

1 Summary

- 1.1 Acetop Global Markets Limited (hereinafter referred to as ‘Acetop’, the ‘Firm’ or the ‘Company’) is incorporated in The Commonwealth of The Bahamas, Certificate of Incorporation No. 201178B. Acetop is authorised and regulated by the Securities Commission of The Bahamas (licence No. SIA-F198).
- 1.2 Acetop does not offer investment advice to clients, regardless to their classification.
- 1.3 There are three Client Classifications, each with different levels of protection;
 - 1.3.1 Professional Client
 - 1.3.2 Sophisticated Client
 - 1.3.3 Retail Client
- 1.4 By default, all clients will be classified as a retail client unless they meet the below criteria.

2 Professional Client

- 2.1 A Professional Client that is an individual, institution, or any other institutional investor that is subject to licensing or regulation in the Bahamas, or in another jurisdiction, in order to operate in the financial markets.
- 2.2 Acetop will request documented evidence to show that a client is licensed or regulated in the Bahamas or in another jurisdiction to operate in financial markets.

3 Sophisticated Client

- 3.1 A Client that is regarded as a “accredited investor;” any person who comes within any of the following categories, or whom the issuer reasonably believes comes within any of the following categories:
 - a) any bank licensed under the Banks and Trust Companies Regulation Act, whether acting in its individual or fiduciary capacity;
 - b) any firm registered under the Act and acting for its own account;
 - c) any insurance company registered under the Insurance Act;
 - d) any mutual fund company licensed under the Mutual Funds Act, 1995;
 - e) any employee benefit plan if the investment decision is made by a plan fiduciary, which is either a bank or trust company licensed under the Banks and Trust Companies Regulation Act, an insurance company registered under the Insurance Act, or registered firm, or if the employee benefit plan has total assets in excess of five million dollars;
 - f) any director, executive officer or general partner of the issuer of the securities being offered or sold, or any director, executive officer or general partner of a general partner of that issuer;
 - g) any natural person whose individual net worth, or joint net worth with that person’s spouse, at the time of his purchase exceeds one million dollars;

- h) any natural person who had an individual income in excess of two hundred thousand dollars in each of the two most recent years or joint income with that person's spouse in excess of three hundred thousand dollars in each of those years and has a reasonable expectation of reaching the same income level in the current year;
- i) any trust, with total assets in excess of five million dollars, not formed for the specific purpose of acquiring the securities offered; and
- j) any entity in which all of the equity owners are accredited investors; an "affiliate" of, or person "affiliated" with, a specified person means a person that directly, or indirectly through one or more intermediaries, controls or is controlled by, or is under common control with, the person specified.

3.2 Should you wish to be classified as a Sophisticated Client, you must;

- Match the criteria of an 'accredited investor'
- Have a full understanding of your designation as a Sophisticated Client
- Have a full understanding of our products and the ability to bear the financial risk associated
- Understand that, by being a Sophisticated Client, you waive your rights as a Retail Client
- Give Acetop consent to classify you as a Sophisticated Client

4 Retail Client

4.1 A Client who does not qualify as either a 'Professional Client' or 'Sophisticated Client' by default. Retail Client are afforded with the highest level of protection.

5 Right to Change Your Classification

5.1 If you have been classified as a Professional or Sophisticated Client, you will not be entitled to certain protections afforded to Retail Clients, including certain protections under the Securities Commission of the Bahamas' client money rules.

6 Re-classification Request

6.1 You have the right to request a different client classification. Your given full consent and request can be made via;

6.1.1 Email: cs@acetop.com

6.2 We may request additional documentation to confirm your classification is correct. This may include trading statements.

6.3 If you have any further queries about your classification, do not hesitate to contact the Customer Services Department on;

6.3.1 Email: cs@acetop.com

7 Declaration

- 7.1 The Chinese version shall always prevail in case of any discrepancy or inconsistency between the Chinese and English version.