PERSONAL ADVICE · INTERNATIONAL PERSPECTIVE · SINCE 1997

Policies, built for *accountability.*

Governance and operating standards for client protection, product oversight, risk, resilience and regulatory conduct.

A single internal reference for the policies that support consistent advice, responsible decisions and fair client outcomes.



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POLICY GOVERNANCE

Inside this manual

Use this manual as the central policy reference. Detailed procedures, registers, templates and controlled records continue to provide the operational evidence.

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CONTROLLED DOCUMENT
Printed copies may become outdated. Confirm the current approved version before relying on this manual.

POLICY 01 · CLIENT GOVERNANCE

Client Categorisation Policy

1. Purpose

The purpose of this policy is to set out how 3D Global Financial Services Ltd ("3D Global") categorises clients in accordance with the requirements of MiFID II and the Investment Services and Activities and Regulated Markets Law 87(I)/2017 of Cyprus ("the Law"). This policy ensures that clients are afforded the appropriate level of regulatory protection and that the firm complies with its obligations under CySEC rules.

2. Scope

This policy applies to all staff engaged in the provision of investment services on behalf of 3D Global. It covers the initial categorisation of clients, ongoing reviews, and any re-categorisation requests.

3. Definitions

- Retail Client - a client who is not a professional client or eligible counterparty. Retail clients benefit from the highest level of regulatory protection.
- Professional Client - a client who possesses the experience, knowledge and expertise to make their own investment decisions and properly assess the risks involved, as defined under Annex II of MiFID II.
- Eligible Counterparty - a client defined under MiFID II Article 30, typically investment firms, credit institutions, or other regulated entities, afforded the lowest level of protection.

4. Policy Statement

3D Global shall categorise each client as Retail, Professional, or Eligible Counterparty prior to providing services. The categorisation determines the level of protections, disclosures, and suitability/appropriateness assessments applicable.

5. Procedures

Initial Categorisation

- At onboarding, clients are categorised based on information provided in the Client Profile and KYC documentation. The default categorization is 'Retail'.
- The categorisation is communicated in writing to the client, including their rights to request recategorisation.

Re-Categorisation

- Retail clients may request to be treated as Professional clients, subject to the criteria and procedures set out in Annex II of MiFID II.
- Professional clients may request to be treated as Retail clients to obtain additional protections.
- Requests are documented and approved by the IA Director before changes are applied.

Ongoing Review

- Client categorisation is reviewed at least annually, or earlier if material changes in client circumstances are identified.
- Compliance maintains a register of client categories and all re-categorisation requests.

6. Roles and Responsibilities

- Advisers/Consultants: Collect information and explain categorisation to clients.
- Administration: Record categorisation in the client file and systems.
- IA Director: Approve re-categorisation requests.
- Compliance Officer: Monitor categorisation processes and review samples annually.

7. Monitoring & Reporting

- Compliance conducts periodic file reviews to ensure categorisations are correctly applied and documented.
- Any deficiencies are reported to senior management and corrective actions implemented.

8. Review Cycle

This policy shall be reviewed annually or earlier if required by regulatory changes or internal audit findings.

POLICY 02 · ADVICE STANDARDS

Suitability & Appropriateness Policy

1. Purpose

The purpose of this policy is to set out how 3D Global Financial Services Ltd ("3D Global") assesses and ensures the suitability and appropriateness of investment services and financial instruments provided to clients, in line with the requirements of MiFID II and the Investment Services and Activities and Regulated Markets Law 87(I)/2017 of Cyprus. This policy also incorporates Environmental, Social, and Governance (ESG) preferences, as required by recent regulatory updates.

2. Scope

This policy applies to all advisers, investment consultants, and relevant staff at 3D Global. It governs initial suitability assessments, ongoing monitoring, annual reviews, and appropriateness testing for products and services.

3. Definitions

- Suitability - The requirement to ensure investment advice or portfolio management is suitable for the client, based on their knowledge, experience, financial situation, investment objectives, risk appetite, and ESG preferences.
- Appropriateness - The obligation to assess whether a financial instrument is appropriate for a client where no advice is given, based on their knowledge and experience.
- ESG Preferences - A client's expressed interest in including Environmental, Social, and Governance considerations in their investments.

4. Policy Statement

3D Global shall only recommend or execute investment services and products that are suitable for clients, taking into account all relevant circumstances. Appropriateness assessments will be carried out where required. ESG preferences shall be explicitly documented and incorporated into suitability assessments.

5. Procedures

Initial Suitability Assessment

- Conduct a comprehensive fact-find at onboarding, covering financial situation, investment objectives, risk appetite (ATR), knowledge, experience, and ESG preferences.
- Complete an Attitude to Risk (ATR) questionnaire.
- Provide written suitability reports to clients, evidencing the rationale for recommendations.

Annual Review

- A full periodic assessment of suitability must be conducted at least annually using the approved template (see Appendix 1).
- Reviews must cover changes in financial situation, risk appetite, objectives, ESG preferences, and portfolio performance.

Appropriateness Testing

- For non-advised services, assess whether the client has the knowledge and experience to understand the risks of the product.
- If a product is deemed inappropriate, the client must be warned in writing before proceeding.

Documentation

- All assessments must be documented and retained for at least seven years.
- ESG preferences must be clearly recorded and updated as part of ongoing suitability assessments.

6. Roles and Responsibilities

- Advisers/Consultants: Conduct fact-finds, complete suitability and appropriateness assessments, and document ESG preferences.
- Administration: Ensure documentation is complete, filed, and accessible.
- IA Director: Provide oversight and approve suitability procedures.
- Compliance Officer: Monitor assessments, conduct periodic sampling, and report deficiencies.

7. Monitoring & Reporting

- Compliance will review a sample of suitability and appropriateness files annually.
- Reports will be submitted to senior management highlighting findings and corrective actions.
- Any breaches will be escalated in line with internal compliance procedures.

8. Review Cycle

This policy shall be reviewed annually or earlier if regulatory changes or internal findings require updates.

POLICY 03 · ADVICE STANDARDS

Annual Suitability Review Policy

1. Purpose

This policy establishes the process for conducting, documenting, and reviewing the Annual Periodic Assessment of Suitability in line with MiFID II requirements and ESG considerations. It ensures that all client portfolios remain suitable in light of changes in financial situation, investment objectives, risk appetite, ESG preferences, and regulatory requirements.

2. Scope

This policy applies to all advisers and investment consultants at 3D Global who provide investment advice. It also covers compliance, administration, and management oversight functions.

3. Review Frequency

- A full suitability review must be conducted at least annually for every client receiving investment advice or portfolio management.
- Reviews may be carried out more frequently if triggered by material changes in the client's circumstances, portfolio performance, or regulatory requirements.

4. Review Content

The annual review must address the following areas, as set out in the approved review template: 1. Changes in Financial Situation - Assess changes that affect investment advice. 2. Appetite for Risk (ATR) - Confirm validity; complete a new ATR questionnaire if needed. 3. Acceptable Asset Classes & Product/Provider Selection - Review appropriateness. 4. ESG Preferences - Confirm client's ESG objectives and align strategy. 5. AML Compliance - Verify documentation is up to date. 6. Review of Fund Performance and Strategy - Assess performance, rebalancing, and ESG impact. 7. Action Points - Record strategy changes and follow-up actions. 8. Suitability Declaration - Adviser and client sign-off; IA Director approval.

5. Roles and Responsibilities

- Advisers/Consultants: Conduct review, complete template, obtain client signatures, and submit for approval.
- Administration: Ensure documentation completeness, update AML, store securely.
- IA Director: Oversight, policy compliance, and sign-off.
- Compliance Officer: Conducts audits and reports findings to the Board.

6. Record-Keeping

- All reviews must be retained for at least seven years.
- ESG preferences, AML updates, and ATR reassessments must be clearly documented.

7. Monitoring & Reporting

- Compliance will carry out annual sampling of reviews to ensure adherence.
- Failures (e.g., missing documentation, unsigned declarations, overdue reviews) will be reported and corrected.

8. Policy Review

This policy will be reviewed annually or sooner if regulatory changes or audit findings require updates.

Appendix 1 - Adviser Checklist

[ ] 1. Confirm client's financial situation and objectives.

[ ] 2. Reassess Appetite for Risk (ATR) - complete questionnaire if needed.

[ ] 3. Review acceptable asset classes, products, and providers.

[ ] 4. Confirm ESG preferences and update strategy if required.

[ ] 5. Verify AML documentation is current.

[ ] 6. Review fund performance against objectives and ATR.

[ ] 7. Identify any rebalancing or switching needs.

[ ] 8. Record action points and responsibilities.

[ ] 9. Complete Suitability Declaration and obtain signatures.

[ ] 10. Submit file for Admin and IA Director review and approval.

Appendix 2 - Periodic Assessment of Suitability (Template)

1. Changes in Financial Situation - Document updates to financial situation, objectives, ATR, asset

classes, currency, service level, provider/product, fees.

2. ESG Preferences - Confirm client ESG objectives.

3. AML Compliance -- Confirm AML documentation is current.

4. Review of Fund Performance and Investment Strategy - Assess fund performance, ESG impact,

rebalancing needs.

5. Action Points - Note specific products, funds, or strategy changes.

6. Suitability Declaration - Adviser and client confirm suitability remains valid.

POLICY 04 · PRODUCT OVERSIGHT

Product Governance Policy

(Distributor of Financial Instruments)

1. Purpose

The purpose of this Policy is to establish and maintain effective Product Oversight and Governance arrangements at 3D Global Financial Services Ltd ("3D Global"), in accordance with MiFID II Article 16(3) (distributor obligations) and CySEC Circular C553, Guideline 3 (points 17-23). 3D Global does not manufacture financial instruments. This Policy therefore applies exclusively to the Firm's role as a distributor of financial instruments manufactured by third parties. It sets out how products are selected, approved, distributed, monitored, reviewed, and, where necessary, restricted or withdrawn, to ensure that they are consistently distributed in the best interests of clients and in line with the identified target market.

2. Scope

This Policy applies to:

- All new and existing financial instruments and investment services distributed by 3D Global;
- All stages of the distributor product lifecycle, including product selection, approval, distribution, monitoring, review, and withdrawal;
- All staff involved in advising, distributing, approving, monitoring, or overseeing financial instruments. The Policy applies across all business lines and client categories.

3. Definitions

Target Market

The group of clients for whom a product is compatible, identified by reference to client categorisation, knowledge and experience, financial situation, investment objectives, time horizon, attitude to risk, capacity for loss, and, where applicable, ESG preferences. Both positive and negative target markets must be defined.

Product Approval Process

The formal, documented internal process through which 3D Global obtains and assesses manufacturer information, performs its own distributor-level assessment, and approves products prior to distribution.

High-Risk Products

Products exposing clients to heightened risks such as significant capital loss, leverage, illiquidity, valuation uncertainty, or material counterparty or credit risk.

High-Complexity Products

Products with features that are difficult for retail clients to understand, including embedded derivatives, contingent or path-dependent returns, or opaque pricing structures.

Product Governance File

A documented audit trail maintained for each approved product, evidencing distributor-level approval, target market validation, distribution strategy, monitoring outcomes, and any corrective actions taken.

4. Policy Statement

3D Global shall only distribute financial instruments that:

- Are approved through a formal distributor product governance process;
- Are compatible with the needs, characteristics, and objectives of the identified target market;
- Are distributed in accordance with a documented distribution strategy. Products assessed as high risk or high complexity shall not be distributed to retail clients. Such products may only be offered to professional clients or eligible counterparties, subject

to enhanced governance and monitoring controls.

5. Product Oversight and Governance Framework

5.1 Product Approval Prior to Distribution

Before any product is distributed, 3D Global shall:

- Obtain sufficient information from the manufacturer regarding:
  - Product features and structure;
  - Risks and complexity;
  - Costs and charges;
  - Manufacturer-defined target market;
- Perform a distributor-level assessment to determine whether the product is compatible with its client base;
- Assess potential client outcomes, including under adverse market conditions where relevant;
- Review ESG characteristics and limitations, where applicable;
- Obtain Compliance review and formal approval by Senior Management or the IA Director. No product may be distributed without documented approval.

5.2 Target Market Identification and Validation

For each approved product, 3D Global shall:

- Use manufacturer target market information as a baseline;
- Validate and, where necessary, refine the target market at distributor level;
- Define both:
  - A positive target market, and
  - A negative target market;
- Ensure alignment with:
  - Client categorisation;
  - Knowledge and experience;
  - Attitude to Risk and capacity for loss;
  - Investment objectives and time horizon;
  - ESG preferences, where applicable. Distribution outside the defined target market is prohibited.

5.3 Distribution Strategy and Controls

A documented distribution strategy shall be established for each product, specifying:

- Permitted client categories;
- Any restrictions or conditions on distribution;
- Adviser-only or restricted distribution arrangements;
- Disclosure or warning requirements;
- Training or competence requirements, where applicable. Advisers may only recommend products where both target market compatibility and individual suitability requirements are met.

5.4 High-Risk and High-Complexity Products

Products identified as high risk or high complexity include, but are not limited to:

- CFDs, derivatives, leveraged FX, and leveraged exchange-traded products;
- Structured products with embedded derivatives or contingent returns;
- - Illiquid, unregulated, or non-mainstream collective investment schemes;
- Complex Insurance-Based Investment Products (IBIPs).

Such products

- Shall not be distributed to retail clients;
- May only be offered to professional clients or eligible counterparties;
- Are subject to enhanced governance, documentation, and monitoring.

5.5 Ongoing Product Monitoring

3D Global shall conduct ongoing monitoring of all approved products, at least annually, to ensure continued compatibility with the target market and fair client outcomes. Monitoring includes:

- Review of product performance and material changes;
- Assessment of client outcomes and suitability evidence;
- Identification of distribution outside the target market;
- Analysis of complaints, incidents, or detriment indicators;
- Consideration of regulatory, market, or manufacturer developments.

5.6 Product Review, Corrective Action, and Withdrawal

Where monitoring identifies concerns, 3D Global shall:

- Escalate findings to Compliance and Senior Management;
- Take appropriate corrective action, including:
  - Enhanced controls or adviser guidance; o_ Restriction or suspension of distribution;
  - Withdrawal of the product from the approved list;
- Communicate with manufacturers where relevant. Actions are taken without undue delay and fully documented.

5.7 Documentation and Record-Keeping

For each product, 3D Global shall maintain a Product Governance File containing:

- Manufacturer information obtained;
- Distributor-level approval and target market validation;
- Distribution strategy and restrictions;
- Monitoring, review, and escalation records;
- Corrective actions and decisions. Records are retained in accordance with MiFID II record-keeping requirements and made available for CySEC inspection.

6. Roles and Responsibilities

Advisers / Consultants

- Distribute products only within approved target markets;
- Ensure suitability and appropriateness requirements are met;
- Escalate product-related concerns promptly.

Senior Management / IA Director

- Approve products and material changes;
- Oversee effective implementation of this Policy;
- Ensure client outcomes remain central to product decisions. Compliance Officer
- Monitor adherence to this Policy;
- Conduct periodic product governance reviews;
- Escalate material issues internally and to CySEC where required.

7. Monitoring, Reporting, and Escalation

Compliance conducts periodic reviews of product governance arrangements and distribution practices. Findings and remedial actions are reported to Senior Management. Material issues are escalated in line with regulatory requirements.

8. Review Cycle

This Policy shall be reviewed at least annually, or earlier where required due to regulatory developments, product changes, or compliance findings.

Appendix A

Product Governance Procedures Manual (Operational application of the Policy)

1. Product Identification

Initial review of manufacturer product information and client compatibility.

2. Product Approval

Completion of the Product Approval & Target Market Assessment Template, Compliance review, and Senior Management approval.

3. Distribution Controls

Product added to internal product register with defined restrictions.

4. Ongoing Monitoring

Annual monitoring of performance, client outcomes, complaints, and distribution patterns.

5. Product Review

Trigger-based review where risks, complaints, or misalignment arise.

6. Restriction or Withdrawal

Documented decision-making, escalation, and implementation.

7. Record-Keeping

Maintenance of Product Governance Files for regulatory inspection.

Appendix B

Product Approval & Target Market Assessment Template

1. Product Details

Name | Provider | Product Type | Date | Assessor

2. Manufacturer Information

Summary of features, risks, costs, and manufacturer target market.

3. Distributor Risk & Complexity Assessment

Risk level | Complexity | Capital loss | Liquidity | Leverage

4. ESG Characteristics (if applicable)

5. Target Market Validation

Positive Target Market

Client category | Knowledge | ATR | Objectives | Time horizon

Negative Target Market

Explicit exclusions

6. Distribution Strategy

Permitted clients | Restrictions | Training | Warnings

7. Monitoring Considerations

Key risks | Client outcome indicators | Review frequency

8. Approval

Compliance review | Management approval | Decision | Date

9. Ongoing Review Record

Review date | Findings | Action | Sign-off

POLICY 05 · PRODUCT OVERSIGHT

High Risk / Complex Products Policy

1. Purpose

This policy sets out the approach of 3D Global Financial Services Ltd ('3D Global') towards the identification, definition, and treatment of products that fall under the category of 'High Risk' or 'High Complexity'. It ensures that such products are managed in compliance with MiFID II requirements and CySEC expectations, and that they are not promoted or distributed to retail clients.

2. Scope

This policy applies to all staff, advisers, management, and business units of 3D Global. It covers all investment products considered during the provision of investment services to clients.

3. Definitions

High Risk Products: Instruments that expose investors to significant risk of capital loss, leverage, illiquidity, or valuation uncertainty. High Complexity Products: Instruments that are difficult for the average retail investor to understand, including those with embedded derivatives, opaque pricing structures, or contingent outcomes.

4. Policy Statement

- 3D Global will not promote or distribute high risk or complex products to retail clients.
- Such products may only be considered for professional clients or eligible counterparties where suitable and appropriate.
- All product approvals must include an assessment of risk and complexity before onboarding.

5. Governance & Controls

- The Compliance Officer, in discussion with the Investment Committee, is responsible for identifying and categorising products as high risk or complex.
- Product governance reviews must include assessment of target market, stress testing, and transparency of costs.
- Any new product must be reviewed and approved by the Investment Committee before being made available.

6. Monitoring & Review

- Compliance will conduct an annual review of the product set to ensure that no prohibited products are distributed to retail clients.
- All advisers must complete training on recognising high risk and complex products.
- The Board of Directors will review this policy annually.

7. Commitment

3D Global is committed to ensuring fair client outcomes and protecting retail clients from unsuitable products. By implementing this policy, the firm ensures compliance with MiFID II product governance rules, and maintains its ethos of service, independence, and performance.

Appendix A - Examples of High Risk / Complex Products

- Contracts for Difference (CFDs)
- Options, Futures, and other Derivatives
- Structured Notes with capital at risk
- Illiquid or Unregulated Funds
- Insurance-Based Investment Products (IBIPs) with performance participation
- Leveraged Exchange Traded Products
- Products with opaque pricing or limited secondary market availability

POLICY 06 · CONDUCT & REMUNERATION

Conflicts of Interest Policy

1. Purpose

This policy sets out the framework for identifying, preventing, managing, and disclosing conflicts of interest at 3D Global Financial Services Ltd ("3D Global"), in accordance with MiFID II and CySEC requirements.

2. Scope

Applies to all staff, directors, and business units where conflicts may arise between the firm, staff, and clients.

3. Definitions

Conflict of Interest - A situation where competing interests may impair objectivity or client best interests.

4. Policy Statement

3D Global shall act honestly, fairly, and professionally in accordance with the best interests of clients, and shall identify and manage conflicts through avoidance, mitigation, or disclosure.

5. Procedures

- Maintain a Conflicts of Interest Register.
- Conduct regular staff training.
- Apply Chinese Walls and information barriers.
- Disclose unavoidable conflicts to clients before acting.

6. Roles and Responsibilities

- Staff: Identify and report potential conflicts.
- Management: Ensure conflicts are managed.
- Compliance: Maintain register and monitor adherence.

7. Monitoring & Reporting

Compliance will review conflicts quarterly and report to the Board annually.

8. Review Cycle

Annual review or earlier if required.

POLICY 07 · CONDUCT & REMUNERATION

Inducements & Remuneration Policy

1. Purpose

This policy defines how 3D Global manages inducements and remuneration in line with MiFID II and CySEC rules, ensuring that all arrangements serve the best interests of clients.

2. Scope

Applies to all inducements, benefits, and remuneration structures for staff and third parties.

3. Definitions

Inducement - Any fee, commission, or non-monetary benefit provided to or by a third party. Remuneration - Compensation to staff for services rendered.

4. Policy Statement

3D Global prohibits acceptance of inducements unless they enhance the quality of service and do not impair duty to act in the best interest of clients.

5. Procedures

- All inducements must be disclosed to clients.
- Remuneration structures must avoid creating conflicts of interest.
- Maintain records of all benefits received or given.

6. Roles and Responsibilities

- Management: Approve remuneration structures.
- Staff: Report any offered inducements.
- Compliance: Monitor and review inducements register.

7. Monitoring & Reporting

Compliance reviews inducements and remuneration annually and reports to the Board.

8. Review Cycle

Annual review or earlier if required.

POLICY 08 · ORDER HANDLING

Best Execution & Order Handling Policy

1. Purpose

This policy sets out how 3D Global achieves best execution and fair order handling for clients, as required by MiFID II and CySEC rules.

2. Scope

Applies to all client orders in financial instruments executed or transmitted by 3D Global.

3. Definitions

Best Execution - The obligation to take all sufficient steps to obtain the best possible result for clients, considering price, costs, speed, likelihood of execution, and settlement.

4. Policy Statement

3D Global will act in clients' best interests, ensuring transparency and fairness in execution and order handling.

5. Procedures

- Consider price, costs, speed, and other relevant factors when executing.
- Provide clients with a summary of the execution policy.
- Monitor execution quality regularly and update annually.

6. Roles and Responsibilities

- Staff: Follow order handling rules.
- Management: Approve execution venues.
- Compliance: Review execution reports and monitor adherence.

7. Monitoring & Reporting

Compliance conducts annual reviews.

8. Review Cycle

Annual review or earlier if required.

POLICY 09 · CLIENT PROTECTION

Complaints Handling Policy

1. Purpose

This policy sets out the procedures for handling complaints from clients in line with MiFID II and CySEC requirements.

2. Scope

Applies to all client complaints, whether oral or written, relating to investment services provided by 3D Global.

3. Definitions

Complaint - Any oral or written expression of dissatisfaction from a client regarding services provided.

4. Policy Statement

3D Global is committed to treating clients fairly, ensuring that complaints are handled promptly, impartially, and effectively.

5. Procedures

- Acknowledge complaints within five business days.
- Investigate and provide a final response within two months.
- Maintain a Complaints Register.
- Inform clients of their right to escalate unresolved complaints to the Financial Ombudsman of Cyprus.

6. Roles and Responsibilities

- Staff: Forward all complaints to Compliance immediately.
- Compliance: Investigate, document, and resolve complaints.
- Management: Review complaint trends and corrective actions.

7. Monitoring & Reporting

Compliance reports complaints statistics to the Board and CySEC as required.

8. Review Cycle

Annual review or earlier if required.

POLICY 10 · FINANCIAL CRIME

AML / CTF Policy

1. Purpose

This policy sets out 3D Global's Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) framework, in compliance with the AML Law of Cyprus and relevant EU directives.

2. Scope

Applies to all staff and all aspects of client onboarding, transaction monitoring, and reporting.

3. Definitions

AML - Measures to prevent money laundering. CTF - Measures to prevent terrorist financing. SAR (Suspicious Activity Report) - Report filed when suspicious activity is identified.

4. Policy Statement

3D Global is committed to preventing its services from being used for money laundering or terrorist financing. Strict KYC and ongoing monitoring measures shall be applied.

5. Procedures

- Conduct Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD) where required.
- Screen clients against sanctions lists.
- Monitor transactions for unusual or suspicious activity.
- File SARs promptly with the Unit for Combating Money Laundering (MOKAS).
- Maintain AML training for all staff.

6. Roles and Responsibilities

- Money Laundering Reporting Officer (MLRO): Oversee AML framework.
- Staff: Conduct KYC checks and escalate concerns.
- Compliance: Monitor AML/CTF compliance and training.

7. Monitoring & Reporting

The MLRO prepares an annual AML report for senior management and CySEC.

8. Review Cycle

Annual review or earlier if required.

POLICY 11 · INFORMATION GOVERNANCE

Record-Keeping & Data Protection Policy

1. Introduction

3D Global Financial Services Ltd and 3D Global Insurance Advisors, Agents & Sub-Agents Ltd (together "3D Global" or "the Company") are committed to protecting the personal data entrusted to us in the course of delivering regulated investment and insurance services. Ensuring the lawful, fair, and transparent handling of personal data is essential to maintaining client trust, fulfilling our contractual obligations, and complying with all relevant laws and regulations. This Data Protection Policy sets out the Company's principles, governance structure, and high-level expectations for how personal data must be handled across

the organisation, in full alignment with

- The EU General Data Protection Regulation (GDPR)
- Cyprus Law 125(1)/2018
- MiFID II and IDD regulatory frameworks
- Anti-Money Laundering (AML) and Counter-Terrorist Financing obligations
- The 3D Global Client Agreement for Investment and Insurance Services This Policy forms part of the Company's internal risk management and governance framework.

2. Purpose of the Policy

The purpose of this Policy is to ensure that all personal data processed by the Company is managed in a lawful, transparent, and secure manner. It provides clear guidance to staff on the overarching rules that govern personal data handling. More detailed operational instructions are set out in the separate:

- Information Security & Acceptable Use Policy
- Personal Data Handling Procedures
- Data Breach Response Playbook While these documents provide detailed instructions, this Policy sets the principles that underpin all personal data processing at 3D Global.

3. Scope of the Policy

This Policy applies to:

- All employees, officers, directors, contractors, sub-agents, and authorised representatives
- All business units of 3D Global
- All personal data relating to clients, prospective clients, employees, and third parties
- All processing operations carried out on behalf of the Company, including via third-party service providers Failure to comply with this Policy may result in disciplinary action and, where appropriate, reporting to regulatory authorities.

4. What Constitutes Personal Data

Personal data refers to any information relating to an identified or identifiable natural person. Examples include-but are not limited to:

- Names, addresses, contact information
- Identity documentation and verification data
- Financial information such as income, assets, liabilities
- Investment objectives, knowledge, and risk profile
- Insurance needs, policy details, and relevant health disclosures
- Employment and HR-related information
- Records of communication and activity with the Company This Policy applies regardless of the form of the data, whether electronic, paper-based, audio, or photographic.

5. Principles of Data Protection

All personal data processed by the Company must comply with the six core GDPR

principles

5.1 Lawfulness, Fairness, and Transparency

All processing must be based on a valid legal basis and carried out in a way that is clear to the data subject.

5.2 Purpose Limitation

Personal data must be collected only for specific, explicit, and legitimate purposes.

5.3 Data Minimisation

Only the personal data necessary for the intended purpose may be collected.

5.4 Accuracy

Data must be accurate and kept up to date.

5.5 Storage Limitation

Personal data must be retained only for as long as necessary for regulatory, contractual, or business purposes.

5.6 Integrity and Confidentiality

Appropriate technical and organisational measures must be used to protect personal data from loss, unauthorised access, or damage.

6. Lawful Bases for Processing

The Company relies on the following legal bases:

6.1 Contractual Necessity

The majority of processing is required to deliver investment and insurance services as set out in the Client Agreement.

6.2 Legal and Regulatory Obligations

This includes obligations under MiFID II, IDD, AML legislation, tax laws, and Cyprus regulatory frameworks.

6.3 Legitimate Interests

Used for internal management, quality assurance, IT security, and operational efficiency.

6.4 Consent

Obtained only where required, such as for certain marketing activities.

7. Categories of Personal Data Processed

Depending on the individual relationship, the Company may process:

- Identity verification documents
- Contact details
- Financial information and investment history
- Suitability and appropriateness information
- Insurance-related information, including limited health data
- Client categorisation data (MiFID/IDD)
- Transactional and communication records The use of special category data is restricted and subject to enhanced controls.

8. Collection and Use of Personal Data

Personal data is collected

- Directly from clients during onboarding and throughout the relationship
- From third parties, such as KYC service providers, insurers, or investment providers
- From public sources where appropriate Data is used only for purposes that support service delivery, regulatory obligations, or internal governance. Any new or expanded processing purpose must be reviewed by the Compliance Officer.

9. Sharing of Personal Data

Personal data may be shared with third parties only where necessary and lawful.

Examples include

- Product providers, custodians, and insurers
- Brokers, investment platforms, and intermediaries
- Regulatory authorities and auditors
- Trusted IT and cloud service providers All third-party processors must enter into written agreements reflecting GDPR requirements.

10. International Data Transfers

Transfers outside the European Economic Area may occur only where adequate

safeguards exist, such as

- Adequacy decisions

- Standard Contractual Clauses (SCCs)
- Approved certification frameworks All international transfers must be reviewed and approved by Compliance.

11. Data Accuracy and Updating

Staff must check the accuracy of personal data at collection and ensure updates are recorded promptly. Clients may request amendments at any time.

12. Data Retention Requirements

Retention periods are guided by

- AML record-keeping laws
- MiFID and IDD requirements
- Tax and accounting standards
- Internal business needs At the end of the retention period, data must be securely deleted in accordance with the Company's Personal Data Handling Procedures.

13. Data Security Expectations

All staff must ensure that:

- Personal data is accessed only by authorised personnel
- Confidential information is not left visible or unattended
- Devices and systems follow Company IT policy
- Data is transmitted only via approved secure channels Detailed technical controls are set out in the Information Security & Acceptable Use Policy.

14. Rights of Data Subjects

Individuals have the right to request

- Access to their personal data
- Correction of inaccuracies
- Deletion where permitted
- Restriction or objection to certain processing
- Transfer of data to another provider (portability)
- Withdrawal of consent where applicable All requests must be forwarded immediately to the Compliance Officer.

15. Data Breach Management

Any suspected or actual data breach must be reported immediately to the Compliance Officer. The Company will investigate the incident and, where required, notify the Cyprus Commissioner for Personal Data Protection within the statutory 72-hour period, and affected individuals where the risk is high. The detailed process is contained in the Data Breach Response Playbook.

16. Data Protection Impact Assessments (DPIAs)

A DPIA must be completed for any processing that may result in a high risk to individuals, including new technology, large-scale processing, or sensitive data use. Compliance will advise on when a DPIA is required.

17. Staff Responsibilities and Training

All staff must:

- Understand and comply with this Policy
- Complete periodic data protection training
- Report concerns or breaches promptly
- Follow the procedures set out in related policies Managers are responsible for ensuring their teams comply.

18. Governance and Oversight

The Board of Directors has ultimate responsibility for data protection compliance. Day-to-day oversight is delegated to the Senior Management Team, supported by the Compliance Officer or Data Protection Officer. The Company maintains records of processing activities in accordance with GDPR Article 30.

19. Review of Policy

This Policy will be reviewed at least annually, and whenever there are significant changes in law, regulation, or business practices.

POLICY 12 · THIRD-PARTY OVERSIGHT

Outsourcing & Third-Party Oversight Policy

1. Purpose

This policy sets out how 3D Global manages outsourcing arrangements and oversight of third-party providers in compliance with MiFID II and CySEC rules.

2. Scope

Applies to all outsourcing arrangements, including IT, compliance support, back-office operations, and critical service providers.

3. Definitions

Outsourcing -- Contracting a service provider to perform a function which would otherwise be undertaken internally.

4. Policy Statement

3D Global will only outsource functions where it can ensure continued regulatory compliance, adequate oversight, and protection of clients.

5. Procedures

- Conduct due diligence on all service providers.
- Enter written outsourcing agreements.
- Monitor service providers regularly.
- Notify CySEC of material outsourcing arrangements.

6. Roles and Responsibilities

- Management: Approve outsourcing agreements.
- Staff: Monitor outsourced activities within their function.
- Compliance: Maintain outsourcing register and oversee monitoring.

7. Monitoring & Reporting

Compliance reports outsourcing arrangements and any material issues to senior management annually.

8. Review Cycle

Annual review or earlier if required.

POLICY 13 · RISK & CONTROL

Risk Management & Internal Controls Policy

1. Purpose

This policy defines the framework for risk management and internal controls at 3D Global in line with MiFID II and CySEC requirements.

2. Scope

Applies to all business units, staff, and processes at 3D Global.

3. Definitions

Risk - The effect of uncertainty on objectives. Internal Control - Processes to ensure effective operations, reliable reporting, and compliance.

4. Policy Statement

3D Global is committed to identifying, assessing, managing, and monitoring risks to ensure operational resilience and regulatory compliance.

5. Procedures

- Identify key operational, market, credit, conduct, and compliance risks.
- Maintain a Risk Register.
- Apply risk mitigation controls.
- Conduct regular risk assessments and stress testing.

6. Roles and Responsibilities

- Staff: Identify and escalate risks.
- Risk Management Function: Maintain risk register and controls.
- Management: Oversee risk framework.
- Compliance: Monitor adherence and report issues.

7. Monitoring & Reporting

Quarterly risk reports are submitted to senior management and the Board.

8. Review Cycle

Annual review or earlier if required.

POLICY 14 · COMPLIANCE OVERSIGHT

Compliance Monitoring & Reporting Policy

1. Purpose

This policy establishes the compliance monitoring and reporting framework at 3D Global, ensuring ongoing adherence to MiFID II and CySEC rules.

2. Scope

Applies to all compliance activities across business lines and services.

3. Definitions

Compliance Monitoring - Regular review of processes and records to ensure compliance. Compliance Reporting - Formal communication of compliance status to management and regulators.

4. Policy Statement

3D Global maintains a proactive compliance function, conducting monitoring and reporting to ensure effective governance.

5. Procedures

- Develop annual compliance monitoring plan.
- Conduct thematic and routine reviews.
- Document findings and corrective actions.
- Submit annual compliance report to CySEC.

6. Roles and Responsibilities

- Compliance Officer: Lead monitoring and reporting.
- Staff: Cooperate with compliance reviews.
- Management: Act on compliance findings.

7. Monitoring & Reporting

Compliance maintains detailed logs of reviews and corrective measures. Reports are provided quarterly to management and annually to CySEC.

8. Review Cycle

Annual review or earlier if required.

POLICY 15 · OPERATIONAL RESILIENCE

Business Continuity & Operational Resilience Policy

1. Purpose

This policy establishes 3D Global's framework for business continuity and operational resilience in line with MiFID II, CySEC rules, and best practices.

2. Scope

Applies to all business units, systems, staff, and critical functions of 3D Global.

3. Definitions

Business Continuity - The capability to continue critical functions during and after a disruption. Operational Resilience - The ability to adapt and respond to operational disruptions while maintaining critical services.

4. Policy Statement

3D Global is committed to ensuring the continuity of critical operations and services to clients in the event of disruptions, safeguarding client interests and financial stability.

5. Procedures

- Maintain a Business Continuity Plan (BCP).
- Identify critical business functions and recovery priorities.
- Ensure IT disaster recovery and backup systems are in place.
- Conduct annual BCP testing and staff training.
- Maintain communication protocols for clients and regulators during disruptions.

6. Roles and Responsibilities

- Staff: Follow continuity procedures during disruptions.
- Management: Oversee resilience framework and allocate resources.
- Compliance: Monitor continuity preparedness and testing results.

7. Monitoring & Reporting

Continuity plans are reviewed annually, with test results reported to senior management and corrective measures implemented.

8. Review Cycle

Annual review or earlier if required.

POLICY 16 · TRAINING & COMPETENCE

Training & Competence Policy

1. Purpose

This policy sets out 3D Global's framework for ensuring that all staff possess and maintain the necessary knowledge and competence in accordance with MiFID II and CySEC requirements.

2. Scope

Applies to all staff, directors, and relevant outsourced individuals performing investment services on behalf of 3D Global.

3. Definitions

Knowledge - Understanding of financial instruments, markets, and regulatory requirements. Competence - The ability to apply knowledge and skills to deliver compliant services.

4. Policy Statement

3D Global is committed to maintaining a skilled workforce through initial and ongoing training, ensuring that staff meet MiFID II knowledge and competence requirements.

5. Procedures

- Assess staff competence at onboarding.
- Provide mandatory induction training.
- Require continuous professional development (CPD) of at least 15 hours annually.
- Maintain training logs and evidence of competence.

6. Roles and Responsibilities

- Staff: Complete training requirements.
- Management: Ensure adequate resources for training.
- Compliance: Maintain training records and monitor CPD adherence.

7. Monitoring & Reporting

Compliance reviews training logs annually and reports training compliance to senior management.

8. Review Cycle

Annual review or earlier if required.