance, and to bear the consequences of its own decisions. Protections designed for retail clients — including the appropriateness assessment and the discretionary treatment of a negative balance — are not applied. **The commercial terms of an account do not improve by reason of categorisation alone.** If you are seeking tighter pricing, the relevant choice is the account type, not the category.

5 — Account Types and Categorisation

Account type and client category are separate. The Standard, Pro, Prime, ZERO, and Risk Management accounts are available to retail and professional clients alike, subject to the published minimum deposit for each. The **DMA** account, and FIX API connectivity, are available to professional clients and eligible counterparties only, because they require the client to manage market depth, uncapped variable spreads, and the behaviour of their own connected systems.

6 — Moving Between Categories

Requesting more protection	A professional client may ask at any time to be treated as retail. The Company will normally agree, and will do so in writing. This request is never refused on commercial grounds.
Requesting less protection	A retail client may request professional treatment under Section 3. The Company may decline.
Change by the Company	Where the Company becomes aware that a client no longer meets the criteria for professional categorisation, it will recategorise the client as retail and notify them in writing.
Your obligation	A professional client must inform the Company of any change that affects their categorisation.

7 — Appropriateness and Records

For retail clients, the Company assesses at onboarding whether the products are appropriate, using the information the client provides about knowledge, experience, and financial position. Where the assessment indicates that the products may not be appropriate, the Company warns the client. A warning is not a prohibition: the client may proceed, having been warned, and does so on their own responsibility. Categorisation records, assessments, requests, and warnings are retained for not less than **five (5) years**.

Categorisation enquiries: support@prime-desk.com · Complaints: complaints@prime-desk.com · Prime Desk Ltd., Top Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia LC01 401 · PD·LEG·11