



CGPH GROUP TREATING CLIENTS FAIRLY POLICY

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Policy Owner	Group Legal & Compliance
Approved by	Director of CGPH Group Ltd.
Applies to	All CGPH Group Companies
Classification	Internal Group Policy
Effective Date	July 1, 2026
Review Cycle	Annual

1. Introduction

CGPH Group Ltd. is committed to maintaining the highest standards of professionalism, transparency and fairness in every relationship with its clients.

The purpose of this Policy is to establish the principles that govern how all Group Companies interact with clients throughout every stage of a business relationship, from the first contact through engagement, execution of services and completion of the mandate.

The Group recognises that trust is one of its most valuable assets. Every client shall therefore be treated fairly, honestly and professionally, regardless of the size, complexity or value of the engagement.

This Policy complements the Group Code of Ethics, the Group Code of Conduct and all other Group governance policies.

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2. Scope

This Policy applies to every company belonging to the CGPH Group and to every director, officer, employee, consultant, advisor, contractor and representative acting on behalf of a Group Company.

It applies to all advisory and financial services provided by the Group, including investment banking, corporate finance, private debt, structured finance, fundraising, capital markets, tokenization, mergers and acquisitions, real estate advisory, investor relations and any other professional services offered by the Group.

3. Commitment to Fair Treatment

The Group is committed to placing fairness, integrity and professionalism at the centre of every client relationship.

Clients shall be treated consistently, respectfully and without discrimination.

Every decision affecting a client shall be based on objective professional considerations and never on personal interests or improper commercial incentives.

4. Transparency

Clients shall receive information that is accurate, balanced and presented in a clear and understandable manner.

Communications shall never be misleading, deceptive or intentionally incomplete.

Fees, engagement terms, responsibilities, assumptions, conditions and limitations shall be communicated before the commencement of services whenever reasonably possible.

Where assumptions or external factors may affect the outcome of an engagement, these shall be appropriately explained.

5. Professional Advice

All advice provided by the Group shall be based on reasonable professional judgement, appropriate analysis and the information available at the relevant time.

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Personnel shall avoid making guarantees regarding the success, timing or outcome of any transaction. Recommendations shall be formulated independently and in the best professional interests of the client, taking into account the nature of the engagement and the information provided.

6. Understanding Client Needs

Before providing professional services, the Group shall seek to understand the client's objectives, expectations and requirements to the extent reasonably necessary for the relevant engagement.

Personnel shall ensure that the proposed services are appropriate for the client's objectives and clearly explain the scope of the Group's mandate.

Where the Group believes that a proposed transaction may involve material legal, regulatory, financial or reputational risks, such concerns shall be communicated openly to the client.

7. Honest Communications

Personnel shall communicate with clients honestly, promptly and professionally.

Clients shall be kept reasonably informed regarding the progress of their engagement.

Where delays, regulatory developments, third-party actions or other circumstances affect a transaction, the Group shall communicate such developments without undue delay whenever appropriate.

Personnel shall never intentionally conceal material information relating to the services being provided.

8. Fair Commercial Practices

The Group shall conduct its business using fair commercial practices.

Clients shall never be pressured into accepting services or entering into transactions.

Commercial negotiations shall always be conducted in good faith.

Fees shall reflect the professional services provided and shall be clearly documented within the relevant engagement documentation.

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9. Confidentiality

All client information shall be treated as confidential unless disclosure is authorised by the client or required by applicable law.

Personnel shall take appropriate measures to protect confidential information against unauthorised access, disclosure or misuse.

Confidentiality obligations continue after completion of the engagement.

10. Managing Expectations

The Group recognises that many engagements involve negotiations, third parties, regulatory approvals or market conditions that are outside its control.

Personnel shall ensure that clients understand the distinction between professional advisory services and the ultimate outcome of a transaction.

No member of the Group shall provide unrealistic assurances or create expectations that cannot reasonably be supported.

11. Conflicts of Interest

Where a conflict of interest exists or may reasonably arise, the matter shall be managed in accordance with the Group Conflicts of Interest Policy.

Clients shall receive appropriate disclosure whenever required by law or by internal policy.

The Group shall always seek to preserve its professional independence and objectivity.

12. Complaints

The Group encourages clients to raise concerns regarding the quality of its services.

Complaints shall be handled fairly, impartially and without unnecessary delay.

Every complaint shall be reviewed objectively and independently whenever appropriate.

The objective of the complaints process is not only to resolve individual concerns but also to improve the quality of the Group's services.

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Complaint handling shall be conducted in accordance with the Group Complaint Handling Policy.

13. Protection of Client Information

Client information shall only be accessed by personnel with a legitimate business need.

Appropriate technical and organisational measures shall be adopted to protect client data.

Personnel shall comply with all applicable data protection legislation and the Group Data Protection Policy.

14. Professional Standards

Personnel representing the Group shall maintain high standards of competence, courtesy and professionalism.

Continuous professional development is encouraged to ensure that clients receive services reflecting current legal, financial and regulatory standards.

Personnel shall seek guidance whenever they are uncertain regarding professional obligations or ethical considerations.

15. Continuous Improvement

The Group is committed to continually improving the quality of its services.

Client feedback, complaints, internal reviews and lessons learned shall be considered in order to strengthen procedures and improve client experience.

Management shall periodically review this Policy and related procedures to ensure continued effectiveness.

16. Responsibilities

Every member of the Group is responsible for treating clients fairly and consistently.

Managers shall promote a culture centred on professionalism, transparency and client service.

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Group Legal & Compliance shall oversee the implementation of this Policy and provide guidance where required.

17. Breaches of this Policy

Failure to comply with this Policy may result in disciplinary action, contractual consequences or other measures considered appropriate by the Group.

Serious breaches may also result in reporting obligations where required by applicable law.

18. Review

This Policy shall be reviewed at least annually or whenever changes in the Group's activities, legal requirements or regulatory expectations make such review necessary.

Material amendments shall be approved by the Board of Directors of CGPH Group Ltd.

19. Final Provisions

The fair treatment of clients is a fundamental principle of CGPH Group's governance framework and forms an integral part of the Group's commitment to integrity, professionalism and responsible business conduct.

Every individual acting on behalf of the Group is expected to uphold these principles and contribute to maintaining long-term relationships built on trust, competence and transparency.

Approved by:

Director of CGPH Group Ltd.

Date: July 1, 2026

Signature: _____

Name: Kolyo Boichev

Title: Director

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