

PROCEDURES FOR ASSESSING THE APPROPRIATENESS OF CROWDFUNDING TRANSACTIONS AND MODELLING THE LOSS-ABSORBING CAPACITY OF UAB INRENTO

1. GENERAL PROVISIONS

- 1.1. The Procedure for the Assessment of the Suitability of Crowdfunding Transactions and the Modelling of Loss-absorbing Capacity of Inrento UAB (the "**Procedure**") sets out the requirements for the procedure for the assessment of the suitability of crowdfunding transactions for inexperienced investors and for the modelling of the loss-taking capacity of inexperienced investors.
- 1.2. These Rules are drawn up in accordance with the requirements of Regulation (EU) 2020/1503 (the "**Regulation**"), Directive (EU) 2014/65 (the "**Directive**") and any other applicable legislation.

2. TERMS USED IN THE PROCEDURE

- 2.1. For the purposes of these Rules, the following terms shall have the meanings set out below:
 - 2.1.1. **The Company** - UAB Inrento, legal entity code 305519977, registered office at Sporto g. 12-114, Vilnius, Lithuania;
 - 2.1.2. **Directive** - Directive (EU) 2014/65;
 - 2.1.3. **Investor** means a natural or legal person who has submitted an investment offer via the Platform and who has duly registered on the Platform;
 - 2.1.4. **Inexperienced Investor** - An investor who is not an Experienced Investor;
 - 2.1.5. **Experienced Investor** - an Investor who meets the criteria set out in Section 3.1 of the Schedule and has received confirmation from the Company that it will be considered an Experienced Investor in accordance with the procedure set out in Section 3 of the Schedule;
 - 2.1.6. **Platform** - the crowdfunding platform operated by the Company;
 - 2.1.7. **Project** - one or more types of business activity for which the Project owner seeks funding by submitting a crowdfunding proposal on the Platform;
 - 2.1.8. **Project Owner** - a natural person (entrepreneur) or a legal entity that seeks funding for its Project through the Platform;
 - 2.1.9. **Regulation** - Regulation (EU) 2020/1503;
 - 2.1.10. **A large transaction is a single transaction with a value equal to or greater than EUR 15 000;**
 - 2.1.11. **Procedure** - this procedure for assessing the appropriateness of crowdfunding transactions and modelling the capacity to absorb losses.
- 2.2. Other terms used in these Rules shall have the same meaning as defined in the Regulation. Unless the context otherwise requires, words used in the singular in the Regulations shall include words used in the plural and vice versa.

3. EXPERIENCED INVESTORS

- 3.1. The following persons shall be deemed to be sophisticated investors in respect of all crowdfunding services provided by the Company:
 - 3.1.1. legal persons fulfilling at least one of the following criteria:
 - a. have own resources of at least EUR 100 000;
 - b. a net turnover of at least EUR 2 000 000;
 - c. a balance of at least EUR 1 000 000
 - d. is an entity active in the financial markets and is authorised (licensed) and supervised by the relevant supervisory authorities. Such entities include: (i) credit institutions; (ii) investment firms; (iii) other authorised or regulated financial institutions; (iv) insurance companies; (v) collective investment schemes and the management companies of

such schemes; (vi) pension funds and the management companies of such funds; (vii) commodities and commodities derivatives dealers; (viii) exchange access tenants; (ix) other institutional investors;

- e. national and regional governments, including public authorities managing public debt at national or regional level, central banks, international and supranational institutions (e.g. the World Bank, the International Monetary Fund, the European Central Bank and other similar international organisations);
- f. is another institutional investor whose principal activity is investment in financial instruments, including entities engaged in securitisation and other financing transactions.

3.1.2. natural persons meeting at least two of the following criteria:

- g. a personal gross income of at least EUR 60 000 per fiscal year or a portfolio of financial instruments of more than EUR 100 000, consisting of cash deposits and financial assets;
- h. the Investor is employed or has been employed for at least one year in the financial sector in a professional capacity requiring knowledge of the transactions or services envisaged, or the Investor has been in a managerial position for at least 12 months in a legal entity that corresponds to point 3.1.1;
- i. the Investor has executed an average of 10 large transactions per quarter over the last four quarters of the year, either on the capital markets or through crowdfunding providers.

3.2. An investor may be considered by the Company to be an Experienced Investor only if he/she meets the criteria set out in paragraph 3.1 above and submits to the Company an application to be considered as an Experienced Investor in the form set out in Annex 1 to these Procedures, together with appropriate evidence of compliance with the criteria.

3.3. The Company shall comply with an Investor's request to be treated as an Experienced Investor unless it has reasonable doubts as to the accuracy of the information provided in the request. Once the status of an Investor has been confirmed, the Company shall clearly inform the relevant Investor thereof.

3.4. The approval referred to in point 3.3 of the Procedure shall be valid for two years. Investors wishing to retain their status as an Experienced Investor after the expiry date must submit a new application to the Company in the form set out in Annex 1 to the Schedule.

3.5. Experienced investors are responsible for informing the Company of any changes that may affect their categorisation.

3.6. If the Company becomes aware that the Investor no longer meets the initial conditions for being recognised as an Experienced Investor, the Company shall inform the Investor that he/she will be considered as an Inexperienced Investor.

3.7. By way of derogation from the procedure set out in this Chapter, the entities referred to in Annex II, Chapter I, points 1 to 4 of the Directive shall be deemed to be sophisticated investors if they provide the Company with proof of their sophisticated investor status.

4. ASSESSING THE INVESTOR SUITABILITY OF TRANSACTIONS AND MODELLING LOSS-ABSORPTION

4.1. In all cases, before giving an Inexperienced Investor the full opportunity to invest in crowdfunding projects on the Platform, the Company shall assess whether and which crowdfunding services offered are suitable for the prospective Inexperienced Investor.

4.2. For the purposes of the assessment referred to in paragraph 4.1 above, the Company shall request information on the experience, investment objectives, financial situation and general understanding of the risks involved in investing in the types of investments offered on the Platform from prospective Inexperienced Investors. The information required for the assessment is detailed in Section 5 of the Procedures and the procedure for its assessment is set out in Section 6.

4.3. For each Inexperienced Investor, the Company shall review the valuation referred to in paragraph 4.1 every two years after the initial valuation.

- 4.4. For the purposes of the assessment referred to in paragraph 4.1 of the Schedule, the Company shall also require prospective Inexperienced Investors to model their capacity to absorb losses calculated as 10% of the net asset value of the Investors. Such modelling shall be carried out in accordance with the procedure set out in Section 8 of the Schedule.
- 4.5. The Company shall review the modelling set out in paragraph 4.5 for each Inexperienced Investor on an annual basis after the initial modelling.
- 4.6. Whenever, prior to a prospective Inexperienced Investor or an Inexperienced Investor accepting an individual crowdfunding offer and investing an amount exceeding EUR 1 000 or 5% of the net asset value of that Investor's assets calculated in accordance with Chapter 8, whichever is the greater, the Company shall ensure that such Investor:
 - 4.6.1. be warned of the risks;
 - 4.6.2. give the Company their express consent; and
 - 4.6.3. demonstrate to the Company that the prospective inexperienced investor understands the investment and its risks. The evaluation of the suitability of the crowdfunding transaction and the modelling of the loss-absorbing capacity may be used as evidence that a prospective Inexperienced Investor or an Unseasoned Investor understands the investment and its risks.

5. THE INFORMATION REQUIRED FOR THE ASSESSMENT OF THE ELIGIBILITY OF TRANSACTIONS AND ITS COLLECTION

- 5.1. In order to assess whether and which crowdfunding services offered are suitable for a prospective Inexperienced Investor, the Company shall take into account whether:
 - 5.1.1. A prospective investor who is inexperienced has the necessary experience and knowledge to understand the risks associated with investing in general;
 - 5.1.2. the prospective Inexperienced Investor has the necessary experience and knowledge to understand the risks associated with the types of investments offered on the Platform.
- 5.2. In order to implement paragraph 5.1.2 of the Schedule, the Company shall assess the prospective Inexperienced Investor's understanding of what crowdfunding services are and the risks associated with them.
- 5.3. In order to obtain the information necessary for the assessment, the Company shall provide the Inexperienced Investor with a questionnaire on the Investor Suitability of Crowdfunding Transactions prepared by the Company (Annex 2 hereto), each question of which shall be associated with a relevant score.
- 5.4. The Investor shall complete the questionnaire set out in Annex 2 to the Regulations electronically directly on the Company's Platform.
- 5.5. If the Investor is a legal person, the questionnaire set out in Annex 2 to the Regulations shall be completed by a person representing such Investor as a legal person (e.g. a manager).
- 5.6. The Company shall take reasonable steps to ensure that the information collected from prospective Inexperienced Investors in accordance with the questionnaire set out in Annex 2 to this Schedule is reliable and accurately reflects the Inexperienced Investors' knowledge, skills, experience, and financial situation, investments, objectives and understanding of the risks involved.
- 5.7. In accordance with point 5.6 of the Procedure, the Company shall take at least the following actions:
 - 5.7.1. ensure that the questions used in the questionnaire are comprehensible to prospective Inexperienced Investors and are sufficiently detailed to provide information that adequately and accurately reflects the situation of prospective Inexperienced Investors;
 - 5.7.2. ensure that the tools used to collect information are fit for purpose and tailored to the needs of prospective inexperienced investors;
 - 5.7.3. draws the attention of prospective Inexperienced Investors to the importance of accurate and up-to-date information.

6. PROCEDURES FOR ASSESSING THE ELIGIBILITY OF TRANSACTIONS

- 6.1. Each question in the questionnaire in Annex 2 to the Rules of Procedure has a choice of possible answers. Each answer chosen carries a number of points (the number of points for each answer chosen is indicated next to the corresponding answer in Annex 2 of the Timetable).
- 6.2. The Company's information systems, upon receipt of the responses provided by a prospective Inexperienced Investor to the questionnaire set out in Annex 2 to the Procedures, shall automatically calculate the total number of points scored by such Investor.
- 6.3. If a prospective Non-experienced Investor has scored at least 35 points, the crowdfunding transaction is acceptable to that Investor. If the prospective Inexperienced Investor scores less than 35 points or selects at least one response indicating that the crowdfunding transaction is not acceptable (responses indicating that the crowdfunding transaction is not acceptable are marked in red next to the relevant response in Annex 2 of the Schedule), the crowdfunding transaction is unacceptable to the prospective Inexperienced Investor.
- 6.4. The Company shall take into account the results of the modelling detailed in Section 8 when assessing the financial position of future non-experienced investors.

7. WARNING FOR THE INEXPERIENCED INVESTOR

- 7.1. If a Prospective Inexperienced Investor fails to provide the information required under Schedule 2 to the Schedule or if the Company determines, based on the information obtained under Schedule 2 to the Schedule, that the Prospective Inexperienced Investor has scored less than 19 points or has selected at least one response indicating that crowdfunding is not acceptable, the Company shall issue to such Prospective Inexperienced Investor a notice stating that:
 - 7.1.1. the services offered on the Platform may not *be* suitable for a potential inexperienced investor;
 - 7.1.2. investing in a crowdfunding project involves risks, including the risk of losing some or all of the money invested. These risks are clearly indicated by the following text: "*By investing in a crowdfunding project, you risk losing all the money you have invested*";
 - 7.1.3. future investments are not covered by the deposit guarantee schemes set out in Directive 2014/49/EU of the European Parliament and of the Council;
 - 7.1.4. Future investments are also exempt from investor compensation schemes established under Directive 97/9/EC of the European Parliament and of the Council.
- 7.2. The warning referred to in paragraph 7.1 shall be made available to inexperienced investors in an easily readable manner and in a prominent place on the Company's website.
- 7.3. The window containing the warning referred to in clause 7.1 must be displayed on the screen of an Inexperienced Investor until such Investor expressly acknowledges receipt and understanding of the Company's warning.

8. MODELLING PROCEDURES FOR LOSS-ABSORPTION

- 8.1. The Company provides a tool on its website that allows prospective Inexperienced Investors to model their capacity to bear losses ([\[link to the tool\]](#)). Such tool shall in all cases be easy to use and shall not require prospective Inexperienced Investors to perform any tasks other than providing the information set out in paragraphs 8.5 to 8.8.
- 8.2. The loss absorbency modelling tool operates in such a way that the Company cannot independently access the information that a potential Inexperienced Investor enters into the tool. Nor may the Company in any way record additional information or otherwise influence the results of the loss absorbency modelling tool. However, the loss capacity modelling tool may include a feature that allows a prospective Inexperienced Investor to communicate the result of the modelling to the Company.
- 8.3. In addition to the tool available on the Company's website, the Company may also make it possible to model loss-absorbing capacity using a different method, which shall be communicated to prospective Non-expert Investors.
- 8.4. For the purposes of the loss-absorption modelling, the net value of future inexperienced investors is calculated as follows:

Net asset value of the investor =

(annual net income) + (total liquid assets) - (annual financial liabilities)

- 8.5. Net Annual Income is understood as the total annual income received by an Inexperienced Investor after deduction of related expenses, social contributions and taxes. Net annual income consists of:
- 8.5.1. employment income, which includes wages, unemployment benefits and pension benefits received by an Inexperienced Investor, but excludes exceptional benefits;
 - 8.5.2. interest on bank deposits or other debt instruments, including payments on bank deposits or other debt instruments received by the Inexperienced Investor during the preceding calendar year, but excluding payments that are of an exceptional nature;
 - 8.5.3. dividend payments, which include payments received by an Inexperienced Investor in respect of a holding in shares or other equity instruments in a collective investment scheme, but exclude any capital gains arising from the sale of all or part of such holding;
 - 8.5.4. income from immovable property, which includes any payments received for the rental of immovable property, but excludes capital gains on the sale of all or part of such immovable property.
- 8.6. Total liquid assets shall be understood as the sum of all funds held by the Inexperienced Investor in savings and current accounts, as well as the value of assets that can be easily and quickly realised, including but not limited to:
- 8.6.1. savings products that can be converted into funds within a maximum of 30 calendar days;
 - 8.6.2. financial instruments negotiated on a regulated market within the meaning of Article 4(1)(21) of the Directive;
 - 8.6.3. shares and units in collective investment schemes offering redemption rights at least once a week.
- 8.7. It is not considered a liquid asset:
- 8.7.1. real estate;
 - 8.7.2. the amount of pension contributions;
 - 8.7.3. shares in a company that are not freely redeemable or transferable, including previous crowdfunding investments.
- 8.8. Annual financial commitments shall be understood as all expenditure that binds the Non-Experiential Investor in a given calendar year, including, but not limited to:
- 8.8.1. alimony and child maintenance payments
 - 8.8.2. rent and mortgage payments
 - 8.8.3. loan repayments;
 - 8.8.4. for paying insurance premiums;
 - 8.8.5. utility bills, including electricity, heating and water costs;
 - 8.8.6. service subscription fees;
 - 8.8.7. income and property taxes
- 8.9. The liquid assets referred to in paragraph 8.6 and the annual financial liabilities referred to in paragraph 8.8 shall be valued as at 31 December of the calendar year preceding that in which the modelling is carried out unless the valuation as at such date does not accurately reflect the current position of the future situation of the Inexperienced Investor. In that case, the valuation shall be carried forward to a later date. The later date may be any date between 31 December of the calendar year preceding that in which the modelling is carried out and the date on which the modelling is performed. In all cases, liquid assets and annual financial liabilities shall be valued at the same date. In determining such a date, prospective inexperienced investors must consider whether the choice of such a date will permit an accurate measurement of all three values in paragraph 8.4.

- 8.10. The annual net revenue referred to in point 8.5 is the revenue for the calendar year preceding the year in which the modelling is carried out. However, in cases where the valuation of liquid assets and annual financial liabilities is carried out for a later date in accordance with paragraph 8.9, the net annual income shall be that received in the twelve months preceding that later date.
- 8.11. In all cases, the Company shall ask prospective Inexperienced Investors to provide the Company with the results of their loss absorbency modelling.

9. FINAL PROVISIONS

- 9.1. The proper implementation and control of the Procedure shall be the responsibility of the Company's CEO.
- 9.2. Amendments and/or additions to these Rules shall enter into force on the day following the date of their adoption, unless a different effective date is specified.
- 9.3. The Company's Manager shall ensure that the Company's employees are informed in a timely manner about changes and/or additions to the Procedure.
- 9.4. All employees of the Company shall be made aware of and shall comply with these Procedures and any amendments thereto.

APPLICATION FORM FOR DESIGNATION AS AN EXPERIENCED INVESTOR

Date and place of application:	
Name of investor:	
Investor registration code and LEI code (if applicable):	
The address of the investor's place of residence or registered office:	
Investor contact details: <ul style="list-style-type: none"> ○ Address: ○ Telephone number: ○ Email address: 	

I request to be considered as an experienced investor on the following basis(s): *(please tick the criteria for which the investor is eligible and provide relevant evidence of eligibility)*:

1.	Legal persons meeting at least one of the following criteria:	
i.	at least EUR 100 000 of own resources;	
ii.	a net turnover of at least EUR 2 000 000;	
iii.	a balance of at least EUR 1 000 000	
iv.	is an entity active in the financial markets and is authorised (licensed) and supervised by the relevant supervisory authorities. Such entities are considered to be: (i) credit institutions; (ii) investment firms; (iii) other authorised or regulated financial institutions; (iv) insurance companies; (v) collective investment schemes and the management companies of such schemes; (vi) pension funds and the management companies of such funds; (vii) commodities and commodities derivatives dealers; (viii) exchange access tenants; (ix) other institutional investors;	
v.	national and regional governments, including public authorities managing public debt at national or regional level, central banks, international and supranational institutions (e.g. the World Bank, the International Monetary Fund, the European Central Bank and other similar international organisations);	
vi.	is another institutional investor whose principal activity is investment in financial instruments, including entities engaged in securitisation and other financing transactions.	
2.	Natural persons who meet at least two of the following criteria:	
i.	a personal gross income of at least EUR 60 000 per fiscal year or a portfolio of financial instruments of more than EUR 100 000, consisting of cash deposits and financial assets;	
ii.	the investor is employed or has been employed for at least one year in the financial sector in a professional capacity requiring knowledge of the transactions or services envisaged, or the investor has been in a managerial position for at least 12 months in a legal person corresponding to paragraph 1;	
iii.	In the last four quarters of the year, the Investor executed an average of 10 large transactions per quarter in capital markets.	

By signing this application, I declare and certify that:

- I understand the consequences of losing investor protection for inexperienced investors;

- I accept responsibility for the accuracy of the information provided in the application.

Attached documents:

1. [...]

2. [...]

Name, surname, signature

QUESTIONNAIRE FOR ASSESSING THE ELIGIBILITY OF CROWDFUNDING TRANSACTIONS

In accordance with Regulation (EU) 2020/1503, we must assess the suitability of the type of financing transaction for you before you can finance projects on the platform. This will allow us to assess your knowledge and experience in the investment field in relation to the financing transactions on our platform.

Please note that the following questions must be answered by the head of the legal entity (or other person) who represents the legal entity in its relations with the platform operator.

1. Details of the client (in the case of a legal person, its representative)

1.1. What is your age?

- up to 20 years; [0]
- between 20 and 30 years of age; [1]
- more than 30 years. [2]

1.2. What is your educational background?

- basic; [x]
- secondary; [0]
- professional; [0]
- higher education; [1]
- higher. [2]

2. Information on the knowledge and experience of the client (or, in the case of a legal person, its representative)

2.1. Information on current (and, if available, former) occupation(s) (multiple choices available at¹):

- business and management; [3]
- business analytics, economic analysis; [3]
- economy; [3]
- banking; [4]
- accounting, auditing, financial management; [4]
- financial or economic engineering; [3]
- business development; [2]
- law; [3]
- Other. [0]

2.2. How long have you been working in your current job / self-employed or running a business:

- up to 1 year; [0]
- from 1 year to 5 years; [1]
- more than 5 years; [2]
- I'm not working at the moment. [-4]

¹ If several options are chosen, the Company will only evaluate the one option with the highest score.

- 2.3. Which funding instruments are you familiar with (more than one option available at²)?
- any form of loans to other persons (loan agreements, promissory notes, etc.); [2]
 - crowdfunding; [3]
 - peer-to-peer lending platforms; [1]
 - bonds; [1]
 - refinancing; [1]
 - I am not familiar with any of the above funding instruments. [-3]
- 2.4. If you are familiar with at least one of the above funding instruments, please indicate the number of times you have used it/they have been used (cumulating all funding instruments):
- 1 to 2 times; [1]
 - 3 to 5 times; [2]
 - more than 6 times; [3]
 - I have not benefited from any of the above funding instruments. [0]
- 2.5. If you are familiar with at least one of the above funding instruments, please indicate the average level of funding you have provided:
- up to EUR 1 000; [1]
 - more than EUR 1 000; [2]
 - I am not familiar with any of the above funding instruments. [0]
- 2.6. If you are familiar with at least one of the above financing instruments, please indicate how long it has been since the last financing transaction:
- less than 1 year; [2]
 - 1 to 3 years; [1]
 - more than 3 years; [0]
 - I am not familiar with any of the above funding instruments. [0]
- 2.7. Have you read the description of the risks of crowdfunding here - [[link](#)]?
- Yes; [1]
 - no. [-1]
- 2.8. To which of the following can you lend funds using our crowdfunding platform?
- the owner of a project that can be financed on a crowdfunding platform; [1]
 - to the operator of the crowdfunding platform; **if this answer is ticked, the financing transaction is deemed to be unacceptable to the financier**
 - Other. **if this answer is ticked, the financing transaction is deemed not acceptable to the financier**
- 2.9. How can the stage of the economy (boom or bust) affect the success of a project?
- The economic phase can either be a positive influence on the project or a failure, depending on the phase; [1]
 - The economic phase has no impact on the success of the project. **if this answer is ticked, the financing transaction is considered unacceptable to the financier**
- 2.10. What are the main risks of investing in crowdfunding projects?

² If several options are chosen, the Company will only evaluate the one option with the highest score.

- potential risk of losing the funds lent; [1]
- the investment return may not be equal to the expected investment return; [1]
- the risk of loss of funds exists even in the best risk class of projects; [1]
- the risk of loss of funds exists even when projects are financed with collateral (e.g. mortgage, etc.); [1]
- There are no risks in investing in crowdfunding projects, as they are normally secured by additional collateral. *if this answer is ticked, the financing transaction is considered unacceptable to the financier*

2.11. Who is liable for any loss of your loaned funds?

- Platform operator; *if this answer is ticked, the financing transaction is deemed not acceptable to the financier*;
- Owner of the project; *if this answer is ticked, the financing transaction is considered not acceptable to the financier*;
- No one is responsible for the loss of my investment. [1]

2.12. What are the steps to take before using a crowdfunding platform?

- critically assess existing knowledge and experience in the field of crowdfunding; [1]
- take into account their financial situation and the possible negative consequences of not repaying all or part of the loaned funds; [1]
- investing in crowdfunding projects is risk-free because the projects are secured by additional collateral (e.g. mortgage, etc.); *if this answer is ticked, the financing transaction is considered as not acceptable to the financier*
- investing in crowdfunding projects is risk-free as the return on investment is guaranteed by the Platform Operator and/or the Project Owner; *if this answer is ticked, the financing transaction is considered as unacceptable to the financier*

2.13. Have you invested in business loans secured by collateral such as a surety, guarantee or mortgage?

- Yes; [1]
- no. [-3]

2.14. What are the risks when a loan is secured by a mortgage?

- the collateral may be illiquid or its realisation price may be less than the amount of the loan granted to the borrower; [3]
- a pledge of assets does not guarantee repayment of the loan; [1]
- no additional risks, as the funds invested are always repaid in the event of default by the Project Owner through the realisation of the Project Owner's collateral. *if this answer is ticked, the financing transaction is considered unacceptable to the financier*

2.15. What are the risks inherent in securing the repayment of a loan with a guarantee or surety?

- the assets held by the guarantor or surety may not be sufficiently liquid to realise a successful repayment of the invested funds; [3]
- the guarantor or surety may be in poor financial condition; [2]
- no additional risks. *if this answer is ticked, the financing transaction is considered unacceptable to the financier*

2.16. For what period do you intend to make each investment, i.e. how long do you intend to hold the investment, or do you intend to dispose of it as soon as possible on the secondary market?

I intend to invest for the long term and to hold the investment until the end of the projects published on the platform in which I will invest; [3]

I intend to invest for the short term and to dispose of the investment on the secondary market before the end of the projects in which I will invest; [-3]

2.17. Do you intend to invest in riskier projects (with a medium or higher credit risk) and, if so, what proportion of your investment will be in such projects?

not; [3]

I intend to invest up to 30% of my investment portfolio in riskier projects; [2]

I intend to invest 30-40% of my investment portfolio in riskier projects; [0]

I intend to invest more than 40% of my investment portfolio in riskier projects; [-3]

I intend to invest my entire investment portfolio in riskier projects, as I want to maximise the return on my investment; *if this answer is ticked, the financing transaction is considered as not acceptable to the financier*

2.18. What is the purpose of investing in crowdfunding projects published on the platform?

I want to make long-term and safe investments with the aim of earning a conservative, predetermined return; [2]

I want to diversify my investment portfolio and invest part of it in crowdfunding transactions; [2]

I want to make short-term investments and aim to maximise the return on my investment; *if this answer is ticked, the financing transaction is considered not acceptable to the financier*

2.19. Are sustainability factors important to you when investing in Projects?

Yes; [1]

no. [0]

2.20. What sustainability factors are important to you when investing in Projects?

environmental and other similar social issues; [1]

respect for working conditions and other similar social issues; [1]

respect for human rights and the fight against corruption and bribery and other similar issues; [1]

none of the above. [0]

2.21. Do you have a goal of investing in projects that are sustainability oriented as part of your loan portfolio?

Yes; [1]

no. [0]

3. Customer identification information for the purposes of preventing money laundering and terrorist financing

In order to ensure proper compliance with AML/CFT requirements, we also ask you to provide answers to the questions below.

3.1. Please indicate the amount you intend to invest in the crowdfunding platform in a calendar year:

up to €1 000;

between €1 000 and €10 000;

between €10 000 and €50 000;

more than EUR 50 000. [enhanced identification is applied in this case and proof of origin is requested]

3.2. What is the purpose of the crowdfunding platform?

to finance projects published on the platform, with a view to achieving a potential financial return;

Other: [enhanced identification and proof of origin requested]

4. **Information on contacts with politically exposed persons.** Before marking the answers, please familiarise yourself with the concepts of '**politically exposed person**'³, '**important public office**'⁴, '**close family member**'⁵ and '**close associate**'⁶.

4.1. Are you a politically vulnerable (affected) person?

Yes;

no.

4.2. Are you a close family member of a politically exposed person?

Yes;

no.

4.3. Are you a close associate of a politically vulnerable/influenced person?

Yes;

no.

4.4. If you have answered yes to any of the above questions, please indicate the politically exposed person and his/her position:

[if at least one question is answered in the affirmative, enhanced identification is applied and additional requests for proof of origin are made]

³ **Politically vulnerable (affected) person** - a natural person who is or has been entrusted with an important public office, and their close family members or close associates.

⁴ **Important public duties** - duties in the Republic of Lithuania, the European Union, international or foreign institutions:

- 1) head of state, head of government, minister, deputy minister or deputy minister, secretary of state, chancellor of parliament, government or ministry;
- 2) Member of Parliament;
- 3) a member of supreme courts, constitutional courts or other supreme judicial bodies whose decisions cannot be appealed;
- 4) the mayor of the municipality, the director of the municipal administration;
- 5) a member of the governing body of the supreme audit and control institution of the State or the chairman, deputy chairman or member of the board of directors of a central bank;
- 6) an ambassador, a temporary trustee, the Commander of the Lithuanian Armed Forces, the commanders of armed forces and formations, the Chief of Defence Staff or a high-ranking officer of a foreign country's armed forces;
- 7) a member of the management or supervisory body of a state-owned enterprise, joint-stock company, or private limited liability company whose shares or part of the shares carrying more than 1/2 of the total number of votes at the general meeting of shareholders of such companies are owned by the state;
- 8) a member of the management or supervisory body of a municipal company, joint-stock company or private limited liability company whose shares or part of the shares carrying more than 1/2 of the total number of votes at the general meeting of shareholders of these companies are owned by the municipality and which are considered to be large companies under the Law on Financial Reporting of Enterprises in Lithuania;
- 9) the head of an international intergovernmental organisation, his/her deputy, or a member of its governing or supervisory body;
- 10) the head of a political party, his deputy, or a member of its governing body.

⁵ **Close family member** - spouse, registered partner (cohabitants), parents, brothers, sisters, children and children's spouses and children's cohabitants.

⁶ **A close helper:**

- 1) a natural person who is a member of the same legal person or unincorporated organisation or has other business relations with a person who holds or has held an important public office;
- 2) a natural person who is the sole beneficiary of a legal person or an organisation without legal personality established or operating *de facto* for the purpose of benefiting, whether financially or otherwise, a person who holds or has held an important public office.