

**PARTNERS INVESTMENTS, o.c.p., a.s.**

Einsteinova 24, 851 01 Bratislava - municipality part Petržalka

Comp. Reg. No. 52 413 179, Tax ID: 2121011475, ID VAT: SK7120001900

The Company is registered in the Commercial Register of the Municipal Court in Bratislava III., Sec. Sa, Entry No. 6941/B

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**Information Disclosed by the Securities Broker**

according to Sec. 74b of Act No. 566/2001 Coll. on Securities and Investment Services and on amendments and supplements to certain acts (the Securities Act), as amended (hereinafter referred to as the "**Securities Act**") and Article 46 of Regulation (EU) 2019/2033 of the European Parliament and of the Council of 27 November 2019 on prudential requirements for investment firms and amending Regulations (EU) No. 1093/2010, (EU) No. 575/2013, (EU) No. 600/2014 and (EU) No. 806/2014 (hereinafter referred to as "**Regulation 2019/2033**")

**as of: December 31, 2025**

**I.**

**Risk Management Objectives and Policies**

(Article 47 of Regulation 2019/2033)

**Summary of Risk Management Policies and Procedures:**

A Securities Broker (hereinafter referred to as the "**Securities Broker**" or the "**Company**") in accordance with Article 23 (2) of Commission Delegated Regulation (EU) No. 2017/565 of 25 April 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms as well as defined terms for the purposes of that Directive (hereinafter referred to as "**CDR 2017/565**") does not establish a separate risk management function (i.e. a risk manager function) as it is not proportionate to the nature, scope, and complexity of its business activities and the scope of the investment services, ancillary investment services, and the performance of investment activities it provides.

The Securities Broker has decided to establish a Risk Management Committee, which is made up of members of the Supervisory Board. The Risk Management Committee is an independent advisory and consultative body to the CEO and DCEO on the management of current and future risk tolerances and risk management strategy. At the same time, the Risk Management Committee proposes strategies to the Securities Broker Board of Directors on how to proceed to maintain business continuity in the event of a serious failure. The activities of the Risk Management Committee are governed by a separate statute.

**a) Organisation of Individual Risk Management**

The basic requirements for the risk management system are ensured by the approved organisational structure of the Securities Broker with the division of responsibilities and competences for the system of individual risk reporting, risk assessment, follow-up control and with the provision of adequate information flows for the performance of individual responsibilities and competences, defined in the internal regulations of the Securities Broker. Individual risks are identified, measured, and evaluated as part of the normal process of monitoring the risks of activities carried out at the level of individual departments. The CEO is responsible for adherence to the long-term risk management strategy and the execution of operational activities related to risk monitoring. These activities are carried out in close cooperation with the DCEO, the Company's Board of Directors and the Compliance Officer.

**b) Scope and Nature of Risk Reporting and Measurement Systems**

The Securities Broker identifies the following risks with regard to the nature and scope of the investment services provided:

- credit risk,
- market risk,
- liquidity risk,
- operation risk,
- business risk.

**c) Credit Risk Management**

Credit risk arises from cash and cash equivalents, financial derivatives and deposits with banks and other financial institutions, trade with customers and clients, including outstanding receivables and future agreed transactions. An overdue receivable is a receivable from a company for which the debtor is in arrears. An allowance for receivables is to be made when there is a presumption that the debtor will not repay their debt in full. In establishing the allowance, the Company assesses each receivable individually based on its financial position and long-term relationship with the debtor.

An impaired receivable is a receivable whose fair value has been reduced below the carrying amount of the receivable. The Securities Broker defines credit risk as the degree of uncertainty arising from business activity, i.e. the risk of default by debtors, business partners and other counter-parties. For the purpose of calculating capital requirements for credit risk, the Company uses a standardised approach.

**d) Market Risk Management**

The Securities Broker's activities expose themselves to market risks arising mainly from operations in interest rate and currency instruments sensitive to the volatility of the financial and capital markets.

Currency risk is the risk of changes in the value of assets and liabilities due to changes in foreign exchange rates. The Securities Broker calculates own funds requirements for foreign exchange risk cover using the standard method. The Company continuously monitors its foreign currency position and monitors the ratio of assets to liabilities denominated in foreign currencies.

Interest rate risk relates to the possibility of loss arising from movements in interest rates. Receivables and floating rate debt securities expose the Company to the risk of variability in cash flows. Receivables and fixed rate debt securities expose the Securities Broker to fair value risk.

**e) Liquidity Risk Management**

The Securities Broker defines liquidity risk as the potential for loss of earnings and own funds arising from the Company's inability to meet its obligations when due without incurring unnecessary losses and also the risk of loss in the event of low or limited liquidity in the financial and capital markets on which individual financial instruments are traded.

**f) Operational Risk Management**

Operational risk is the risk of direct or indirect loss that may arise from inadequate or faulty internal processes of the Securities Broker due to human or systems failure, or due to independent external events. In order to minimize operational risk and to identify it in a timely and effective manner, the Securities Broker has in place a functional organizational structure, an internal control system, a modern information system and regularly updated formal and informal internal regulations and procedures.

**g) Business Risk Management**

The Securities Broker identifies the following risks as part of their business risk management:

- **reputation risk** – a threat to a company's reputation in the marketplace,
- **tax risk** – losses arising from changes in tax regulations,
- **currency convertibility risk** – losses caused by the inability to fully convert capital, dividend, and interest income from investments,
- **regulatory risk** – the risk of loss due to inability to comply with regulatory requirements and measures,
- **legal risk** – the risk of loss due to losses from legal claims or legal unenforceability, possible insolvency of the counter-party.

Of the above risks, the Company's main focus is on the management of legal, tax, reputation, and regulatory risk. For their timely identification, monitoring and effective management, the Company also uses the services of various external consultants.

**Concise Risk Statement, Approved by the Securities Broker 's Governing Body, which Succinctly Describes the Overall Risk Profile of the Investment Firm Associated with the Business Strategy:**

The Securities Broker declares that they have sound strategies, policies, procedures, and systems in place to identify, measure, manage, and monitor significant sources of risk and their effects within the meaning of Sec. 71c (2) of the Securities Act, which are appropriate to the complexity, risk profile, scope of Securities Broker's activities and risk tolerance determined by the Board of Directors and correspond to the business strategy as well as the importance of Securities Broker in the Slovak Republic.

**II.**

**Securities Broker Management and Administration**

(Article 48 of Regulation 2019/2033)

The Securities Broker publish the following information regarding internal governance and management mechanisms:

**a) Number of management positions held by members of the governing body (as of December 31, 2025):**

**the number of members of the Board of Directors:** 6

of which the members of the Board of Directors hold the following management positions:

**Ing. Jozef Bartánus, Chairman of the Board of Directors**

the number of executive management functions: 6 (including 6 executive management functions within one business group)

the number of non-executive management functions: 3 (including 3 non-executive management functions within the same business group)

**Ing. Daniel Petrakovič, Vice-Chairman of the Board of Directors**

the number of executive management functions: 1

the number of non-executive management functions: 0

**Mgr. Martin Čája, Member of the Board of Directors**

the number of executive management functions: 1  
the number of non-executive management functions: 0

**Ing. Silvia Karcolová, Member of the Board of Directors**

the number of executive management functions: 3 (of which 3 executive management functions within the same business group)  
the number of non-executive management functions: 0

**JUDr. Katarína Faguľová, member of the Board of Directors**

the number of executive management functions: 3 (of which 3 executive management functions within the same business group)  
the number of non-executive management functions: 0

**Mgr. Ivan Kasanický, PhD, Member of the Board of Directors**

the number of executive management functions: 3 (of which 3 executive management functions within the same business group)  
the number of non-executive management functions: 1

**the number of members of the Supervisory Board:** 3  
of which the members of the Supervisory Board hold the following management positions:

**Ján Müller, member of the Supervisory Board**

the number of executive management functions: 4 (of which 3 executive management functions within the same business group)  
the number of non-executive management functions: 5 (of which 4 executive management functions within the same business group)

**Ing. Bohuslav Benedek, Member of the Supervisory Board**

the number of executive management functions: 3 (of which 3 executive management functions within the same business group)  
the number of non-executive management functions: 5 (of which 5 executive management functions within the same business group)

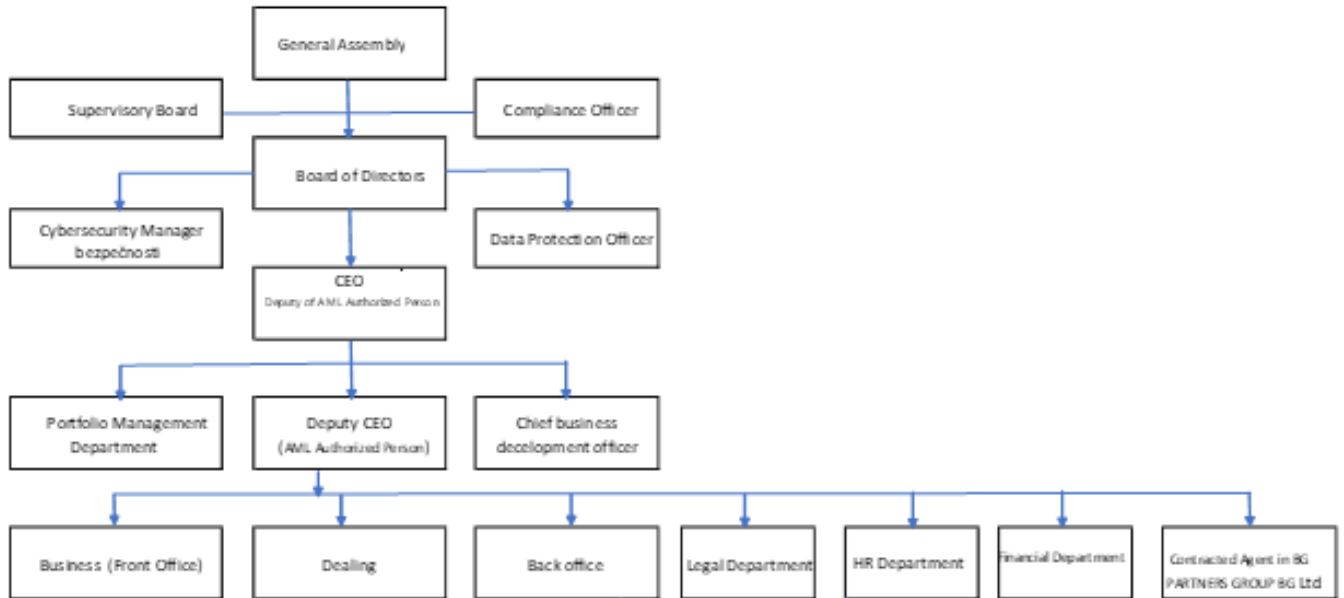
**Marcel Kohút, Member of the Supervisory Board**

the number of executive management functions: 1  
the number of non-executive management functions: 3 (including 3 non-executive management functions within the same business group)

total number of employees: 24

## Organizational Structure (as of December 31, 2025):

Graphical Organization Structure of PARTNERS INVESTMENTS, o.c.p., a.s.



### b) Diversity Policy in Relation to the Selection of Members of the Governing Body:

The Diversity Policy aims to ensure that the collective knowledge and experience of the governing body of the Company as a whole is sufficient. Each candidate nominated as a member of the Company's governing body must meet certain criteria, in particular: professional knowledge, experience, skills, reputation, and potential conflict of interest.

A specific nomination as a member of the Securities Broker Board of Directors is subject to the approval procedure at the National Bank of Slovakia (NBS), i.e. prior consent to their election as a member of the Securities Broker Board of Directors is granted by the NBS. Only a person who meets the legal criteria may become a member of the Supervisory Board, and although nominations for membership on the Securities Broker Supervisory Board are not subject to approval by the NBS, the Securities Broker subsequently informs the NBS of the Supervisory Board member and demonstrates their professional competence and trustworthiness, while the NBS is authorized to verify whether the Supervisory Board member meets the requirements under Sec. 8(b), Sec. 55 (10) and Sec. 71 of the Securities Act and if a member of the Supervisory Board does not meet the above requirements, the NBS is entitled to order the Securities Broker to replace such member of the Supervisory Board pursuant to Sec. 144 (1)(u) of the Securities Act. The above competence of the NBS also applies in relation to the members of the Securities Broker Board of Directors.

At the same time, the Securities Broker follows the principle of gender equality in the selection of the members of the governing body; although they do not apply any quotas for the mandatory representation of men and women in the governing body, any gender discrimination in the selection of the members of the governing body is prohibited.

The objectives of the Diversity Policy were duly met in the past period and the Company's Diversity Policy was in line with the applicable legislation.

**c) Information on the Establishment of the Special Committee on Risk and the Number of its Meetings Per Year:**

The Securities Broker has decided to establish a Risk Management Committee, which is made up of members of the Supervisory Board. The Risk Management Committee is an independent advisory and consultative body to the CEO and DCEO on the management of current and future risk tolerances and risk management strategy. At the same time, the Risk Management Committee proposes strategies to the Securities Broker Board of Directors on how to proceed to maintain business continuity in the event of a serious failure. The activities of the Risk Management Committee are governed by a separate statute.

Number of Risk Management Committee meetings in 2025: 1

### **III.**

#### **Own Resources**

(Article 49 of Regulation 2019/2033)

**a) Reconciliation of Common Own Funds Items to the Balance Sheet in the Financial Statements:**

The Securities Broker will disclose data demonstrating a full reconciliation of the Tier 1 Common Own Funds, Tier 1 Additional Capital Items, Tier 2 Capital Items and applicable filters and deductions applied to the investment firm's own funds to the balance sheet in the Securities Broker's audited financial statements as an investment firm. The Securities Broker will publish the above data on their website <https://www.partnersinvestments.sk/dokumenty>.

**b) Description of the Main Characteristics of the Tier 1 Common Own Funds and Tier 1 Additional Capital instruments and Tier 2 Capital Items issued by the Securities Broker**

As of December 31, 2025, the Company reported own funds, Tier 1 capital, Tier 1 own funds of EUR 3,494,797.21. These items included fully paid-up capital instruments amounting to EUR 300,000, other reserves amounting to EUR 106,000 and retained earnings amounting to EUR 3,176,032.61.

**c) Description of All Restrictions Applied to the Calculation of Own Funds and the instruments and deductions to which those restrictions apply:**

Own funds were reduced by the amortisation of intangible assets amounting to EUR 87,235.4 calculated in accordance with DELEGATED COMMISSION REGULATION (EU) 2020/2176.

### **IV.**

#### **Own Funds Requirements**

(Article 50 of Regulation 2019/2033)

The Securities Broker will publish a summary regarding their approach to assessing the adequacy of the Securities Broker's internal capital to support its current and future activities:

- PARTNERS INVESTMENTS, o.c.p., a.s. as an investment company that does not qualify as a small and unaffiliated investment company under Article 12 (1) of Regulation 2019/2033, has in place arrangements, policies, and procedures for the ongoing assessment and maintenance of the amount, types, and deployment of internal capital and

liquid assets appropriate and proportionate to the nature, scale and complexity of the Company's activities. They are subject to regular internal review.

The Extraordinary General Meeting held on February 23, 2026 approved the distribution of part of the retained earnings for the 2024 financial year in the amount of EUR 2,176,032.61 and its payment as a dividend to the shareholders of the Company. The Ordinary General Meeting held on April 27, 2026 approved the distribution of retained earnings for 2024 in the amount of EUR 1,000,000 and their payment as a dividend to the Company's shareholders and also approved the proposal for the settlement of the Company's 2025 profit so that the entire net profit of the Company for 2025 in the amount of EUR 3,907,994.77 will be transferred to the retained earnings account of previous years.

At the same time, the Company is prudent and diligent in its approach to the consistent recognition of intangible assets, software.

- In accordance with Article 46 of Regulation 2019/2033, PARTNERS INVESTMENTS, o.c.p., a.s. discloses the K-factor requirements calculated in accordance with Article 15 of Regulation 2019/2033 in aggregate form for RtM, RtF, and RtC based on the sum of the applicable K-factors:

### K-Factor requirement calculations

			Factor amount	K-factor requirement		
			0010	0020		
Total K-Factor requirement			0010	-	EUR 669157,64	
	Risk to client			0020	-	EUR 659438,24
		Assets under management	0030	EUR 790235560,87	EUR 158047,11	
		Client money held - Segregated	0040	EUR 28019229,33	EUR 112076,92	
		Client money held - Non-segregated	0050			
		Assets safeguarded and administered	0060	EUR 973021498,83	EUR 389208,60	
		Client orders handled - Cash trades	0070	EUR 105613,45	EUR 105,61	
		Client orders handled - Derivatives trades	0080			
	Risk to market			0090	-	
		K-Net positions risk requirement	0100			
		Clearing margin given	0110			
	Risk to firm			0120	-	EUR 9719,40
		Trading counterparty default	0130			

	Daily trading flow - Cash trades	0140	EUR 9719395,51	EUR 9719,40
	Daily trading flow - Derivative trades	0150		
	K-Concentration risk requirement	0160	-	

- PARNERS INVESTMENTS, o.c.p., a.s. discloses the fixed overhead requirement determined in accordance with Article 13 of Regulation 2019/2033.

### Fixed overheads requirements calculation

			Amount	
			0010	
Fixed overhead requirement		0010	EUR 916614,63	
Annual fixed overheads of the previous year after distribution of profits		0020	EUR 3666458,51	
Total expenses of the previous year after distribution of profits		0030	EUR 19042970,20	
Of which: Fixed expenses incurred on behalf of the investment firms by third parties		0040		
(-)Total deductions		0050	-EUR 15376511,69	
(-)Staff bonuses and other remuneration		0060		
(-)Employees', directors' and partners' shares in net profits		0070		
(-)Other discretionary payments of profits and variable remuneration		0080		
(-)Shared commission and fees payable		0090	-EUR 82371,67	
(-)Fees, brokerage and other charges paid to CCPs that are charged to customers		0100		
(-)Fees to tied agents		0110	-EUR 14594092,30	
(-)Interest paid to customers on client money where this is at the firm's discretion		0120		
(-)Non-recurring expenses from non-ordinary activities		0130		
(-)Expenditures from taxes		0140	-EUR 700047,72	

		(-)Losses from trading on own account in financial instruments	0150	
		(-)Contract based profit and loss transfer agreements	0160	
		(-)Expenditure on raw materials	0170	
		(-)Payments into a fund for general banking risk	0180	
		(-)Expenses related to items that have already been deducted from own funds	0190	

## Composition of Own Resources

			Amount	
			0010	
Own funds			0010	EUR 3494797,21
	Tier 1 Capital		0020	EUR 3494797,21
		Common Equity Tier 1 Capital	0030	EUR 3494797,21
		Fully paid up capital instruments	0040	EUR 300000,00
		Share premium	0050	
		Retained earnings	0060	EUR 3176032,61
			0070	EUR 3176032,61
		Previous years retained earnings	0070	EUR 3176032,61
		Profit eligible	0080	
		Accumulated other comprehensive income	0090	
		Other reserves	0100	EUR 106000,00
		Minority interest given recognition in CET1 capital	0110	
		Adjustments to CET1 due to prudential filters	0120	
		Other funds	0130	
		(-)Total deductions from Common Equity Tier 1	0140	
			0150	
		(-) Own CET1 instruments	0150	
			0160	
		(-) Direct holdings of CET1 instruments	0160	
		(-) Indirect holdings of CET1 instruments	0170	
		(-) Synthetic holdings of CET1 instruments	0180	
		(-) Losses for the current financial year	0190	
		(-) Goodwill	0200	
		(-) Other intangible assets	0210	-EUR 87235,40
		(-) Deferred tax assets that rely on future profitability and do not arise from temporary differences net of associated tax liabilities	0220	
		(-) Qualifying holding outside the financial sector which exceeds 15% of own funds	0230	
		(-) Total qualifying holdings in undertaking other than financial sector entities which exceeds 60% of its own funds	0240	

				(-) CET1 instruments of financial sector entities where the investment firm does not have a significant investment	0250	
				(-) CET1 instruments of financial sector entities where the investment firm has a significant investment	0260	
				(-) Defined benefit pension fund assets	0270	
				(-) Other deductions	0280	
			CET1: Other capital elements, deductions and adjustments		0290	
	Additional Tier 1 Capital				0300	
		Fully paid up, directly issued capital instruments			0310	
		Share premium			0320	
		(-) Total deductions from Additional Tier 1			0330	
			(-) Own AT1 instruments		0340	
				(-) Direct holdings of AT1 instruments	0350	
				(-) Indirect holdings of AT1 instruments	0360	
				(-) Synthetic holdings of AT1 instruments	0370	
			(-) AT1 instruments of financial sector entities where the investment firm does not have a significant investment		0380	
			(-) AT1 instruments of financial sector entities where the investment firm has a significant investment		0390	
			(-) Other deductions		0400	
		Additional Tier 1: Other capital elements, deductions and adjustments			0410	
	Tier 2 Capital				0420	
		Fully paid up, directly issued capital instruments			0430	
		Share premium			0440	
		(-) Total deductions from Tier 2			0450	
			(-) Own T2 instruments		0460	
				(-) Direct holdings of T2 instruments	0470	
				(-) Indirect holdings of T2 instruments	0480	
				(-) Synthetic holdings of T2 instruments	0490	
			(-) T2 instruments of financial sector entities where the investment firm does not have a significant investment		0500	
			(-) T2 instruments of financial sector entities where the investment firm has a significant investment		0510	
		Tier 2: Other capital elements, deductions and adjustments			0520	

## Own Funds Requirements

			Amount
			0010
Own fund requirement		0010	EUR 916614,63
	Permanent minimum capital requirement	0020	EUR 150000,00
	Fixed overhead requirement	0030	EUR 916614,63
	Total K-Factor Requirement	0040	EUR 669157,64
Transitional own funds requirements		0049	(Abstract)
	Transitional requirement based on CRR own funds requirements	0050	

	Transitional requirement based on fixed overhead requirements	0060	
	Transitional requirement for investment firms previously subject only to an initial capital requirement	0070	
	Transitional requirement based on initial capital requirement at authorisation	0080	
	Transitional requirement for investment firms that are not authorised to provide certain services	0090	
	Transitional requirement of at least 250 000 EUR	0100	
Memorandum items		0109	(Abstract)
	Additional own funds requirement	0110	
	Additional own funds guidance	0120	
	Total own funds requirement	0130	EUR 916614,63

## Capital ratios

		Amount
		0010
CET 1 Ratio	0010	381,27%
Surplus(+)/Deficit(-) of CET 1 Capital	0020	EUR 2981493,02
Tier 1 Ratio	0030	381,27%
Surplus(+)/Deficit(-) of Tier 1 Capital	0040	EUR 2807336,24
Own Funds Ratio	0050	381,27%
Surplus(+)/Deficit(-) of Total capital	0060	EUR 2578182,58

## V.

### Remuneration Policy and Procedures

(Article 51 of Regulation 2019/2033)

- 1) **Key Conceptual Features of the Remuneration System**, including the level of variable remuneration and the criteria for the award of variable remuneration, the policy of payment in the form of instruments, the deferral policy and the vesting criteria:

The Securities Broker applies the remuneration principles in accordance with Sec. 71da (2) of the Securities Act for the following persons:

- a) all members of the Company's Board of Directors,
- b) all members of the Company's Supervisory Board,
- c) Chief Executive Officer (CEO), Deputy Chief Executive Officer (DCEO), and Chief Development Officer (CBDO),
- d) risk-takers,
- e) officers with control functions,
- f) all employees other than those referred to in points (a) to (e) whose professional activities have a significant impact on the risk profile of the Company as a Securities Broker or the assets it manages and who are entitled to total remuneration at least equal to the lowest remuneration of the persons referred to in point (c) or point (d).

Within the framework of the Remuneration Policy, remuneration mainly consists of the following components:

- a) fixed remuneration component:
  - a1) the annual salary of employees, i.e. persons employed under a contract of employment;
  - a2) annual remuneration for the performance of functions in the Board of Directors and the Supervisory Board under a performance contract;
- b) a variable remuneration component (the so-called annual bonus):
  - b1) the annual remuneration of employees, i.e. persons employed under a contract of employment,
  - b2) annual royalties for the performance of functions in the Board of Directors and the Supervisory Board under a performance contract.

The determination of the specific amount of the fixed component of the employee's salary is within the discretion of the Company's CEO. The amount of the fixed annual remuneration of the members of the Board of Directors is approved by the Supervisory Board and the members of the Supervisory Board by the General Assembly in the performance contracts. Due to (i) the cumulative functions of the Company's Chief Executive Officer and managers under the direct management responsibility of the Company's Chief Executive Officer, who also perform the functions of a member of the Board of Directors within the meaning of the Company's Organizational Regulations and the Company's Working Regulations, and (ii) the remuneration of members of the Board of Directors and members of the Supervisory Board for the performance of their functions in the form of a fixed remuneration component, no variable remuneration component (the so-called annual bonus) is provided to members of the Board of Directors and members of the Supervisory Board.

The percentage of variable pay for each employee group is set as a percentage of the annual basic salary and is set out in Annex No. 1 of the Internal Remuneration Policy.

There is no guaranteed variable remuneration and no legal obligation of the Company in relation to it.

Annual bonuses may be awarded to employees after the following conditions have been met:

- a) resources have been budgeted for the payment of annual bonuses;
- b) an employee was set individual objectives in an evaluation sheet and an individual evaluation interview (evaluation of individual objectives) was carried out with them;
- c) meeting individual targets at a minimum of 70%, no annual bonus will be paid if individual targets are below this threshold;
- d) an employee has worked for at least 6 months during the assessment period;
- e) an employee has not received a warning for breach of work discipline within the last 6 months;
- f) an employee was employed by the Company on December 31 of the calendar year for which the remuneration is paid and has not given notice of termination on that date.

In the case of termination of employment of an employees who have deferred part of their variable remuneration, the payment of the variable remuneration will be reviewed on the date of the employee's departure, taking into account the reason for the termination of employment. In the event of serious breaches of work discipline or serious breaches of generally applicable legal regulations or internal regulations, the variable remuneration component will not be paid. The reassessment is the responsibility of the Company's Board of Directors.

The payment of the variable component as well as its deferred portion is subject to reassessment – ex post risk adjustment, whereby it will only be paid or allocated if the value of the client assets under management and the Company's performance do not affect the Company's ability to meet its obligations under Sec. 74 of the Securities Act. The Company is obliged to monitor the state of its own resources when determining the variable component of the total remuneration and not to grant the variable component of the total remuneration if its payment would have a negative impact on the Company's own resources. Also, if the Company achieves negative financial results, the variable component of the total remuneration may be significantly reduced. However, the priority in remuneration decisions is the capital requirements of the Company. The reassessment is the responsibility of the Board of Directors in cooperation with the risk management function (if established).

A reduction in the variable component may also occur in the following cases:

- a) fraud or other wrongful conduct by an employee during the assessed period;
- b) misleading information from an employee with a real or potential material impact on the evaluation of their performance;
- c) misconduct or serious ill-conduct by an employee, e.g. a breach of internal rules of a high degree of seriousness.

The decision to not to assign or reduce the variable component of the so-called designated persons is a matter for the Board of Directors.

The payment of the variable component in the Company is made only in the form of a cash payment. This is due to (i) the non-application of the requirement on the basis of the proportionality principle, as well as the fact that the Company does not issue any financial instruments specified in Sec. 71bd (10) of the Securities Act, which could serve as a vehicle for the purposes of the non-financial component of remuneration.

## 2) **Ratios Between Fixed and Variable Remuneration** set out in Article 30 (2) of Directive (EU) 2019/2034:

The Company determines an appropriate ratio between the fixed component of total remuneration and the variable component of total remuneration of an employee in accordance with the business strategy, the risks involved and the impact of employees on the risk profile of the Company as a Securities Broker. In order to align the payment of variable remuneration with the life cycle of the Company as a Securities Broker and the risks directly related to the Company's business, part of the variable remuneration is paid to designated persons:

- a) immediately (immediate component), after the end of the calendar year for which the variable remuneration component is due;
- b) payment of the remaining balance is deferred to a later date (deferred component). The deferral period begins whenever the immediate (upfront) component of the variable remuneration is paid.

In this case, 60% of the variable remuneration (i.e. the immediate component) is paid as a one-off cashless transfer in the year following the performance assessment period, and 40% of this remuneration (i.e. the deferred component) is deferred over three instalments over a period of three years following the payment of the immediate component as follows: 15% in the first year, 15% in the second year and 10% in the third year.

A remuneration of at least EUR 100,000 is considered as a significantly high remuneration. In the case of a significantly high remuneration, the immediate component is 40% and the deferred component is 60% of the variable remuneration (the deferred component is paid over three years after the immediate component is paid as follows: 20% in the first year, 20% in the second year and 20% in the third year).

3) **Aggregate Quantitative Information on Remuneration Broken Down by Executive Management and Officers whose Activities have a Significant Impact on the Securities Broker 's Risk Profile:**

**Amount of Remunerations Granted for 2025:**

Fixed component paid to 3 members of executive management for 2025 – EUR 263,384.81

Variable component paid to 3 members of executive management for 2025 – EUR 31, 560

No share-based remuneration, share-linked instruments or other types of remuneration were paid to employees.

Amount of deferred remuneration granted for prior assessed periods: EUR 21,040

The amount of deferred remuneration that vests in the accounting period that is paid during the accounting period and reduced as a result of performance-based adjustments: EUR 13,317

Vested variable remuneration granted during the accounting period and the number of recipients of such remuneration: EUR 52,600. number of recipients: 3

Severance payments granted in prior periods that were paid during the accounting period: EUR 0

The amount of severance payments granted during the accounting period: EUR 0

4) **Information on Whether the Securities Broker is Making Use of the Exemption** provided for in Article 32 (4) of Directive (EU) 2019/2034:

The Securities Broker did not make use of the exemption under Article 32 4(b) of Directive (EU) 2019/2034, i.e. the conditions for granting a variable component of total remuneration under point 2 of this Article does not apply to a person whose annual variable remuneration does not exceed EUR 50,000 and does not represent more than one quarter of the total annual remuneration of that person.

5) **Applying the Principle of Gender Equality:**

The Securities Broker's Remuneration Policy is based on the principle of gender equality, to which no exceptions are permitted. Any discrimination in pay between men and women for equal work or work of equal value is prohibited.

## VI.

### Investment Policy

(Article 52 of Regulation 2019/2033)

The Securities Broker does not invest any of its clients' funds in shares of companies that are admitted to trading on a regulated market. Investing in such financial instruments is not part of

an investment strategy at this time. When providing investment portfolio management services, the Securities Broker invests exclusively in mutual funds of domestic and foreign collective investment entities and exchange-traded funds. Thus, it does not make any direct investments in shares admitted to trading on a regulated market. For these reasons the Securities Broker:

- has no voting rights attached to the shares held directly or indirectly by the Securities Broker,
- does not hold any votes at General Assemblies of public limited companies (as the Securities Broker does not directly or indirectly hold any shares);
- does not use any proxy advisory companies when voting at the General Assemblies of public limited companies.

## **VII.**

### **Environmental, Social, and Governance Risks**

(Article 53 of Regulation 2019/2033)

The Securities Broker publishes the above data on their website in the following documents:

- in the "Client Documentation" section: [ESG Pre-Contractual Information on Investment Strategies](#)
- in the "MIFID Information" section: [Policy for Integrating Sustainability Risk Into Investment Decision-Making](#)