

Target Market Statement

Novia Global Europe Global Investment Account (GIAE)

For Advisers

The Novia Global Europe Global Investment Account is provided and distributed exclusively through Novia Global Europe Ltd, operating under its MiFID II license.

This product is designed to support investors seeking a flexible, EU-regulated investment solution for medium to long-term wealth management.

Primary Target Market

The primary target market for this product is expatriates residing in the EU.

We define an expatriate as:

- ◇ An individual who is not currently residing in their country of nationality but is residing within an EU member state.
- ◇ Typically, this includes UK nationals or other non-EU nationals who have relocated to the EU for work, retirement, or other long-term personal reasons.

Additional Eligible Client Groups

Under MiFID II, a professional client is a client who possesses the experience, knowledge, and expertise to make investment decisions and properly assess the risks involved.

This includes:

Per Se Professional Clients, such as:

- ◇ Regulated financial institutions, including:
 1. Credit institutions
 2. Investment firms
 3. Insurance companies
 4. Collective investment schemes and their management companies
 5. Pension funds and their management companies
 6. Commodity and commodity derivatives dealers
 7. Other authorised or regulated financial institutions
- ◇ Large undertakings that meet two or more of the following size criteria:
 1. Total balance sheet of €20 million or more
 2. Net turnover of €40 million or more
 3. Own funds of €2 million or more

Elective Professional Clients, who may opt to be classified as professional if they meet at least two of the following criteria:

1. Significant trade volume – Executed at least 10 transactions per quarter of significant size in the past four quarters.
2. Portfolio size – Holds a financial instrument portfolio exceeding €500,000.
3. Relevant experience – Has worked in the financial sector for at least one year in a role requiring investment knowledge.

Clients for Whom This Product Is NOT Suitable

The Novia Global Europe GIAE is not suitable for:

- ◇ EU nationals residing in their country of nationality.
- ◇ EU nationals residing in non-EU jurisdictions (these clients must be referred to Novia Global UK for an alternative solution).
- ◇ Clients without an authorised financial adviser (direct-to-consumer business is not accepted).
- ◇ Investors looking to hold significant cash balances as a long-term strategy. Savers looking for risk-free cash solutions will find better options elsewhere.
- ◇ Investors seeking capital guarantees or risk-free returns.
- ◇ Clients unwilling to take investment advice or preferring to manage their own investments.
- ◇ US Persons (as defined by FATCA regulations).
- ◇ Individuals or entities from jurisdictions subject to bans or restrictions under local AML guidelines (refer to AML guidance for further details).
- ◇ Investors seeking non-standard or highly complex financial products not approved by the platform.

Adviser Considerations

Our target advisers are regulated firms operating within the EU, adhering to MiFID II standards, including:

- ◇ Advisers with cross-border expertise who understand the complexities of expatriate financial planning.
- ◇ Advisers who support clean, transparent platform pricing and client-agreed remuneration structures.

Adviser Requirements & Controls

- ◇ Advisers must be authorised in an EU member state and maintain an active Terms of Business agreement with Novia Global Europe.
- ◇ MiFID II compliance requires advisers to conduct ongoing suitability assessments to ensure clients receive appropriate investment advice.
- ◇ Direct-to-consumer business is not accepted – all clients must engage with a regulated financial adviser.

Product Features & Investment Controls

To ensure positive client outcomes, the following safeguards are in place:

- ◇ Only authorised advisers regulated under MiFID II may distribute the product.
- ◇ Only 'clean' share classes are offered, ensuring full cost transparency.
- ◇ Investment options that are approved by the platform and align with MiFID II standards.
- ◇ Multi-currency options are available for all investors.
- ◇ Withdrawals are restricted to verified bank accounts in the client's name to prevent third-party payments.
- ◇ Investments are limited to non-complex, MiFID II-compliant assets.

Client Suitability & Risk Profile

The Novia Global Europe GIAE is designed for:

- ◇ Retail or professional clients with a medium to long-term investment horizon (typically 3–5 years).
- ◇ Investors willing to accept capital risk, with an understanding that investment values can fluctuate.
- ◇ Clients seeking a transparent investment solution with access to regulated financial products that meet MiFID II suitability criteria.
- ◇ Individuals looking to consolidate existing investments or transfer assets from other providers, particularly those with cross-border financial needs.
- ◇ Investors with a basic understanding of financial products who consent to receiving investment advice, where required by regulation.

Vulnerable Clients

Any client can become vulnerable, either temporarily or permanently.

- ◇ Novia Global staff are trained to assist advisers in supporting vulnerable clients and their representatives.
- ◇ Vulnerable clients will receive the same high level of service as all other clients, with additional support where required.

Key Risks

- ◇ Tax treatment varies by jurisdiction – Clients may be subject to income tax, capital gains tax, or wealth tax, depending on local regulations.
- ◇ Investments should be considered as part of a long-term financial strategy, aligned with the client's risk profile and financial circumstances.
- ◇ Investment values can go down as well as up, and clients may not recover their full capital.
- ◇ Past performance is not a reliable indicator of future returns.