A.J.K. Wealth Management Ltd

Disclosure and Market Discipline Report

FOR THE YEAR ENDED 31 DECEMBER 2025

According to Part Six of Regulation (EU) 2019/2033 of the European Parliament and of the Council of the prudential requirements of investment firms.

APRIL 2026

DISCLOSURE

*The Disclosure and Market Discipline Report for the year 2025 has been prepared by A.J.K. Wealth Management Limited as per the requirements of Regulation (EU) 2019/2033 (the "**IFR**"), the Directive EU 2019-2034 (the "**IFD**") and Law 165(I)/2021 on the prudential supervision of investment firms (the "**Prudential Law**") issued by the Cyprus Securities and Exchange Commission (the "**CySEC**").*

A.J.K. Wealth Management Limited states that any information that was not included in this report was either not applicable on the Company's business and activities -OR- such information is considered as proprietary to the Company and sharing this information with the public and/or competitors would undermine the Company's competitive position.

A.J.K. Wealth Management Limited is regulated by the Cyprus Securities and Exchange Commission under License number 139/11.

The Legal Entity Identifier of *A.J.K. Wealth Management Limited is 529900IWOTE6JQGD7O56*

Contact Us	
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The Board of Directors is ultimately responsible for the risk management framework of the Company. The Risk Management framework is the sum of systems, policies, processes and people within the Company that identify, assess, mitigate and monitor all sources of risk that could have a material impact on the Company's operations.

The Board of Directors approves in full the adequacy of Risk Management arrangements of the institution providing assurance that the risk management systems in place are adequate with regards to the institution's profile and strategy.

Contents

1. INTRODUCTION

1.1 Group Information

AJK Wealth Management Group Limited (the "**AJK Group**") was incorporated in Cyprus with registration number HE 118700 and is the parent holding company of A.J.K. Wealth Management Limited (the "**AJK"** or "**Company"**), which was incorporated in Cyprus on 19th April 2011 with registration number HE 277477. The Company obtained a Cyprus Investment Firm ("**CIF**") authorized by the Cyprus and Exchange Commission (the "**CySEC**" or the "**Commission**"), CIF license No. 139/11 on 24 November 2010 to provide the following Investment and Ancillary Services in trading with the Financial Instruments listed below, in accordance with Part I, II and III of the Law 87(I)/2017:

Investment Services

- Reception and transmission of orders in relation to one or more financial instruments (1)
- Portfolio Management (4)
- Provision of Investment Advice (5)

Note: In brackets (…) the number of the investment service as referred in the Law 87(I)/2017.

Ancillary Services

- Safekeeping and administration of financial instruments, including custodianship and related services (1)
- Foreign exchange services where these are connected to the provision of investment services (4)

Note: In brackets (…) the number of the investment service as referred in the Law 87(I)/2017.

Financial Instruments:

- Transferable securities (1)
- Money Market instruments (2)
- Units in collective investment undertakings (3)
- Options, futures, swaps, forward rate agreements and any other derivative contracts relating to securities, currencies, interest rates or yields, or other derivatives instruments, financial indices or financial measures which may be settled physically or in cash (4)
- Options, futures, swaps, forward rate agreements and any other derivative contracts relating to commodities that must be settled in cash or may be settled in cash at the option of one of the parties (otherwise than by reason of a default or other termination event) (5)
- Options, futures, swaps, and any other derivative contract relating to commodities that can be physically settled provided that they are traded on a regulated market or/and an MTF (6)
- Options, futures, swaps, forwards and any other derivative contracts relating to commodities, that can be physically settled not otherwise mentioned in point 6 of Part III and not being for commercial purposes, which have the characteristics of other derivative financial instruments, having regard to whether, inter alia, they are cleared and settled through recognized clearing houses or are subject to regular margin calls (7)
- Derivative instruments for the transfer of credit risk (8)
- Financial contracts for differences (9)
- Options, futures, swaps, forward rate agreements and any other derivative contracts relating to climatic variables, freight rates, emission allowances or inflation rates or other official

economic statistics that must be settled in cash or may be settled in cash at the option of one of the parties (otherwise than by reason of a default or other termination event), as well as any other derivative contract relating to assets, rights, obligations, indices and measures not otherwise mentioned in this Part, which have the characteristics of other derivative financial instruments, having regard to whether, inter alia, they are traded on a regulated market or an MTF, are cleared and settled through recognized clearing houses or are subject to regular margin calls (10).

Note: In brackets (...) is the number of the financial instruments as referred in CIF Law.

Cross Border Services to Member States: Provision of investment advice services

Investment advice services provided to the following Member States: Austria, Belgium, Bulgaria, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Iceland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden.

The Company is also a member of the Investor Compensation Fund pursuant to the Investor Compensation Fund Directive DI87-07 (the “**ICF Directive**”) of 2019, as amended in 2020.

The table below illustrates the current license information of the Company:

Table 1: Company License Information (based on the First Appendix of the Law 87(I)/2017)

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<tr><th></th><th></th><th colspan="9">Investment Services and Activities</th><th colspan="7">Ancillary Services</th></tr>
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1.2 Scope of Application

The Disclosures and Market Discipline Report (the “**Disclosures**” or the “**Report**”) has been prepared on a consolidated basis for the period from 1st January 2025 until 31st December 2025, in accordance with the disclosure requirements set out in Part Six of the IFR and Paragraph 37 of the Prudential Law.

In line with these requirements, the Company is required to disclose information relating to its risk exposure, management, objectives and policies, as well as the most important characteristics of the Company’s capital requirements, remuneration policies, practices and governance standards. The scope of this report is to promote market discipline and to improve transparency of market participants.

The consolidated basis of this Report includes A**.J.K. Wealth Management Group Limited, A.J.K. Wealth Management Limited** and **A.J.K. Wealth Management (Schweiz) AG** (the "**AJKAG**"), with the prudential consolidation applied in line with the IFR requirements. Although the figures are presented on a consolidated basis, it is important to note that the Risk Management framework referenced throughout the Report pertains to the CIF, as the AJKAG in the consolidation is not subject to Risk Management obligations under the applicable regulations.

The Disclosures are based on the audited financial statements of the Company for the year ended 31 December 2025; which are prepared in accordance with International Financial Reporting Standards (the "**IFRS**") as adopted by the European Union (the "**EU**") and the requirements of the Cyprus Companies Law, Cap.113. As the Disclosures & Market Discipline Report and the Financial Statements serve different purposes, the reported figures illustrate differences, which relate to the differences in the fundamental concepts between the IFR and the IFRS.

1.3 Classification and prudential requirements

Under the current prudential regulatory framework, IFD and IFR, all Investment Firms (the **"IFs")**, IFs are classified as Class 1, 2 or 3 IFs, based on their activities, systemic importance, size and interconnectedness. The largest and most systemic investment firms are classified as Class 1, and have an equivalent treatment as credit institutions in the sense of a level playing field accordingly and they will fall entirely under the **Regulation (EU) No 575/2013 (the "CRR"**).

IFs categorized as Class 2 and Class 3 must comply with the provisions of the IFR/IFD prudential regulatory regime for IFs introduced back in June 2021. IFs that meet **all of** the below criteria are categorized as Class 3 IFs and thus qualify as a small and non-interconnected IFs, while when they exceed any of the following specific size thresholds, are categorized as Class 2 IFs.

Table 2: Threshold Criteria

No.	Criteria	Threshold
1.	Assets Under Management (AUM)	< €1.2 billion
2.	Client Orders Handled (COH) – cash trades	< €100 million/day
3.	Client Orders Handled (COH) – derivative trades	< €1 billion/day - derivatives
4.	Assets safeguarded and administered (ASA)	0
5.	Client Money Held (CMH)	0
6.	Daily Trading Flow (DTF)	0
7.	Net Position Risk (NPR)	0
8.	Clearing Margin Given (CMG)	0
9.	Trading Counterparty Default (TCD)	0
10.	On - and off - balance sheet total of investment firm	< €100 million
11.	Total annual gross revenue from investment services and activities of the investment firm	< €30 million

Further to the above thresholds, the Company is categorized as **Class 2 Investment Firm** since it exceeds certain thresholds, and more specifically, Clients Money Held (COH), and, as such, it should maintain own funds at least the higher between:

A. *Permanent minimum capital requirement*

The permanent minimum capital requirement of Class 2 IFs has been set to €150,000, since it is not authorized to provide the investment service of "dealing on own account" but it is permitted to hold clients' money and assets.

B. *Fixed Overhead Requirement*

The Fixed Overheads Requirement (the **"FOR"**) is calculated as 25% (1/4) of the preceding year's fixed expenses (based on the audited financial statements).

C. *K-Factor Requirement*

The K-Factors are quantitative indicators representing the specific risks IFs face and the risks they pose to customers/markets. Specifically, pursuant to Article 15 of the IFR capital requirements from applying the K-Factors formula is the sum of the Risk-to-Customer (the "**RtC**") K-Factors, Risk-to-Market (the "**RtM**"), Rik to Client (**"RtC"**) and Risk-to-Firm (the "**RtF**") proxies.

1.4 Regulatory Framework

The Disclosures have been prepared in accordance with the regulatory regime for IFs adopted by the European Parliament, the IFR and IFD, as well as the relevant provisions of the Prudential Law, and "The Capital Adequacy Investment Firms Law of 2021", Law 164(I)/2021, amending Law 97(I)/2021 (the "**Capital Adequacy Law**"). The IFR establishes the prudential requirements in terms of own funds, level of minimum capital, concentration risk, liquidity requirements and level of activity with respect to small and non-interconnected investment firms.

Furthermore, IFR introduced significant changes in the prudential regulatory regime applicable to Investment Firms including a new classification system, an amended minimum initial capital and minimum capital ratios, changes to the calculation of the capital requirements, the reporting requirements and the internal governance policies and the introduction of the K-Factors methodology and new measures relating to liquidity requirements, large exposures and consolidation requirements.

The Regulatory framework consists of:

- **Basic Prudential Requirements**: Covers minimum regulatory capital requirement and liquidity requirements (Part Three of IFR);
- **Internal Capital Adequacy and Risk Assessment Process** (the "**ICARA**")**:** Regulates the investment firm's accountability to the regulator for capital and liquidity adequacy. If the regulator deems the capital to be insufficient, a corrective requirement can be imposed on the company in the form of what is known as a "SREP" (Chapter 2 of Title IV of IFD); and
- **Disclosures Requirement:** Based on the requirements of Part Six of the IFR, an obligation to disclose regarding prudential requirements, risk management and remuneration policy and practices, investment policy, which may also extend to environmental, social and governance risks (ESG).

The Company has prepared the Disclosures in accordance with the applicable regulatory requirements as set out in Part Six of the IFR. The provisions on disclosure requirements are described in Articles 46 to 53 of the IFR. In addition, these disclosures must be verified by the external auditors of the Company. The Company will be responsible for submitting its external auditors' verification report to CySEC, within a month from the publication of the Disclosures. The Company has included its risk managements disclosures on its website.

Materiality is based on the criterion that the omission or misstatement of information would be likely to change or influence the decision of a reader relying on that information for the purpose of making economic decisions. Where the Company has considered a disclosure to be immaterial, this was not included in the document.

Frequency

The Company has an obligation to publish information relating to risks and risk management on an annual basis at a minimum. The frequency of disclosure will be reviewed should there be a material change in the approach used for the calculation of capital or the business structure of regulatory requirements.

Location

According to the IFR, the Disclosures should be included in either the financial statements of the IF, if these are published or on their website. The external auditors of the Company issue a Limited Assurance Report on the information contained in the Report and this report is published on the Company's website at: http://ajkwealth.com/footer/mifid-disclosures/.

Furthermore, the Board and senior management have the overall responsibility for the internal control systems in the process of capital adequacy assessment and they have established effective processes to ensure that the full spectrum of risks faced by the Company is properly identified, measured, monitored and controlled to minimize adverse outcomes.

Verification

The Company's Disclosures are subject to internal review and validation prior to being submitted to the Board for approval. The Company's Disclosures have been reviewed and approved by the Board. In addition, the Remuneration disclosures as detailed in Section 5 of this document have been reviewed by the Board which have the responsibility of the Remuneration Policy.

In accordance with the IFR, the Disclosures must be verified by the external auditors of the IF. The Company is responsible to submit its external auditor's verification report to CySEC the latest within five months from the end of each financial year, the latest by the 31st May 2026.

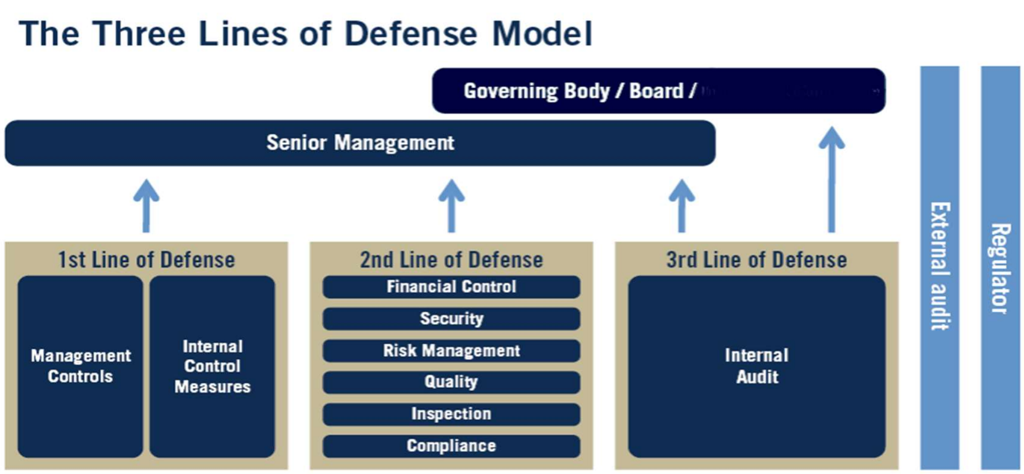
In addition the external auditor has performed certain procedures in accordance with International Standard on Assurance Engagements 3000 " Assurance Engagements Other Than Audits or Reviews of Historical Financial Information" in order to obtain limited assurance as to whether certain matters have come to the independent auditors attention that cause the auditor to believe that the disclosures are not fairly presented in all material respects in accordance with the requirement of Directive. The limited assurance report issued by the external auditor is submitted to CySEC.

2. RISK MANAGEMENT OBJECTIVES AND POLICIES

The Company's risk management and internal control systems include risk assessment, management and mitigation of risks, the use of control processes, information, communication systems and processes for monitoring and reviewing their continuing effectiveness. The risk management and internal control systems are embedded in the operations of the Company and are capable of responding quickly to evolving business risks, whether they arise from factors within the Company or from changes in the business environment.

The Company applies the "three lines of defence" model for managing risk. The three lines of defence are a clear and consistent organizational and operational structure, including decision-making powers, reporting and functional links and segregation of duties which are clearly defined, transparent, consistent, complete, and free from conflicts of interest.

The Company's risk and compliance management system for the control of company risks is based on the three lines of defence model.



First line of defence: The business management which has day-to-day ownership, responsibility and accountability for assessing, controlling and managing risk. The business function and all support functions (managers and employees) that generate exposure to a risk make up the first line of defence. All employees are required to ensure the effective management of risks within the scope of their direct organisational responsibilities. The senior management takes the lead role with respect to implementing and maintaining appropriate controls across the business to ensure the quality standards expected by clients and regulators.

Second line of defence: The second line of defence is performed by the independent risk functions (including compliance), working with the business to provide support and challenge on risk management, and helping to set risk appetite and strategy, define risk reporting and ensure the adequacy of risk mitigation. It consists of activities covered by several components of internal governance such as compliance, risk management, legal functions, IT and other control departments. The role of these functions is to provide independent oversight and challenge the risk management activities performed by the first line of defence. These functions are responsible for ensuring that the risks are managed in accordance with the risk appetite defined by senior management and to foster a strong risk culture across the Company. They must also provide guidance, advice and expert opinion in all key risk-related matters.

Third line of defence: The third line of defence is provided by internal audit. As the last layer of control, regularly assesses policies, methods and procedures to ensure they are adequate and are being implemented effectively in the management and control of all risks. It provides independent assurance on the first and second lines, and the appropriateness and effectiveness of policy implementation and internal controls.

2.1 Risk Management Framework

The Company's Risk Management Framework (the **"RMF"**) forms an integral part of its overall business processes and is supported by a structured and consistent policy framework designed to identify, assess, monitor and manage risks arising from its activities. A key priority for the Company is the development of a forward-looking risk management approach, supported by a sound control environment. This enables the Company to respond effectively to changes in the economic, social and regulatory environment in which it operates.

The establishment of a strong and consistent risk culture across the Company is a fundamental component of the RMF. Risk culture underpins the decision-making processes that govern the day-to-day organization. Employees are regularly informed and trained on the risks relevant to their roles and are encouraged to promptly escalate any identified issues to Senior Management, the Board of Directors or the relevant control functions, ensuring timely and effective response and mitigation.

The RMF is designed to ensure that appropriate policies and procedures are in place for the identification, assessment, monitoring and management or risks arising from the Company's activities, while also defining the level of risk the Company is willing to accept in line with its risk appetite. It provides a structured process for identifying potential events that may affect the Company's operations, managing those risks within defined parameters, and supporting the achievement of its strategic objectives.

The Company's risk management process is supported by the coordinated interaction of key functions, including the Accounts and Operations Departments, the Risk Management Function, the Compliance Function and the Internal Audit Function. Taking into account the nature, scale and complexity of the Company's business and the range of investment services provided, these functions work together to ensure the effectiveness, accuracy and continuous improvement of the Company's risk management and monitoring framework.

The Company also maintains business continuity and operational resilience arrangements as part of its overall risk management framework, designed to ensure the continuity of critical operations and the timely recovery of services in the event of disruptions. These arrangements are proportionate to the nature, scale and complexity of the Company's activities.

2.2 Risk Statement

In 2025, AJK operated within a complex and evolving global environment characterized by continued geopolitical tensions, elevated interest rates and persistent macroeconomic uncertainty.

Developments such as the ongoing conflict in Ukraine and instability in the Middle East, continued to affect global markets, contributing to increased volatility in energy prices, inflationary pressures and uncertainty in global economic activity.

Throughout the year, the international sanctions framework continued to evolve in response to geopolitical developments, particularly concerning Russia, Belarus and certain Middle Eastern jurisdictions. These development increased regulatory complexity and required enhanced monitoring and control mechanisms. In response, the Company further strengthen its internal systems, policies, and procedures, and allocated additional resourced to ensure effective monitoring of sanctions-related risks and continued compliance with applicable regulatory requirements. The Compliance Function (the "**CF**") and Senior Management remained actively engaged in overseeing these developments and participated in targeted training to address emerging risks.

In this environment, AJK maintained a proactive and forward-looking approach to risk management. Where necessary, adjustments were made to its operations, internal controls and investment processes to mitigate the impact of external risks and ensure continued alignment with its risk appetite.

AJK continues to adopt a holistic approach to risk management, recognizing the interdependence between different types of risks. Its risk management framework is subject to ongoing review and enhancement to ensure alignment with regulatory developments, market conditions and the Company's strategic objectives.

Overall, AJK maintains a sound and effective risk management framework, supported by appropriate governance arrangements, policies and procedures, enabling the identification, assessment, monitoring and management of risks arising from its activities. Based on the assessment performed, the Company's risk profile during 2025 remained within the defined risk appetite and consistent with the nature, scale and complexity of its operations.

Furthermore, following CySEC's assessment, the Company is subject to prudential consolidated supervision under the IFR. Accordingly, the disclosures presented in this Report are prepared on both an individual (solo) and consolidated basis.

2.3 Risk Strategy

Within the overall RMF, the Company aligns the risk management strategies with its business strategy, operational processes and capabilities. In its organizational structure supports this alignment by clearly defining roles, responsibilities and reporting lines, as well as assigning ownership for each key risk area, based on the nature of the activities and the risks involved.

The Company establishes clear guidelines regarding acceptable risk-taking and defines appropriate actions for managing identified risks, ensuring that these remain within its risk appetite.

The Board of Directors has overall responsibility for setting the Company's risk strategy and overseeing its implementation. It determines the policies and strategies for managing the various risk categories, assigns ownership of significant risks and evaluates the effectiveness of the control framework in place.

In addition, the Investment Committee supports the implementation of the risk strategy by providing oversight and guidance in relation investment-related risks and ensuring that decisions remain aligned with the Company's RMF.

2.4 Risk Appetite Statement

The Company's risk appetite is aligned with the financial and strategic planning processes for the purpose of ensuring that both risks and opportunities are considered during the strategic decision-making process. The Board is responsible for setting the direction of the Company's risk taking and reviews and approves the risk appetite statement at least annually.

The Company's low-risk appetite is embedded in the Company's investment philosophy when rendering investment services to its customers, who are primarily aiming at wealth preservation.

The Company's risk appetite is set by taking into consideration its current risk profile and business environment. The key principles applicable across all activities are as follows:

a) Own funds are targeted to be equal or greater to €225,000;
b) Zero tolerance is applied in relation to internal fraud and breaches to regulatory requirements;
c) Low tolerance is applied in relation to operational risks and associated losses.

The Company undertakes only those risks that:
a) Are consistent with its strategy and capabilities;
b) Can be effectively understood, measures and managed;
c) Do not expose the Company to:
   - material financial loss affecting its viability or ability to execute its strategy;
   - breaches of applicable laws and regulations that could result in loss of license, sanctions or significant fines;
   - damage to its reputation and brand name.

To support the implementation of its risk appetite, the Company establishes forward-looking thresholds and key risk indicators, which are monitored on an ongoing basis. These indicators provide early warning signals and support timely escalation and decision-making.

Table 3: Risk Appetite Areas

Risk Appetite Metrics	Normal	Critical	Crisis
Minimum Own Fund Requirement	≥€225,000	<€225,000	€150,000
CET1 Ratio	≥75%	<75%	56%
Total Capital Ratio	≥150%	100%-150%	100%
AT1 Capital Ratio	≥150%	100%-150%	100%
Liquid Assets	≥€33,000	<€33,000	€21,000

Threshold Interpretation:

- **Normal:** Within the Company’s risk appetite and acceptable limits.
- **Critical:** Requires proactive management actions to prevent deterioration.
- **Crisis:** Immediate corrective actions are required to restore acceptable levels.

During 2025, the Company remained within the “Normal” thresholds for all key indicators, including CET1 ratio, Total Capital Ratio and Own Funds. In the event of a breach of the defined thresholds, whether under normal or stressed conditions, Senior Management and the Board are promptly informed, and appropriate remedial actions are implemented without delay.

2.5 Board of Directors - Risk Management Declaration

The Board of Directors is responsible for reviewing, at least annually, the adequacy and effectiveness of the Company’s RMF, as well as ensuring that the risk management arrangements and systems of financial and internal control are appropriate to the Company’s risk profile and business activities.

These systems are designed to manage, rather than eliminate, the risks of failure to achieve the Company’s business objectives and, and as such, provide reasonable, but not absolute, assurance against material misstatement, loss or fraud.

Based on the assessment performed, the Board of Directors confirms that the Company maintains adequate risk management arrangements, internal control systems and governance structures, which are appropriate to the nature, scale and complexity of its activities and consistent with its overall risk strategy.

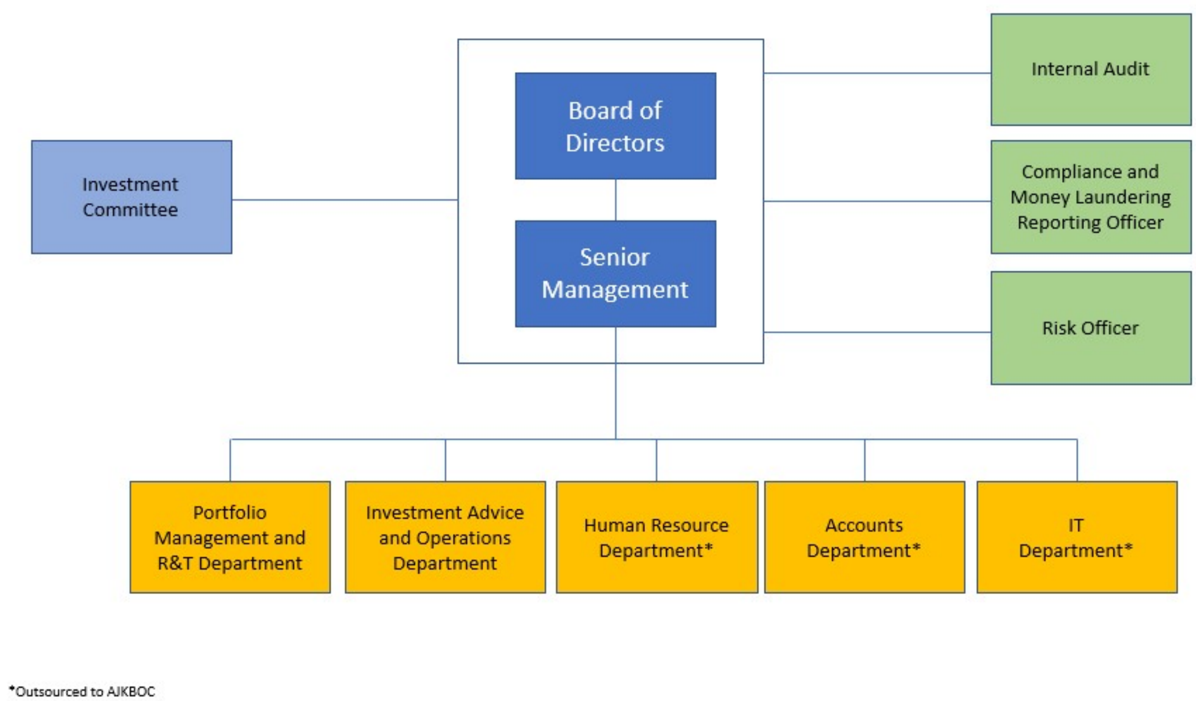
3. CORPORATE GOVERNANCE

The Company maintains a robust governance framework supported by effective risk management and internal control systems. These include structured processes for the identification, assessment and mitigation of risks, as well as appropriate information, communication and monitoring mechanisms to ensure their ongoing effectiveness.

The internal control framework is embedded within the Company's operations and is designed to respond effectively to evolving risks arising from both internal and external factors.

3.1 Organizational Structure

The Company's organizational structure is designed to ensure compliance with applicable laws and regulations, while supporting the achievement of its strategic objectives. The Company's Organizational Structure is shown below:



The outlined organizational structure clearly defines reporting lines, roles and responsibilities and ensures effective internal communication and oversight. The Company takes appropriate measures to ensure that all personnel possess the necessary skills, knowledge, and expertise required for their roles and are adequately informed of the procedures relevant to their responsibilities.

Ongoing training forms an integral part of the Company's framework, ensuring that employees remain up to date with regulatory developments and market practices.

The Company also ensures that the performance of multiple functions by relevant persons does not give rise to conflicts of interest or impair their ability to perform their duties in an independent and professional manner.

3.2 Board of Directors

The Board of Directors (the "**Board**") has the overall responsibility for the Company and is responsible for setting and overseeing the implementation of its strategic objectives, risk management framework and internal governance arrangements.

The Board ensures the integrity of financial and operational reporting, the effectiveness of internal controls and compliance with applicable legal and regulatory requirements. The Board is responsible for providing effective supervision of senior management, and monitors and periodically assesses the effectiveness of the Company's governance arrangements and takes appropriate steps to address any deficiencies.

The Board approves key policies and procedures, including those relating to risk management and monitors the Company's risk profile, capital adequacy and ICARA process.

The Board meets regularly to review the Company's strategy, financial performance and key risk and compliance matters, and may convene additional meetings as required.

3.2.1 Composition of Board of Directors

All members of the Board commit sufficient time to effectively perform their duties and responsibilities. The number of directorships held by members of the Board takes into account individual circumstances of each member, as well as the nature, scale and complexity of the Company's activities.

In accordance with the applicable regulatory framework, members of the management body of a CIF that is considered significant in terms of its size, internal organization and the nature, the scope and the complexity of its activities, shall not hold more than one of the following combinations of directorships at the same time:

- one executive directorship with two non-executive directorships;
- four non-executive directorships.

Directorships held in organizations which do not pursue predominantly commercial objectives, such as non-profit or charitable organizations, are not taken into account for the purposes of the above guidelines.

A CIF is considered as a "significant CIF", where its on- and off-balance sheet assets are, on average, greater than €100,000,000 over the four-year period immediately preceding the given financial year. In accordance with CySEC Circular C487 dated 10th February 2022, CIFs are required to assess whether they meet the above threshold within four months from the end of each financial year.

The assessment is performed internally and is communicated to the Board and Senior Management in a form of a Memo. The Company has assessed whether its on and off-balance sheet assets are on average greater than €100,000,000 over the four-year period immediately preceding the given financial year. Based on this assessment, the Company's average on- and off- balance sheet assets remained below the applicable threshold and, therefore, the Company is not considered a "significant CIF" for the purposes of the above requirements.

Nevertheless, the Company ensures that the Board do not hold directorships or commitments that could prevent from devoting sufficient time and attention to the performance of their duties.

During the reporting period, the Board consisted of:

- three Executive Directors;
- two Non-Executive Directors; and
- two Independent Non-Executive Directors.

Taking into account the size, internal organization and the nature, scope and complexity of the Company's activities, the Company has determined that the establishment of a separate Risk Management Committee, Nomination Committee or Remuneration Committee is not required under the principle of proportionality. Accordingly, the responsibilities relating to risk management, nomination and remuneration matters are undertaken by the Board. No separate Risk Committee meetings were held during the reporting period.

The table below discloses the number of directorships held by members of the Board of Directors as of 31 December 2025.

Table 4: Number of Directorships of the Members of the Board of Directors

Name of Directors	Position/Title	Country	Executive Directorships	Non-executive Directorships
Dr Andreas Karapatakis	Chairman - Non-Executive Director	Cyprus	0	2
George Malactos	Non-executive Director	Cyprus	0	1
Socrates Philippou	Managing Director - Executive Director	Cyprus	1	0
Pantelis Panteli	Head of Portfolio Management and R&T - Executive Director	Cyprus	1	0
Lydia Karapataki	Head of Investment Advisory and Operations Department – Executive Director	Cyprus	1	0
Philippos Charalambides	Independent Non - Executive Director	Cyprus	1	1
Julius Markides	Independent Non - Executive Director	Cyprus	0	1

For the purpose of the above, Executive or Non-Executive directorships held within the same group shall count as a single directorship.

3.2.2 Board Recruitment Policy

Recruitment into the Board combines and assessment of both technical capability and competency skills referenced against the Company's regulatory and operational framework. Without prejudice to the shareholders' right to appoint members when recruiting members of the Board, one of the Board's responsibilities is to identify, evaluate and select candidates for the Board and ensure appropriate succession planning.

The Board, should actively contribute to the selection of candidates for vacant Board positions and should:

a) Prepare a description of the roles and capabilities for a particular appointment;
b) Evaluate the adequate balance of knowledge, skills and experience of the Board member(s);
c) Assess the time commitment expected; and
d) Consider the objectives of the diversity policy.

The Money Laundering Compliance Officer (the "**MLCO**") is assigned the responsibility to review the qualifications of potential Board candidates and make recommendations to the Board.

The individuals proposed for appointment shall, at all times, be of sufficiently good repute and possess sufficient knowledge, skills and experience necessary to discharge their duties effectively. All members of the Board shall commit sufficient time to perform their duties. Prior to their appointment the proposed persons should obtain the approval of CySEC. The following factors should be considered in the review of potential candidates:

a) Specialized skills and/or knowledge in accounting, finance, banking, law, business administration or related subject;
b) Knowledge of and experience with financial institutions ("fit-and-proper");
c) Integrity, honesty and the ability to generate public confidence;
d) Knowledge of financial matters including understanding financial statements and financial ratios;
e) Demonstrated sound business judgment; and
f) Clean criminal record.

In line with the recent changes in the regulatory reporting framework (in accordance with ESMA & EBA Joint Guidelines on the assessment of the suitability of members of the management body and key function holders), the Company has established a written Board Recruitment Policy which is approved by the Board and included in the POM.

3.2.3 Policy on Diversity

The Company recognizes the importance of diversity in the composition of its Board of Directors, as diversity contributes to effective decision-making, sound governance and the overall effectiveness of the management body. The Company believes that a diverse Board enhances the quality of discussions and decision-making by promoting a broader range of perspectives, experience and expertise.

The Company's Board Diversity Policy aims to:

- promote diversity in the composition of the Board, including but not limited to gender, race, ethnicity, age, sexual orientation, disability, and cultural backgrounds;
- ensure that the Board collectively possess an appropriate balance of knowledge, skills, experience and competencies relevant to the Company's activities and strategic objectives;
- support independent judgement and effective decision making; and

- cultivate an inclusive culture that values and respects the contribution of all members of the Board.

The Company recognizes and embraces the benefits of having a diverse Board as an essential element in maintaining effective governance arrangements and enhancing the overall performance of the Company. Diversity considerations form part of the Board nomination and selection process, which seeks to ensure that candidates are assessed objectively and fairly based on merit, qualifications, experience, competence and the ability to contribute effectively to the management and oversight of the Company.

When assessing the composition of the Board and selecting candidates for appointment, the Company takes into consideration a range of diversity factors, including:

a) educational and professional background;
b) industry knowledge and experience;
c) technical expertise and specialized skills;
d) age and gender diversity;
e) cultural and international background; and
f) other qualities and competencies relevant to the Company's business model and governance structure.

The Board nomination and selection process is designed to be transparent, objective and free from discrimination or bias. The Company seeks to ensure that the composition of the Board remains appropriate in light of the size, internal organization and the nature, scale and complexity of the Company's activities.

In line with ESMA and EBA Joint Guidelines on the assessment of the suitability of members of the management body and key function holders, the Company has established a formal Board Diversity Policy, which is approved by the Board and incorporated into the Company's Policy and Operations Manual.

Given the size, internal organization and nature of the Company's activities, the Company has not established specific quantitative diversity targets. Nevertheless, the Board considers that the current composition of the management body reflects an appropriate balance of professional backgrounds, experience, knowledge and competencies relevant to the Company's business activities, strategic objectives and governance requirements.

3.2.4 Information Flow on Risk to the Management Body

Risk information flows is escalated to the Board through both the business units and control functions, ensuring effective oversight of the Company's risk profile. The Board receives regular reporting from key functions, including Risk Management, Compliance, Anti-Money Laundering, Internal Audit covering material risk exposures, control effectiveness and regulatory compliance matters, and approves the ICARA report. The main reports provided to the Board and relevant stakeholders are summarized below:

Table 5: Information Flow

No.	Report Name	Owner	Recipient	Frequency
1	Risk Management Report	Risk Officer	Senior Management, Board, CySEC	Annually
2	IF CLASS2 Solo & IF CLASS2 Con	Risk Officer/CFO	Senior Management, Board, CySEC	Quarterly
3	ICARA Report	Risk Officer/CFO	Senior Management, Board, CySEC (upon request)	Annually
4	Disclosure and Market Discipline Report	Risk Officer	Senior Management, Board	Annually
5	Risk Register	Risk Officer	Senior Management, Board	Annually
6	Compliance Report	MLCO	Senior Management, Board, CySEC	Annually
7	Internal Audit Report	Internal Auditor	Senior Management, Board, CySEC	Annually
8	Anti-Money Laundering Report	MLCO	Senior Management, Board, CySEC	Annually
9	Audited Financial Statements	External Auditor	Senior Management, Board, CySEC, CBC	Annually
10	Form 165-03 “Prudential Supervision Information”	Risk Officer/CFO	Senior Management, Board, CySEC	Annually
11	Monthly Prevention Statement	MLCO	Senior Management, CySEC	Monthly
12	Suitability Report	External Auditor	Senior Management, Board, CySEC	Annually
13	Complaints Report	MLCO	Senior Management, CySEC	Monthly
14	Quarterly Statistics	MLCO	Senior Management, CySEC	Quarterly
15	Shareholder Statement	MLCO	Senior Management, CySEC	Annually
16	Remuneration Reporting	Risk Officer/ CFO	Senior Management, Board, CySEC	Annually
17	Form 165-05 “Prudential Consolidation information”	Risk Officer/CFO	Senior Management, Board, CySEC	Annually

3.3 Risk Management Function

The Risk Management Function is responsible for monitoring the adequacy and effectiveness of the Company’s risk management policies, procedures and overall framework. It operates independently from business lines, forms part of the second line of defense, and is responsible for the identification, assessment and ongoing monitoring of all material risks.

The Risk Management Function is outsourced to A.J.K. Bureau of Consultants Limited (the “**AJK BOC**”), an affiliated entity licensed by CySEC as Administrative Service Provider. The outsourcing arrangement is governed by formal agreement, ensuring that the function is performed with the necessary expertise, independence and objectivity. The remuneration of the function fixed and determined annually, and is not linked to the performance of the Company.

The Risk Officer reports directly to Senior Management and the Board and is responsible for monitoring the implementation of the Company’s risk management framework, as approved by the Board, and ensuring alignment with applicable regulatory requirements. The function also contributes to the continuous development and enhancement of risk identification, measurement and monitoring processes.

In addition, the Risk Management Function is responsible for the periodic review and update of the Company's risk management policies and procedures, ensuring that they remain appropriate in light of changes in the Company's activities, risk profile and regulatory environment.

The Company considers that the risk management systems and controls in place are adequate and proportionate to its nature, scale and complexity, and are aligned with its risk profile and strategy.

3.4 Compliance Function

In accordance with the applicable regulatory requirements, the Board has established a Compliance Function responsible for the identification, assessment and monitoring of compliance risk. The compliance and anti-money laundering functions are performed by the same individual, the MLCO.

The MLCO is responsible for ensuring that the Company complies with its legal and regulatory obligations, internal policies and procedures, and applicable industry standards. This includes ongoing monitoring of the Company's operations and the activities of its personnel, to ensure that these are conducted in accordance with the internal control framework and the laws and regulations governing the provision of investment services.

In addition, the MLCO is also responsible for ensuring compliance with The Prevention and Suppression of Money Laundering and Terrorist Financing Law (the "**AML Law**") and the relevant CySEC AML Directives. The detailed policies, procedures and responsibilities relating to the prevention of Money Laundering and Terrorist Financing (the "**ML&TF**"), are set out in the Company's AML Manual.

The Compliance Function operates independently from the business lines, and the MLCO, as well as any relevant persons involved in compliance activities, are not engaged in the provision of the services they monitor. The remuneration of the function is structures so as not compromise their objectivity.

The Compliance Function is outsourced to AJK BOC, under a formal outsourcing arrangement. The remuneration is fixed and determined annually in accordance with the outsourcing agreement and is not linked to the performance of the Company.

To ensure effective performance of its duties, the MLCO, has direct access to Senior Management and the Board and is provided with full access to all relevant information, including systems and records. This ensures the independence of the function and its ability to perform its role in an objective and effective manner.

3.5 Internal Audit Function

The Internal Audit Function is responsible for independently reviewing and evaluating whether the Company's operations are conducted in accordance with applicable laws, regulations, internal policies and procedures. It provides assurance on the adequacy and effectiveness of the Company's internal control environment, governance arrangements and risk management framework.

As part of its role, the Internal Audit Function assesses whether risks that may adversely affect the Company are appropriately identified, monitored and managed, and whether the relevant controls are operating effectively.

The function constitutes the third line of defence and is outsourced to an independent external provider. The Internal Auditor reports directly to the Board and Senior Management, ensuring an appropriate level of independence and objectivity. The Internal Audit Function operates independently from all other functions and business activities of the Company. It has restricted access to all records, personnel and systems necessary to perform its duties effectively and is available to all employees for guidance or to raise matters of concern.

3.6 Investment Committee

The Company has established an Investment Committee, which is responsible for overseeing the investment strategy and providing guidance on portfolio management and investment advisory activities, taking into account prevailing market conditions and the Company's risk appetite.

The Investment Committee plays a key role in ensuring the investment decisions are aligned with the Company's strategic objectives, client profiles and regulatory requirements. It monitors market developments, reviews portfolio performance and risk exposures, and provides direction on asset allocation and investment parameters.

The Investment Committee is composed of executive and non-executive directors, and regularly reports to the Board, ensuring appropriate oversight and escalation of material matters.

During the year 2025, the Investment Committee met regularly in line with its mandate.

4. OWN FUNDS

Own Funds is the type and level of regulatory capital that the Company is required to maintain in order to absorb losses under both going concern and gone concern scenarios. During the year under review, the Company's primary objective in relation to capital management was to ensure that it complied with the imposed capital requirements with respect to its own funds and that the Company maintained healthy capital ratios in order to support its business. The Company throughout the year 2025, ensured that it complied with the regulatory capital requirements with respect to its own funds and that the Company maintained healthy capital ratios in order to support its business and protect its customers.

4.1 Composition of Regulatory Own Funds

The Company shall disclose information relating to their own funds according to Article 49(a) and (c) of the IFR. The following information provides a full reconciliation of the Common Equity Tier 1 (the **"CET1"**), Additional Tier 1 (the **"AT1"**) instruments and Tier 2 (the **"T2"**) instruments at a solo and consolidated basis. Both on solo basis and consolidated basis regulatory capital comprises fully CET1 capital with no AT1 or T2 capital in issue. The Composition of the Company's Own Funds as of 31 December 2025 are presented in the below table:

Table 6: IF CC1.01 - COMPOSITION OF REGULATORY OWN FUNDS AS OF 31 DECEMBER 2025

Regulatory Own Funds		Solo €'000	Consolidated €'000	Source based on reference numbers/letters of the balance sheet in the audited financial statements
1.	**OWN FUNDS**	545	741	
2.	**TIER 1 CAPITAL**	545	741	
3.	**COMMON EQUITY TIER 1 CAPITAL**	545	741	
4.	Fully paid up capital instruments	200	17	Ref 1 - Statement of Changes in Equity
5.	Share premium	-	-	N/A
6.	Retained earnings	386	-267	Ref 2, 4 - Statement of Changes in Equity
7.	Accumulated other comprehensive income	-	-	N/A
8.	Other reserves	-	1,053	Ref 3 - Statement of Financial
9.	Minority interest given recognition in CET1 capital	-	-	N/A
10.	Adjustments to CET1 due to prudential filters	-	-	N/A
11.	Other funds	-	-	N/A
12.	**(-) TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1**	-41	-41	
13.	(-) Own CET1 instruments	-	-	N/A
14.	(-) Direct holdings of CET1 instruments	-	-	N/A
15.	(-) Indirect holdings of CET1 instruments	-	-	N/A
16.	(-) Synthetic holdings of CET1 instruments	-	-	N/A
17.	(-) Losses for the current financial year	-	-	N/A
18.	(-) Goodwill	-	-	N/A
19.	(-) Other intangible assets	-	-	N/A

20.	(-) Deferred tax assets that rely on future profitability and do not arise from temporary differences net of associated tax liabilities	-	-	N/A
21.	(-) Qualifying holding outside the financial sector which exceeds 15% of own funds	-	-	N/A
22.	(-) Total qualifying holdings in undertaking other than financial sector entities which exceeds 60% of its own funds	-	-	N/A
23.	(-) CET1 instruments of financial sector entities where the institution does not have a significant investment	-	-	N/A
24.	(-) CET1 instruments of financial sector entities where the institution has a significant investment	-	-	N/A
25.	(-)Defined benefit pension fund assets	-	-	N/A
26.	(-) Other deductions	-41	-41	Ref 1 (Assets)
27.	CET1: Other capital elements, deductions and adjustments	-	-	N/A
28.	**ADDITIONAL TIER 1 CAPITAL**	-	-	
29.	Fully paid up, directly issued capital instruments	-	-	N/A
30.	Share premium	-	-	N/A
31.	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	-	-	N/A
32.	(-) Own AT1 instruments	-	-	N/A
33.	(-) Direct holdings of AT1 instruments	-	-	N/A
34.	(-) Indirect holdings of AT1 instruments	-	-	N/A
35.	(-) Synthetic holdings of AT1 instruments	-	-	N/A
36.	(-) AT1 instruments of financial sector entities where the institution does not have a significant investment	-	-	N/A
37.	(-) AT1 instruments of financial sector entities where the institution has a significant investment	-	-	N/A
38.	(-) Other deductions	-	-	N/A
39.	Additional Tier 1: Other capital elements, deductions and adjustments	-	-	N/A
40.	**TIER 2 CAPITAL**	-	-	
41.	Fully paid up, directly issued capital instruments	-	-	N/A
42.	Share premium	-	-	N/A
43.	(-) TOTAL DEDUCTIONS FROM TIER 2	-	-	N/A
44.	(-) Own T2 instruments	-	-	N/A
45.	(-) Direct holdings of T2 instruments	-	-	N/A
46.	(-) Indirect holdings of T2 instruments	-	-	N/A
47.	(-) Synthetic holdings of T2 instruments	-	-	N/A

48.	(-) T2 instruments of financial sector entities where the institution does not have a significant investment	-	-	N/A
49.	(-) T2 instruments of financial sector entities where the institution has a significant investment	-	-	N/A
50.	Tier 2: Other capital elements, deductions and adjustments	-	-	N/A

**According to Circular C334 and paragraph 11(6) of the Directive D187-07, the members of ICF are required to keep a minimum buffer of 3 per thousand of the eligible funds and financial instruments of their clients as at the previous year in a separate bank account in case there is need for an extraordinary contribution and this should not be used for any other purpose. Therefore, CIFs should deduct the additional cash buffer of 3 per thousand of the eligible funds and financial instruments of their clients from the Common Equity Tier 1 capital.*

4.2 Balance Sheet Reconciliation with Audited Financial Statements

As per Article 49(1) (a) of the IFR, IFs must disclose a full reconciliation of CET1 items, AT1 items and T2 items and applicable filters and deductions applied to own funds of the IFs and the balance sheet in the audited financial statements of the IF. The table below displays the reconciliation between the balance sheet presented in the financial statements of the Company with the balance sheet prepared for regulatory purposes for the year ended 31 December 2025:

Table 7: EU IF CC2 - Reconciliation of Regulatory Own Funds to Balance Sheet in the Audited Financial Statements

		a	b	c
No.	**Item**	**Balance sheet as in published/audited financial statements in**	**Under regulatory scope of consolidation**	**Cross reference to EU IF CC1**
		As at period end 31 December 2025 in €'000s	**As at period end 31 December 2025 in €'000s**	
Assets - ***Breakdown by asset classes according to the balance sheet in the audited financial statements***				
1.	Property, plant and equipment	-	2	N/A
2.	Intangible assets	-	55	N/A
3.	Other assets	-	463	N/A
4.	Financial assets at fair value through profit or loss	41	2,357	Ref 26
5.	Trade and other receivables	292	618	N/A
6.	Cash and cash equivalents	406	1,102	N/A
xxx	**Total Assets**	**739**	**4,597**	
Liabilities - ***Breakdown by liability classes according to the balance sheet in the audited financial statements***				
1.	Trade and other payables	109	491	N/A
2.	Current tax liabilities	44	123	N/A
xxx	**Total Liabilities**	**153**	**614**	
Shareholders' Equity				
1.	Share capital	200	17	Ref. 4
2.	Other reserves	-	1,053	Ref. 5
3.	Retained Earnings	386	2,914	Ref. 6
xxx	**Total Shareholders' Equity**	**586**	**3,984**	

4.3 Own Funds Main Features

As per Articles 49 (1) (b) of the IFR, the Company is required to describe the main features of CET1, AT1 and T2 instruments issued by the Company. The table below presents the Company's main features of the ordinary shares.

Table 8: EU IF CCA: Own Funds main features of own instruments issued by the Company

	Capital Instruments Main Feature	2024
1	Issuer	A.J.K. Wealth Management Limited
2	Unique identifier (i.e. CUSIP, ISIN or Bloomberg identifier for Public or private placement)	529900IWOTE6JQGD7O56
3	Public or private placement	Private
4	Governing Law(s) of the instrument	Cyprus Law
5	Instrument type	Ordinary shares
6	Amount recognized in regulatory capital	€200,000
7	Nominal amount of instrument	€1
8	Issue Price	€1
9	Redemption price	N/A
10	Accounting classification	Common Equity
11	Original date of issuance	24/11/2010
12	Perpetual or dated	N/A
13	Original maturity date	No maturity
14	Issuer call subject to prior supervisory approval	N/A
15	Optional call date, contingent call dates and redemption amount	N/A
16	Subsequent call dates, if applicable	N/A
	Coupons / dividends	N/A
17	Fixed or floating dividend/coupon	Floating
18	Coupon rate and any related index	N/A
19	Existence of a dividend stopper	No
20	Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A
21	Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A
22	Existence of step up or other incentive to redeem	No
23	Noncumulative or cumulative	Non-cumulative
24	Convertible or non-convertible	Non-convertible
25	If convertible, conversion trigger(s)	N/A
26	If convertible, fully or partially	N/A
27	If convertible, conversion rate	N/A
28	If convertible, mandatory or optional conversion	N/A
29	If convertible, specify instrument type convertible into	N/A
30	If convertible, specify issuer of instrument it converts into	N/A
31	Write-down features	N/A
32	If write-down, write-down trigger(s)	N/A
33	If write-down, full or partial	N/A
34	If write-down, permanent or temporary	N/A
35	If temporary write-down, description of write-up mechanism	N/A
36	Non-compliant transitioned features	N/A
37	If yes, specify non-compliant features	N/A
38	Link to the full term and conditions of the instrument (signposting)	N/A

5. PRUDENTIAL REQUIREMENTS

5.1 Own Funds Requirement

The Company, as a Class 2 IF, shall at all times have own funds at least the highest of the following:

- Fixed overhead requirement (FOR);
- Initial Capital (minimum capital requirement);
- K-Factors requirement.

5.1.1 Initial Capital Requirement

The initial capital requirement acts as a floor for all levels of capital required under the new prudential regime. The initial capital requirement is set out in Article 9 of the IFD and is based on the MiFID II services and Annex I to the CIF Law that an IF is authorized or plans to offer its services.

As at 31 December 2025, the Company is not authorized to provide the investment service of dealing on own account. In accordance with Article 9 of the IFD and Article 9 of the Law, the Company's initial capital requirements on a solo basis amounts to €150,000, pursuant to Article 15 of MiFID II by having the authorization to provide investment services other than those referred in paragraphs 1, 2 and 4 (i.e. Ancillary Services such- safekeeping and administration of financial instruments, including custodianship and related services and foreign exchange services where these are connected to the provision of investment services).

On a consolidated basis, the permanent minimum requirements is determined as the sum of the applicable capital requirements of the entities included within the prudential consolidation perimeter. As at 31 December 2025, the consolidated permanent minimum capital requirement amount to €225,000.

5.1.2 Fixed Overheads Requirement (FOR)

The fixed overheads requirement (FOR) applies to all CIFs. The FOR is intended to calculate a minimum amount of capital that a CIF would need to absorb losses if it has cause to wind-down or exit the market. As per Article 13 of the IFR, FOR shall amount to at least one quarter of the fixed overheads of the preceding year.

Further to the above, the solo and consolidated fixed overheads requirement based on the latest solo and consolidated audited financial statements dated 31 December 2025, is €107K and €304K, as per the table below:

Table 9: Fixed Overheads Requirement

Item	Solo €'000	Consolidated €'000
Total expenses of the previous year after distribution of profits	**500**	**1,240**
Total deductions	**(71)**	**(25)**
(-) Staff bonuses and other remuneration	-	
(-) Employees', directors' and partners' shares in net profits	-	
(-) Other discretionary payments of profits and variable remuneration	-	
(-) Shared commission and fees payable	-	
(-) Fees, brokerage and other charges paid to CCPs that are charged to	(25)	(25)

customers		
(-) Fees to tied agents	-	
(-) Interest paid to customers on client money where this is at the firm's discretion	-	
(-) Non-recurring expenses from non-ordinary activities	(25)	
(-) Expenditures from taxes	-	
(-) Losses from trading on own account in financial instruments	-	
(-) Contract based profit and loss transfer agreements	-	
(-) Expenditure on raw materials	-	
(-) Payments into a fund for general banking risk	-	
(-) Expenses related to items that have already been deducted from own funds	(21)	
Projected fixed overheads of the current year	**435**	**1,258**
Fixed Overhead Requirement	**107**	**304**
Annual Fixed Overheads of the previous year after distribution of profits	**429**	**1,215**
Variation of fixed overheads (%)	**1.40%**	**3.54%**

5.1.3 K-Factors Requirement

K-Factors are used by Class 2 IFs to determine their capital requirements. The K-Factors capital requirement is essentially a mixture of activity and exposure-based requirements. The K-Factors are divided into three groups that aim to capture the risk the IF can pose to its clients, market or the IF itself. The general principles concerning the calculation of the three groups of K-factors, Risk-to-Client (RtC), Risk-to-Market (RtM) and Risk-to-Firm (RtF), can be found in Article 15 of the IFR.

In the sub-sections below details of the methodology and assumptions for the quantification for each relevant K-Factor are provided. The below table demonstrates the summary of the quantified capital requirements for each K-Factor and the total K-Factor Requirement as of 31 December 2025:

Risk-to-Client (RtC)

For the vast majority of IFs, one the most important elements of risk, is the potential harm they may pose to their clients. RtC are proxies covering the business areas of IFs from which harm to clients can conceivably be generated if risks arise. RtC is the sum of client assets under management (K-AUM), client money held (K-CMH), assets safeguarded and administered (K-ASA), and client orders handled (K-COH), multiplied by a corresponding coefficient. The Company is required to calculate the following K-Factors requirements as part of the RtC:

K-AUM: Assets Under Management

K-AUM captures the risk of harm to clients from an incorrect discretionary management of client portfolios or poor execution. AUM is the value of assets an IF managed for its clients under both discretionary portfolio management and non-discretionary arrangements constituting investment advice of an ongoing nature.

Calculation

AUM shall be the rolling average of the value of the total monthly assets under management, measured on the last business day of each of the previous 15 months, excluding the three most recent monthly values.

K-AUM shall be the arithmetic mean of the remaining 12 monthly values multiplied by the relevant coefficient of 0.02%.

As at 31 December 2025, the K-AUM on a solo and consolidated basis was €63k. The tables below show the solo and consolidated AUM values for the fourth quarter of 2025 as per Article 17 of the IFR:

Table 10: Total Solo AUM (average amounts)

	Factor Amount		
	December 2025 €'000	November 2025 €'000	October 2025 €'000
Total AUM (average amounts)	**313,946**	**312,488**	**313,494**
Of Which: AUM-Discretionary portfolio management	125,448	128,708	132,006
Of Which: AUM formally delegated to another entity	-	-	-
AUM – Ongoing non-discretionary advice	188,498	183,780	181,488

Table 11: Total Consolidated AUM (average amounts)

	Factor Amount		
	December 2025 €'000	November 2025 €'000	October 2025 €'000
Total AUM (average amounts)	**313,946**	**312,488**	**313,494**
Of Which: AUM-Discretionary portfolio management	250,651	249,866	251,586
Of Which: AUM formally delegated to another entity	-	-	-
AUM – Ongoing non-discretionary advice	63,296	62,622	61,908

K-CMH: Client Money Held

K-CMH captures the risk of harm where an investment firm holds its clients' money, whether on its own balance sheet or in third-party accounts. In other words, this is the amount of client money that an investment firm holds, taking into account the legal arrangements in relation to asset segregation and irrespective of the national accounting regime applicable to client money held by the IF.

CMH is the amount of client money that an investment firm holds or controls. It excludes client money that is deposited on a (custodian) bank account in the name of the client itself, where the investment firm has access to these client funds via a third-party mandate. (on segregated or non-segregated basis).

Calculation

CMH shall be the rolling average of the value of total daily client money held, measured at the end of each business day for the previous nine months, excluding the three most recent months.
K-CMH shall be the arithmetic mean of the daily values from the remaining 6 months multiplied by the relevant coefficient (0.4% for segregated accounts and 0.5% for non-segregated accounts).

During the year ended 31 December 2025, the solo and consolidated K-CMH was €2k. The tables below show the average solo and consolidated CMH values in segregated accounts and non-segregated accounts for the fourth quarter of 2025 as per Article 18(1) of the IFR.

Table 12: Total Solo CMH (average amounts)

	Factor Amount		
	December 2025 €'000	November 2025 €'000	October 2025 €'000
CMH- Segregated (average amounts)	490	473	468
CMH – Non segregated (average amounts)	-	-	-

Table 13: Total Consolidated CMH (average amounts)

	Factor Amount		
	December 2025 €'000	November 2025 €'000	October 2025 €'000
CMH- Segregated (average amounts)	490	473	468
CMH – Non segregated (average amounts)	-	-	-

K-ASA: Assets Safeguarded and Administered

This K-factor ensures that an investment firm holds capital in proportion to such assets, regardless of whether they are on its own balance sheet or in third-party accounts. ASA means the value of assets that an IF safeguards and administers for clients.

Calculation

It is calculated as the rolling average of the daily total value of assets under safekeeping and administration, measured at the end of each business day for the previous 9 months, excluding the three most recent months.

K-ASA shall be the arithmetic mean of the daily values from the remaining 6 months multiplied by the relevant coefficient of 0.04%

As at 31 December 2025, the K-ASA on a solo and consolidated basis was €2K. The tables below show the total ASA values for the fourth quarter of 2025 as per Article 19(1) of the IFR:

Table 14: Total Solo ASA (average amounts)

	Factor Amount		
	December 2025 €'000	November 2025 €'000	October 2025 €'000
Total ASA (average amounts)	**3,861**	**3,427**	**3,213**
Of which: assets formally delegated to another financial entity	3,861	3,427	3,213
Of which: assets of another financial entity that has formally delegated to the investment firm	-	-	-

Table 15: Total Consolidated ASA (average amounts)

	Factor Amount		
	December 2025 €'000	November 2025 €'000	October 2025 €'000
Total ASA (average amounts)	**3,861**	**3,427**	**3,213**
Of which: assets formally delegated to another financial entity	3,861	3,427	3,213
Of which: assets of another financial entity that has formally delegated to the investment firm	-	-	-

K-COH: Client Orders Handled

COH captures the risk to clients of an investment firm that executes orders in the names of clients, and not in the firm's name, say in providing execution- only services or when a firm is part of a chain of client orders. This is the value of orders that an IF handles for clients, through the reception and transmission of client orders and through the execution of orders on behalf of clients.

Calculation

COH shall be the rolling average of the value of the total client orders handled, measured throughout each business day for the previous six months, excluding the three most recent months. COH shall be measured as the sum of the absolute value of buys and the absolute value of sells for both cash trades and derivatives.

K-COH shall be the arithmetic mean of the daily values of the remaining 3 months multiplied by the relevant coefficient (0.1% for cash trades and 0.01% for derivative trades).

AS at 31 December 2025, the solo and consolidated K-COH was €0.01K. The Company's K-COH requirement remains immaterial, reflecting the limited volume of client orders handled and the Company's business model, which is primarily focused on reception and transmission of orders with no execution activity and no exposure to derivative trading.

The table below shows the arithmetic mean amount of COH in cash trades and derivatives for the fourth quarter of 2025 , as per Article 20(1) of the IFR:

Table 16: Total Solo COH (average amounts)

	Factor Amount		
	December 2025 €'000	November 2025 €'000	October 2025 €'000
COH – Cash trades (average amounts)	**14**	**14**	**24**
Of which: Execution of client orders	-	-	-
Of which: Reception and transmission of client orders	14	14	24
COH – Derivative (average amounts)	-	-	-

Table 17: Total Consolidated COH (average amounts)

	Factor Amount		
	December 2025 €'000	November 2025 €'000	October 2025 €'000
COH – Cash trades (average amounts)	**14**	**14**	**24**
Of which: Execution of client orders	-	-	-
Of which: Reception and transmission of client orders	14	14	24
COH – Derivative (average amounts)	**-**	**-**	**-**

Risk to Market (RtM)

Risk-to-Market captures the risk an IF can pose to market access. The RtM K-factors only apply to firms with a trading book that deals on their own account or on behalf of their clients, i.e. they deal on a matched principal basis or as a market maker.

K-NPR: Net Position Risk

The own fund requirement for market risk for trading book positions of an IF shall be calculated using the standardized approach set out in Chapters 2, 3 and 4 of Title IV of Part Three of the CRR. This is in addition to the alternative standardized approach or alternative internal model approach which can also be used to calculate the K-NPR.

The Company's sole exposure to market risk arises from foreign exchange risk. As at 31 December 2025, the K-NPR capital requirements for both solo and consolidated is €26k and €95k. The table below presents the Company's K-NPR net position as of 31 December 2025:

Table 18: K-NPR Net Position

	Solo €'000	Consolidated €'000
Position risk in equity instruments	-	-
Position risk in debt instruments	-	-
Particular approach for positions risk in CIUs		
Foreign exchange risk	**26**	**95**
Commodities risk	**-**	**-**
K-NPR	**26**	**95**

Foreign Exchange Risk

Foreign Exchange Risk is the risk that the value of financial instruments will fluctuate due to changes in foreign exchange rates. Foreign exchange risk arises when future commercial transactions and recognized assets and liabilities are denominated in a currency that is not in Euro, which is the Company's measurement currency. The Company is exposed to foreign exchange risk arising from various currency exposures primarily with respect to the US Dollar and the British Pound. The Company's management monitors the exchange rate fluctuations on a continuous basis and acts accordingly.

The Company does not have a policy of hedging foreign exchange risk, as exposures are monitored and considered non-structural and limited in nature.

As at 31 December 2025, the Company's net foreign exchange exposure amounted to €319k on a solo basis and €1.183k on a consolidated basis, primarily driven by USD and GBP balances. The resulting capital requirements under the standardized approach were €26k and €95k respectively. The Company does not maintain structural FX positions and does not currently hedge such exposures, as they are considered limited and are monitored on an ongoing basis.

The Company continues to regularly monitor the impact of exchange rate risk and, if deemed necessary, corrective actions will be taken to minimize the effect.

The Company's standardized approach for Foreign Exchange Risk (MKR SA FX) for the period as of 31 December 2025 is depicted in the below table:

Table 19: Foreign Exchange Risk capital requirements (MKR SA FX) - solo

	Net Positions		Positions Subject to Capital Charge		Own Funds Requirements	Total Risk Exposure Amount
	Long €'000	Short €'000	Long €'000	Short €'000		
Total Positions	319	-	319	-	26	319
All other currencies	319	-	319	-	26	
Memorandum items: CURRENCY POSITIONS						
Euro	266	-				
Pound Sterling	7	-				
US Dollar	312	-				

Table 20: Foreign Exchange Risk capital requirements (MKR SA FX) - consolidated

	Net Positions		Positions Subject to Capital Charge		Own Funds Requirements	Total Risk Exposure Amount
	Long €'000	Short €'000	Long €'000	Short €'000		
Total Positions	1,183	-	1,183	-	95	1,183
All other currencies	1,183	-	1,183	-	95	
Memorandum items: CURRENCY POSITIONS						
Euro	3,061	-				
Pound Sterling	43	-				
Swiss Franc	94	-				
US Dollar	1,046	-				

Risk to Firm (RtF)

The K-factors under the RtF cover an IF's exposure to the default of their trading counterparties (K-TCD) in accordance with simplified provisions for counterparty credit risk based on the CRR, concentration risk in an IF's large exposures to specific counterparties based on the CRR that apply to large exposures in the trading book (K-CON), and operational risks from an IF's daily trading flow (K-DTF).

The RTF-factor requirement is the sum of K-TCD, K-DTF and K-CON calculated in accordance with the IFR requirements and in relation to K-DTF multiplied with the respective coefficient. The Company is not exposed to any RtF exposures.

K-TCD: Trading Counterparty Default
K-TCD captures the risk of default of trading counterparties when dealing on own account. Calculation based on CRR counterparty credit risk refers to exposure value, credit valuation, replacement cost, potential future exposure and collateral. The Company is not exposed to any trading counterparty default risk since it does not deal on its own account.

K-CON: Concentration Risk on Large Exposure
K-CON captures concentration risk in relation to individual or highly connected private sector counterparties with whom firms have exposures above 25% of their Own Funds, or specific alternative threshold in relation to credit institutions or other IFs, by imposing a capital add-on in line with CRR for excess exposures above those limits.

This includes large individual exposures and significant exposures to companies whose likelihood of default is driven by common underlying factors such as the economy, geographical location, instrument type etc. Large exposure means the exposures in the trading book of an IF to a client or a group of connected clients, the value of which exceeds the 25% limit of its own funds.

In case that individual client is a credit institution or an investment firm, or where a group of connected clients includes one or more credit institutions or investment firms, the limit with regard to concentration risk shall be the higher of 25% of the IF's own funds or €150,000,000 provided that for the sum of exposure values with regard to all connected clients that are not credit institutions or investments firms, the limit with regards to concentration risk remains at 25% of the IF's own funds. Where the amount of €150,000,000 is higher than 25% of the IF's own funds, the limit with regard to concentration risk shall not exceed 100% of the IF's own funds.

Only IFs which are subject to a minimum Own Funds requirement under the K-factors should report to competent authorities on their concentration risks. It is noted that the Company is not authorized to deal on own account and therefore does not hold any positions in financial instruments with trading intent that would trigger the calculation of K-CON. However, senior management and the Investment Committee have established relevant monitoring procedures to detect any breaches of the exposure limits to each counterparty. The Company carries out regular analyses of the exposures, including estimates of the trends, in order to be able to verify the adequacy of the processes, parameters which are put in place in order to manage the risk of concentration.

The Company shall monitor and control its concentration risk in line with Part Four of the IFR, by means of sound administrative and accounting procedures and robust internal control mechanisms, including:

- Exposures associated with the default of counterparties and trading book positions;
- Where client money is held;
- Where securities are deposited;
- Where own cash is deposited;
- Sources of its earnings; and

- Off-Balance sheet items.

In addition, the Company is reporting to CySEC on a quarterly basis the level of concentration risk with respect to the credit institutions, investment firms and other entities where clients' money are held and where client securities are deposited while it shall report the level of concentration risk with respect to the credit institutions where its own cash is deposited in accordance with Article 54(2) of the IFR. In addition, the Company is required under MiFID requirements to report the top five clients from whom the largest amounts of Company's earnings are derived, the top five, if available, largest trading book exposures and largest exposures not recorded in the trading book. Furthermore, the clients' money held during the year 2025 were well diversified.

K-DTF: Daily Trading Flow

DTF means the daily value of transactions that an IF enters through dealing on own account or the execution of orders on behalf of clients in its own name, excluding the value of orders that an IF handles for clients through the Reception & Transmission of client orders and through the execution of orders on behalf of client which are already taken into account in the scope of COH. DTF also excludes transactions executed by an IF for the purpose of providing portfolio management services on behalf of investment funds. The Company does not deal on its own account or execute orders on behalf of clients in its own name, therefore, the K-DTF factor is not calculated.

K-Factors Requirement Results

As at 31 December 2025, the K-Factors Requirement was €92k on a solo basis and €161 on a consolidated basis, driven primarily by assets under management (K-AUM) and foreign exchange risk (K-NPR), with all other K-factors being immaterial, as shown in the table below:

Table 21: K-Factors Results

As of 31 December 2025	Solo € 000		Consolidated € 000	
	Factor Amount	K-Factor Requirement	Factor Amount	K-Factor Requirement
TOTAL K-FACTOR REQUIREMENT		**92**		**161**
Risk to client		**66**		**66**
Assets under management (K-AUM)	313,912	63	313,946	63
Client money held – Segregated (K-CMH)	490	2	507	2
Client money held – Non-segregated (K-CMH)	-	-	-	-
Assets safeguarded and administered (K-ASA)	3,861	2	3861	2
Client orders handled – Cash trades (K-COH)	14	0	14	0
Client orders handled – Derivatives Trades (K-COH)	-	-	-	-
Risk to market		**26**		**95**
K-Net positions risk requirement (K-NPR)		26		95
Clearing margin given (K-CMG)	-	-	-	-
Risk to firm		-		-
Trading counterparty default (K-TCD)		-		-
Daily trading flow – Cash trades (K-DTF)	-	-	-	-
Daily trading flow – Derivative trades (K-DTF)	-	-	-	-
K-Concentration risk requirement (K-CON)		-		-

5.2 Capital Ratios

According to Article 9 (1) of the IFR, IFs shall have own funds consisting of the sum of their CET1 capital, AT1 capital and T2 capital, and shall maintain all the following conditions all times:

$$\frac{\text{Common Equity Tier 1 Capital}}{D} \geqslant 56\%$$

$$\frac{\text{Common Equity Tier 1 Capital + Additional Tier 1 Capital}}{D} \geqslant 75\%$$

$$\frac{\text{Common Equity Tier 1 Capital + Additional Tier 1 Capital + Tier 2 Capital} \geqslant 100\%}{D}$$

where D = the Company's total capital requirement calculated in accordance with Article 11.

The own funds, own funds requirement and capital ratio as at 31 December 2025, were as follows:

Table 22: Own Funds and Own Funds Requirements Summary

OWN FUNDS COMPOSITION	Solo €'000	Consolidated €'000
Own Funds	**545**	**741**
OWN FUNDS REQUIREMENT	€'000	€'000
Permanent minimum capital requirement	150	225
Fixed overhead requirement	107	304
Total K-Factor requirement	92	161
Own funds requirement	**150**	**304**
CAPITAL RATIOS	€'000	€'000
CET 1 Ratio (⩾ 56%)	**363.33%**	**243.75%**
Surplus of CET 1 Capital	461	571
Tier 1 Ratio (⩾ 75%)	**363.33%**	**243.75%**
Surplus of Tier 1 Capital	433	513
Own Funds Ratio (⩾ 100%)	**363.33%**	**243.75%**
Surplus of Total Capital	**395**	**437**

As at 31 December 2025, the Company maintains a strong capital position, with own funds significantly exceeding the applicable Own Funds Requirement under Article 11 of IFR. The excess capital provides a buffer against potential increases in risk exposures and supports the Firm's ongoing operations. Capital adequacy is monitored on a continuous basis on a monthly basis.

5.3 Liquidity Requirement

Liquidity risk is defined as the risk of incurring losses resulting from the inability to meet payment obligations in a timely manner when they become due or from being unable to do so at a sustainable cost. The Company has procedures with the object of minimizing such losses such as maintaining sufficient cash and other highly liquid current assets and by having available an adequate amount of committed credit facilities.

In accordance with Article 43 of the IFR, IFs that qualify as Class 2, shall hold an amount of liquid assets equivalent to at least one third of the FOR. The purpose is to ensure that the IFs have an adequate stock of unencumbered high-quality liquidity assets that can be converted easily and immediately in cash to meet their liquidity need for a 30-calendar day liquidity stress scenario.

As per the Company's latest audited financial statements, the Company has the following liquid assets which is well above the 1/3 of the total fixed overheads requirement.

Table 23: Liquidity Requirements

As of 31 December 2025 Item	Solo €'000	Consolidated €'000
Liquidity Requirement	**36**	**102**
Liquid assets	**407**	**1,101**
Surplus	*371*	*999*

As a result of the above, we confirm that the Company currently maintains a higher than required amount of liquid assets to cover the one third FOR. Nevertheless, the Company will continuously monitor its liquidity requirement to ensure compliance at all times.

5.4 Reporting requirements

The Company as a Class 2 IF, is required to submit prudential reports to CySEC on a quarterly basis. These reports include, inter alia:

- the level and composition of own funds;
- the Own Funds Requirement;
- detailed K-factor calculations (including K-AUM, K-CMH, K-ASA, K-COF, K-NPR etc.);
- concentration risk exposures; and
- liquidity requirements.

The above information is submitted through CySEC's XBRL portal using the IF_CLASS2_IND and IF_CLASS2_CON reporting templates.

Senior Management and the Risk Officer are responsible for monitoring compliance with prudential reporting requirements. This is supported by internal processes for the preparation, review and validation of prudential calculations, including own funds, capital requirements and liquidity metrics.

The Company is also required to notify CySEC without undue delay in the event of breaches of regulatory thresholds, including:

a) The own funds of the CIF have decreased below its own funds requirement;
b) The CIF's liquid assets are below its liquidity requirement; and
c) The CIF has exceeded the concentration risk limits, as defined in Articles 37(1) and 37(3) of IFR.

During the year under review, the Company's own funds never dropped below its own funds requirement and the Company fulfilled its obligations by successfully submitting, on a quarterly basis, the Prudential Reporting Reports.

5.5 Other Material Risks

The Company considers its operations to be prudent and risk averse, with the business objective of achieving client satisfaction and financial strength of the company. The Company is exposed to various risks arising from the provision of investment services and has risk management policies and practices in place for each category of risk it is exposed to. Some of the Company's inherent risks which have been identified are analysed below:

5.5.1 Interest Rate Risk

Interest rate risk is the risk that the value of financial instruments will fluctuate due to changes in market interest rates. The Company's income and operating cash flows are substantially independent of changes in market interest rates as the Company has no significant interest-bearing assets or liabilities. The Company's management monitors the interest rate fluctuations on a continuous basis and acts accordingly.

At the reporting date the interest rate profile of interest-bearing financial instruments was immaterial.

5.5.2 Operational Risk

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. Operational risk covers legal risk, (fines, penalties and punitive damage resulting from regulatory actions, as well as private settlements), but excludes reputational and strategic risk and therefore, operational risk events can have a direct or indirect impact on the value/earnings of the company.

Operational risk is often associated with specific, non-recurring events, such as clerical or record-keeping errors, technical infrastructure, information technology deficiencies, fraud, regulatory non-compliance, cyber threats, external disruptions (such as geopolitical conflicts or pandemic), and litigation. Recognizing the significance of operational risk, the Company manages it within acceptable levels through strong governance arrangements, effective risk management processes and internal control mechanisms proportionate to the Company's size, nature, scale and complexity.

The Company calculates its operational risk using the basic indicator approach. The Company systems are evaluated, maintained and updated continuously, in an effort to minimize its operational risks throughout the organization. In line with regulatory expectations, operational risk encompasses the following key risks:

a) Process Risk

Process risk arises from deficiencies or failures in the Company's business processes, potentially leading to financial, regulatory, or reputational consequences.

The following are a few common types of process risks which might lead to fines, reputational cost or even bankruptcy:

a. Lack of clearly defined procedures;
b. Ineffective process design or implementation;
c. Excessive manual intervention and control weaknesses;

d. Absence of escalation procedures; and
e. Weaknesses in client suitability assessments or asset pricing processes.

The Company mitigates process risk through:

- Clearly documented policies and procedures;
- Segregation of duties and application of the four-eyes principle;
- Ongoing monitoring by Senior Management, Compliance Function and Internal Audit;
- Regular review and updating of internal manuals; and
- Continuous staff training and awareness programs

Residual process risk is considered low.

b) Outsourcing Risk

Outsourcing risk arises from the delegation of critical or important operational functions to third parties or affiliated entities, and may impact the Company's resilience, regulatory compliance, and service delivery.

The Company has adopted an outsourcing model where specific functions are delegated either within the same corporate group (intragroup outsourcing) or to external third parties (external outsourcing). The Internal Audit Function is outsourced to an independent third party, EY, to ensure objectivity and compliance with regulatory audit requirements. The Company has assessed the outsourcing risk extensively and in general all outsourced services fulfil their contractual and service agreement obligations in accordance with the applicable outsourcing policies. Furthermore, all outsourcing arrangements are approved by the Board.

The Company also considers exit and transition risk as part of its outsourcing risk framework. This includes the risk that termination, replacement or transition of outsourced providers may result in operational disruption, data transfer issues, legal disputes, knowledge transfer challenges, or temporary impairment of service delivery.

c) Information Technology (IT) Risk

Information Technology (IT) Risk refers to the potential risks associated with the use, management, and security of IT systems and infrastructure that could impact the operations, security, and compliance of the Company. IT risk encompasses both cybersecurity threats (e.g. hacking, data breaches) and operational risks (e.g. system failures, outages), and can extend to issues with data integrity, privacy, and availability of critical systems used to manage client assets, transactions and regulatory reporting.

As the digital landscape evolves, IT risk management has become a central concern for CIFs, particularly due to the increasing reliance on technology and external service providers in meeting regulatory compliance obligations under frameworks like DORA, MiFID II, and EBA Guidelines.

Assessing the Company's operational risks in the information technology field is considered an important area. AJK focuses on ensuring the confidentiality, integrity and availability of information and records. Information security remains a key area of focus. The Company's information technology department, management and internal auditors regularly review the information technology security, including contingency plans for information technology breakdowns etc., that are designed to ensure that operations can continue at a satisfactory level in case of extraordinary events. Should any shortfalls appear in the Company's systems, the information technology department ensures they are fixed immediately.

d) Internal and External Fraud

Fraud risk refers to the potential for loss arising from intentional act by internal or external parties, including misappropriation of assets, manipulation of records, or circumvention applicable laws, regulations or internal policies.

Fraud may be committed internally by employees, management or other relevant persons, or externally by customers, counterparties or third parties. This includes risks such as unauthorized transactions, falsification of records, bribery and corruption, misuse of client assets, and cyber-enabled fraud (e.g. phishing, hacking or identity theft). Fraud risk is also closely linked to ML/TF activities.

For risk monitoring purposes, internal and external fraud risks are assessed separately within the Company's risk register.

The Company maintains a robust control environment to mitigate fraud risk, supported by strong governance and a culture of compliance. In particular, the Company implements the following measures:

- Segregation of duties and application of the Clear transaction procedures including: No employee is allowed to sign on the orders/payments alone. The four-eye principle applied on all orders/payments before released;
- Employee vetting and background checks on new employees;
- Ongoing staff training promoting a strong ethical culture and awareness of fraud prevention reporting;
- Continuous supervision and oversight by senior management;
- Regular monitoring and reconciliation of transactions and records;
- Access controls and system restrictions to prevent unauthorized access to sensitive systems or data;
- Maintenance and regular review of the Conflicts of Interest policy;
- Whistleblowing procedures allowing employees to report suspicious behavior anonymously; and
- Independent review by Internal Audit Function to assess the effectiveness of controls.

The Company also maintains procedures for the identification, investigation and escalation of suspected fraudulent activities, including cooperation with relevant authorities where required.

Taking into account the control environment in place, internal and external fraud risk is assessed to be low and remains within the Company's risk appetite.

e) Reputational Risk

Reputational risk refers to the potential loss of trust or confidence that may negatively impact the Company's ability to maintain relationships with customers, regulators, and other stakeholders.

Safeguarding the Company's reputation is of paramount importance to its continued success and is the responsibility of every member of staff. The Company has various policies and practices to mitigate reputational risk, including strong values that are regularly and proactively reinforced. The Company is aware of the impact of practices that may result in a breakdown of trust and confidence in the organization. The Company's as well as the Group's policies and practices are regularly reinforced through transparent communication, accurate reporting, continuous group culture and values assessment, internal audit and regulatory compliance review, and risk management practices.

The Company has also policies and procedures in place when dealing with possible customer complaints in order to provide the best possible assistance and service under such circumstances. The Company's Board are made up of high calibre professionals who are recognised in the industry for their integrity and ethos; this adds value to the Company.

5.5.3 Strategic Risk

Strategic risk is the risk of loss arising from adverse business decisions, improper implementation of decisions or lack of responsiveness to changes in the business environment. The Company's exposure to strategic risk is moderate as policies and procedures to minimize this type of risk are implemented in the overall strategy of the Company.

5.5.4 Concentration Risk

Concentration risk arises from exposures to individual counterparties, clients, sectors or geographical regions and may affect the Company's earnings, capital and liquidity position.

At firm level, concentration risk is mitigated through:

- diversification of the client base;
- monitoring of revenue concentration;
- distribution of deposits across multiple financial institutions; and
- the absence of direct credit exposures or lending activities.

At client portfolio level, concentration risk may arise from exposures to specific issuers, sectors or geographic regions. This is mitigated through a diversified investments approach and strict limits set by the Investment Committee which are subject to ongoing monitoring and periodic review. In addition, portfolio exposures are regularly assessed and stress testing is performed to evaluate sensitivity to adverse market conditions.

5.5.5 Investment Performance Risk

Investment performance risk refers to the risk that client portfolios do not achieve their investment objectives. This may arise from adverse market conditions, inappropriate asset allocation, deficiencies in portfolio construction, poor investment selection, or ineffective investment advice. Such outcomes may result in client dissatisfaction, loss of clients and reduction in assets under management and related revenues.

The IC regularly reviews and challenges the investment risks associated with each clients' portfolios. The Company applies clearly defined investment processes designed to meet investment targets within stated risk parameters and ensure that portfolio construction and asset allocation remain appropriate in light of client objectives and prevailing market conditions.

Portfolio performance, valuations and risk profiles are continuously monitored by Portfolio Managers, Investment Advisors and Senior Management. The IC also plays a key role in reviewing these elements, ensuring that potential issues are promptly identified and mitigated. The risk is further mitigated through:

1. Diversification across asset classes and instruments;
2. Ongoing monitoring of portfolio performance and risk exposures; and
3. Periodic review of portfolio construction, investment allocation and investment suitability;
4. Internal investment oversight and challenge by the IC; and
5. Continuous training of Portfolio Managers and Investment Advisors to ensure alignment with market developments and regulatory requirements.

5.5.6 Regulatory, Compliance and Legal Risk

This is the risk the Company faces by not complying with relevant laws and regulations issued by its supervisory body. This risk is a significant factor in the overall risk framework of IFs. It is not limited to simple compliance with laws and regulations; it also encompasses sound fiduciary principles, prudent ethical standards, client documents, internal policies and procedures, and other contractual obligations. If materialized, the risk could trigger the effects of reputation and strategic risk. The risk is limited to a significant extent due to the supervision applied by the Compliance Function, as well as by the monitoring controls applied by the Company.

Regulatory, Compliance and Legal Risk is managed through internal policies and procedures, which include legal, regulatory and other technical requirements relevant to the business. The Compliance Function provides training to ensure that all employees are familiar with their regulatory obligations and advice on regulatory issues. The Compliance Function independently monitors the business units to ensure adherence to policies and procedures and other technical requirements.

5.5.7 Emerging Risks

Emerging risks refer to newly developing or evolving risks that are difficult to quantify but which may have a material on the Company's business model, operations, strategic objectives, or regulatory environment. Such risks are typically characterized by uncertainty regarding the probability, magnitude and timing, yet may significantly affect the Company's financial performance, operational resilience, client relationships and compliance framework.

The Company recognizes that the external risk environment continues to evolve due to geopolitical developments, macroeconomic uncertainty, technological innovation, cyber threats and regulatory transformation. Accordingly, the Risk Management Function proactively monitors internal and external developments, assesses emerging risk themes, and escalates material developments to Senor Management and the Board where appropriate.

In the context of the current environment, the Company has identified the following key emerging risks relevant to its operations and strategic objectives:

a) **Geopolitical and Social Instability:** Heightened geopolitical tensions, sanctions developments, regional conflicts and political instability may increase market volatility, disrupt capital flows, affect investor sentiment and create additional sanctions and compliance challenges.
b) **Global Trade and Macroeconomic Uncertainty**: Escalating trade tensions, inflationary pressures, restrictive monetary conditions and slowing economic growth may adversely affect

financial markets, asset valuations, client investment activity and overall demand for financial services.

c) **Cyber Threats and Digital Supply Chain Attacks**: Cyber threats continue to evolve in complexity and frequency, particularly in relation to attaches targeting outsourced ICT providers, critical vendors and digital supply chains. Such developments may increase operational disruption, data security and third-party risk exposure**.**

d) **Digital Operational Resilience and Regulatory Change**: The continued implementation of the Digital Operational Resilience Act ("DORA") and related ICT governance obligations presents ongoing implementation and compliance challenges, particularly in relation to ICT risk management, third-party oversight and incident management.

e) **Artificial Intelligence and Technological Risks:** The increasing use of Artificial Intelligence (AI) and automated decision-making tools introduces legal, regulatory, ethical and operational risks, including model risk, transparency concerns, bias, data governance issues and compliance with the forthcoming EU AI Act.

The Company continues to monitor these developments closely and incorporates emerging risk considerations into its strategic planning, risk management processes, policy reviews and operational resilience framework. Given the increasing complexity of the external environment, the Company will continue refining its risk identification, monitoring and escalation mechanisms to maintain operational resilience, regulatory compliance and the trust of its stakeholders.

6. CAPITAL RISK MANAGEMENT AND INTERNAL CAPITAL ADEQUACY AND RISK ASSESSMENT PROCESS (ICARA)

The ICARA framework is the process through which the Company identifies, assesses, monitors and manages the risks arising from its activities, including risks that may not be fully captured under Pillar I Own Funds Requirements of the prudential framework. The ICARA framework ensures that the Company maintains sufficient internal capital and liquid assets on an ongoing and forward-looking basis, to cover the nature and level of risks to which the Company is exposed, as well as the potential harms the Company may pose to clients, markets and the Company itself. The framework also supports the Company's ability to remain financially resilient under both normal and stressed operating conditions.

The Company is classified as Class 2 IF under the IFR/IFD, and is therefore required to establish "sound, effective and comprehensive arrangements, strategies and processes to assess and maintain on an ongoing basis the amounts, types, and distribution of internal capital and liquid assets that they consider adequate to cover the nature and level of risks which they may pose to others and to which the investment firms themselves are or might be exposed."

This ICARA framework is conceptually aligned with the Internal Capital Adequacy Assessment Process (ICAAP) and the Internal Liquidity Adequacy Assessment Process (ILAAP) under the Capital Requirements Directive (CRD) regime, while being specifically tailored to the business model and risk profile of investment firms.

The Company's approach to capital risk management focuses on maintaining a strong capital position to support its business strategy, regulatory obligations, operational resilience future growth objectives. The Company continuously monitors its financial and capital position through periodic prudential calculations, management reporting and risk monitoring processes to ensure ongoing compliance with applicable regulatory requirements.

The Company maintains internal capital levels above the minimum regulatory requirements in order to provide an appropriate buffer against adverse business conditions and unexpected losses. Management has established internal capital targets which exceed the regulatory minimum requirements, taking into account the Company's size, nature, scale and complexity, as well as its overall risk profile and strategic objectives.

Senior management, together with the Risk Officer and the Group Financial Controller, are overseeing the ICARA framework and ensuring the effective implementation. This includes maintaining appropriate governance structures, risk management processes, methodologies, controls and reporting mechanisms to support the identification, assessment, monitoring and management of risks. The Board has ultimate responsibility for reviewing and approving the ICARA framework and ensuring that the Company maintains adequate financial resources at all times.

The ICARA is prepared in accordance with Article 24 of the IFD and is reviewed and updated at least annually, or more frequently where required, to reflect changes in the Company's activities, business model, risk profile, regulatory environment and market conditions. The ICARA Report provides a comprehensive assessment of the Company's capital and liquidity adequacy under both normal and stressed scenarios.

The ICARA framework adopts a proportionate and risk-based approach, taking into account the Company's size, internal organization, and the nature , scope and complexity. The assessment includes, inter alia, analysis on the following areas:

a) Business Model & Strategy
b) Internal Governance
c) Risk Management Objectives and Policies
d) Scenario Analysis and Stress Testing
e) Pillar II Calculation and Capital Planning

The ICARA Report for the year 2024 was prepared and approved by the Board on the 30th June 2025. The report is subject to annual review and is made available to the CySEC upon request, as laid down in Article 50(b) of the IFR.

Based on the outcome of the latest ICARA assessment, AJK has established and maintains adequate risk management policies, procedures and internal controls to identify, assess, managed and monitor the risks arising from its activities, processes and systems, and to ensure its internal capital and liquidity resources remain appropriate relative to its risk profile.

In addition, in line with CySEC's Circular C518 on Prudential Supervision Information, the Company submits annually Form 165-03, which supports CySEC's supervisory assessment of the ICARA framework, audited financial statements and the safeguarding of client's money. The form for the year 2024 was submitted to CySEC on 20 June 2025, within the prescribed deadline.

7. REMUNERATION POLICY

The Company has established a Remuneration Policy which sets out the principles governing the remuneration practices, in accordance with the requirements of the IFD, the CIF Law and CySEC's Guidelines GD-IF-07 on remuneration policies and practices.

The Remuneration Policy is approved by the Board and is reviewed at least annually. It applies to all members of staff, with particular focus on those categories of staff whose professional activities have a material impact on the Company's risk profile (the "Identified Staff"), including senior management, members of the Board and other risk takers.

The Remuneration Policy is designed to promote sound and effective risk management and does not encourage risk-taking. It is aligned with the Company's business strategy, objectives, values and long-term interests, and incorporates measures to avoid conflicts of interest. Employees engaged in control functions are independent from the business units they oversee and are remunerated based on objectives linked to their control functions, irrespective of the performance of the business areas they supervise.

The Compliance, Risk Management and Internal Audit functions are outsourced. Their remuneration of the external service providers is fixed in accordance with the respective outsourcing agreements and is not linked to the performance of the Company or any variable remuneration arrangements, other than adjustments relating to additional time spent for the performance of the duties and expenses incurred.

When designing and reviewing the remuneration policies and practices, the Company takes into consideration the conduct of business and potential conflicts of interest risks and implements reasonable measures to avoid or manage such risks appropriately and efficiently. The Remuneration Policy is designed so as not to create incentives that may lead individuals to favour their own interests, or the interests of the Company, to the detriment of clients.

The Company applies remuneration practices in a gender-neutral manner and may consider, were appropriate, factors such as:

- educational background, professional qualifications, skills, and experience;
- level of responsibility and complexity of the role performed;
- the managerial responsibilities and seniority level;
- market conditions and availability of specialized personnel;
- the nature and duration of the employment contract, including if it is temporary or a contract with an indefinite period;
- appropriate benefits, including the payment of additional household and child allowances to staff with spouses and dependent family members.

The Remuneration Policy applies to all employees whose activities may have a material impact on the Company's conduct of business risk profile or who may influence corporate behaviour, including:

a) client-facing front-line staff;
b) sales and business development staff; and

c) other staff indirectly involved in the provision of investment services whose remuneration may create inappropriate incentives to act against the best interest of the clients.

The following principles apply to the Company to the extent that is appropriate to the size, internal organization and the nature, the scope and the complexity of the Company's activities:

a) The Compliance Function is involved in the design, review and periodic assessment of the Remuneration Policies and related practices;
b) The Remuneration Policy is gender-neutral and promotes equal treatment of staff;
c) The Remuneration Policy is consistent and promotes sound and effective risk management;
d) The Remuneration Policy is aligned with the Company's business strategy, objectives and long term interests, while also considering the long-term effects of the investment decisions;
e) The Remuneration Policy includes measures to avoid conflicts of interest, promote responsible business conduct and encourage prudent risk taking;
f) The employment terms and remuneration arrangements of staff are documented in the relevant employment agreements entered into between the Company and each employee. Emoluments relate to fixed element remuneration in accordance with the relevant employment contracts entered into between each employee and the Company;
g) The remuneration of employees, managers and senior management, is primarily fixed and is not linked to short-term performance or sale targets;
h) Staff engaged in control functions are independent from the business units they oversee, have appropriate authority, and are remunerated independently from the performance of the business activities they monitor;
i) The remuneration of senior management and executive directors is reviewed periodically by the Board and is based on the individual's responsibilities, experience, competence and contribution to the Company;
j) The Board, in its supervisory capacity, adopts and periodically reviews the Remuneration Policy and is responsible for overseeing its implementation;
k) The implementation of the Remuneration Policy is subject to periodic independent review by the control functions at least annually;
l) The remuneration of independent non-executive directors consists solely of fixed annual compensation for their participation on the Board. Independent non-executive directors do not participate in incentive schemes and do not receive performance-based remuneration. Their remuneration reflects the qualifications, responsibilities and expected contribution associated with their role and the number of the Board meetings. No pension contributions are payable in respect of such remuneration.
m) No remuneration is paid to the non-executive directors who are not independent.

7.1 Remuneration Committee

It is noted that the Company has considered its size, internal organization and the nature, scope and complexity of its activities and it does not deem as necessary the establishment of a specific remuneration committee. Remuneration practices are currently set by the Senior Management, in its supervisory capacity. In case the Company shall deem necessary to establish a Remuneration Committee in the future, then this section shall be updated as applicable.

7.2 Fixed Remuneration Policy

Fixed Remuneration represents the main component of the Company's remuneration structure and is approved by the Board of Directors for each Director, Officer and Employee of the Company. Fixed remuneration is determined based on the role, responsibilities, level of experience, professional qualifications, accountability and the requirements of each position.

The fixed remuneration framework is designed to attract and retain qualified and experienced personnel and is not primarily linked to short-term performance objectives or sales targets. It is structured so as to avoid incentives that may encourage excessive risk-taking or conduct detrimental to clients. The framework reflects the skills, expertise and level of responsibility required for the effective performance of each role.

Benefits such as health and social insurance contributions are not performance-related and form part of the employees' fixed remuneration. In addition, employees may be entitled to holiday remuneration and other benefits in accordance with the terms of their employment agreements and applicable legislation.

7.3 Variable Remuneration Policy

The Company maintains a conservative approach in relation to variable remuneration. Where variable remuneration may be granted, it is assessed taking into consideration:

a) the achievement of individual and business performance objectives, as assessed through the annual evaluation process;
b) the performance of the relevant department;
c) the overall financial and operational performance of the Company.

Article 32 of the IFD sets, sets out specific requirements applicable to variable remuneration arrangements relating to payment in instruments and deferral mechanisms. In particular:

- at least 50% of variable remuneration should consist of shares, share-linked instruments or equivalent non-cash instruments that adequately reflect the credit quality of the IF as a going concern, or non-cash instruments which reflect the instrument of the portfolios managed;
- At least 40% of variable remuneration should be deferred over the three-to-five-year period.

However, pursuant to Article 32 (4) of the IFD, the above requirements do not apply to the Company, as it does not qualify as a *"significant CIF"* (off-balance sheet assets is on average less than €100,000,000 over the preceding four-year period).

The Company does not pay transaction-based commissions or maintain remuneration arrangements linked to sales targets or the promotion of specific financial instruments or other investment services. Furthermore, the remuneration framework does not provide incentives that may encourage excessive risk-taking or conduct that could be detrimental to clients' interests.

7.4 Performance Appraisal Process

The Company has established a performance appraisal process designed to assess employee performance in a consistent and objective manner, while supporting the development of staff skills and competencies.

The performance appraisal process includes the following stages:

a) **Establishments of performance objectives and standards**
Management determines the performance objectives, responsibilities, competencies and skills applicable to each role, taking into consideration the relevant job descriptions and operational requirements. Performance objectives and evaluation criteria are communicated to employees at the beginning of each year and are reviewed on an annual basis.

b) **Ongoing feedback and guidance**
Managers provide employees with ongoing feedback, guidance and support throughout the year in order to assist them in improving existing skills, developing new competencies and achieving their professional objectives.

c) **Annual performance assessment**
Employee performance is assessed annually, usually within the first three months of the year, based on relevant qualitative and quantitative information, including professional conduct, achievement of objectives, competencies and overall contribution to the Company. The assessment process enables the management and employees to discuss performance outcomes, development needs and future objectives in a structured manner.

This performance appraisal framework supports the effective implementation of the Company's Remuneration Policy and promotes sound and responsible business conduct consistent with the Company's risk management framework.

7.5 Link between pay the and performance

The Company's remuneration practices are designed to support the recruitment and retention of qualified personnel, taking into account the size, internal organization and the nature, scope and complexity of the Company's activities. The Board considers the remuneration framework appropriate and proportionate to the Company's business model and risk profile.

The remuneration of employees whose professional activities have a material impact on the Company's risk profile (the "**Relevant Persons**"), including senior management, members of the Board and the heads of the departments, consists primarily of fixed remuneration and is not materially linked to short-term performance based objectives or sales targets.

The total remuneration of employees may consist of:

a) fixed remuneration;
b) variable remuneration, where applicable and subject to specified criteria;
c) social insurance contributions; and
d) health insurance and other benefits.

Total staff cost for the year ending 2025 was €292,634 (compared to 2024 which was €269,173).

The table below presents the remuneration of Board members and other key management personnel whose professional activities have a material impact on the risk profile of the Company for the reporting period:

Table 24: Remuneration split of staff whose activities have a material impact on the risk profile of the Company

	Number of Beneficiaries	Fixed Remuneration	Variable Remuneration	Total Remuneration
Non-Executive Directors-Independent	2	€10,000	-	€10,000
Non-Executive Directors	2	€0	-	€0
***Senior Management/ Executive Directors**	3	€126,673	-	€126,673
Total	7	**€136,673**	**-**	**€136,673**

During the reporting period, no variable remuneration was awarded to the members of the Board or other key management personnel whose professional activities have a material impact on the Company's risk profile. In addition:

- no variable remuneration was awarded or paid in cash, shares, share-linked instruments or other types paid upfront and for the deferred part;
- no deferred remuneration was awarded for previous performance periods, of neither amounts due to vest in the current reporting period nor due to vest in subsequent years;
- no deferred remuneration due to vest and paid out in the current reporting period and that is reduced through performance adjustments;
- no guaranteed variable remuneration was granted during the reporting period; and
- no severance payments were awarded or paid out during the reporting period.

Furthermore, companies are required to disclose the number of natural persons that are remunerated €1,000,000 or more per financial year, in pay brackets of €1,000,000, including their job responsibilities, the business area involved and the main elements of salary, bonus, long-term award and pension contribution. Currently there are no natural persons at the Company that are remunerated €1,000,000 or more per financial year and as such the above disclosure is not applicable to the Company.

8. INVESTMENT POLICY

In accordance with of Article 52 (1) of the IFR, IFs that do not meet the criteria set out in Article 32 (4) (a) of the IFD are required to disclose information relating to their investment policy.

In particular, IFs are required to disclose, in accordance with Article 52 of IFR the following information:

a) the proportion of voting rights attached to the shares held directly or indirectly by the investment firm, broken down by Member State and sector;
b) a complete description of voting behavior in the general meetings of companies the shares of which are held in accordance with paragraph 2 of Article 46, an explanation of the votes, and the ratio of proposals put forward by the administrative or management body of the company which the investment firm has approved;
c) an explanation of the use of proxy advisor firms; and
d) the voting guidelines regarding the companies the shares of which are held in accordance with paragraph 2 of Article 52.

IFs whose on-and-off balance sheet assets are, on average, less than €100,000,000 over the 4 year period are exempted from the above disclosure requirements.

The Company's average on-and off-balance sheet assets over the preceding four-year period were below the threshold of €100,000,000 and, therefore, the Company is exempted from the disclosure requirements relating to investment policy under Article 52 of the IFR.

9. ENVIRONMENTAL, SOCIAL AND GOVERNANCE RISK (ESG RISK)

Under the prudential framework introduced by the IFD and IFR, certain investment firms are required to disclose information relating to Environmental, Social and Governance (the "ESG") risks, including physical risks and transition risks.

In particular, Article 35 of the IFD and Article 53 of the IFR requires the IFs to disclose information on ESG risks, including risks arising from climate change, environmental factors, social matters and governance considerations. Such disclosures include inter-alia, information to physical risks and transition risks (i.e. changes in politics, technology and the market environment) that may impact the Company's activities, counterparties and investments. The above requirement has entered into force on the 26th December 2022 and it shall be disclosed once in the first year and biannually thereafter.

In accordance with Article 32(4) of the IFD, IFs whose on-and-off balance sheet assets are, on average less than €100,000,000 over the preceding four-year period are exempted from the ESG requirements.

The Company's average on-and off – balance sheet assets over the preceding four-year period were below the threshold of €100,000,000 and, therefore, the Company is exempted from the disclosure requirements relating to ESG risk under Article 53 of the IFR.

10. APPENDIX – SPECIFIC REFERENCES TO THE IFR

IFR Reference	High Level Summary	Section
Scope of disclosure requirements		
46 (1)	Requirement to publish disclosures for Class 2 IFs	1.2
46 (2)	Requirement to publish disclosures for small and non-interconnected IFs	N/A
46 (3)	Requirement to publish disclosures for IFs which do not longer meet the criteria of small and non-interconnected IF	N/A
46 (4)	Market disclosures to be published in an appropriate medium or provide clear cross-references to other media.	1.4
Risk management objectives and policies		
47	Disclosure of the risk management objectives and policies for each separate category of risk set out in Parts Three, Four and Five of the IFR, including a summary of the strategies and processes to manage those risks and a concise risk statement approved by the investment firm's management body succinctly describing the investment firm's overall risk profile associated with the business strategy	2.
Governance		
48 (a)	Disclosure of the number of directorships held by members of the management body	3.2.1
48 (b)	The policy on diversity with regard to the selection of members of the management body, its objectives and any relevant targets set out in that policy, and the extent to which those objectives and targets have been achieved	3.2.3
48 (c)	whether or not the investment firm has set up a separate risk committee and the number of times the risk committee has met annually	3.2.1
Own Funds		
49 (1) (a)	Full reconciliation of Common Equity Tier 1 items, Additional Tier 1 items, Tier 2 items and applicable filters and deductions applied to own funds of the investment firm and the balance sheet in the audited financial statements of the IF;	4.2
49 (1) (b)	Description of the main features of the Common Equity Tier 1 and Additional Tier 1 instruments and Tier 2 instruments issued by the IF	4.3
49 (1) (c)	Description of all restrictions applied to the calculation of own funds in accordance with the IFR and the instruments and deductions to which those restrictions apply	4.1
49 (2)	EBA shall develop implementation standards for points (a), (b), (c) above	N/A

Own Funds Requirements		
50 (a)	Summary of IF's approach to assessing adequacy of its internal capital to support current and future activities	6
50 (b)	Result of ICARA upon request of the competent authority	6
50 (c)	K-factors requirement calculated in aggregate form for RtM, RtF, and RtC, based on the sum of the applicable K - factors	5.1.3
50 (d)	Fixed overheads requirement	5.1.2
Remuneration policy and practices		
51	Remuneration policy, including aspects related to gender neutrality and the gender pay gap, for those categories of staff whose professional activities have a material impact on the risk profile	7
51 (a)	Design characteristics of the remuneration system, including the level of variable remuneration and criteria for awarding variable remuneration, payout in instruments policy, deferral policy and vesting criteria	7.3
51 (b)	Ratios between fixed and variable remuneration	7.5
51 (c)	Aggregated quantitative information on remuneration, broken down by senior management and members of staff whose actions have a material impact on the risk profile of the investment firm	7.5
51 (d)	Whether the IF benefits from a derogation laid down in Article 32(4) of the IFD	7.3
Investment Policy		
52	The Company is exempt from the disclosure requirements relating to investment policy pursuant to Article 52 of the IFR, as it meets the criteria referred to in Article 32(4)(a) of the IFD	8
Environmental, social and governance risk		
53	The Company is exempt from the disclosure requirements relating to ESG risks pursuant to Article 53 of the IFR, as it meets the criteria referred to in Article 32(4)(a) of the IFD	9