



BATES WEALTH

M A N A G E M E N T

CLIENT CLASSIFICATION

Client Classification

Bates Wealth Management Ltd (Bates Wealth) treats all clients fairly and we are transparent with all our dealings and interactions with clients. We provide professional advice which protects and enhances client assets and we build long term relationships based on trust, mutual respect and integrity.

This document sets out the different classifications of clients and how we work with these clients. However, whatever the classification, all clients have the right to request a different categorisation at any time. Should this be required, simply write to us with your request.

Retail Clients

Retail clients enjoy the highest level of investor protection provided by UK law. This means that we must provide them with clear information about Bates Wealth, our services, the available investment options and the risk involved in such investments as well as information on the fees and charges that we intend to charge for these services.

These Bates Wealth fees and charges are disclosed within a separate document known as a Personal Client Agreement that we will ask you to sign and agree to should you wish to become a client.

If a retail client is provided with services in the form of investment advice, Bates Wealth must make a suitability assessment as to whether a particular service and/or financial instrument is suitable in view of the retail client's investment objectives, financial situation, experience and knowledge.

The category of retail clients includes individuals as well as smaller companies and organisations.

Bates Wealth categorises local public authorities or municipalities which do not manage public debt as retail clients.

Retail clients may request in writing to be treated as professional clients or an eligible counterparty by Bates Wealth, either generally or regarding a particular transaction or type of transaction. If a retail client requests to be classified as a professional client or an eligible counterparty, Bates Wealth shall assess the client's expertise, experience and knowledge and whether these give reasonable assurance that the client is capable of making their own investment decisions and understands the risks involved. Additionally, the retail client must meet certain financial conditions.

If Bates Wealth accepts the client's request to be treated as a professional client or an eligible counterparty, the client may no longer enjoy the protection reserved for retail clients afforded by the Financial Services Compensation Scheme and the Financial Ombudsman Service.

Professional Clients

A professional client is a client possessing sufficient experience, knowledge and expertise to make their own investment decisions and properly assess the associated risks.

Bates Wealth's obligations to professional clients are not as extensive as its obligations to retail clients. If a professional client is provided with service in the form of investment advice, Bates Wealth is obligated to assess whether a particular service or financial instrument is consistent with the professional client's investment objectives.

The following are regarded as per se professional clients:

- Legal persons who are licensed to operate or engage in regulated activities in financial markets, including financial undertakings, insurance companies and collective investment undertakings.
- A trustee of an occupational pension scheme or SSAS, or a trustee or operator of a personal pension scheme or stakeholder pension scheme where the scheme has (or has had in the last two years) assets under management of at least £10 million.
- Large corporations meeting certain requirements regarding their balance sheet, net turnover and equity.
- National and regional governments, including a public body that manages public debt at national or regional level, central banks, international or supranational institutions or another similar international organisation.
- Other institutional investors whose main activity is to invest in financial instruments.

The following are regarded as elective professional clients:

- A local public authority or municipality providing it has been assessed against a quantitative test to treat it as an elective professional client. The criteria of this test is as follows:
 - a. The size of the client's portfolio exceeds £10 million and, either
 - b. The client has carried out transactions of a significant size at an average frequency of 10 per quarter over the previous 4 quarters, or
 - c. The person authorised to carry out transactions has worked in the financial sector for at least one year in a professional position, or
 - d. The client is an administering authority of the Local Government Pension Scheme

Professional clients may request in writing to be categorised as retail clients, either generally or regarding a particular transaction or type of transaction. Professional clients may also request to be categorised as eligible counterparties, subject to the fulfilment of certain conditions. It should be noted that professional clients do not qualify for the protections in place for retail clients.

Professional clients must notify Bates Wealth of any changes that might affect their categorisation or if they believe that their categorisation is wrong.

Professional clients are responsible for keeping Bates Wealth informed about any changes that could affect their current categorisation.

Bates Wealth may treat a professional client as an eligible counterparty or retail client, either at Bates Wealth's own initiative or at the request of the client.

Eligible Counterparties

Eligible counterparties enjoy the lowest level of investor protection provided by UK law. They are assumed to have extensive experience, knowledge and expertise in the field of investments, pensions and securities transactions.

The following are per se eligible counterparties:

- A national government or its corresponding office, including a public body that deals with the public debt at a national level
- A central bank

The following are elective eligible counter parties:

- An institutional investor

Eligible counterparties must notify Bates Wealth of any changes that might affect their categorisation or if they believe that their categorisation is wrong.

Eligible counterparties may request in writing to be categorised differently and receive the added protection to which clients in the other categories are entitled.

Bates Wealth may treat an eligible counterparty as a professional or retail client, either at Bates Wealth's own initiative or at the request of the client.