Appendix No. **5**
to the Client Service Regulations

Brokerage Company "Rioni Capital"

DECLARATION

on Risks Related to Combination of Different Types of Professional Activities

TBILISI
2025

This Declaration on Risks Related to the Broker's Combination of Different Types of Professional Activities (hereinafter – the Declaration) constitutes an appendix to and an integral part of the Client Service Regulations (hereinafter – the "Regulations") of the brokerage company "Rioni Capital" (hereinafter – the Company).

The purpose of this Declaration is to provide the Client with information on the risks associated with the Broker's combination of different types of professional activities, as well as the combination of professional activities with other types of activities.

1. The Broker informs all Clients that, within the scope of the license issued by the National Bank of Georgia, it carries out the following types of activities:
   a. Brokerage activity (Reception & Transmission / Execution of Orders) — receipt, transmission and execution of Clients' orders.
   b. Dealing on Own Account (Dealing on Own Account / Proprietary Trading) — transactions carried out in the name of the Company and with its own funds within the prop-book framework.
   c. Individual discretionary management of Clients' assets (Portfolio Management) — asset management based on an individual agreement and the Client's mandate.

2. The Company does not carry out management of collective investment schemes (funds).

3. All types of activities are organizationally and functionally segregated in accordance with the requirements of the National Bank of Georgia and the principles of MiFID II (Chinese Walls / Segregation of Duties).

4. For the purposes of this document, the risks of combining different types of professional activities in the securities market include:
- conflicts of interest between the Company's structural units (Sales / Execution / Prop / Portfolio Management / Risk / Back Office);
- the risk of prioritizing execution of the Company's transactions over Clients' transactions (Best Execution Risk);
- the risk of misuse of non-public information in violation of the Company's internal policies (Insider Information Controls);
- the risk of incorrect execution of Client orders in the event of insufficient segregation of functions;
- the risk of role confusion when proprietary trading (prop-book) and client brokerage activities coexist;
- operational risks associated with one employee performing multiple functions.

5. When combining several types of professional activities or combining professional activities with other types of activities, the capital burden on the Broker increases.
Rioni Capital LLC complies with the minimum own funds requirements established by the National Bank of Georgia.
The Company also complies with operational and market risk ratios. Capital control is carried out on a daily basis.

6. The Broker informs the Client of the existence of a control and prevention system implemented by the Broker, aimed at mitigating and preventing risks related to the combination of different types of professional activities, which includes:
- segregation of Front Office, Middle Office and Back Office functions;
- isolation of the prop-book from client services (Chinese Walls);
- independence of Risk Management from proprietary trading and brokerage departments;

- Best Execution procedures;
- a system for prevention and identification of conflicts of interest;
- internal audit and regular compliance monitoring.

***This Declaration is not intended to force the Client to refuse relations with the Broker, but is intended to assist the Client in assessing risks and responsibly approaching the terms of the agreement concluded between the Client and Rioni Capital*.**
The Client must ensure that the above information is clear and, if necessary, obtain clarification from Rioni Capital or from a consultant specializing in the relevant matters.