PERSONAL ADVICE · INTERNATIONAL PERSPECTIVE · SINCE 1997

Business practices, shaped around *your life.*

Your client guide to our services, advice process and protections.

Based in Cyprus, supporting expatriates and internationally connected clients across Europe and beyond —where circumstances, services and permissions allow.



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ONLINE www.3dglobal.com

CLIENT INFORMATION

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Use this guide as a clear overview of the relationship. Your signed agreement, personalised recommendation and product documents provide the detail for your service.

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KEEP THIS GUIDE

The current approved client information and supporting policies are available through www.3dglobal.com or on request.

THE 3D GLOBAL APPROACH

Advice guided by your goals.
Your interests come first.

Our Cyprus base anchors the relationship. Our advice reflects clients whose work, family, assets and future plans may extend across Europe and beyond.

01

Investment services

Independent advice from a defined and sufficiently diverse range.

CYSEC · LICENCE 063/06

02

Insurance services

Non-independent, restricted advice from a limited panel.

ICCS · REGISTRATION 5057

03

International perspective

Services only where residence, circumstances and permissions allow.

CYPRUS REGULATED

HOW WE WORK

01

Understand

Your priorities, family, responsibilities and plans.

02

Shape

A clear strategy using carefully researched solutions.

03

Stay alongside

Regular advice as markets move and your life evolves.

This guide explains the service scope, advice process, costs, client protections and responsibilities that sit behind that relationship.

Message from the CEO

Welcome to 3D Global.

Our ethos is built on service, independence and performance. We support clients whose lives, families and assets may span more than one country, while remaining clear about where we are permitted to act and which regulated entity provides each service.

Good advice starts with understanding you: your objectives, financial position, time horizon, knowledge and experience, risk tolerance, capacity for loss, liquidity needs and, where relevant, sustainability preferences. We document that understanding before making a personal recommendation.

For investment services, 3D Global Financial Services Ltd provides independent investment advice from a defined and sufficiently diverse range. For insurance distribution, 3D Global Insurance Advisors, Agents & Sub-Agents Ltd provides non-independent, restricted advice from a limited panel. We explain the basis, scope, costs and material limitations of the relevant service before you proceed.

This document describes our current client journey and the standards that sit behind it—from fact-find and risk assessment through recommendation, implementation, review, record keeping and complaints. Please ask us to explain anything that is unclear.

Mark Nowell
Chief Executive Officer
3D Global Financial Services Ltd

SECTION 01 · THE RELATIONSHIP

1. About This Document

This document explains the services, processes and client protections applied by the relevant 3D Global group entity. It is information only: it is not a personal recommendation, an offer, a product contract or tax or legal advice.

Read it with your Client Agreement, terms of business, suitability report, personalised costs and charges disclosure, product Key Information Document (KID) where required, policy documentation, privacy information and any provider or custodian terms. If documents conflict, applicable law and regulatory requirements prevail; the signed contractual and personalised documents then govern the specific service or transaction.

SCOPE

Services are only provided where the client's residence, circumstances, requested service and the relevant entity's permissions allow. We may decline, restrict or refer work where those conditions are not met.

SECTION 02 · THE RELATIONSHIP

2. Who We Are & How We Are Regulated

3D Global operates through separate legal entities. The identity of the contracting and advising entity matters because its permissions, advice basis, complaints route and protections may differ.

Entity	Role	Registration / regulator	Advice basis
3D Global Holdings Ltd	Group holding company; does not itself provide the regulated services described here.	HE 188 420	Not applicable
3D Global Financial Services Ltd (3DGFS)	Investment advice and receipt and transmission of orders.	HE 86 659; Cyprus Investment Firm; CySEC licence 063/06	Independent investment advice from a defined and sufficiently diverse range—not every product or provider in the market.
3D Global Insurance Advisors, Agents & Sub-Agents Ltd (3DGIA)	Insurance distribution, including advice on insurance-based investment products where applicable.	HE 183 597; ICCS registration 5057	Non-independent, restricted insurance advice based on a limited panel. The basis and scope are explained before advice.

3DGFS is authorised to provide investment advice and reception and transmission of orders in relation to the financial instruments within its CySEC permission. It does not hold client money or financial instruments. Client assets are held by authorised product providers, platforms or custodians under their own safeguarding and contractual arrangements.

Eligible clients of 3DGFS may be covered by the Investor Compensation Fund, subject to the Fund's eligibility criteria, exclusions and compensation limits. This is not protection against normal investment loss or poor market performance.

SECTION 03 · THE RELATIONSHIP

3. Contact Information

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- Telephone: +357 25 82 82 92
- Website: www.3dglobal.com
- General enquiries: info@3dglobal.com
- Administration and client instructions: admin@3dglobal.com
- Investment services: invest@3dglobal.com
- Insurance services: insure@3dglobal.com
- Complaints: complaints@3dglobal.com

IMPORTANT

Do not send trade instructions or urgent time-sensitive requests through the website enquiry form. Use the agreed service channel and obtain confirmation that your instruction has been received.

SECTION 04 · THE RELATIONSHIP

4. Our Core Principles

Service

We aim to communicate clearly and promptly, administer instructions carefully, and provide appropriate support—including reasonable adjustments for clients who may be vulnerable or need additional help.

Independence and clarity

We describe the advice basis accurately. Independent investment advice does not mean that every product or provider in the market is reviewed. Restricted insurance advice is based on a limited panel and is presented as such.

Performance in context

Performance is considered alongside risk, costs, tax circumstances, liquidity, diversification, time horizon and the client's objectives. No return is guaranteed unless a regulated product's binding terms expressly provide one.

Best interests and professional standards

We act honestly, fairly and professionally in clients' best interests, maintain competence, manage conflicts and provide information that is fair, clear and not misleading.

Vulnerable clients

We seek to identify support needs sensitively, adapt communication and process where appropriate, and avoid pressure. With consent and subject to confidentiality, a trusted person may support the client.

SECTION 05 · THE RELATIONSHIP

5. Our Services

5.1 Investment services — 3DGFS

3DGFS primarily provides personal investment advice and may receive and transmit orders to authorised third-party providers, platforms or custodians. Advice is independent and based on a defined and sufficiently diverse range that is capable of supporting a suitable recommendation; it does not cover every product or provider in the market.

- personal recommendations supported by a suitability assessment and written suitability report;
- portfolio construction, asset allocation, product selection and restructuring within the agreed scope;
- receipt and transmission of orders to implement advice or, in limited circumstances, without advice;
- ongoing service and periodic suitability assessment where expressly agreed.

Where a non-advised service is permitted, 3DGFS may need to assess appropriateness. A warning that an instrument is not appropriate—or that there is insufficient information to assess it—is not a personal recommendation and does not convert the transaction into advised business.

5.2 Insurance distribution — 3DGIA

3DGIA provides non-independent, restricted insurance advice based on a limited panel. It identifies the client's insurance demands and needs and, where personal advice is given, explains why the proposed contract is consistent with them. The panel, advice basis, remuneration and relevant product limitations are disclosed before conclusion of the contract.

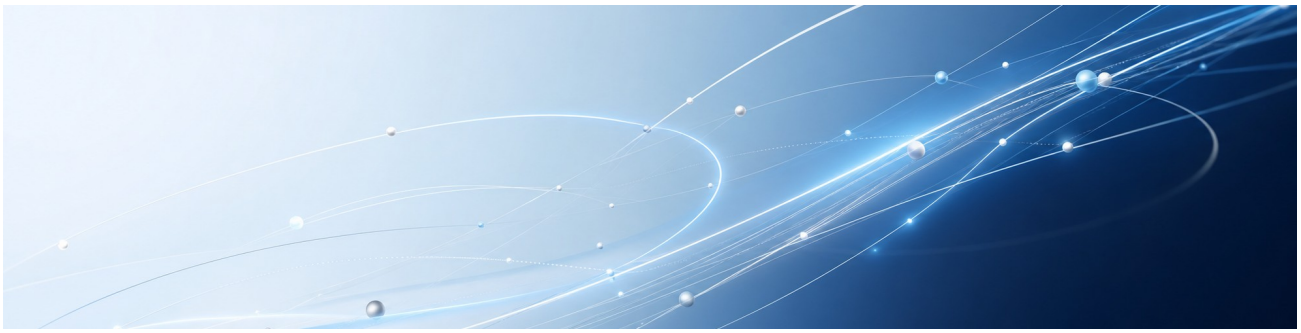
- life, family, medical, health, income-protection and disability cover where available;
- general insurance within the entity's permissions and distribution arrangements; and

- insurance-based investment products, subject to applicable IDD suitability, conflicts, cost and product-governance requirements.

5.3 International and planning context

We may support internationally connected clients, but a connection with Cyprus or an existing client relationship does not by itself authorise a service in another country. We assess residence, location, nationality where relevant, the service requested, product availability and applicable permissions.

Broader planning discussions do not make 3D Global a tax or legal adviser. Where an outcome depends on tax, succession, trust, immigration or legal analysis, clients should obtain advice from a suitably qualified professional in the relevant jurisdiction. We may coordinate with that adviser with consent.



SECTION 06 · THE ADVICE PROCESS

6. Client Categorisation (MiFID II)

In accordance with MiFID II, 3D Global Financial Services Ltd is required to categorise each client before providing investment services. Client categorisation is an important regulatory requirement because it determines the level of protection, disclosures, and regulatory safeguards that apply to the client relationship.

The purpose of categorisation is to ensure that clients receive an appropriate level of information, risk disclosure, and regulatory protection based on their experience, knowledge, and ability to understand and assess investment risks.

Clients are categorised into one of the following three categories:

Retail Clients

Most private individuals are categorised as Retail Clients. This category provides the highest level of regulatory protection and includes, among other safeguards:

full disclosure of risks, charges, and product information
mandatory suitability assessments when investment advice is provided
appropriateness testing where required
enhanced reporting and transparency obligations
additional protections relating to product governance and target market rules

3D Global applies the Retail Client category as the default classification unless there is a clear regulatory basis for categorising a client differently.

Professional Clients

A client may be categorised as a Professional Client if they are considered to have the experience, knowledge, and expertise necessary to make their own investment decisions and properly assess the risks involved, as defined under MiFID II.

Professional Clients are subject to fewer regulatory protections than Retail Clients. For example, the level of disclosure provided may be reduced and certain suitability requirements may be applied differently, as it is assumed that the client has a greater understanding of financial markets and investment products.

Professional Client status may apply automatically to certain institutions, or may be granted to an individual client on request, subject to formal assessment.

Eligible Counterparties

Certain regulated entities such as investment firms, banks, insurance companies, collective investment schemes, and other qualifying institutions may be categorised as Eligible Counterparties. This category provides the lowest level of regulatory protection and is generally relevant only for specific types of investment activity.

Where applicable, Eligible Counterparty categorisation requires formal client consent, and the level of regulatory protection is significantly reduced compared to Retail or Professional categorisation.

Default Categorisation

Unless otherwise assessed, all clients are categorised as Retail Clients, ensuring the highest degree of regulatory protection is applied from the outset.

Right to Request a Change of Categorisation

Clients have the right to request a change of categorisation by submitting a written request to 3D Global.

A Retail Client may request to be treated as a Professional Client. However, clients should be aware that doing so may result in a reduction in regulatory protections. If such a request is made, 3D Global will carry out an assessment to determine whether the MiFID II eligibility criteria are met and will provide clear warnings regarding the consequences of re-categorisation.

A Professional Client may request to be treated as a Retail Client in order to receive a higher level of protection. Where possible, 3D Global will accommodate such requests and will confirm the revised categorisation in writing.

Any change in categorisation will be formally documented and recorded on the client file and relevant internal systems, in accordance with regulatory record-keeping requirements.

Ongoing Review

Client categorisation may be reviewed periodically, particularly where there is a material change in a client's circumstances that could impact the appropriateness of the categorisation.

This ensures that the client continues to receive the appropriate level of regulatory protection over time.

SECTION 07 · THE ADVICE PROCESS

7. Suitability, Appropriateness & ESG Preferences

A core part of 3D Global's commitment to client protection is ensuring that any investment recommendation or transaction is made in accordance with the relevant regulatory requirements and, most importantly, is appropriate for the individual client's circumstances.

Under MiFID II, investment firms are required to carry out formal assessments designed to ensure that clients are treated fairly, that they understand the risks involved, and that investment solutions are aligned with their personal objectives and financial situation. These requirements form a key part of our advice process and are central to how we deliver regulated investment services.

7.1 Suitability (Investment Advice)

Where 3D Global provides Investment Advice, we are required to assess whether a recommendation is suitable for the client. Suitability means that the advice must be consistent with the client's needs, objectives, and ability to accept and withstand investment risk.

To complete a suitability assessment, we obtain and evaluate information including (but not limited to):

Financial Situation

This includes an understanding of the client's overall financial position, such as:

- income and its sources
- assets, including liquid assets, property, investments and pensions
- liabilities and financial commitments
- affordability of investment contributions
- capacity to absorb losses without undue financial hardship

Investment Objectives

We establish what the client is seeking to achieve, including:

- the purpose of the investment (e.g. retirement, capital growth, income, education planning, inheritance planning)

investment time horizon
need for income or access to capital
expected future changes in circumstances
attitude to long-term planning and wealth preservation

Attitude to Risk and Capacity for Loss

Risk tolerance is a critical part of investment planning. We assess:

the client's appetite for risk (how comfortable they are with volatility and potential loss)
capacity for loss (how much financial loss could realistically be absorbed without impacting lifestyle or essential needs)
overall risk-return expectations and whether they are realistic

This assessment may be supported by an Attitude to Risk (ATR) questionnaire and further discussion.

Knowledge and Experience

We consider whether the client has sufficient understanding of:

investment products and underlying asset classes
the nature and complexity of the proposed investment
risks such as volatility, liquidity restrictions, currency movements and market downturns
previous investment history and experience

Currency Requirements and Liquidity Needs

As many of our clients are internationally mobile or have cross-border assets, we also assess:

base currency requirements (e.g. EUR, GBP, USD)
exposure to foreign exchange risk
short and medium-term liquidity needs
foreseeable capital withdrawals (e.g. property purchase, education costs, retirement drawdown)

ESG Preferences

In accordance with regulatory developments, we also ask clients to state whether they have any ESG preferences, meaning whether they wish their investments to reflect Environmental, Social, and Governance considerations.

7.2 ESG Preferences (Environmental, Social and Governance)

3D Global recognises that many clients increasingly wish to incorporate sustainability considerations into their investment planning. Where a client expresses ESG preferences, these will be formally recorded and incorporated into the suitability assessment and recommendation process.

Where possible, we will seek to recommend solutions that align with the client's stated ESG objectives, which may include:

a preference for investments that integrate sustainability risk considerations
a desire to avoid certain sectors or activities
a preference for funds or portfolios with specific sustainability characteristics

Clients should be aware that ESG investing is subject to evolving definitions, regulatory classifications, and provider frameworks. ESG preferences may also restrict the available investment universe and may affect portfolio construction, diversification, and performance outcomes.

For this reason, ESG preferences are considered as part of the overall suitability process alongside risk profile, objectives, and investment constraints.

7.3 Documenting Suitability

Where investment advice is provided, 3D Global will normally issue a written Suitability Report. This report is designed to explain:

the client's objectives and profile
the rationale for the recommendation

how the recommendation aligns with the client's risk profile and capacity for loss
relevant product risks, restrictions and costs
any ESG considerations incorporated into the recommendation

This documentation forms an important part of transparency and regulatory record-keeping.

7.4 Appropriateness (Receipt and Transmission Without Advice)

Where 3D Global provides Receipt and Transmission of Orders without providing investment advice, MiFID II may require us to assess whether the investment is appropriate for the client.

An appropriateness assessment focuses primarily on whether the client has the knowledge and experience to understand the nature and risks of the relevant financial instrument.

If, based on the information provided, a product or transaction is assessed as not appropriate, we will issue a written warning explaining that the investment may not be suitable for the client's level of understanding. If the client still wishes to proceed, the transaction may be carried out at the client's instruction, subject to regulatory requirements.

7.5 Ongoing Suitability and Review

Suitability is not a one-time assessment. Where clients receive ongoing advice services, suitability will be reviewed periodically and at least annually, or more frequently where a material change occurs in the client's circumstances, objectives, or portfolio structure.

This ensures that advice remains aligned with the client's evolving needs and that investments continue to support fair long-term outcomes.

SECTION 08 · THE ADVICE PROCESS

8. Product Governance & Target Market

3D Global is committed to ensuring that all products recommended or made available to clients are selected, distributed, and monitored in a responsible and compliant manner. This is an important part of protecting clients and ensuring that investment solutions are aligned with client needs, risk profiles, and long-term objectives.

3D Global does not manufacture financial instruments. Instead, we act as a distributor of investment products and solutions issued or managed by third-party product providers and financial institutions. These may include banks, custodians, insurance companies, and fund management groups.

8.1 Product Governance Framework

Under MiFID II, investment firms are required to operate a robust product governance framework. This includes formal processes for the selection, approval, monitoring, and review of financial instruments that are distributed to clients.

In line with applicable MiFID II product-governance requirements and current ESMA guidance, 3DGFS maintains arrangements designed to ensure that:

products are selected only after appropriate due diligence and assessment
product features, risks, costs, and limitations are properly understood
products are offered only where they are compatible with the needs of the relevant client group
products are distributed in a manner that supports fair client outcomes
product distribution is consistent with regulatory expectations and best practice

Product governance is not simply a compliance requirement—it is a key element of our commitment to acting in the best interests of the client.

8.2 Target Market Concept

A central element of product governance is the concept of a Target Market. Manufacturers of financial instruments are required to define the type of client for whom a product is intended. As a distributor, 3D Global is required to understand and apply this information and ensure that products are only recommended or made available to clients who fall within the identified target market.

A product's target market is defined by factors such as:

client category (Retail / Professional / Eligible Counterparty)
investment knowledge and experience
financial situation and ability to bear losses
risk tolerance and investment objectives
investment time horizon and liquidity requirements
intended use of the product (e.g. growth, income, capital preservation)
ESG characteristics and sustainability-related objectives (where relevant)

In addition, manufacturers may define a negative target market, meaning the type of clients for whom a product is not appropriate.

3D Global takes these target market requirements seriously and applies them as part of the product selection and suitability process.

8.3 Product Selection and Due Diligence

Before a product is made available for recommendation, 3D Global carries out a structured assessment of the provider and the product. This may include reviewing:

financial strength and credibility of the institution
regulatory jurisdiction and investor protection arrangements
product structure and complexity
underlying investment exposure and asset types
liquidity, dealing terms, and redemption restrictions
costs and charges, including ongoing fees and transaction costs
risk characteristics and volatility expectations
reporting quality, administrative efficiency, and service standards
any relevant ESG classifications and sustainability disclosures

This process helps ensure that product recommendations are supported by appropriate governance and that risks are clearly understood.

8.4 High-Risk and Complex Products

3D Global has a clear policy that high-risk and complex products are not promoted or distributed to Retail Clients.

High-risk or complex products may include instruments that expose investors to heightened risks such as:

significant potential for capital loss
leverage or gearing
illiquidity or long lock-in periods
opaque pricing structures
embedded derivatives or conditional return features
valuation uncertainty or limited secondary markets

Where such products are considered, they may only be offered to Professional Clients or Eligible Counterparties, and only where:

the product falls within the defined target market
enhanced due diligence and governance controls are applied
suitability and appropriateness requirements are met
risks are clearly disclosed and understood

This approach reflects our commitment to client protection, regulatory compliance, and the principles of treating customers fairly.

8.5 Ongoing Monitoring and Review

Product governance does not end once a product is approved. 3D Global carries out ongoing monitoring of products to ensure that they remain appropriate for distribution and continue to support fair client outcomes.

Monitoring may include:

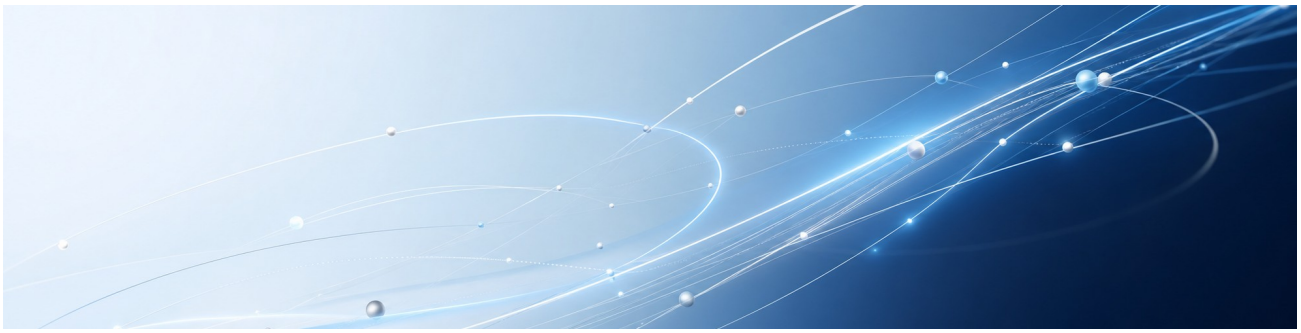
review of product performance and volatility
assessment of client outcomes and suitability evidence
identification of any product-related complaints or issues
consideration of market events or provider developments
review of changes to product terms, charges, or risk profile
ongoing confirmation that distribution remains within the intended target market

Where concerns are identified, 3D Global may take corrective action, including issuing additional guidance, restricting distribution, or removing a product from availability.

8.6 Commitment to Fair Client Outcomes

Through our product governance framework, 3D Global aims to ensure that every product recommendation is supported by appropriate oversight and is made in a manner consistent with our obligations under MiFID II and CySEC requirements.

Our objective is to ensure that products are distributed responsibly, transparently, and in a way that promotes long-term suitability and fair outcomes for clients.



SECTION 09 · INVESTMENT FOUNDATIONS

9. Key Investment Concepts (Client-Friendly Overview)

Investing can appear complex, particularly as many modern investment solutions are structured using multiple layers. At 3D Global, we believe it is important that clients understand the key building blocks of how investments are arranged, what they are investing in, and how different structures can affect risk, cost, liquidity, and long-term outcomes.

Although investment products may vary considerably between providers and jurisdictions, most investment arrangements can be understood by considering three core elements:

what the underlying investments are
how they are held and managed
the structure or "wrapper" used to administer and protect the investment

Understanding these concepts helps clients make informed decisions and improves transparency in the advice process.

9.1 Underlying Investments (Asset Classes)

At the most basic level, every investment is ultimately linked to one or more underlying asset classes. Common asset classes include:

Cash and money market instruments
Bonds (fixed income securities)
Equities (shares in companies)
Property and real estate-related investments
Commodities and alternative assets
Mixed or multi-asset portfolios

Different asset classes behave differently and are affected by different economic forces. For example, equities tend to offer higher long-term growth potential but can be volatile, while bonds may provide greater stability but can be impacted by interest rate movements and inflation. The way asset classes are combined within a portfolio is one of the key drivers of long-term risk and return.

9.2 Collective Investment Schemes (Funds)

Many clients invest through collective investment schemes, commonly referred to as funds. These are professionally managed investment vehicles where investors pool their money together and the fund manager invests in a portfolio of assets on behalf of all investors.

Funds are widely used because they can provide:

Diversification, by investing across multiple securities, sectors, and regions
access to professional investment management
economies of scale, potentially reducing costs compared to holding assets directly
access to specialist asset classes or strategies that may not be practical for individuals to manage alone

Funds may invest in a wide range of underlying holdings and may be designed for different objectives such as growth, income, capital preservation, or a balanced approach.

There are many types of collective investment schemes, including:

UCITS funds
SICAVs
mutual funds
unit trusts
OEICs
exchange-traded funds (ETFs)

Each fund has its own investment mandate, risk level, charges, and dealing frequency. Clients should always review the Key Information Document (KID) where required or fact sheet to understand how the fund operates and what risks apply.

9.3 Direct Holdings vs Managed Portfolios

In some cases, clients may hold investments directly (for example, individual shares or bonds). However, many clients prefer investments to be structured as a managed portfolio (sometimes called a discretionary or model portfolio), where the investment strategy is managed on an ongoing basis and the portfolio is periodically rebalanced.

Managed portfolio solutions may provide:

professional oversight and asset allocation management
rebalancing discipline
access to diversified fund selections
alignment with a defined risk profile

Where managed portfolios are used, it is important that the portfolio remains aligned with the client's suitability profile and that ongoing reviews are carried out.

9.4 Wrappers and Investment Structures

Many investments are held through an administrative structure known as a wrapper. A wrapper is not an investment itself, but a vehicle that holds investments and provides features such as administration, reporting, beneficiary nomination, and (in some jurisdictions) tax planning advantages.

Common types of wrappers include:

Investment Platforms / Custody Accounts

These structures allow clients to hold multiple funds and investments under a single account, typically with consolidated reporting and easier administration. Platforms often provide flexibility and transparency, allowing clients to switch funds or rebalance portfolios efficiently.

Insurance Wrappers / Insurance Bonds

Some clients invest through insurance-based structures that allow investments to be held within an insurance contract. These may provide features such as:

consolidated investment administration
beneficiary nomination and succession planning advantages
potential tax planning benefits depending on jurisdiction
access to a broad range of funds and portfolio strategies

Insurance wrappers are widely used in international financial planning but may involve contractual terms, specific charging structures, and potential surrender penalties.

Trust-Based or Estate Planning Structures

Certain arrangements may involve trust structures, particularly where succession planning or inheritance planning is an objective. Trust-based planning is highly dependent on jurisdiction and individual circumstances and may require specialist legal or tax advice.

9.5 Understanding "Layers" of an Investment

Many clients find it helpful to think of investment structures as having three layers:

The underlying assets (e.g., equities, bonds, cash, property)
The investment vehicle (e.g., a fund or portfolio holding those assets)
The wrapper or product structure (e.g., platform account or insurance bond)

Each layer has its own risks, costs, and features. For example, a client may invest in a global equity fund (layer 2) that holds international shares (layer 1), within an insurance bond (layer 3). In such a case, the client is exposed not only to market risk but also to fund management risk, currency risk, and product terms such as liquidity restrictions or charges.

Understanding these layers helps ensure that clients are aware of what they own, how it is managed, and what the relevant risks and contractual obligations are.

9.6 Why Structure Matters

The way an investment is structured can influence important outcomes such as:

the level of diversification achieved
liquidity and access to capital
reporting and transparency
costs and charges
taxation treatment (depending on jurisdiction)
estate planning and beneficiary arrangements
administrative efficiency and ease of switching or rebalancing

For this reason, 3D Global considers not only the investment strategy itself, but also the most appropriate structure for holding investments, based on the client's objectives, residency status, and long-term planning needs.

SECTION 10 · INVESTMENT FOUNDATIONS

10. Understanding Investment Risk

All investments involve some degree of risk. The value of investments can go down as well as up, and you may not get back the amount originally invested. Investment returns are not guaranteed and past performance is not a reliable indicator of future results.

At 3D Global, we believe that risk should not be avoided blindly, but understood and managed appropriately. Taking some investment risk is often necessary to achieve long-term objectives such as retirement planning, wealth accumulation, and protection against inflation. However, the level of risk taken must always be aligned with your personal circumstances, time horizon, and ability to withstand losses.

The nature and level of risk will depend on the type of investment, the underlying assets, the structure of the product, and broader market conditions.

10.1 The Relationship Between Risk and Return

In general, higher potential returns are associated with higher levels of risk. Lower-risk investments may provide greater stability, but often generate lower long-term growth. For this reason, investment planning requires balancing the need for growth with the need for security and capital preservation.

Clients should be aware that short-term volatility is normal in investment markets. Temporary declines in value do not necessarily mean a long-term loss, but they can have a significant impact if investments are sold at an unfavourable time. This is why investment time horizon and liquidity needs are important considerations.

10.2 Key Types of Investment Risk

There are several different types of risk that may apply, depending on the investment solution and its underlying holdings. The most common risks include:

Market Risk

Market risk refers to the possibility that the value of an investment may fall due to movements in financial markets. This can be caused by factors such as changes in economic conditions, investor sentiment, interest rates, inflation, corporate performance, or global events. Market risk is particularly relevant to equities, property-related investments, and higher-yield bonds.

Currency Risk

Currency risk arises when investments are held in a currency different from the client's base or spending currency. Exchange rates can fluctuate significantly and may increase or reduce the value of an investment when converted back into the client's domestic currency. Currency movements can have a major impact on returns, particularly for internationally mobile clients or those with multi-currency financial commitments.

Liquidity Risk

Liquidity risk refers to the possibility that an investment cannot be easily sold or redeemed when required, or that redemption may only be possible under certain conditions. Some products may impose lock-in periods, notice periods, or restrictions on withdrawals. Certain investments may also apply early redemption penalties or surrender charges. Liquidity considerations are particularly important for clients who may require access to capital in the short or medium term.

Inflation Risk

Inflation risk refers to the loss of purchasing power over time. If the return on an investment is lower than the rate of inflation, the real value of capital may be eroded. This risk is particularly relevant for long-term savers and for clients holding excessive amounts in low-interest cash deposits over extended periods.

Credit Risk

Credit risk is the risk that a bond issuer, bank, or other counterparty may fail to meet its obligations. For example, a bond issuer may be unable to pay interest or repay the capital at maturity. Credit risk can also apply to certain structured products and deposits. Credit quality varies significantly between institutions, and credit ratings may change over time.

Counterparty Risk

Counterparty risk refers to the risk of loss arising from the failure of a third party involved in the transaction or product structure. This could include a custodian, platform provider, insurer, bank, or other financial institution. Although regulated structures are designed to reduce this risk, it cannot be eliminated entirely.

Concentration Risk

Concentration risk arises when a portfolio is overly exposed to a single asset class, region, currency, sector, or investment provider. This may increase volatility and vulnerability to specific events. Concentration risk can also occur where a portfolio relies heavily on one or two funds or strategies.

Political and Geographic Risk

Political and geographic risk refers to the possibility that economic instability, political decisions, regulation changes, taxation changes, or geopolitical events may affect investments in specific countries or regions. Some emerging markets, while offering growth potential, may carry higher levels of political and regulatory uncertainty.

10.3 Additional Risks That May Apply

Depending on the product type and underlying investments, other risks may also be relevant, including:

interest rate risk (particularly affecting bonds and fixed income assets)
valuation risk (difficulty valuing certain assets or private investments)
derivative risk (where derivatives are used within a fund or structured product)
operational risk (failures in systems, controls, or processes at product providers)
regulatory and tax risk (changes in law affecting product treatment or client outcomes)

10.4 Risk Management and Diversification

A key principle of investment risk management is diversification. Diversification means spreading investments across different asset classes, sectors, regions, currencies, and investment managers to reduce reliance on any single area.

A well-diversified portfolio may help reduce volatility and manage risk, although it does not eliminate the possibility of loss. Diversification is particularly important for long-term investors and forms a central part of 3D Global's investment approach.

Where appropriate, we may also recommend portfolio rebalancing to ensure that asset allocation remains aligned with the client's risk profile and objectives over time.

10.5 Understanding Risk in Context

Risk should always be considered in the context of the client's:

objectives and time horizon
liquidity requirements
personal and financial circumstances
ability to tolerate short-term fluctuations
ability to absorb losses without financial hardship

For this reason, 3D Global places strong emphasis on the suitability assessment process and ongoing reviews, ensuring that risk levels remain appropriate and consistent with the client's needs.

SECTION 11 · INVESTMENT FOUNDATIONS

11. Liquidity, Term & Early Redemption

When selecting an investment or insurance-based product, it is important to consider not only the potential return and risk profile, but also how easily the investment can be accessed. Different products offer different levels of flexibility, and some may involve contractual terms or restrictions that limit access to capital.

Liquidity refers to the ability to withdraw funds or redeem an investment quickly and without significant cost. While some investments offer daily access, others may be designed specifically for long-term planning and may not be suitable where funds may be required at short notice.

11.1 Product Term and Commitment

Certain investment and insurance solutions are established for a defined period of time, known as the term. This is common in products such as regular savings plans, insurance-based investment products, or structured solutions. The term is typically designed to support long-term financial objectives and may provide cost or pricing advantages when held for the intended duration.

Clients should ensure that the recommended product term aligns with their investment time horizon and that they are comfortable committing funds for the relevant period.

11.2 Lock-In Periods and Access Restrictions

Some products may include lock-in periods, meaning that withdrawals may not be permitted for a certain number of years, or may only be allowed under specific conditions. In other cases, withdrawals may be possible but limited in frequency or subject to notice requirements.

Liquidity restrictions can arise due to:

contractual terms set by the product provider
the nature of the underlying investments (for example, property, private assets, or illiquid funds)
market disruption or exceptional circumstances, where fund dealing may be suspended
regulatory restrictions or provider controls designed to protect investors

Clients should be aware that liquidity restrictions may delay access to funds even where the investment is otherwise performing well.

11.3 Early Redemption and Surrender Charges

Some investment and insurance-based products may apply early redemption penalties (also known as surrender charges) if the product is terminated or withdrawn from earlier than planned. These charges may reduce the value returned to the client and, in some cases, may be significant during the early years of the product term.

Early redemption penalties may apply for a number of reasons, including:

initial establishment costs
contractual pricing assumptions based on long-term holding
administrative and distribution costs incurred by the provider

Clients should always consider whether early access to capital may be required in the future, as unexpected withdrawals may result in financial disadvantage.

11.4 Notice Periods and Processing Times

Even where a product permits withdrawals, clients should be aware that redemption requests may take time to process. Processing times vary depending on:

the product provider's administrative procedures
dealing cycles of underlying funds
banking transfer times
anti-money laundering verification requirements

In some cases, funds may only be priced or dealt weekly or monthly, which can delay execution of transactions.

11.5 Importance of Liquidity Planning

Liquidity planning forms an important part of our suitability assessment process. Before recommending an investment solution, we consider:

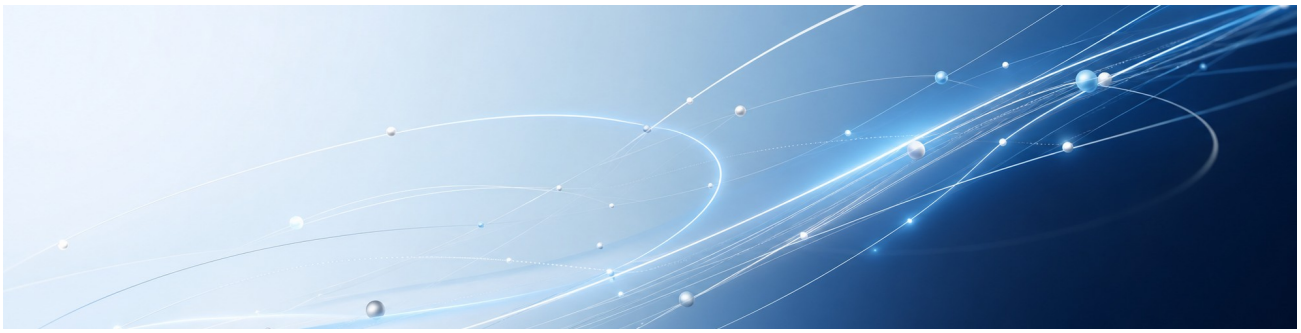
expected short-term and medium-term cash needs
emergency reserve requirements
potential future commitments (property purchases, education fees, retirement income needs, healthcare costs)
whether the investment is intended to be accessed gradually or held long term

Where liquidity is important, we may recommend maintaining an appropriate allocation to more accessible assets, such as cash, money market funds, or short-duration bond holdings.

11.6 Product Documentation

All relevant liquidity terms, surrender charges, notice periods, and early redemption conditions are set out in the product provider's documentation. Clients should always read the relevant Key Information Document (KID) where required, other applicable product disclosure, product brochure, terms and conditions, and policy schedule carefully before proceeding.

Where appropriate, we will also highlight key liquidity restrictions in the Suitability Report or supporting documentation.



SECTION 12 · COSTS & ONGOING SERVICE

12. Fees, Charges, Inducements & Remuneration

Before a service or recommendation, we provide an aggregated estimate of expected costs and charges and explain their cumulative effect. Where required, we provide an itemised breakdown on request. For an ongoing relationship, personalised ex-post information shows the actual costs incurred.

The ranges below are indicative only. The exact amount, calculation basis, payment method and any provider remuneration are confirmed in the personalised disclosure, suitability report and product or policy documentation before commitment.

Cost category	Indicative range	How it is confirmed
3DGFS initial advisory fee	0%–5% of amount invested, one-off	Personalised cost disclosure and suitability documentation
3DGFS ongoing servicing/advisory fee	0.25%–1.25% per annum	Agreed service and personalised cost disclosure
Non-insurance transaction fee, where applicable	0%–1% per transaction	Provider/platform and transaction disclosure
3DGIA initial provider commission	0%–7% of premiums or investment value	Insurance remuneration disclosure
3DGIA ongoing provider commission	0%–1.25% per annum	Insurance remuneration disclosure
3DGIA renewal/trail commission	0%–0.50% per annum	Insurance remuneration disclosure
Fund ongoing charges (OCF)	0.10%–2.50% per annum	Product KID and provider documentation
Performance fee, where applicable	10%–20% of outperformance	Product KID/provider terms
Insurance wrapper/policy charges	0.50%–1.50% per annum	Policy documentation
Platform / custody fees	0%–0.35% / 0%–0.20% per annum	Platform/custodian disclosure
Exit/surrender; switching; FX	0%–8%; 0%–1%; 0.20%–1.00%	Product-specific disclosure; terms can materially affect outcomes

12.1 Third-party benefits and commissions

When 3DGFS provides independent investment advice, it does not retain third-party monetary benefits. Any such amount received in connection with that service is handled in accordance with the applicable MiFID II restrictions and returned or transferred to the client as required. Only permitted minor non-monetary benefits may be accepted, subject to the applicable conditions and disclosure.

3DGIA may receive commission from an insurer or other product provider. The nature and basis of that remuneration, and the amount where required or available, are disclosed before conclusion. Insurance remuneration must not conflict with the duty to act honestly, fairly, professionally and in the client's best interests.

COST RISK

Charges reduce returns and may be particularly significant when an investment is surrendered, switched or encashed early. Compare total costs, not only the headline advisory charge.

SECTION 13 · COSTS & ONGOING SERVICE

13. Best Execution & Order Handling

For 3DGFS investment services, orders are normally transmitted to an authorised third party for execution; 3DGFS is not an execution venue. When receiving and transmitting an order, 3DGFS takes all sufficient steps required by its order-execution arrangements to obtain the best possible result, considering price, costs, speed, likelihood of execution and settlement, size, nature and other relevant factors. For retail clients, total consideration is ordinarily central.

A specific instruction may prevent 3DGFS or the executing firm from taking the steps in its normal arrangements for the aspect covered by that instruction. Orders may be delayed or rejected where information is incomplete, the service is outside permissions, financial-crime controls require review, a market or provider is unavailable, or another legal or operational restriction applies.

The Best Execution Policy and execution arrangements are monitored and reviewed at least annually and when a material change affects the ability to obtain the best possible result.

SECTION 14 · COSTS & ONGOING SERVICE

14. Reporting, Communications & Online Access

Clients receive the reports and confirmations applicable to their service and products. These may include suitability reports, provider or platform statements, transaction confirmations, annual cost disclosures and periodic suitability assessments where an ongoing service has been agreed.

Information may be provided on paper or another agreed durable medium. Certain telephone conversations and electronic communications relating to transactions may be recorded and retained where required. Clients should use approved contact channels and keep their contact details current.

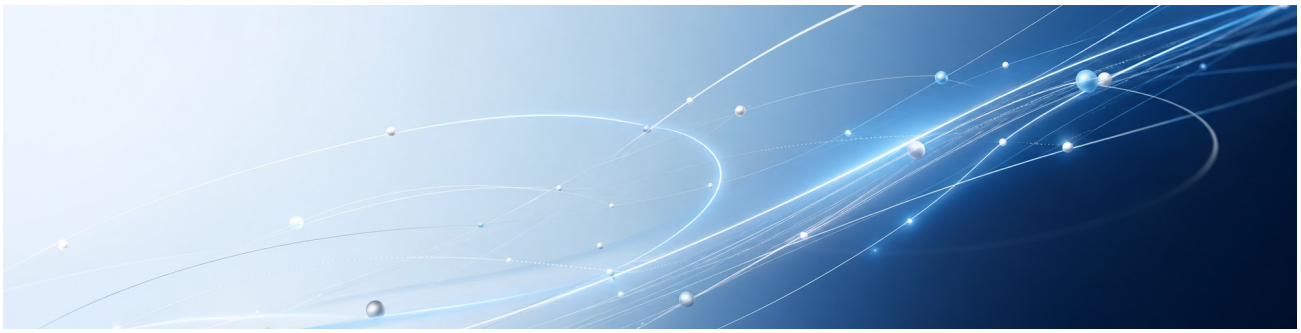
14.1 Digital client records and CRM-supported service

Our client relationship management system supports the client file and service workflow. Depending on the relationship, this may include contact and household information, client categorisation, meeting records, fact-find data, risk assessment, recommendations, KYC/AML checks, accounts, reviews, tasks, documents, communications metadata and an audit trail.

Website enquiries accepted into the service may be transferred securely to the CRM, matched to an existing record and routed to an appropriate team member. Approved Microsoft 365 mailbox information may also be linked to a client record in accordance with the privacy notice. Human staff remain responsible for advice and material decisions; we do not make solely automated decisions producing legal or similarly significant effects.

SECURITY

Online access and email are convenient but not risk-free. Protect credentials, use multi-factor authentication where offered, and contact us promptly through a verified channel if you suspect fraud or unauthorised access.



SECTION 15 · PROTECTING THE RELATIONSHIP

15. Anti-Money Laundering, Sanctions & Client Verification

The relevant 3D Global entity applies risk-based customer due diligence and ongoing monitoring under applicable Cyprus and EU requirements. We may request and verify identity, address, beneficial ownership, purpose and intended nature of the relationship, source of funds, source of wealth and supporting evidence.

- enhanced due diligence may apply to higher-risk clients, jurisdictions, products, structures, politically exposed persons or unusual activity;
- screening may cover sanctions, politically exposed persons and adverse media;
- we may pause, decline or terminate a service or transaction where checks cannot be completed or risk is unacceptable;
- we may make a report to MOKAS or another competent authority where legally required; the law may prohibit us from telling the affected person.

Clients must provide accurate, complete and current information and promptly notify us of material changes. Delays in providing evidence can delay onboarding, advice, transactions or withdrawals.

SECTION 16 · PROTECTING THE RELATIONSHIP

16. Record Keeping & Data Protection

3DGFS and 3DGIA act as controllers for the personal data used in their respective services. We process data for purposes including onboarding, advice, contract administration, legal and regulatory compliance, financial-crime prevention, communications, service management, security and the establishment or defence of legal claims. The current Privacy Notice explains the applicable legal bases, recipients, transfers, rights and contact route.

Access is role-based and proportionate to duties. Appropriate technical and organisational measures are used, and processors are subject to contractual controls. A personal-data breach is assessed and, where required, notified to the competent supervisory authority within 72 hours of awareness.

16.1 Retention

Our internal policy normally retains core client-relationship, advice, suitability, transaction and regulatory records for at least seven years. Category-specific law may prescribe a different minimum—for example, certain MiFID records are retained for five years and may be extended to seven at the authority's request, while AML records are generally retained for five years after the relationship or occasional transaction ends. Records may be kept longer where a documented legal, regulatory, complaints, litigation or limitation-period reason applies, and are securely deleted or anonymised when no longer required.

16.2 Individual rights

Subject to legal conditions and exemptions, individuals may have rights of access, rectification, erasure, restriction, objection and portability, and rights concerning automated decision-making. A complaint may be made to the Office of the Commissioner

for Personal Data Protection in Cyprus. Current contact details and the rights request route are in the Privacy Notice at www.3dglobal.com/privacy/.

SECTION 17 · PROTECTING THE RELATIONSHIP

17. Conflicts of Interest

We identify circumstances in which the interests of a group entity, employee, adviser, product provider or another client could conflict with a client's interests. Controls include governance and oversight, a conflicts register, separation of duties, information barriers, remuneration review, product governance, personal-account dealing controls, training and periodic compliance reporting.

Disclosure is a measure of last resort: where organisational and administrative arrangements are not sufficient to prevent a material risk of client detriment, we disclose the nature and source of the conflict and the steps taken to mitigate it before proceeding. We may decline to act where the conflict cannot be managed in the client's best interests.

SECTION 18 · PROTECTING THE RELATIONSHIP

18. Complaints Handling

A complaint is any oral or written expression of dissatisfaction about a service or product for which a response or resolution is expected. It is handled fairly, consistently and without charge.

- Email complaints@3dglobal.com or write to the office address in section 3.
- State whether the matter concerns investment services or insurance, if known; if unsure, use info@3dglobal.com with "Complaint" in the subject.
- Include your name and contact details, a clear description, relevant dates, people or products, supporting documents and the outcome sought.
- Do not include passwords or unnecessary special-category personal data.

We record the complaint, assign a unique reference and normally acknowledge it within five business days. For investment-service complaints, a final response is normally issued within two months. If that is not possible, we explain the delay and expected completion date; the extended period should not exceed three months. The insurance route follows the applicable ICCS and policy requirements. We will identify the correct external escalation route in the response.

If dissatisfied with the outcome, an eligible complainant may refer the matter to the Financial Ombudsman of the Republic of Cyprus or another competent authority, subject to that body's jurisdiction, conditions and time limits. Regulatory bodies do not normally determine private compensation claims merely because they supervise the firm.

SECTION 19 · PROTECTING THE RELATIONSHIP

19. Business Continuity & Digital Operational Resilience

We maintain business-continuity and operational-resilience arrangements proportionate to our services. They address governance, incident response, communications, remote working, technology and data recovery, critical third parties, backups, cyber risk, testing and lessons learned.

3DGFS is within the scope of the EU Digital Operational Resilience Act (DORA) and maintains ICT risk, incident, testing and third-party arrangements accordingly. Other group entities apply DORA and related requirements to the extent legally applicable to their size, activities and status.

A disruption may affect response or transaction times. We will prioritise client safety, regulatory obligations, critical services and clear communications. Business-continuity arrangements reduce risk but cannot guarantee uninterrupted service in every scenario.

SECTION 20 · PROTECTING THE RELATIONSHIP

20. Governing Law, Changes & Further Information

The governing law and jurisdiction applicable to a client relationship are stated in the relevant Client Agreement or policy terms. Mandatory consumer and regulatory protections may apply regardless of a contractual choice of law.

We may update this document to reflect legal, regulatory, service or operational changes. Material changes are communicated through an appropriate channel. The current approved version and supporting policies are available through www.3dglobal.com or on request.

NEED HELP?

Contact your adviser or info@3dglobal.com. For a complaint, use the route in section 18. For a privacy request, use the contact route in the current Privacy Notice.