CONTRACTS FOR DIFFERENCE

DISCLOSURE AND MARKET DISCIPLINE REPORT FOR 2020

(1st July 2019 – 30th June 2020)

Issue Date: 30th November 2020*

** replacing previous version issued on 29th October 2020 that was based on unaudited records*

Independent Auditor's report to the Cyprus Securities and Exchange Commission in respect of First Prudential Markets Ltd for the year ended 30 June 2020 pursuant to paragraph 32(1) of Section 4, Chapter 1 of Part II of the Directive DI144-2014-14 of the Cyprus Securities and Exchange Commission for the Capital Requirements of Investment Firms

We report in relation to the fair presentation of the disclosures of First Prudential Markets Ltd (the "Company") for the year ended 30 June 2020, required by paragraph 32(1) of Section 4, Chapter 1 of Part II (the "Disclosures") of the Directive DI144-2014-14 of the Cyprus Securities and Exchange Commission for the Capital Requirements of Investment Firms (the "Directive"). The Disclosures, which are set out on the Company's website, are attached as an Appendix and have been initialled for identification purposes.

Respective responsibilities

The Company's Board of Directors is responsible for the preparation and fair presentation of the Disclosures in accordance with the Part Eight of Regulation (EU) No 575/2013 (the "Regulation"). Our responsibility is to express an independent conclusion in relation to the fair presentation of the Disclosures, in all material respects, in accordance with the requirements of the Regulation.

Independence and ethical requirements

The firm applies International Standard on Quality Control 1 and, accordingly, maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.
We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Scope of work performed

We conducted our work in accordance with International Standard on Assurance Engagements 3000 (Revised) "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information". This Standard requires that we plan and perform our work to obtain limited assurance whether any matters have come to our attention that cause us to believe that the Disclosures are not fairly presented, in all material respects, in accordance with the requirements of the Regulation.

The procedures performed do not constitute either an audit or a review made in accordance with International Standards on Auditing or International Standards on Review Engagements, and hence we do not express any assurance other than the statement made below. Had we performed an audit or a review in accordance with International Standards on Auditing or International Standards on Review Engagements, other matters might have come to our attention that would have been reported to you.

Our procedures included verifying, on a sample basis, the compliance of the Disclosures with the requirements of the Part Eight of the Regulation, as well as obtaining evidence supporting certain amounts and notifications included in the Disclosures. Our procedures also included an assessment of any significant estimates made by the Company's Board of Directors in the preparation of the Disclosures. We believe that our procedures provide a reasonable basis for our conclusion.

Conclusion

Based on our work described in this report, nothing has come to our attention that causes us to believe that the Disclosures for the year ended on 30 June 2020 are not fairly presented, in all material respects, in accordance with the requirements of the Regulation.

Our report is solely for the purpose as set out above and is not to be used for any other purpose or to be distributed to any other parties without our prior consent in writing. This report relates only to the Disclosures required pursuant to Part Eight of the Regulation and does not extend to any financial statements or other financial information of the Company.

PREMIOCONSULT LTD

Charalambos Georgiou
Certified Public Accountant and Registered Auditor
for and on behalf of

Premioconsult Limited
Certified Public Accountants and Registered Auditors

30 November 2020

PREMIOCONSULT LIMITED
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DISCLOSURE

The Disclosure and Market Discipline Report for the year 2020 has been prepared by **First Prudential Markets Ltd** (hereinafter called the "Company", or "we" or "us") as per the provisions of the Capital Requirements Regulation (EU) No. 575/2013 (hereinafter "the CRR") issued by the European Commission and the Directive DI144-2014-14 issued by the Cyprus Securities and Exchange Commission.

It is worth noting that, due to the fact that the Company belongs to a group of entities that also includes an Investment Firm regulated by the Australian Securities and Investments Commission ("ASIC"), the Company's financial reporting year for this report covers the period from ***01st July 2019 to 30th June 2020 (hereinafter "the Reporting Period")***, rather than 01st January to 31st December that is the case for the majority of Cyprus Investment Firms CIFs. For the same reason, the present report together with the external auditors' verification report, shall be published on Company's website by the following date:

- ***by 30th November 2020***, rather than by 31st May 2020.

First Prudential Markets Ltd 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 our competitive position.

First Prudential Markets Ltd is regulated by the Cyprus Securities and Exchange Commission (hereinafter the "CySEC", the "Commission") under License number **371/18.**

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Board of Directors declaration on the adequacy of risk management arrangements of the institution

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.

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1. Introduction

1.1. Investment Firm

Table 1: Company information

Company name	First Prudential Markets Ltd
CIF Authorization date	19/11/2018
CIF License number	371/18
Company Registration Date	27/07/2017
Company Registration Number	HE 372179
Investment Services	
Reception and transmission of orders in relation to one or more of the Financial Instruments	
Execution of orders on behalf of Clients	
Ancillary Services	
Safekeeping and administration of Financial Instruments for the account of Clients, including custodianship and related services such as cash/collateral management	
Foreign exchange services where these services are connected to the provision of investment services	
Investment Research	

1.2. Purpose

The present report is prepared by **First Prudential Markets Ltd**, a Cyprus Investment Firm (hereinafter “the CIF”) authorized and regulated by the CySEC under License number 371/18 and operates in harmonisation with the Markets in Financial Instruments Regulation and Directive (“MiFIR” & “MiFID II” respectively).

In accordance with the CRR, which was introduced in late 2014, the Company is required to disclose information relating to its risk exposure and management, capital structure, capital adequacy as well as the most important characteristics of the Company’s corporate governance including its remuneration system. The scope of this report is to promote market discipline and to improve transparency of market participants.

This document is updated and published annually; it will, however, be published more frequently if there are significant changes to the business (such as changes to the scale of operations, range of activities, etc.). CySEC is responsible for implementing and enforcing the European Capital Requirements Directive IV (hereinafter “CRD IV”), a capital adequacy framework comprising of a directive and a regulation, consisting of three (3) “Pillars”:

- **Pillar I** sets minimum capital requirements comprising of base capital resources requirements; credit, market and operational risk capital requirements;
- **Pillar II** requires companies to undertake an overall internal assessment of their capital adequacy, taking into account all the risks to which the Company is exposed to, and whether additional capital should be held to cover risks not adequately covered by Pillar I

requirements. This is monitored and achieved through the Company's Internal Capital Adequacy Assessment Process ("ICAAP");

- **Pillar III** complements Pillars I and II and improves market discipline by requiring companies to disclose information on their capital resources and Pillar I capital requirements, risk exposures and their risk management framework.

The present Pillar III Disclosure and Market Discipline Report for the year 2020 sets out both quantitative and qualitative information required in accordance with Part 8 of the CRR, particularly Articles 431 to 455, which set the requirements of the disclosures.

The information contained in the Pillar III Disclosure and Market Discipline Report will be audited by the Company's external auditors and published on the Company's websites www.fpmarkets.com/eu and www.fpmarkets.eu on an annual basis.

Furthermore, the Board of Directors and the 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 minimise adverse outcomes.

The Company's business effectiveness is based on the guidelines of the risk management policies and procedures put in place. The Board of Directors, Internal Auditor, Risk Manager, Compliance and Anti-Money Laundering Officer control and supervise the overall risk system so that all units charged with risk management perform their roles effectively on a continuous basis.

As with all Investment Firms, the Company is exposed to a variety of risks and in particular to credit risk, operational risk and minor exposure to market risk. More information can be found in the sections below.

The Company is making the disclosures on a solo basis.

1.3. The Company

FP Markets is operated by First Prudential Markets Ltd, that is a CIF supervised and regulated by the CySEC with CIF Licence number 371/18 and Company registration number HE 372179, located at Griva Digeni, 109, Aigeo Court, 2nd floor, 3101, Limassol, Cyprus, offering investment and ancillary services in relation to Contracts for Differences (hereinafter "CFDs").

First Prudential Markets Ltd, as a CIF intends to operate in the European Union, offering CFDs products and as at the date the financial year ended i.e. 30th June 2020 it had 19 employees located in Cyprus.

Although the Company has only accepted a small number of clients to this date, it intends to undertake every possible measure to achieve a stable business model and that will, *inter alia*, reflected in:

- A well-balanced capital allocation between the Company's operations;
- A geographically balanced model with a high percentage of revenues;
- A high-quality and diversified customer base.

The Company's growth strategy focuses on its existing areas of competence and on utilising the knowledge and expertise gained through operating another well-established entity that belongs to the group and which has been established and regulated in Australia by the Australian Securities and Investments Commission ("ASIC") since 2005. The Company strives for sustainable profitability consistent with its cost of capital and a balanced business model.

To this end, the Company's aims include:

- Seek to contain the volatility of its results;
- Calibrate its capital ratio to ensure a significant safety margin relative to the minimum regulatory requirements;
- Monitor the stability and diversification of its funding sources;
- Ensure sufficient resilience in scenarios of liquidity shortages;
- Tightly control its foreign-exchange risks.

The Company aims to maintain a diversified customer base.

The Company ensures that compliance rules are rigorously respected, especially in the area of Anti-Money Laundering and Countering of Terrorism Financing. The Company monitors the loyalty of the behaviour of its employees with regard to customers and all its stakeholders, as well as the integrity of its investment and financial practices.

The Company considers its reputation to be an asset of great value that must be protected to ensure its sustainable development. The prevention and detection of the risk of harm to its reputation are integrated within all the Company's operating practices. The Company's reputation is protected by making its employees aware of the values of responsibility, ethical behaviour and commitment.

1.4. Regulatory Supervision

The minimum capital requirements as at 30th June 2020 for the CRD were calculated in accordance with the "Pillar I" rules as set out by the Laws and Regulations, published by the CySEC. All CIFs under CySEC's authority must meet the requirements with respect to capital adequacy and market discipline, which are comprised by the following:

- **Law 87(I)/2017:** Provision of investment services, the exercise of investment activities, the operation of regulated markets and other related matters (hereinafter "Law");
- **Regulation (EU) No. 575/2013:** Capital Requirements Regulation (hereinafter "CRR");
- **Regulation (EU) No. 648/2012:** European Markets Infrastructure Regulation (hereinafter "EMIR");
- **Directive 2013/36/EU:** On access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC, (hereinafter Capital Requirements Directive "CRD");
- **Directive DI144-2014-14:** For the prudential supervision of Investment Firms;
- **Directive DI144-2014-15:** On the discretions of CySEC arising from CRR.

2. Governance and Risk Management

Implementing a high-performance and efficient risk management structure is a critical undertaking for the Company, in all businesses, markets and regions in which it operates, as are; maintaining a strong risk culture and promoting good corporate governance. The Company's risk management, supervised at the highest level is compliant with the regulations enforced by CySEC and the European regulatory framework.

2.1. Types of Risks

Given the diversity and evolution of the Company's activities, risk management involves the following main categories:

- **Credit and Counterparty risk (including Country risk):** risk of losses arising from the inability of the Company's customers, issuers or other counterparties to meet their financial commitments. Credit risk includes Counterparty risk linked to market transactions (Replacement risk) and securitisation activities. In addition, Credit risk may be further amplified by Concentration risk, which arises from a large exposure to a given risk, to one or more counterparties, or to one or more homogeneous groups of counterparties; Country risk arises when an exposure (loan, security, guarantee or derivative) becomes liable to negative impact from changing political, economic, social and financial conditions in the country of exposure.
- **Market risk:** risk of a loss of value on financial instruments arising from changes in market parameters, the volatility of these parameters and correlations between them. These parameters include but are not limited to exchange rates, interest rates, and the price of securities (equity), commodities, derivatives and other assets, including real estate assets.
- **Operational risks (including Accounting and Environmental risks):** risk of losses arising from inadequacies or failures in internal procedures, systems or staff, or from external events, including low-probability events that entail a high risk of loss.
- **Liquidity risk:** risk of the Company not being able to meet its cash or collateral requirements as they arise and at a reasonable cost.
- **Compliance risk (including Legal and Tax risks):** risk of legal, administrative or disciplinary sanction, or of material financial losses, arising from failure to comply with the provisions governing the Company's activities.
- **Reputational risk**: risk arising from a negative perception on the part of customers, counterparties, shareholders, investors or regulators that could negatively impact the Company's ability to maintain or engage in business relationships and to sustain access to sources of financing.
- **Strategic risk**: risks inherent in the choice of a given business strategy or resulting from the Company's inability to execute its strategy.
- **Business risk**: risk of lower than anticipated profits or experiencing losses rather than a profit.

2.2. Risk Appetite

The Company defines Risk Appetite as the level of risk, by type and by business that the Company is prepared to incur given its strategic targets. Risk Appetite is defined using both quantitative and qualitative criteria.

The Risk Appetite Framework takes into account earnings' sensitivities to business cycles and credit, market and operational events. The Risk Appetite is one of the strategic oversight tools available to the Management bodies. It underpins the budgeting process and draws on the ICAAP, which is also used to ensure capital adequacy under stressed economic scenarios.

Key Risk Appetite metrics

For 2020, our key risk appetite metrics can be seen below. These two (2) simple but important metrics helped us remain within our risk appetite and are the basis onto which our Internal Capital Adequacy Assessment Process forms.

Level	CET 1 ratio	Total Ratio
● Normal	> 10%	> 12%
● Manageable	10% - 8%	12 % - 10%
● Critical	< 8%	< 10%

Level	Own Funds
● Normal	> €160,000
● Manageable	€130,000 – €160,000
● Critical	< €130,000

Furthermore, the positioning of the business in terms of risk/return ratio as well as the Company's risk profile by type of risk are analysed and approved by the BoD. The Company's risk appetite strategy is implemented by the Senior Management in collaboration with the BoD and applied by all divisions through an appropriate operational steering system for risks, covering:

- **Governance** (decision-making, management and supervisory bodies);
- **Management** (identification of risk areas, authorisation and risk-taking processes, risk management policies through the use of limits and guidelines, resource management);
- **Supervision** (budgetary monitoring, reporting, leading risk indicators, permanent controls and internal audits).

Essential indicators for determining the Risk Appetite and their adaptations are regularly supervised over the year in order to detect any events that may result in unfavourable developments on the Company's risk profile. Such events may give rise to remedial action, up to the deployment of the recovery plan in the most severe cases.

The Company has established a Risk Appetite and all the relevant thresholds based on the Company's business.

2.3. Internal Capital Adequacy Assessment Process

The Internal Capital Adequacy Assessment Process ("ICAAP") requires institutions to identify and assess risks not adequately covered in Pillar I, maintain sufficient capital to face these risks and apply appropriate risk-management techniques to maintain adequate capitalization on an ongoing and forward-looking basis, i.e., internal capital supply to exceed internal capital demand.

The Company maintains compliance with the ICAAP, as required under Pillar II of Basel III and its local implementation in Cyprus, through risk management and governance framework, methodologies, processes and infrastructure. The Company is in the process of establishing its ICAAP for the year 2020, in which each risk will be taken into account and be stress-tested.

2.4. Stress Tests

Stress testing is a key risk management tool used by the Company to rehearse the business response to a range of scenarios, based on variations of market, economic and other operating environment conditions.
Stress tests are performed for both internal and regulatory purposes and serve an important role in:

- Understanding the risk profile of the Company;
- Evaluating the Company's capital adequacy in absorbing potential losses under stressed conditions: This takes place in the context of the Company's ICAAP on an annual basis;
- Evaluating the Company's strategy: Senior Management considers the stress test results against the approved business plans and determines whether any corrective actions need to be taken. Overall, stress testing allows Senior Management to determine whether the Company's exposures correspond to its risk appetite;
- Establishing or revising limits: Stress testing results, where applicable, is part of the risk management processes for the establishment or revision of limits across products, different market risk-variables and portfolios.

The ultimate responsibility and ownership of the Company's stress testing policy rests with the Board of Directors. If the stress testing scenarios reveal vulnerability to a given set of risks, the management should make recommendations to the Board of Directors for mitigation measures or actions. These may vary depending on the circumstances and include one or more of the following:

- Review the overall business strategy, risk appetite, capital and liquidity planning;
- Review limits;
- Reduce underlying risk positions through risk-mitigation strategies;
- Consider an increase in capital;
- Enhance contingency planning.

The Company performs financial modelling and stress analysis on a frequent basis especially when year-end financial results are available or when it revises its business plan.

The Company has performed a qualitative analysis of the material Pillar II risks, as well as weighed them against the Company's future development. By doing so, it has been deduced that in the future, whilst the probability of occurrence of any material risk is likely to remain the same, the associated / respective financial cost is likely to increase in light of the future enlargement of the organisation. The Company has thus, reached the decision that in planning its projected Capital for Pillar II purposes for the three (3) years' projected period, it shall maintain the same assumptions as it did in the first year's Risk Register calculations in terms of the probability of risk occurrence and probability/impact Matrix, while it will only amend the financial impact element of each risk.

2.5. Risk Management Committee

The Risk Management Committee (hereinafter "the RMC") advises the Board of Directors on the overall strategy and the appetite to all kinds of risks, both current and future, and helps the Board when it verifies that this strategy is implemented. In particular, it is responsible for:

- Reviewing the risk control procedures and is consulted about setting overall risk limits;
- Reviewing on a regular basis the strategies, policies, procedures and systems used to detect, manage and monitor the liquidity risk and submitting its conclusions to the Board of Directors;
- Reviewing the policies in place and the reports prepared to comply with the regulations on internal control;
- Reviewing the policy concerning risk management and the monitoring of off-balance sheet commitments, especially in light of the memoranda drafted to this end by the without prejudice to the Compensation Committee's missions, reviewing whether the incentives provided by the compensation policy and practices are compatible with the Company's situation with regard to the risks it is exposed to, its share capital, its liquidity and the probability and timing of expected benefits.

The Company established a Risk Committee and held meetings during the reporting period.

2.6. Diversity Policy

Diversity is increasingly seen as an asset to organizations and linked to better economic performance. It is an integral part of how the Company does business and imperative to commercial success.

The Company recognizes the value of a diverse and skilled workforce and management body, which includes and makes use of differences in the age, skills, experience, background, race and gender between them. A balance of these differences will be considered when determining the optimum composition.

The Company is committed to creating and maintaining an inclusive and collaborative workplace culture that will provide sustainability for the organization into the future. This is also documented as best practises in the Corporate Governance Code of many EU countries.

In line with the changes in the regulatory reporting framework, the Company implements a diversified approach during the recruitment and building of its Management body.

2.7. Board Recruitment

One of the BoD's main responsibilities is to identify, evaluate and select candidates for the Board and ensure appropriate succession planning. The Senior Management is assigned the responsibility to review the qualifications of potential director candidates and make recommendations to the BoD.

The persons proposed for the appointment should have specialised skills and/or knowledge to enhance the collective knowledge of the BoD and must be able to commit the necessary time and effort to fulfil their responsibilities.

Factors considered in the review of potential candidates include:

- Specialised skills and/or knowledge in accounting, finance, banking, law, business administration or related subject;
- Knowledge of and experience with financial institutions ("fit-and-proper");
- Integrity, honesty and the ability to generate public confidence;
- Knowledge of financial matters including understanding financial statements and financial ratios;
- Demonstrated sound business judgment;
- Risk management experience;
- Understanding of Good Corporate Governance.

The Company's Compliance Function and Senior Management are overviewing the selection, approval and later appraisal process of employees prioritising compliance with the provisions of the legislative framework provided by CySEC. The Company is also in the process of establishing a dedicated recruitment policy.

2.8. Remuneration

Remuneration refers to payments or compensations received for services or employment. The remuneration system includes the base salary and any bonuses or other economic benefits that an employee or executive receives during employment and shall be appropriate to the CIF's size, internal organization and the nature, the scope and the complexity of its activities to the provisions of the Directive DI144-2014-14.

During the period under review, the Company's remuneration system is concerned with practices of the Company for those categories of staff whose professional activities have a material impact on its risk profile, i.e. the Senior Management, members of the Board of Directors and the Heads of the Departments; the said practices are established to ensure that the rewards for the "Executive Management" provide the right incentives to achieve the key business aims while not giving rise to possible conflicts of interest.

The total remuneration of staff consists of fixed and variable components. Fixed and variable components are appropriately balanced, and the fixed component represents a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components, including the possibility to pay no variable remuneration component.

The Company has implemented a dedicated Remuneration Policy when setting out Company-wide remuneration practices, salaries and benefits for all employee categories.

Table 2: Aggregate Quantitative Information on Remuneration broken-down by business area

Department	No. of staff	Fixed - Full Time (€)	Fixed - Outsourcing & Secondment basis (€)	Variable (€)	Non-cash	Total (€)
Back Office, Customer Support, Sales, Safekeeping, Compliance, Finance	9	24,318	139,424	n/a	n/a	163,742
Brokerage	2	8,436	48,364	n/a	n/a	56,800
IT	1	7,579	43,453	n/a	n/a	51,032
Marketing	2	7,258	41,610	n/a	n/a	48,686
Non-Executive Directors	3	6,600	n/a	n/a	n/a	6,600
Grand Total	**17**	**54,191**	**272,851**	**n/a**	**n/a**	**327,042**

Department	No. of staff	Fixed - Full Time (€)	Fixed - Outsourcing & Secondment basis (€)	Variable (€)	Non-cash	Total (€)
Members of staff whose actions have a material impact on the risk profile of the institution and other staff [*1]	2	10,503	35,932	n/a	n/a	**46,435**
Grand Total	**2**	**10,503**	**35,932**	**n/a**	**n/a**	**46,435**

[*1] *both persons were members of the Risk Management Committee during the reporting period.*

2.9. Directorships held by Members of the Management Body

During the period under review, the members of the Management body of the Company, given their industry experience, have been taking seats in other CIF Companies' boards of directors. In line with this, the following table indicates the number of positions that each member holds with other CIFs:

Table 3: Directorships held by Members of the Management Body

Name	Position in the CIF	Directorships (Executive)	Directorships (Non-Executive)
Mr. Craig McKinlay Allison	Executive Director	**1**	**-**
Mr. Konstantinos Dimitriou	Executive Director	**1**	**1**
Mr. Eyal Israel Wagner	Independent Non-Executive Director	**1**	**1**
Ms. Sophie Louise Stabler	Independent Non-Executive Director	**-**	**1**
Mr. Matthew Kevin Murphie	Non-Executive Director	**1**	**-**

2.10. Reporting and Control

In line with the requirements set out in the Law and subsequent Directives providing for the operation of Cyprus Investment Firms, the Company has been able to maintain a good information flow to the Management body, as it can be seen below:

Table 4: Periodic Reporting Summary (from beginning of the reporting period until report publish date i.e. 30th November 2020)

Report Name	Report Description	Owner	Recipient	Frequency	Due Date
Annual Compliance Report	Inform the Senior Management and the BoD of the Company regarding the Performance of Compliance function during the year	Compliance Officer	BoD, CySEC	Annual	**30/04/2020** *extended to 31/07/20*
Annual Internal Audit Report	Inform the Senior Management and the BoD of the Company regarding the Internal Auditor during the year	Internal Auditor	BoD, CySEC	Annual	**30/04/2020** *extended to 31/07/20*
Annual Anti Money Laundering Compliance Report	Inform the Senior Management and the BoD of the Company's level of compliance with regards to Money Laundering.	Anti-Money Laundering Compliance Officer	BoD, CySEC	Annual	**31/03/2020**
Annual Risk Management Report	Represent the work and activities undertaken by the Risk Manager during the year	Risk Manager	BoD, CySEC	Annual	**30/04/2020** *extended to 31/07/20*
Pillar III Disclosures (Market Discipline & Disclosure)	Company is required to disclose information regarding its risk management, capital structure, capital adequacy and risk exposures	Risk Manager	BoD, CySEC, Public	Annual	**31/10/2020 first publish via durable medium** **30/11/2020 external auditor Verification Report**
Financial Reporting and Suitability Report	It is a formal record of the financial activities of the CIF	External Auditor	BoD, CySEC	Annual	**31/10/2020**
Capital Adequacy Reporting	A measure of the CIF's capital. It is expressed as a percentage and is used to protect depositors and promote the stability and efficiency of financial systems all over the world	Risk Manager / Accounting	Senior Management, CySEC	Quarterly	**11/08/2019** **11/11/2019** **11/02/2020** **12/05/2020** **11/08/2020** **11/11/2020** **30/11/2020**

3. Capital Management and Adequacy

3.1. The Regulatory Framework

In response to the financial crisis of recent years, the Basel Committee, mandated by the G20, has defined the new rules governing capital and liquidity aimed at making the financial sector more resilient. The new Basel III rules were published in December 2010. They were translated into European law by a directive ("CRD IV") and a regulation ("CRR") which entered into force on 1st January 2014.

The general framework defined by Basel III is structured around three (3) pillars, as in Basel II:

- **Pillar I** sets the minimum solvency requirements and defines the rules that institutions, that are required to comply with the regulation, must use to measure risks and calculate associated capital requirements, according to standard or more advanced methods;

- **Pillar II** relates to the discretionary supervision implemented by the competent authority, which allows them – based on a constant dialogue with supervised credit institutions – to assess the adequacy of capital requirements as calculated under Pillar I, and to calibrate additional capital requirements with regard to risks;
- **Pillar III** encourages market discipline by developing a set of qualitative or quantitative disclosure requirements which will allow market participants to make a better assessment of a given institution's capital, risk exposure, risk assessment processes and, accordingly, capital adequacy.

In terms of capital, the main new measures introduced to strengthen institutions' solvency were as follows:

- The complete revision and harmonisation of the definition of capital, particularly with the amendment of the deduction rules, the definition of a standardised Common Equity Tier 1 (or CET1) ratio, and new Tier 1 capital eligibility criteria for hybrid securities;
- New capital requirements for the counterparty risk of market transactions, to factor in the risk of a change in CVA (Credit Value Adjustment) and hedge exposures on the central counterparties (CCP);
- The set-up of capital buffers that can be mobilised to absorb losses in case of difficulties. The new rules require institutions to create a conservation buffer and a countercyclical buffer to preserve their solvency in the event of adverse conditions;
- Capital conservation buffers came into force in January 2016 and have been annually phasing towards their full application in January 2019;
- The set-up of restrictions on distributions, relating to dividends, Additional Tier 1 instruments and variable remuneration, via the maximum distributable amount (MDA) mechanism. At end of 2015, the European Banking Authority (EBA) issued an opinion to clarify that the MDA should be applied when an institution no longer complies with its CET1 ratio requirements, including those of Pillar II and capital buffers;
- In addition to these measures, there will be measures to contain the size and consequently the use of excessive leverage. To this end, the Basel Committee defined a leverage ratio, for which the definitive regulations were published in January 2014. The Basel leverage ratio compares the institution's Tier 1 capital to the balance sheet and off-balance sheet items, with restatements for derivatives and pensions. Full scope institutions have been obliged to publish this ratio since 2015.

3.2. Regulatory Capital

According to the International Financial Reporting Standards ("IFRS"), the Company's regulatory capital consists of Common Equity Tier 1 Capital.

Common Equity Tier 1 Capital (CET1 Capital)

According to CRR/CRDIV regulations, Common Equity Tier 1 capital is made up primarily of the following:

- Ordinary shares (net of repurchased shares and treasury shares) and related share premium accounts
- Retained earnings
- Other reserves

Deductions from Common Equity Tier 1 capital essentially involve the following:
- Goodwill and intangible assets, net of associated deferred tax liabilities
- Regulatory deductions i.e. Investor Compensation Fund

In some cases, additional capital tiers can come into force such as the Tier 2 Capital which could introduce the use of loans to support the business and operational capital. Such loans are highly regulated and are always subordinated to other claims.

3.3. Solvency Ratio (Capital Ratio or Capital Adequacy Ratio)

The capital (adequacy) ratio is a key metric for a financial institution and is calculated by comparing the institutions' capital base with the sum of risk-weighted assets from 3 major risk categories (credit, market, operational risk). The calculation always follows a strict set of rules defined in CRR. The minimum Total Capital Ratio that must be maintained **AT ALL** times is 8%.

The Company, during the period under review had an average Total Capital Ratio of 37.13%, taking into consideration the four (4) CRD reports submitted to CySEC (i.e. Q3 2019 72.35%, Q4 2019 23.65%, Q1 2020 22.12% and Q2 2020 based on audited FS 30.40%).

Since 1st January 2014, the new regulatory framework sets minimum requirements to be met for the CET1 ratio and the Tier 1 ratio. For 2015, the minimum requirement for CET1 was 4% and that of Tier 1 5.5%, excluding the Pillar II requirement. The total equity requirement, including CET1, AT1 and Tier 2 equity, was set at 8%. In 2016, the minimum requirement for CET1 was 4.5%, and that of Tier 1 6% with an overall ratio of 8% (including Tier 2).

In addition to the minimum requirements, CET1 and total Capital Requirements, full-scope investment firms are also expected to comply with a Capital Conservation Buffer. This buffer was introduced in 2016 and required full-scope companies to maintain additional capital of 0.625% of Total Risk Weighted Assets above the minimum requirements. The capital conservation buffer increased to 1.25% in 2017, then to 1.875% in 2018, and to 2.5% in 2019.

3.4. Capital Management

Capital management is implemented by the Senior Management. As part of managing its capital, the Company ensures that its solvency level is always compatible with the following objectives:

- Maintaining its financial solidity and respecting the Risk Appetite targets;
- Preserving its financial flexibility to finance organic growth;
- Adequately allocating of capital among the various business lines according to the Company's strategic objectives;
- Maintaining the Company's resilience in the event of stress scenarios;

- Meeting the expectations of its various stakeholders: supervisors, debt and equity investors, rating agencies, and shareholders.

The Company determines its internal solvency targets in accordance with these.

In line with the above, the Company is obligated to calculate and report on a quarterly basis (see section on *Reporting and Control*), under CRD, its credit risk, market risk and operational risk, the result of which, i.e. solvency/capital ratio, needs to be above 8% (Calculated based on the section above) at all times.

At 30th June 2020, the Total Capital ratio of the Company was 30.40% (19.30% on 30th June 2019) with total risk-weighted assets amounted to EUR 610,000 (EUR 1,031,000 on 30th June 2019).

Table 5: Capital Requirements

	30 June 2020 (Audited) In % or €	30 June 2019 (Audited) In % or €
CET1 Capital Ratio (*min. 4.5%)*	**30.40 %**	19.30 %
T1 Capital Ratio (*min. 6%)*	**30.40 %**	19.30 %
Total Capital Ratio (*min. 8%)*	**30.40 %**	19.30 %
CET1 Capital	**185,000**	199,000
Tier 1 Capital	**185,000**	199,000
Tier 2 Capital	**0**	0
Total Own Funds	**185,000**	199,000
Total Own Funds Surplus	**60,000**	74,000
Total Credit Risk Exposure	**210,000**	198,000
Total Market Risk Exposure	**0**	0
Total Fixed Overheads Risk Exposure	**399,000**	833,000
Total Risk Weighted Assets	**610,000**	1,031,000

Table 6: Regulatory Capital

	30 June 2020 (Audited) **In % or €**	**30 June 2019 (Audited)** In % or €
Common Equity Tier 1 (CET 1) capital: instruments and reserves		
Capital instruments and the related share premium accounts	**480,000**	330,000
Retained earnings	**-252,000**	-89,000
Accumulated other comprehensive income (loss), net of tax	**0**	0
Other	**0**	0
Common Equity Tier 1 (CET 1) capital before regulatory adjustments	**228,000**	241,000
Common Equity Tier 1 (CET 1) capital: regulatory adjustments		
Goodwill and other intangible assets (net of related tax liabilities) (negative amount)	**0**	0
Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liabilities where the conditions in Art. 38 (3) CRR are met) (negative amount)	**0**	0
Direct, indirect and synthetic holdings by the institution of the CET 1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above the 15 % threshold and net of eligible short positions) (negative amount)	**0**	0
Other regulatory adjustments	**-42,000**	-42,000
Total regulatory adjustments to Common Equity Tier 1 (CET 1) capital	**-42,000**	-42,000
Common Equity Tier 1 (CET 1) capital	**185,000**	199,000
Additional Tier 1 Capital	**0**	0
Tier 1 Capital	**185,000**	199,000
Tier 2 Capital	**0**	0
Total Capital	**185,000**	199,000
Total Risk Weighted Assets	**610,000**	1,031,000
Capital Ratios		
Common Equity Tier 1 (CET 1) Capital Ratio *(min. 4.5%)*	**30.40 %**	19.30 %
T1 Capital Ratio *(min. 6%)*	**30.40 %**	19.30 %
Total Capital Ratio *(min. 8%)*	**30.40 %**	19.30 %

4. Credit Risk

Credit risk corresponds to the risk of losses arising from the inability of the Company's customers, issuers or other counterparties to meet their financial commitments.

The Company's credit risk mainly arises:

- By the Company's deposits in credit and financial institutions;
- By assets mainly held from debtors or prepayments made.

The Company follows the Standardized Approach under Pillar I for calculating its Credit Risk Capital Requirements, as specified in CRR. It categorizes the assets in respect to their exposure class and uses the Credit Step methodology to determine its respective Risk Weights ("RW").

The Company follows both regulatory and compliance-oriented credit risk mitigation ("CRM") strategies in order to minimize the possibility of occurrence of this risk, such as:

- All Client funds are held in segregated accounts, separated from Company's funds.
- The Company maintains regular credit review of counterparties, identifying the key risks faced and reports them to the Board of Directors, which then determines the Company's risk appetite and ensures that an appropriate amount of capital is maintained.
- In order to maintain its Credit risk to the minimum, the Company is using EU credit institutions for safekeeping of funds and always ensures that the banks it cooperates with have high ratings based on top credit rating agencies (Moody's, S&P or Fitch), it frequently monitors their compliance with the EU regulatory framework and diversifies the funds over several credit institutions thus mitigating the risk exposure efficiently.

Further to the above, the Company has policies to diversify credit risk and to limit the amount of credit exposure to any particular counterparty in compliance with the requirements of the Regulation (EU) No. 575/2013.

Concentration Risk

Concentrations are measured using a standardised model and individual concentration limits are defined for large exposures. Any concentration limit breach is managed over time by reducing exposures.

4.1. External Ratings

For the purpose of calculating the capital requirements of the Company, mainly under the credit risk requirement, the external credit ratings from **Moody's Analytics** have been applied for the exposure classes listed below:

- Exposures to central governments or central banks;
- Exposures to institutions; and
- Exposures to corporates.

The general association with each credit quality step complies with the standard association published by CySEC as follows:

Credit Quality Step	Moody's Rating	Institution Risk Weight (Below 3 months)	Institution Risk Weight (Above 3 months)	Sovereigns Risk Weight	Corporate Risk Weight
1	**Aaa to Aa3**	**20%**	**20%**	**0%**	**20%**
2	**A1 to A3**	**20%**	**50%**	**20%**	**50%**
3	**Baa1 to Baa3**	**20%**	**50%**	**50%**	**100%**
4	**Ba1 to Ba3**	**50%**	**100%**	**100%**	**100%**
5	**B1 to B3**	**50%**	**100%**	**100%**	**150%**
6	**Caa1 and below**	**150%**	**150%**	**150%**	**150%**

For exposures to regional governments or local authorities, public sector entities and institutions, the external ratings are applied in the following priority (i) Issue/Exposure (ii) Issuer/Counterparty (iii) Sovereign.

For exposures to central governments or central banks and corporates the external ratings are applied in the following priority (i) Issue/Exposure (ii) Issuer/Counterparty.

It should be noted that the external ratings are not taken into account where exceptions or discretions as per the CRR apply.

4.2. Quantitative Information

The credit exposures in this section are measured using the standardized approach. Exposures are broken down by sectors and obligor ratings.

At 30th June 2020, the Company's capital requirements for credit risk amounted to EUR 16,816 (EUR 210,207 total risk-weighted credit risk exposure). The tables below indicate the Company's credit risk exposure.

Table 7: Asset Class Breakdown of Net Credit Risk Exposure and Minimum Capital Requirement as at 30th June 2020, in €

Asset Class	Net value of exposures at the end of the period	Minimum capital requirement
Central governments or central banks	**-**	-
Public sector entities	**-**	-
Institutions	**184,926**	14,794
Corporates	**-**	-
Of which: SMEs	**-**	-
Retail	**4,889**	391
Of which: SMEs	**-**	-
Equity exposures	**-**	-
Other exposures	**20,392**	1,631
Total risk weighted assets	**210,207**	-
	Total Credit Risk Capital Requirements	16,816

Table 8: Exposures Post Value Adjustments (before applying Credit Risk Mitigation and after applying credit conversion factors) by Significant Geographic Area and Material Exposure Class 30th June 2020, in €

Asset class	Cyprus	UK	Total
Central governments or central banks	**-**	**-**	**-**
Public sector entities	**-**	**-**	**-**
Institutions	183,528	1,398	184,926
Corporates	-	-	-
Of which: SMEs	-	-	-
Retail	4,889	-	4,889
Of which: SMEs	-	-	-
Equity exposures	-	-	-
Other exposures	20,392	-	20,392
Total risk weighted assets	**208,809**	**1,398**	**210,207**
Total Credit Risk Capital Requirements	**16,704**	**112**	**16,816**

Table 9: Exposures Post Value Adjustments (before applying Credit Risk Mitigation and after applying credit conversion factors) by Industry and Exposure Class as at 30th June 2020, in €

Asset class	Financial Services	Not Applicable	Total
Central governments or central banks	-	-	-
Public sector entities	-	-	-
Institutions	184,926	-	184,926
Corporates	-	-	-
Of which: SMEs	-	-	-
Retail	4,889	-	4,889
Of which: SMEs	-	-	-
Equity exposures	-	-	-
Other exposures		20,392	20,392
Total risk weighted assets	**189,815**	**20,392**	**210,207**
Total Credit Risk Capital Requirements	**15,185**	**1,631**	**16,816**

Table 10: Exposures Post Value Adjustments (before applying Credit Risk Mitigation and after applying credit conversion factors) by Residual Maturity and by Material Exposure Class as at 30th June 2020, in €

Asset class	Up to 3 months	More than 3 months	Total
Central governments or central banks	-	-	-
Public sector entities	-	-	-
Institutions	184,926	-	184,926
Corporates	-	-	-
Of which: SMEs	-	-	-
Retail	4,889	-	4,889
Of which: SMEs	-	-	-
Equity exposures	-	-	-
Other exposures	-	20,392	20,392
Total risk weighted assets	**189,815**	**20,392**	**210,207**
Total Credit Risk Capital Requirements	**15,185**	**1,631**	**16,816**

5. Market Risk

Market risk corresponds to the risk of a loss of value on financial instruments arising from changes in market parameters, the volatility of these parameters and correlations between them. These parameters include but are not limited to exchange rates, interest rates, and the price of securities (equity, bonds), commodities, derivatives and other assets, including real estate assets. As mentioned above, in the context of Pillar I, market risk mainly arises as:

- ***Position Risk*****:** It refers to the probability of loss associated with a particular trading/security (long or short) position due to price changes.
- ***Interest rate risk*****:** The risk that the fair value of future cash flows of a financial instrument will fluctuate because of changes in market interest rates.
- ***Commodities Risk*****:** It refers to the uncertainties of future market values and of the size of the future income, caused by the fluctuation in the prices of commodities. These commodities may be oil, metals, gas, electricity etc.
- ***Foreign Exchange Risk*****:** It is a financial risk that exists when a financial transaction is denominated in a currency other than the base currency of the company. The foreign exchange risk in the Company is effectively managed by the establishment and control of foreign exchange limits, such as through the establishment of maximum value of exposure to a currency pair as well as through the utilization of sensitivity analysis.

The Company monitors these exposures on a quarterly basis and has policies to minimize its market risk exposures which are in accordance with the CRR.

During the period under review, the Company had minimal market risk mainly because it was not exposed to foreign exchange fluctuations that could affect Company's deposits in banks. Also the Company held no reserves denominated in foreign currencies.

5.1. Quantitative Information

The Company's capital requirements related to market risk are mainly determined using the standardized approach.

As of 30th June 2020, the Company had no market risk exposure.

6. Operational Risks

Operational risks (including accounting and environmental risks) correspond to the risk of losses arising from inadequacies or failures in internal procedures, systems or staff, or from external events, including low-probability events that entail a high risk of loss. This section describes the monitoring of the Company's operational risk, in addition to providing an analysis of the Company's operational risk profile and regulatory capital requirements.

The Company has developed processes, management tools and a control infrastructure to enhance the Company-wide control and management of the operational risks that are inherent in its various activities. These include, among others, general and specific procedures, permanent supervision, business continuity plans and functions dedicated to the oversight and management of specific types of operational risks, such as fraud, risks related to external service providers, legal risks, information system security risks and compliance risks.

In order to control the exposure to operational risks, the management has established two key objectives:

- To minimise the impact of any losses suffered, both in the normal course of business (small losses) and from extreme events (large losses).
- To improve the effective management of the Company and strengthen its brand and external reputation.

The Company recognises that the control of operational risk is directly related to effective and efficient management practices and high standards of corporate governance. To that effect, the management of operational risk is geared towards:

- Maintaining a strong internal control governance framework.
- Managing operational risk exposures through a consistent set of processes that drive risk identification, assessment, control and monitoring.

The Company implements the below Operational Risk Mitigation Strategies in order to minimize its Operational Risk Exposure:

- The development of operational risk awareness and culture.
- The provision of adequate information to the Company's management, in all levels, in order to facilitate decision making for risk control activities.
- The implementation of a strong system of internal controls to ensure that operational losses do not cause material damage to the Company and have a minimal impact on profitability and objectives.
- The improvement of productivity, efficiency and cost effectiveness, with an objective to improve customer service and protect shareholder value.
- The establishment of a "four-eye" structure and board oversight. This structure ensures the separation of power regarding vital functions of the Company namely through the existence of Senior Management. The Board further reviews any decisions made by the Management while monitoring their activities.
- Detection methods are in place in order to detect fraudulent activities.
- Comprehensive business contingency and disaster recovery plan.

The Senior Management employs specialized tools and methodologies to identify, assess, mitigate and monitor operational risk. These specialized tools and methodologies assist operational risk management to address any control gaps. To this effect, the following are implemented:

- Incident collection;
- Key Risk Indicators;
- Business Continuity Management;
- Training and awareness.

6.1. Fixed Overheads Risk

Fixed Overhead Risk is the risk that the Company does not hold sufficient eligible capital to accommodate fluctuations in a company's levels of business. The requirement is to hold eligible capital of at least one-quarter of the fixed overheads of the previous year. For the operational risk in relation to the capital adequacy returns, the Company now uses the fixed overhead requirement, which is taken into account if and only if, the summation of credit and market risk falls below a calculated limit of Fixed overheads.

The risks and uncertainties faced by the Company are those inherent to the industry. The Board seeks to mitigate this risk by constant review and strict control of fixed overhead costs by optimising resources and reducing unnecessary expenses. Throughout the analysis, FOH capital requirements were constantly more than the total of Company's Credit and Market risk exposures and total capital requirements.

Based on the relevant calculations the Company's capital requirement in respect to operational risk, as at 30th June 2020, was EUR 48,772, while the risk-weighted exposure was EUR 610,000.

7. Liquidity risk

Liquidity risk corresponds to the risk of the Company not being able to meet its cash or collateral requirements as they arise and at a reasonable cost.

The Company's primary objective is to ensure the funding of its activities in the most cost-effective way by managing liquidity risk and adhering to regulatory constraints. The liquidity system aims at providing a balance sheet framework with assets and liabilities target structure that is consistent with the risk appetite defined by the Board of Directors:

- The assets structure should allow the businesses to develop their activities in a way that is liquidity-efficient and compatible with the target liabilities structure.
- The liabilities structure is based on the ability of the businesses to collect financial resources from customers and the ability of the Company to sustainably raise financial resources on the markets, in accordance with its risk appetite.

The principles and standards applicable to the management of liquidity risks are defined by the Company's governing bodies, whose duties in the area of liquidity are listed below:

- **The Company's Board of Directors:** (i) establishes the level of liquidity risk tolerance as part of the Risk Appetite exercise, (ii) meets regularly to examine the Company's liquidity risk situation, on a quarterly basis.
- **The Senior Management:** (i) sets budget targets in terms of liquidity (ii) allocates liquidity to the pillars.

To minimize its exposure to liquidity risk, the CIF implements the below Liquidity Risk Mitigation Strategies:

- Regular analysis & reporting to the Board of Directors on the funding needs of the Company.

- Monitoring of the Company's exposures and diversification to avoid rise of concentration risk as per the internal policies.
- Cash Management.

The Company has undertaken a specific review of its liquidity risks and believes that it is able to meet its upcoming maturities. As at 30th June 2020, the Company held EUR 374,045 in its bank accounts.

Worth noting is also the fact that the total amount of Clients' money administrated by the Company was EUR 650,387 (including an amount of EUR 637,418 held under the custodianship services rendered by the Company). The Company is taking due care in safeguarding client assets and is performing the following mitigation strategies:

- Those assets are held by the Company in a fiduciary capacity and are not included in the Company's funds nor its financial statements;
- The said funds are held in client segregated bank accounts; and
- Frequent reconciliations are performed internally and also by the External Auditors who are also tasked to verify and submit to CySEC annual reports.

8. Compliance, Reputational and Legal Risks

Compliance risk (including legal and tax risks) corresponds to the risk of legal, administrative or disciplinary sanction, or of material financial losses, arising from failure to comply with the provisions governing the Company's activities.

Compliance means acting in accordance with applicable regulatory rules, as well as professional, ethical and internal principles and standards. Fair treatment of customers, with integrity, contributes decisively to the reputation of the Company.

By ensuring that these rules are observed, the Company works to protect its customers and, in general, all of its counterparties, employees, and the various regulatory authorities to which it reports.

Compliance System and Department

Independent compliance structures have been set up within the Company's different business lines around the world to identify and prevent any risks of non-compliance.

The Compliance Officer verifies that all compliance laws, regulations and principles applicable to the Company's services are observed, and that all staff respect codes of good conduct and individual compliance. The Compliance Officer also monitors the prevention of reputational risk and provides expertise for the Company performs controls at the highest level and assists with the day-to-day operations. The Compliance Officer is responsible for:

- The Company's financial security (prevention of money laundering and terrorism financing; know-your-customer obligations; embargoes and financial sanctions);
- Developing and updating consistent standards for the function, promoting a compliance culture, coordinating employee training and managing Company regulatory projects;

- Coordinating a compliance control mechanism within the Company (second-level controls), overseeing a normalised Compliance process, oversight of personnel operations and, finally, managing large IT projects for the function;
- Preventing and managing conflicts of interest;
- Proposing ethical rules to be followed by all Company employees;
- Training and advising employees and raise their awareness of compliance issues;
- Building and implementing steering and organisational tools for the function: Compliance and Reputational Risk dashboards, forums to share best practices, meetings of functional compliance officers;
- Generally monitoring subjects likely to be harmful to the Company's reputation.

8.1. Compliance Transformation Programme

In light with the changes arising from MiFID II, which came into force since 1st January 2018, the Company has established a programme for continuous improvement and refinement of the Compliance function, particularly regarding raising the monitoring standards and better fulfilling the increasing requirements of regulatory authorities.

Among other things, such programme strengthens governance and increases the resources made available to the function, both by recruiting additional resources and by investing in streamlining the Compliance function's existing IT applications and strengthening alert controls and management.

It targets the continued enhancement of priority functions, the central tools for monitoring regulatory application (including training, harmonisation, and regulatory oversight), financial security, constant oversight, customer protection, market integrity (including preventing conflicts of interest), and reporting quality.

8.2. Prevention of Money Laundering and Terrorism Financing

Money laundering and terrorist financing risk mainly refers to the risk where the Company may be used as a vehicle to launder money and/or assist/involved in financing terrorism.

The Company has in place and is updating as applicable, certain policies, procedures and controls in order to mitigate the money laundering and terrorist financing risks. Among others, these policies, procedures and controls include the following:

- The adoption of a risk-based approach that involves specific measures and procedures in assessing the most cost effective and appropriate way to identify and manage the Money Laundering and Terrorist Financing risks faced by the Company;
- The adoption of adequate Client due diligence and identification procedures in line with the Clients' assessed Money Laundering and Terrorist Financing risk;
- Setting certain minimum standards of quality and extent of the required identification data for each type of Client (e.g. documents from independent and reliable sources, third party information);
- Obtaining additional data and information from Clients, where this is appropriate and relevant, for the proper and complete understanding of their activities and source of wealth and for the effective management of any increased risk emanating from a particular Business Relationship or an Occasional Transaction;

- Monitoring and reviewing the business relationship or an occasional transaction with clients and potential clients of high-risk countries;
- Ensuring that the Company’s personnel receive the appropriate training and assistance.

The Company is frequently reviewing its policies, procedures and controls with respect to money laundering and terrorist financing to ensure compliance with the applicable legislation and incorporated, as applicable, any new information issued/available in this respect.

9. Appendix - Specific References to CRR

CRR Ref	High Level Summary	Compliance Reference
Scope of disclosure requirements		
431(1)	Requirement to publish Pillar III disclosures.	**1.2**
431(2)	Disclosure of operational risk information.	**6**
431(3)	Institution must have a policy covering frequency of disclosures. Their verification, comprehensiveness and overall appropriateness.	**1.2**
431(4)	Explanation of ratings decisions to SMEs upon request.	**4.1**
Frequency of disclosure		
433	Disclosures must be published once a year at a minimum, in conjunction with the date of publication of the financial statements.	**1.2**
Means of disclosures		
434(1)	To include disclosures in one appropriate medium or provide clear cross-references to other media.	**1.2**
434(2)	Equivalent disclosures made under other requirements (i.e., accounting) can be used to satisfy Pillar III if appropriate.	**1.2**
Risk management objectives and policies		
435(1) (a) **435(1) (b)** **435(1) (c)** **435(1) (d)**	Disclosure of information as regards strategies and processes, organisational structure of the relevant risk management function, reporting and measurement systems and risk mitigation/hedging policies	**2,4,5 and 6**
435(1) (e)	Declaration approved by the BoD on adequacy of risk management arrangements	**Page 3**
435(1) (f)	Concise risk statement approved by the BoD	**Page 3**
435(2)	Information, once a year at a minimum, on governance arrangements.	**2**
435(2) (a)	Number of directorships held by members of the BoD.	**2.9**
435(2) (b)	Recruitment policy of BoD members, their experience and expertise.	**2.7**
435(2) (c)	Policy on diversity of BoD members, its objectives and results against targets.	**2.6**
435(2) (d)	Disclosure of whether a dedicated risk committee is in place, and number of meetings in the year.	**2.5**
435(2) (e)	Description of information flow on risk to BoD.	**2.10**
Scope of application		
436(a)	Name of institution.	**1.1**
436 (b)	Difference on the basis of consolidation for accounting and prudential purposes, naming entities that are:	**N/A**
436 (b) (i)	Fully consolidated;	**N/A**
436 (b) (ii)	Proportionally consolidated;	**N/A**
436 (b) (iii)	Deducted from own funds;	**N/A**
436 (b) (iv)	Neither consolidated nor deducted.	**N/A**

436 (c)	Impediments to transfer of funds between parent and subsidiaries.	**N/A**
436 (d)	Capital shortfalls in any subsidiaries outside of scope of consolidation and their names (if any).	**N/A**
436 (e)	Use of articles on derogations from (a) prudential requirements or (b) liquidity requirements for individual subsidiaries / entities.	**N/A**
Own Funds		
437 (1)	Requirements regarding capital resources table	**3.2**
437 (1)		
437 (1) (a)		
437 (1) (b)		
437 (1) (c)		
437 (1) (d) (i)		
437 (1) (d) (ii)		
437 (1) (d) (iii)		
437 (1) (e)		
437 (1) (f)		
437(2)	EBA shall develop implementation standards for points (a), (b), (d) and (e) above	**3.2**
Capital Requirements		
438(a)	Summary of institution's approach to assessing adequacy of capital levels.	**2.1**
438(b)	Result of ICAAP on demand from competent authority.	**2.3**
438(c)	Capital requirement amounts for credit risk for each Standardised approach exposure class (8% of risk-weighted exposure).	**4.2**
438(d)	Capital requirements amounts for credit risk for each Internal Ratings Based approach exposure class.	**4.2**
438(d) (i)		
438(d) (ii)		
438(d) (iii)		
438(d) (iv)		
438(e)	Capital requirements amount for market risk or settlement risk, or large exposures where they exceed limits.	**5.1**
438(f)	Capital requirement amounts for operational risk, separately for the basic indicator approach, the Standardised approach, and the advanced measurement approaches as applicable.	**6.1**
Exposure to counterparty credit risk (CCR)		
439(a)	Description of methodology to assign internal capital and credit limits for counterparty credit exposures.	**N/A**
439(b)	Discussion of policies for securing collateral and establishing reserves.	**N/A**
439(c)	Discussion of policies as regards wrong-way exposures.	**N/A**
439(d)	Disclosure of collateral to be provided (outflows) in the event of a ratings downgrade.	**N/A**
439(e)	Derivation of net derivative credit exposure.	**N/A**
439(f)	Exposure values for mark-to-market, original exposure, standardised and internal model methods.	**N/A**
439(g)	Notional value of credit derivative hedges and current credit exposure by type of exposure.	**N/A**

439(h)	Notional amounts of credit derivative transactions for own credit, intermediation, bought and sold, by product type.	**N/A**
439(i)	Estimation of alpha, if applicable.	**N/A**
Credit Risk Adjustments		
442(a)	Definitions for accounting purposes of ‘past due’ and ‘impaired’.	**N/A**
442(b)	Approaches for calculating credit risk adjustments.	**N/A**
442(c)	Exposures post-value adjustments (before applying Credit Risk Mitigation and after applying credit conversion factors) by different types of exposures.	**4.2**
442(d)	Exposures post value adjustments (before applying Credit Risk Mitigation and after applying credit conversion factors) by significant geographic areas and material exposure classes.	**4.2**
442(e)		**4.2**
442(f)	Exposures post value adjustments by residual maturity and by material exposure class.	**4.2**
442(g)	Breakdown of impaired, past due, specific and general credit adjustments, and impairment charges for the period, by exposure class or counterparty type.	**N/A**
442(g) (i)		**N/A**
442(g) (ii)		**N/A**
442(g) (iii)		**N/A**
442(h)	Impaired, past due exposures, by geographical area, and amounts of specific and general impairment for each geography.	**N/A**
442(i)	Reconciliation of changes in specific and general credit risk adjustments.	**N/A**
442(i) (i)		**N/A**
442(i) (ii)		**N/A**
442(i) (iii)		**N/A**
442(i) (iv)		**N/A**
442(i) (v)		**N/A**
442 endnote	Specific credit risk adjustments recorded to income statement are disclosed separately.	**N/A**
Unencumbered assets		
443	Disclosures on unencumbered assets.	**N/A**
Use of ECAI’s		
444(a)	Names of the nominated ECAIs used in the calculation of Standardised approach RWAs, and reasons for any changes.	**N/A**
444(b)	Exposure classes associated with each ECAI.	**N/A**
444(c)	Description of the process used to transfer the issuer and issue credit assessments onto items not included in the trading book;	**N/A**
444(d)	Mapping of external rating to credit quality steps.	**N/A**
444(e)	Exposure values pre- and post-credit risk mitigation, by credit quality step.	**N/A**
Exposure to market risk		
445	Disclosure of position risk, large exposures exceeding limits, FX, settlement and commodities risk.	**5**
Operational Risk		
446	Disclosure of the scope of approaches used to calculate operational risk, discussion of advanced methodology and external factors considered.	**6**

Exposures in equities not included in the trading book		
447(a)	Differentiation between exposures based on their objectives and overview of the accounting techniques and valuation methodologies used.	**N/A**
447(b)	Recorded at fair value and actual prices of exchange traded equity where it is materially different from fair value.	**N/A**
447(c)	Types, nature and amounts of the relevant classes of equity exposures.	**N/A**
447(d)	Cumulative realised gains and losses on sales in the period.	**N/A**
447(e)	Total unrealised gains or losses, latent revaluation gains or losses and amounts included in Tier 1 capital.	**N/A**
Exposure to interest rate risk on positions not included in the trading book		
448(a)	Nature of interest rate risk and key assumptions in measurement models.	**N/A**
448(b)	Variation in earnings, economic value, or other measures used from upward and downward shocks to interest rates, by currency.	**N/A**
Remuneration Disclosures		
450	Remuneration Policy	**2.8**
Leverage		
451(1) (a)	Leverage ratio and analysis of total exposure measure, including reconciliation to financial statements, and derecognised fiduciary items.	**N/A**
451(1) (b)		**N/A**
451(1) (c)		**N/A**
451(1) (d)	Description of the risk management process to mitigate excessive leverage and factors that had an impact on the leverage ratio during the year.	**N/A**
451(1) (e)		**N/A**
451(2)	EBA shall develop implementation standards for points above.	**N/A**
Use of Credit Risk mitigation techniques		
453(a)	Policies and processes, and an indication of the extent to which the CIF makes use of on- and off-balance sheet netting.	**N/A**
453(b)	Policies and processes for collateral valuation and management.	**N/A**
453(c)	Description of types of collateral used by the CIF.	**N/A**
453(d)	Types of guarantor and credit derivative counterparty, and their creditworthiness.	**N/A**
453(e)	Information about market or credit risk concentrations within the credit mitigation taken.	**N/A**
453(f)	For exposures under either the Standardised or Foundation IRB approach, disclosure of the exposure value covered by eligible collateral.	**N/A**
453(g)	For exposures under either the Standardised or Foundation IRB approach, disclosure of the exposure covered by guarantees or credit derivatives.	**N/A**
Use of the Advanced Measurement Approaches to operational risk		
454	Description of the use of insurance or other risk transfer mechanisms for the purpose of mitigating operational risk.	**N/A**