



RENAISSANCE SECURITIES (CYPRUS) LIMITED

CUSTOMER DOCUMENT PACK: REGULATORY REPORTING QUESTIONNAIRE

FOR PROFESSIONAL CLIENTS AND ELIGIBLE COUNTERPARTIES

Version 3 / September 2021

CUSTOMER WARNING

RENAISSANCE SECURITIES (CYPRUS) LIMITED DOES NOT OFFER SERVICES OR CARRY OUT ANY BUSINESS WITH CUSTOMERS CATEGORISED AS RETAIL CLIENTS. YOU CAN ONLY FILL IN, SIGN AND DELIVER THIS QUESTIONNAIRE, IF YOU ARE CLASSIFIED AS A PROFESSIONAL CLIENT OR AN ELIGIBLE COUNTERPARTY. WHERE YOU ARE CLASSIFIED AS A PROFESSIONAL CLIENT OR AN ELIGIBLE COUNTERPARTY YOU SHALL NOT BENEFIT FROM CERTAIN INVESTOR PROTECTIONS WHICH ARE AVAILABLE TO RETAIL CLIENTS UNDER THE APPLICABLE LAWS AND REGULATIONS. WE ARE ENTITLED TO ASSUME THAT AS A PROFESSIONAL CLIENT YOU HAVE THE NECESSARY EXPERIENCE AND KNOWLEDGE TO UNDERSTAND THE RELEVANT RISKS INVOLVED IN THE PRODUCTS OR INVESTMENT SERVICES OFFERED OR DEMANDED UNDER THE INVESTMENT SERVICES AGREEMENT ENTERED OR TO BE ENTERED INTO BETWEEN YOU AND RENAISSANCE SECURITIES (CYPRUS) LIMITED AND, THEREFORE, OUR OBLIGATION TO ASSESS THE APPROPRIATENESS THEREOF SHALL BE DEEMED FULFILLED. WE ARE UNDER NO OBLIGATION TO ASSESS THE APPROPRIATENESS OF SERVICES AND FINANCIAL INSTRUMENTS OFFERED TO OR DEMANDED BY ELIGIBLE

Dear Customer

We kindly ask that you study, complete, sign and return this Regulatory Reporting Questionnaire to us at ClientManagement@rencap.com.

This Regulatory Reporting Questionnaire constitutes an integral part of the Account Opening Pack and of your Investment Services Agreement (the "**Agreement**") with Renaissance Securities (Cyprus) Limited ("Renaissance", "we" or "us"). Should any of the information / responses provided below change, please notify us immediately and arrange for an updated Regulatory Reporting Questionnaire to be provided to us as soon as possible. Please note that we will rely on the accuracy and completeness of your responses for the regulatory reporting obligations envisaged herein. Furthermore, we shall assume that your responses and representations emanating from them are to be deemed repeated for every transaction you enter with us, unless you advise us otherwise as per the notification procedure set out in the Agreement between you and us. Unless otherwise defined herein, any capitalized terms used herein shall have the meaning ascribed to them in the Agreement and the relevant EU regulation.

The information or responses provided herein relate to the following European Union regulations:

a) The European Market Infrastructure Regulation

The Regulation (EU) No 648/2012 of the European Parliament and of the Council on OTC derivatives, central counterparties and trade repositories dated 4 July 2012 ("**EMIR**") entered into force on 16 August 2012. The most important aim of EMIR is to increase the transparency of the OTC derivatives market for enhanced monitoring purposes and in order to reduce counterparty and operational risk for market participants.

EMIR establishes regulatory requirements on all types and sizes of entities that enter into any form of derivative contract, including those not involved in financial services. It also indirectly applies to the non-EU entities trading with EU entities. The regulatory requirements are separated into three main categories: transaction reporting, clearing and risk mitigation.

b) The Securities Financing Transactions Regulation

The Regulation (EU) 2015/2365 of the European Parliament and of the Council on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012 dated 25 November 2015 (the "**SFTR**" or "**Securities Financing Transaction Regulation**") came into force on 12 January 2016, and applied from that date with the exception of provisions set out in Article 33, which are being phased in.

Securities Financing Transactions ("**SFTs**") consist of any transaction that uses assets belonging to one counterparty to generate financing means. In practice, this mostly includes lending or borrowing of securities and commodities, repurchase or reverse repurchase transactions, buy-sell back or sell-buy back transactions and margin lending.

The SFTR aims to reduce risks through a safer and more transparent financial system by placing additional requirements on counterparties to SFTs. The SFTR requires counterparties to report details on trades and collateral (including clients' assets that are subject to reuse) to a registered trade repository.

Both EMIR and SFTR require that counterparties are identified on the basis of whether they are authorised financial institutions in relevant sectors. Where certain clearing thresholds are exceeded, EMIR requires clearing and / or the exchange of collateral. For non-financial counterparties which do not exceed the relevant clearing thresholds for all asset classes ("**NFCs-**"), Renaissance being a financial counterparty under EMIR ("**FC**") is, effective 18 June 2020, responsible and legally liable for the timely and accurate reporting of OTC derivative contracts that such NFCs- conclude with us. Small non-financial counterparties are also required, under SFTR, to have their relevant reporting undertaken on a mandatory basis by Renaissance being their counterparty to their SFTs. An agreement on how to generate and exchange the Unique Trade Identifier ("**UTI**") is also required under SFTR, as per the relevant guidance of the European Securities and Markets Authority ("**ESMA**").

Renaissance classification

For the purposes of EMIR & SFTR, Renaissance is a Financial Counterparty (“FC”).

Our identification information

Name of Company	Renaissance Securities (Cyprus) Limited
Legal Entity Identifier (“LEI”)	IK9CLH4U15AXJVV22968
Country of Registration	Republic of Cyprus
Our classification for EMIR & SFTR	Financial Counterparty (“FC”)
Trade Repository for EMIR & SFTR	DTCC Global Trade Repository

Your identification information

Name of Company	
Legal Entity Identifier (“LEI”)	
Country of Registration	

If you are operating through a Branch, please provide the following information:

Name of Branch	
LEI of the Branch	
Country of Registration of the Branch	
Name of Parent Company	
LEI of the Parent Company	
Country of Registration of the Parent Company	

Your classification

Under both EMIR and SFTR	
<p>An EU Financial Counterparty (“FC”) or a 3rd country FC</p> <p><input type="checkbox"/></p>	<p>Please select this classification if you are one of the following type of institutions based in the EU and authorised under the relevant EU Directive, or you are based in a 3rd country but you would fall within this classification if you were established in the EU.</p> <p><input type="checkbox"/> A credit institution</p> <p><input type="checkbox"/> An investment firm</p> <p><input type="checkbox"/> An insurance <input type="checkbox"/> An assurance <input type="checkbox"/> A reinsurance undertaking</p> <p><input type="checkbox"/> An undertaking for Collective Investments in transferable securities (“UCITS”) and their management companies. Please also complete the below:</p> <p style="padding-left: 40px;"><input type="checkbox"/> Exchange Trade Fund (“ETF”)</p> <p style="padding-left: 40px;"><input type="checkbox"/> Money Market Fund (“MTF”)</p> <p style="padding-left: 40px;"><input type="checkbox"/> Other activities (“OTHR”)</p> <p><input type="checkbox"/> An institution for the provision of occupational retirement benefits</p> <p><input type="checkbox"/> An alternative investment fund (“AIF”). Please also complete the below:</p> <p style="padding-left: 40px;"><input type="checkbox"/> Exchange Trade Fund (“ETF”)</p> <p style="padding-left: 40px;"><input type="checkbox"/> Money Market Fund (“MTF”)</p> <p style="padding-left: 40px;"><input type="checkbox"/> Real Estate Investment Trust (“REIT”)</p> <p style="padding-left: 40px;"><input type="checkbox"/> Other activities (“OTHR”)</p> <p><input type="checkbox"/> An alternative investment fund manager (“AIFM”)</p> <p><input type="checkbox"/> A central counterparty or a central securities depository</p> <p>Please indicate which of the below applies to you:</p> <p style="padding-left: 40px;"><input type="checkbox"/> EU based</p> <p style="padding-left: 40px;"><input type="checkbox"/> Based in a 3rd country: _____ (please specify)</p>

A Non-Financial Counterparty ("NFC")

Please select this classification, if you are a counterparty other than the above – hence a non-financial counterparty. Please also indicate the sector of your activities:

- (1) Agriculture, forestry and fishing
- (2) Mining and quarrying
- (3) Manufacturing
- (4) Electricity, gas, steam and air conditioning supply
- (5) Water supply, sewerage, waste management and remediation activities
- (6) Construction
- (7) Wholesale and retail trade, repair of motor vehicles and motorcycles
- (8) Transportation and storage
- (9) Accommodation and food service activities
- (10) Information and communication
- (11) Financial and insurance activities - **Please select one of the below:**
 - Exchange Trade Fund ("ETF")
 - Money Market Fund ("MTF")
 - Real Estate Investment Trust ("REIT")
 - Other activities ("OTHR")
- (12) Real estate activities - **Please select one of the below:**
 - Exchange Trade Fund ("ETF")
 - Money Market Fund ("MTF")
 - Real Estate Investment Trust ("REIT")
 - Other activities ("OTHR")
- (13) Professional, scientific and technical activities
- (14) Administrative and support service activities
- (15) Public administration and defense; compulsory social security
- (16) Education
- (17) Human health and social work activities
- (18) Arts, entertainment and recreation
- (19) Other service activities
- (20) Activities of households as employers; undifferentiated goods – and services –producing activities of households for own use
- (21) Activities of extraterritorial organizations and bodies

Please indicate which of the below applies to you:

- EU based
- Based in a 3rd country: _____ (please specify)

Further information with respect to your EMIR Classification	
SFC, NFC+ or NFC-	<p>Please select one of the subclassification as Small Financial Counterparty (“SFC”), Non-Financial Counterparty+ (“NFC+”) or Non-Financial Counterparty- (“NFC-”), based on the below clearing thresholds and clarifications:</p> <p>Clearing thresholds:</p> <p>(i) EUR 1 bln gross notional value for OTC credit derivatives</p> <p>(ii) EUR 1 bln gross notional value for OTC equity derivatives</p> <p>(iii) EUR 3 bln gross notional value of interest rate derivatives</p> <p>(iv) EUR 3 bln gross notional value of FX derivatives</p> <p>(v) EUR 3 bln gross notional value of commodity and other OTC derivatives not defined above (combined threshold)</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p><input type="checkbox"/> Small Financial Counterparty (“SFC”)</p> <p>Please select this category if you are a Financial Counterparty and all your positions are below the clearing thresholds. If anyone of the clearing thresholds is exceeded, the clearing obligation applies to all classes of OTC derivatives entered into by you that are within the scope of the clearing requirement, and therefore you are to be classified as (“FC”).</p> <p>In determining whether any of the clearing thresholds are exceeded, please include:</p> <ul style="list-style-type: none"> - All hedging positions - All derivative contracts entered by all entities in the group that you may be a member of <p style="text-align: center; border: 1px solid black; padding: 2px;">If you are a FC but not an SFC, we assume that your positions are above the clearing thresholds</p> </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p><input type="checkbox"/> NFC +</p> <p>Please select this category if you are a Non-Financial Counterparty and one or more of your positions are above the clearing thresholds.</p> <p>If one or more of the clearing thresholds is / are exceeded, the clearing obligation applies to only the class / (es) of OTC derivatives in respect of which the clearing thresholds have been exceeded.</p> <p>In determining whether any of the clearing thresholds are exceeded:</p> <ul style="list-style-type: none"> - Do not include any hedging transactions undertaken in order to reduce your risk of commercial or treasury financing activity - Please include all derivative contracts entered by all entities in the group that you may be a member of </div> <div style="border: 1px solid black; padding: 5px;"> <p><input type="checkbox"/> NFC -</p> <p>Please select this category if you are a Non-Financial Counterparty and none of your positions are above the clearing thresholds.</p> <p>In determining whether any of the clearing thresholds are exceeded:</p> <ul style="list-style-type: none"> - Do not include any hedging transactions undertaken in order to reduce your risk of commercial or treasury financing activity - Please include all derivative contracts entered by all entities in the group that you may be a member of <p>Please also specify:</p> <ul style="list-style-type: none"> - Are your OTC derivative trades directly related to commercial activity or treasury financing? <input type="checkbox"/> YES <input type="checkbox"/> NO <p>Where you are not the beneficial party to such commercial activity or treasury financing, please indicate the LEI of the party with such beneficial interest: _____</p> </div>

Exchange of Initial Margin – Aggregate Average Notional																			
<p>Under EMIR, we may be required to exchange Initial Margin for non-centrally cleared OTC derivatives if you are a FC or a NFC+ and your aggregate average notional amount (“AANA”) in derivative contracts at the level of your group exceeds the relevant threshold at the application date:</p> <table border="1"> <thead> <tr> <th>Application date</th> <th>AANA Threshold (EUR Billion)</th> <th></th> </tr> </thead> <tbody> <tr> <td>from 2016</td> <td>3 000</td> <td rowspan="7" style="text-align: center; vertical-align: middle;"><i>Please select as appropriate</i></td> </tr> <tr> <td>from 1 September 2017</td> <td>2 250 - 3 000</td> </tr> <tr> <td>from 1 September 2018</td> <td>1 500 – 2 250</td> </tr> <tr> <td>from 1 September 2019</td> <td>750 – 1 500</td> </tr> <tr> <td>from 1 September 2021</td> <td>50 – 750</td> </tr> <tr> <td>from 1 September 2022</td> <td>8 – 50</td> </tr> <tr> <td>Not In-Scope</td> <td>0 - 8</td> </tr> </tbody> </table>		Application date	AANA Threshold (EUR Billion)		from 2016	3 000	<i>Please select as appropriate</i>	from 1 September 2017	2 250 - 3 000	from 1 September 2018	1 500 – 2 250	from 1 September 2019	750 – 1 500	from 1 September 2021	50 – 750	from 1 September 2022	8 – 50	Not In-Scope	0 - 8
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from 1 September 2021	50 – 750																		
from 1 September 2022	8 – 50																		
Not In-Scope	0 - 8																		
Further information with respect to your SFTR Classification																			
<p>SNFC <input type="checkbox"/></p>	<p>Please select this classification as a Small Non-Financial Counterparty (“SNFC”) for the purposes of the SFTR if you do not meet at least two of the below criteria, based on your latest available financial information. Please mark with X the criteria you do not meet:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Balance sheet (gross assets) total of EUR 20m <input type="checkbox"/> Net annual turnover of EUR 40m <input type="checkbox"/> Average number of 250 employees during the financial year <div style="border: 1px solid black; padding: 5px; text-align: center; margin-top: 10px;"><i>Please only select the criteria you do not meet</i></div>																		

	<p>SFTR - Unique Trade Identifier (“UTI”) - Generation Preference and sequence</p> <p>Where you maintain a prime brokerage relationship with us</p> <p><input type="checkbox"/> Renaissance requires that it generates the UTI. Please mark to confirm your agreement to this.</p> <p>For all other SFT related agreements:</p> <p><input type="checkbox"/> If you are an EU based FC:</p> <p><input type="checkbox"/> Renaissance prefers that it generates the UTI. Please mark to confirm your agreement to this.</p> <p><input type="checkbox"/> Will you use IHS Markit/PIRUM as vendor for UTI generation and exchange? Please mark to confirm this. Renaissance agrees to accept UTIs generated by IHS Markit/PIRUM. Renaissance is not a member of IHS Markit/PIRUM but agrees to the exchange of UTIs via IHS Markit/PIRUM facilities.</p> <p><input type="checkbox"/> If you are an EU based FC and are not using IHS Markit/PIRUM for UTI generation / exchange, will you use an alternative vendor solution. If yes, please mark this item and specify the name of the vendor: _____</p> <p><input type="checkbox"/> Will you accept to follow the ESMA waterfall approach for UTI generation for where you are an EU based FC and not using IHS Markit/PIRUM for UTI generation?</p> <p><input type="checkbox"/> If you are a non-EU based FC:</p> <p><input type="checkbox"/> Renaissance requires that it generates the UTI. Please mark to confirm your agreement to this.</p> <p><input type="checkbox"/> If you are an NFC or SNFC:</p> <p><input type="checkbox"/> Renaissance requires that it generates the UTI. Please mark to confirm your agreement to this.</p>
	<p>SFTR - UTI Exchange</p> <p><input type="checkbox"/> If you will make use of IHS Markit/PIRUM for UTI generation / exchange, do you accept the UTIs to be exchanged via IHS Markit/PIRUM facilities?</p> <p><input type="checkbox"/> If you are not a member of IHS Markit/PIRUM, can you please specify your preference to exchange UTIs: _____</p>

SFTR - Trade repository information	
	<input type="checkbox"/> Can you please specify the trade repository you have chosen to report to for SFTR: <input type="checkbox"/> DTCC <input type="checkbox"/> UnaVista <input type="checkbox"/> Regis TR <input type="checkbox"/> Other _____

Please complete as appropriate

We, _____ hereby declare and confirm that the above information is correct. We understand and agree that it is our responsibility to inform Renaissance immediately of any changes to the information contained in this Regulatory Reporting Questionnaire and that Renaissance shall incur no liability for any losses we may suffer as a result of us failing to do so.

By:
Name:
Title:
Date: