



TeleTrade-DJ International Consulting Ltd

DISCLOSURE AND MARKET DISCIPLINE REPORT FOR 2019

**Regulated by the Cyprus Securities and Exchange
Commission License no. 158/11**

DISCLOSURE

The Disclosure and Market Discipline Report for the year 2019 has been prepared by TeleTrade-DJ International Consulting Ltd as per the requirements of Regulation (EU) No. 575/2013 issued by the European Commission and the Directive DI144-2014-14 issued by the Cyprus Securities and Exchange Commission.

TeleTrade-DJ International Consulting 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.

*TeleTrade-DJ International Consulting Ltd is regulated by the Cyprus Securities and Exchange Commission under License number **158/11**.*

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

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



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Independent Auditors' Report to the Cyprus Securities and Exchange Commission in respect of Teletrade – DJ International Consulting Ltd for the year ended 31 December 2019 pursuant to 32(1) of Directive 144-2014-14 of the Cyprus Securities and Exchange Commission for the prudential supervision of investment firms

1. We report in relation to the fair presentation of the disclosures of Teletrade – DJ International Consulting Ltd (the "Company") for the year ended 31 December 2019, required by paragraph 32(1) of Directive 144-2014-14 of the Cyprus Securities and Exchange Commission (the "CySEC") for the prudential supervision 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

2. The Company's Board of Directors is responsible for the preparation and fair presentation of the Disclosures in accordance with 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.

Scope of work performed

We conducted our work in accordance with International Standard on Assurance Engagements 3000 "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. Our procedures included verifying, on a sample basis, the compliance of the Disclosures with the requirements of Part Eight of the Regulation, as well as obtaining evidence supporting certain of the amounts and notifications included in the Disclosures. Our procedures also included an assessment of any significant estimates made by the Company's

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3. Board of Directors in the preparation of the Disclosures. We believe that our procedures provide a reasonable basis for our conclusion.

4. 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 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.

Conclusion

5. 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 31 December 2019 are not fairly presented, in all material aspects, in accordance with the requirements of the Regulation.

6. 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.

A handwritten signature in blue ink, appearing to read 'Marios Lazarou', with a horizontal line underneath.

Marios Lazarou
Certified Public Accountant and Registered Auditor
for and on behalf of

KPMG Limited
Certified Public Accountants and Registered Auditors

Nicosia, 31 August 2020



TeleTrade-DJ International Consulting Ltd

**DISCLOSURE
AND MARKET DISCIPLINE REPORT FOR 2019**

**Regulated by the Cyprus Securities and Exchange
Commission License no. 158/11**

APPENDIX

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Contents

1. INTRODUCTION	10
1.1. INVESTMENT FIRM	10
1.2. PURPOSE	10
1.3. THE COMPANY	11
1.4. REGULATORY SUPERVISION	12
2. GOVERNANCE AND RISK MANAGEMENT	13
2.7. TYPES OF RISKS	13
2.1. RISK APPETITE	14
2.2. INTERNAL CAPITAL ADEQUACY ASSESSMENT PROCESS	15
2.3. STRESS TESTS	15
2.4. DIVERSITY POLICY	16
2.5. BOARD RECRUITMENT	17
2.6. REMUNERATION	17
2.7. PERFORMANCE RELATED PAY	18
2.8. DIRECTORSHIPS HELD BY MEMBERS OF THE MANAGEMENT BODY	19
2.9. REPORTING AND CONTROL	20
3. CAPITAL MANAGEMENT AND ADEQUACY	20
3.1. SOLVENCY RATIO (CAPITAL RATIO OR CAPITAL ADEQUACY RATIO)	21
3.2. CAPITAL MANAGEMENT	21
4. CREDIT RISK	24
4.1. EXTERNAL RATINGS	24
4.2. QUANTITATIVE INFORMATION	26
4.3. LARGE EXPOSURE	30
4.4. CREDIT RISK MITIGATION AND COUNTERPARTY CREDIT RISK	30
5. MARKET RISK	31
5.1. QUANTITATIVE INFORMATION	32
6. OPERATIONAL RISK	32
6.7. BASIC INDICATOR APPROACH	33
6.1. PANDEMIC RISK	33
7. LIQUIDITY RISK	34
8. LEVERAGE	35
9. COMPLIANCE, REPUTATIONAL AND LEGAL RISKS	37
8.1. PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING	38
10. APPENDIX - SPECIFIC REFERENCES TO CRR	39
11. APPENDIX - RISK STATEMENT	44
12. APPENDIX BALANCE SHEET RECONCILIATION	45

W

TABLE 1: COMPANY INFORMATION	10
TABLE 2: AGGREGATE QUANTITATIVE INFORMATION ON REMUNERATION BROKEN DOWN BY BUSINESS AREA	18
TABLE 3: DIRECTORSHIPS HELD BY MEMBERS OF THE MANAGEMENT BODY.....	19
TABLE 4: PERIODIC REPORTING SUMMARY	20
TABLE 5: CAPITAL REQUIREMENTS.....	21
TABLE 6: REGULATORY CAPITAL	23
TABLE 7: ECAI ASSOCIATION WITH CQS & CREDIT QUALITY STEP MAPPING	25
TABLE 8: BREAKDOWN BY CQS €THOUSANDS.....	26
TABLE 9: ASSET CLASS BREAKDOWN OF NET CREDIT RISK EXPOSURE AND MINIMUM CAPITAL REQUIREMENT AS AT 31 DECEMBER 2019, € THOUSANDS	27
TABLE 10: EXPOSURES POST VALUE ADJUSTMENTS (BEFORE APPLYING CREDIT RISK MITIGATION AND AFTER APPLYING CREDIT CONVERSION FACTORS) BY EXPOSURE CLASS, € THOUSANDS	27
TABLE 11: EXPOSURES POST VALUE ADJUSTMENTS (BEFORE APPLYING CREDIT RISK MITIGATION AND AFTER APPLYING CREDIT CONVERSION FACTORS) BY SIGNIFICANT GEOGRAPHIC AREA AND MATERIAL EXPOSURE CLASS, € THOUSANDS	28
TABLE 12: AVERAGE EXPOSURES IN 2019 €THOUSANDS.....	28
TABLE 13: EXPOSURES POST VALUE ADJUSTMENTS (BEFORE APPLYING CREDIT RISK MITIGATION AND AFTER APPLYING CREDIT CONVERSION FACTORS) BY INDUSTRY AND EXPOSURE CLASS, € THOUSANDS	29
TABLE 14: EXPOSURES POST VALUE ADJUSTMENTS (BEFORE APPLYING CREDIT RISK MITIGATION AND AFTER APPLYING CREDIT CONVERSION FACTORS) BY RESIDUAL MATURITY AND BY MATERIAL EXPOSURE CLASS, € THOUSANDS	29
TABLE 15: COUNTERPARTY CREDIT RISK BREAKDOWN PER DERIVATIVE POSITION € THOUSANDS.....	30
TABLE 16: MARKET RISK CAPITAL REQUIREMENTS €THOUSANDS	32
TABLE 17: RECONCILIATION OF ACCOUNTING ASSETS AND LEVERAGE RATIO EXPOSURES €THOUSANDS.....	35
TABLE 18: BREAKDOWN OF THE EXPOSURE MEASURE BY EXPOSURE TYPE € THOUSANDS.....	36
TABLE 19: BREAKDOWN OF TOTAL ON BALANCE SHEET EXPOSURES BY ASSET CLASS €THOUSANDS.....	37



Abbreviation	Full description
BoD	Board of Directors
CAR	Capital Adequacy Ratio
CCR	Counterparty Credit Risk
CET1	Common Equity Tier 1
CIF	Cyprus Investment Firm
CRD IV	Capital Requirements Directive
CRR	Capital Requirements Regulation
EBA	European Banking Authority
ECB	European Central Bank
EMIR	European Market Infrastructure Regulation
ESMA	European Securities and Markets Authority
ESRB	European Systemic Risk Board
FATF	Financial Action Task Force
FOH	Fixed Overheads
FY	Financial Year
GDPR	General Data Protection Regulation
IAS	International Accounting Standards
ICAAP	Internal Capital Adequacy Assessment Process
ICF	Investors Compensation Fund
IFRS	International Financial Reporting Standards
IOM	Internal Operations Manual
MIFID II	Markets in Financial Instruments Directive 2014
OECD	Organisation for Economic Co-Operation and Development
OTC	Over the Counter
PRIIP	Packaged Retail and Insurance-based Investment Products
PSP	Payment Service Provider
RAG	Red-Amper-Green
RAS	Risk Appetite Statement
RBS-F	Risk Based Supervision Framework
RMF	Risk Management Framework
RWA	Risk Weighted Assets
SME	Small and Medium-sized Enterprise



1. Introduction

1.1. Investment Firm

Table 1: Company information

Company name	TeleTrade-DJ International Consulting Ltd
CIF Authorization date	14/12/2011
CIF License number	158/11
Company Registration Date	01/09/2010
Company Registration Number	HE 272810
Investment Services	
Reception and transmission of orders in relation to one or more financial instruments	
Execution of Orders on Behalf of Clients	
Dealing on own account	
Portfolio Management	
Provision of Investment Advice	
Ancillary Services	
Safekeeping and administration of financial instruments, including custodianship and related services	
Granting credits or loans to one or more financial instruments, where the firm granting the credit or loan is involved in the transaction	
Foreign exchange services where these are connected to the provision of investment services	
Investment research and financial analysis or other forms	

1.2. Purpose

The present report is prepared by *TeleTrade-DJ International Consulting Ltd* (the “Company”), a Cyprus Investment Firm (“CIF”) authorized and regulated by the Cyprus Securities and Exchange Commission (the “CySEC”, the “Commission”) under the license number 158/11 and operates in harmonisation with the Markets in Financial Instruments Directive (“MiFID II”).

In accordance with Regulation (EU) No. 575/2013 (the Capital Requirements Regulation, “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 (‘CRD’) which was implemented by member states of the EU through national law. .

The capital adequacy framework consisting of three ‘pillars’:

- **Pillar I** sets minimum capital requirements comprising of base capital resources requirements; credit, market and Fixed Overheads risk capital requirements;
- **Pillar II** requires firms to undertake an overall internal assessment of their capital adequacy, taking into account all the which the firm is exposed to and whether additional capital should be held to cover risks not adequately covered by Pillar I requirements. This is achieved through the Internal Capital Adequacy Assessment Process (“ICAAP”)
- **Pillar III** complements Pillars I and II and improves market discipline by requiring firms to disclose information on their capital resources and Pillar I capital requirements, risk exposures and their risk management framework

The 2019 Pillar III Disclosures Report sets out both quantitative and qualitative information required in accordance with Part 8 of the CRR and in particular articles 431 to 455, which set the requirements of the disclosures.

The information contained in the Pillar III Market Discipline and Disclosure Report is audited by the Firm’s external auditors and published on the Company’s website at www.teletrade.eu on an annual basis. Further domains of the company are the following; www.teletrade.es; www.teletrade.hu; www.teletrade.bg; www.teletrade.co.uk; www.teletrade-dj.it; www.teletrade-dj.ro; www.teletrade-dj.de; www.teletrade-dj.lv; www.teletrade-dj.cz; www.teletrade-dj.gr; www.teletrade-dj.lt; www.teletrade.pt; www.teletrade-dj.pl; www.teletrade-dj.sk.

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 Audit, 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, Fixed Overheads risk and to market risk. More information can be found in the sections below.

The Company is making the disclosures on a solo basis. This report has been prepared using the audited financial statements of FY2019.

1.3. The Company

TeleTrade-DJ International Consulting Ltd (hereinafter the “Company”), is a registered Cypriot Investment Firm authorised and regulated by the Cyprus Securities and Exchange Commission (hereinafter the “CySEC”) with license no. 158/11, offering investment and ancillary services in relation to Forex/CFDs.



TeleTrade-DJ International Consulting Ltd, as a CIF, operates in Cyprus, offering Contracts for Difference (“CFD”) products and has 17 employees located in Cyprus.

The Company has a stable business model and this is reflected in a well-balanced capital allocation between the Company’s operations

The Company’s growth strategy focuses on its existing areas of expertise and the quality of its customer base. The Company strives for sustainable profitability consistent with its cost of capital and a balanced business model. To this end, the Company:

- Seeks to contain the volatility of its results
- Calibrates its capital ratio to ensure a significant safety margin relative to the minimum regulatory requirements
- Monitors the stability and diversification of its funding sources
- Ensures sufficient resilience in scenarios of liquidity shortages
- Tightly controls 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 counterterrorism 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 31 December 2019 for the CRD IV 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 (hereafter “the Law”)
- Regulation (EU) No. 2019/876 – Capital Requirements Regulation II (Transitional)
- Regulation (EU) No. 575/2013 – Capital Requirements Regulation
- Regulation (EU) No. 648/2012 – European Markets Infrastructure Regulation



- Directive (EU) 2019/878 – amending the Capital Requirements Directive IV as regards exempted entities, financial holding companies, mixed financial holding companies, remuneration, supervisory measures and powers and capital conservation measures (CRD V - Transitional)
- 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 – Capital Requirements Directive IV
- Directive DI144-2014-14: For the prudential supervision of Investment Firms
- Directive DI144-2014-15: On the discretions of CySEC arising from Regulation (EU) No. 575/2013

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.

The Company has established an effective risk oversight structure and the necessary internal organisational controls to ensure that it identifies and manages its risk adequately. Responsible for the Company's internal control system and the management of its risks are the following:

- Board of Directors
- Senior Management
- Risk Manager
- Anti-Money Laundering Compliance Officer
- Compliance Officer
- Internal Audit Function (outsourced)

2.7. Types of Risks

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

- **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, bonds), 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.

2.1. 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.

Furthermore, the positioning of the business in terms of risk/return ratio as well as the Company's risk profile by type of risk will be analysed and approved by the BoD. The Company's risk appetite strategy will be 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 will be 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.

2.2. 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 updating its ICAAP for the year 2019, in which each risk will be taken into account and be stress tested.

2.3. 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
- The evaluation of 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
- The evaluation of 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
- The establishment or revision of limits: Stress test results, where applicable, are 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 weighted 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 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.

2.4. 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.



2.5. 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

The Company has established a dedicated recruitment policy in relation to the BoD.

2.6. 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 2019, 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.

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.



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

Figures in EUR (thousands)	Aggregate Remuneration
Executive and Non-Executive Directors	48
*Control Functions	68
Brokerage Department, Dealing on Own Account, Portfolio Management & Investment Advice	39
**Other risk taking functions	154
Grand Total	309

*Control functions include the persons employed in the Legal, Risk Management, AML & Compliance Department and Senior Management.

** Other risk-taking functions also includes categories of staff whose total remuneration takes them into the same remuneration bracket as senior management and risk takers

Figures in EUR (thousands)	No. of people	Fixed (cash)	Variable (cash & non-cash)	Total
Senior Management & Directors	10	192	-	192
Other staff whose actions have a material impact on the risk profile of the Institution	3	117	-	117
Grand Total	13	309	-	309

In the above table, the category "Senior Management & Directors" consists of the Four Eyes and the Directors of the Company. "Other risk Staff" includes the personnel employed in the departments/business areas mentioned above whose actions could have a material impact on the risk profile of the Company or/and other staff whose total remuneration takes them into the same remuneration bracket as senior management and risk takers. It is noted that staff in the Company's representative offices in other countries such as Spain, Italy, Latvia, Czech, Lithuania etc. are not included in the breakdown in tables above since their business line is not considered as risk taking function. The total staff cost as at 31/12/2019 is provided in the Company's Financial Statements.

2.7. Performance Related Pay

The Company shall ensure that where remuneration is linked with performance, the total amount of remuneration is based on a combination of the assessment of the performance of:

- The individual
- The business unit concerned.
- The overall results of the Company.

Examples of qualitative criteria include compliance with regulatory requirements (especially conduct of business rules) and internal procedures, fair treatment of clients and client satisfaction.

The Company implements a performance appraisal program, mainly to foster talent and promote healthy competition amongst personnel, which is based on a set of Key Performance Indicators and Targets, developed for each department.

The remuneration Committee ensures that any forms of performance related pay schemes do not give rise to any potential conflict of interest between the firm and the employees or the firm and the clients.

2.8. Directorships held by Members of the Management Body

In 2019, the members of the Management body of the Company, given their industry experience, have been taking seats in other Company boards. In line with this, the following table indicates the number of positions that each member holds (including Directorships held with the Company):

Table 3: Directorships held by Members of the Management Body

Name	Position in the CIF	Directorships (Executive)	Directorships (Non-Executive)
Inna Leonova	Executive Director (Appointed on 26/08/2019)	1	0
Nicolas Leventis	Executive Director (Appointed on 11/11/2019)	1	0
Giannakis Georgiou	Non-Executive Director (Appointed on 16/05/2019)	0	2
George Constantintides	Non-Executive Director	0	3



2.9. Reporting and Control

In line with the requirements set out in the Cyprus Investment Firms Law and subsequent Directives, 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

Report Name	Report Description	Owner	Recipient	Frequency
Annual Compliance Report	To inform the Senior Management & the BoD of the Company regarding the Performance of Compliance function during the year	Compliance Officer	BoD, CySEC	Annual
Annual Internal Audit Report	To inform the Senior Management & the BoD of the Company regarding the Internal Auditor during the year	Internal Auditor	BoD, CySEC	Annual
Annual Risk Management Report	Represents the work & activities undertaken by the Risk Manager during the year	Risk Manager	BoD, CySEC	Annual
Pillar III Disclosures (Market Discipline and Disclosures)	The Company is required to disclose information regarding its risk management, capital structure, capital adequacy and risk exposures	Risk Manager	BoD, CySEC, Public	Annual
Independent Auditors Verification on the Pillar III Report	The verification of the Pillar III Disclosures (Market Discipline and Disclosures) Report by the Independent Auditor	External Auditor	BoD, CySEC	Annual
Financial Reporting	It is a formal record of the financial activities of the CIF	External Auditor	BoD, CySEC	Annual
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
ICAAP (Pillar II) Report	The Internal Capital Adequacy Assessment Process, relating to the monitoring and assessment of the risks that are not fully covered by Pillar I	Risk Manager	BoD, CySEC	Annual

3. Capital Management and Adequacy

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

The solvency ratio is calculated by comparing the institutions' equity with the sum of risk-weighted assets for credit risk and the capital requirement multiplied by 12.5 for market risk and operational risk and the minimum is 8%.

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 (CCB) of 2.5%.

3.2. 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
- Adequate allocation 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% at all times (Calculated based on the section above) for Pillar I risks, plus additional capital buffers as applicable, while it may also impose additional capital requirements for risks not covered by Pillar I. As at 31 December 2019, the Company was subject to a minimum Pillar I capital adequacy ratio of 8%, plus a capital conservation buffer of 2,50% as per the transitional application provisions for buffers. The Company was exempted from applying the institution-specific countercyclical capital buffer following a decision of the CBC to exempt small and medium-sized CIFs from this requirement. As a result, as at 31 December 2019 the Company was subject to an overall minimum requirement of 10,5% (for Pillar I plus buffers).

At 31st December 2019, the Total Capital ratio of the Company was 11.61% with total risk-weighted assets of EUR 13,857 thousand.

Table 5: Capital Requirements

€ thousands	Dec 31, 2019 (Audited)
CAR Ratio	11.61%
Capital Adequacy (CET1) ratio	11.61%



CET1 Capital	1,609
Tier 1 Capital	1,609
Tier 2 Capital	-
Total Own Funds	1,609
Credit Risk Capital Req.	174
Market Risk Capital Req.	504
Operational Risk Capital Req.	431
Total Capital Requirements	1,109




Table 6: Regulatory Capital

€ thousands	Dec 31, 2019 (Audited)
Common Equity Tier 1 (CET 1) capital: instruments and reserves (EUR)	
Capital instruments and the related share premium accounts	3,401
Retained earnings	-1,698
Accumulated other comprehensive income (loss), net of tax	-
Other	-
Common Equity Tier 1 (CET 1) capital before regulatory adjustments	1,703
Common Equity Tier 1 (CET 1) capital: regulatory adjustments	
Goodwill and other intangible assets (net of related tax liabilities) (negative amount)	-
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)	-
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)	-
Other regulatory adjustments	(94)
Total regulatory adjustments to Common Equity Tier 1 (CET 1) capital	(94)
Common Equity Tier 1 (CET 1) capital	1,609
Additional Tier 1 Capital	-
Tier 1 Capital	1,609
Tier 2 Capital	-
Total Capital	1,609
Total risk-weighted assets	13,857
Capital Ratios	
Common Equity Tier 1 (CET 1) capital ratio	11.61%
Tier 1 Capital ratio	11.61%
Total Capital ratio	11.61%

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 firm'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 uses EU credit institutions for safekeeping of funds and always ensures that the banks it cooperates with have high ratings based on reputable credit rating agencies (Moody's, S&P or Fitch). The company also 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, Fitch and S&P** have been applied for the exposure classes listed below:

- Exposures to institutions
- Exposures to corporates
- Exposures to other items
- Exposures to particular high-risk items

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

Table 7: ECAI association with CQS & Credit Quality Step Mapping

Credit Quality Step	Moody's Rating	Fitch's Rating	S&P's Rating	Institution Risk Weight (Below 3 months)	Institution Risk Weight (Above 3 months)	Sovereigns Risk Weight	Corporate Risk Weight
1	Aaa to Aa3	AAA to AA-	Aaa to Aa3	20%	20%	0%	20%
2	A1 to A3	A+ to A-	A1 to A3	20%	50%	20%	50%
3	Baa1 to Baa3	BBB+ to BBB-	Baa1 to Baa3	20%	50%	50%	100%
4	Ba1 to Ba3	BB+ to BB-	Ba1 to Ba3	50%	100%	100%	100%
5	B1 to B3	B+ to B-	B1 to B3	50%	100%	100%	150%
6	Caa1 and below	CCC+ and below	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.

A breakdown of the Company's exposures by Credit Quality Step (CQS) is given in the following table:



Table 8: Breakdown by CQS €thousands

Exposures as at 31/12/2019	Exposure before CRM	Exposure After CRM
Credit Quality Step		
1	0	0
2	0	0
3	0	0
4	0	0
5	0	0
6	0	0
Not applicable	364	364
Unrated	2,167	2,167
Total	2,531	2,531

For Credit Institutions (i.e. banks) and custodians, the Company proceeds with a due diligence review when opening an account with the bank and thereafter, regularly, on a monthly basis. The due diligence review includes reviewing the credit ratings of the banks, the financial statements of the banks and also by watching the press news regarding the specific bank. The Company evaluates exposure to the banks according to “institutions’-based method”.

For all the other counterparties (mostly the individual customers), the Risk Assessment is initially made within the scope of Anti-Money Laundering Procedures when the customer approaches the Company to open an account and on a regularly basis (ongoing customer due diligence). For terms of credit risk assessment, the customers are regularly assessed based on their proper consequence on their payments to the Company and their general attitude. Risk Weight of the traded counterparty depends on the CQS of the rated Corporate. For the unrated customers the Risk Weight are assigned as 100% or the Risk Weight of its central government, whichever is higher in the counterparty credit risk assessment.

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.

As at 31st December 2019, the Company’s capital requirements for credit risk amounted to EUR 174 thousands (EUR 2,171 thousands total risk-weighted credit risk exposure). The tables below indicate the Company’s credit risk exposure.



Table 9: Asset Class Breakdown of Net Credit Risk Exposure and Minimum Capital Requirement as at 31 December 2019, € thousands

Asset Class	Total Exposure Value	Risk-weighted amounts	Minimum capital requirement
Central governments or central banks			
Public sector entities			
Institutions	460	93	7
Corporates	1,693	1,693	136
Items associated with particular high risk	14	21	2
Retail			
<i>Of which: SMEs</i>			
Equity exposures			
Other exposures	364	364	29
Total exposures	2,531	2,171	174

Table 10: Exposures Post Value Adjustments (before applying Credit Risk Mitigation and after applying credit conversion factors) by Exposure Class, € thousands

Asset class	Exposure before CRM	Exposure After CRM
Central governments or central banks		
Public sector entities		
Institutions	460	460
Corporates	1,693	1,693
Items associated with particular high risk	14	14
Retail		
<i>Of which: SMEs</i>		
Equity exposures		
Other exposures	364	364
Total exposures	2,531	2,531

3

Table 11: Exposures Post Value Adjustments (before applying Credit Risk Mitigation and after applying credit conversion factors) by Significant Geographic Area and Material Exposure Class, € thousands

Asset class	Cyprus	Latvia	Lithuania	Italia	Greece	Other	Total
Central governments or central banks							
Public sector entities							
Institutions	406	42		1	3	8	460
Corporates	671	562	40	149	77	194	1,693
Items associated with particular high risk						14	14
Retail							
Of which: SMEs							
Equity exposures							
Other exposures	364						364
Total Exposure	1,441	604	40	150	80	216	2,531

Table 12: Average Exposures in 2019 € thousands

Exposure Class	Average Exposure
Institutions	641
Corporates	2,195
Equity	0
High risk items	14
Other items	112
Total	2,962



Table 13: Exposures Post Value Adjustments (before applying Credit Risk Mitigation and after applying credit conversion factors) by Industry and Exposure Class, € thousands

Asset class	Financial Services	Non-financial	Total
Central governments or central banks			
Public sector entities			
Institutions	460		460
Corporates	664	1,029	1,693
Items associated with particular high risk	14		14
Retail			
<i>Of which: SMEs</i>			
Equity exposures			
Other exposures		364	364
Total Exposure	1,138	1,393	2,531

Table 14: Exposures Post Value Adjustments (before applying Credit Risk Mitigation and after applying credit conversion factors) by Residual Maturity and by Material Exposure Class, € thousands

Asset class	Up to 3 months	More than 3 months	Total
Central governments or central banks			
Public sector entities			
Institutions	460		460
Corporates	431	1,262	1,693
Items associated with particular high risk	-	14	14
Retail			
<i>Of which: SMEs</i>			
Equity exposures			
Other exposures	-	364	364
Total Exposures	891	1,640	2,531



4.3. Large exposure

As at 31st December 2019, the Company's gross exposure to connected entities of its shareholder(s) was 41% of the Company's own funds. The said exposure exceeded the 20%, 10% and 2% large exposure limits set by points (f) to (h) of paragraph 61(1) of CySEC Directive 144-2014-14 & 14(A) with regards to a CIF's exposure to its shareholders with more than 10% holding of its share capital, and their connected persons.

The management body of the Firm expects that the amount will be settled by the end of September 2020.

4.4. Credit Risk Mitigation and Counterparty Credit Risk

As at 31 December 2019, the Company was exposed to Counterparty Credit Risk through FX CFD, Gold CFD, Equity CFD, Crypto CFD and Commodity CFD positions with clients. The capital requirement for this risk was calculated using the Mark-to-Market approach. The positions were also secured by cash collaterals (i.e. the margins deposited by the clients in order to be able to conduct the trades), which were used to mitigate the final exposures based on the Simple Method for Credit Risk Mitigation.

Table 15: Counterparty Credit risk Breakdown per Derivative position € thousands

Derivative Type	Positive Fair Value	Negative Fair Value	Nominal Value	Exposure Amount before CRM	Exposure amount after CRM	RWA	Cap. Requirement
FX Derivatives	61	-363	17,789	239	239	239	19
Derivatives in Gold	1	-48	3,251	33	33	33	3
Derivatives in Equity	8	-129	2,096	134	134	134	11
Derivatives in Commodity	7	-74	180	25	25	25	2
Total	77	-614	23,316	431	431	431	35

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 particular 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.

5.1. Quantitative Information

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

During 2019, the Company's capital requirements for market risk was EUR 504 thousands (EUR 6,300 thousands total risk-weighted market risk exposure). This was mainly derived by the firms open positions. Further breakdown of the Market Risk Capital Requirements are shown on table below.

Table 16: Market Risk Capital Requirements €thousands

Components of Market Risk as at Dec 31,2019	Capital requirements
Foreign Exchange	€ 275
Equity Risk	€ 213
Commodity Risk	€ 16
Total	€ 504

6. Operational Risk

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 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 highly dependent on the 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.
- Established 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 a 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

6.7. Basic Indicator Approach

The Company applies the Basic Indicator Approach for calculating the amount of capital required, under the minimum regulatory capital requirements for Operational Risk. As at 31 December 2019, the minimum capital requirements under this approach amounted to €431 thousands.

6.1. Pandemic Risk

On 11 March 2020, the World Health Organisation declared the Coronavirus COVID-19 outbreak to be a pandemic in recognition of its rapid spread across the globe. Many governments are taking increasingly stringent steps to help contain, and in many jurisdictions, now delay, the spread of the virus, including: requiring self-isolation/ quarantine by those potentially affected, implementing social distancing

measures, and controlling or closing borders and "locking-down" cities/regions or even entire countries. These measures could slow down the world economies. Management has considered the unique circumstances and the risk exposures of the Company and has concluded that there is no significant impact in the Company's financial position and operating results. The event is not expected to have an immediate material impact on the business operations. Management cannot however preclude the possibility that extended lock down periods, an escalation in the severity of such measures, or a consequential adverse impact of such measures on the economic environment will not have an adverse effect on the Company, and its financial position and operating results, in the medium and longer term. Management continues to monitor the situations closely and will respond to mitigate the impact of such events and circumstances as they occur.

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 31/12/2019, the Company held enough capital in its bank accounts, to meet its short-term obligations.

Furthermore, the Company is taking due care in safeguarding the client assets held in fiduciary capacity (in segregated accounts) and performs the following mitigation strategies:

- These assets are held by the Company in a fiduciary capacity and are not included in the Company's funds nor its financial statements
- The funds are held in client segregated bank accounts
- Frequent reconciliations are performed internally.

8. Leverage

According to Article 429 of the CRR, the leverage ratio is calculated as an institution's capital measure divided by the institution's total exposure measure and is expressed as a percentage. Institutions shall calculate the end-of-quarter leverage ratio.

The regulatory minimum requirement is 3% in which the company monitors closely. As at 31 December 2019, the leverage ratio of the Company was 63.55% using a fully phased in definition.

The table below, provides a reconciliation of accounting assets and leverage ratio

Table 17: Reconciliation of accounting assets and leverage ratio exposures €thousands

	Applicable Amounts
Total assets as per published financial statements	2,176
Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	-
Adjustments for derivative financial instruments	353
Adjustments for securities financing transactions "SFTs"	-
Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	-
Other adjustments	2
Total leverage ratio exposure	2,531

Table 18: Breakdown of the exposure measure by exposure type € thousands

	CRR Leverage Ratio Exposures
On-balance sheet exposures (excluding derivatives and SFTs)	
On-balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including collateral)	2,194
(Asset amounts deducted in determining Tier 1 capital)	-94
Total on-balance sheet exposures (excluding derivatives, SFTs and fiduciary assets)	2,100
Derivative exposures	
Replacement cost associated with all derivatives transactions (i.e. net of eligible cash variation margin)	78
Add-on amounts for PFE associated with all derivatives transactions (mark-to-market method)	353
Total derivative exposures	431
Securities financing transaction exposures	
Total securities financing transaction exposures	0
Other off-balance sheet exposures	
Other off-balance sheet exposures	0
Capital and total exposures	
Tier 1 capital	1,609
Total leverage ratio exposures	2,531
Leverage ratio	63.55%

The Company monitors its Leverage Ratio on a quarterly basis and all appropriate measures are taken where deemed necessary.

The table below provides a breakdown of total on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) by asset class.

Table 19: Breakdown of total on balance sheet exposures by asset class €thousands

	CRR Leverage Ratio Exposures
Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	2,100
Trading book exposures	0
Banking book exposures, of which:	2,100
Exposures treated as sovereigns	-
Exposures to regional governments, MDB, international organisations and PSE NOT treated as sovereigns	-
Institutions	460
Retail exposures	-
Corporate	1,262
Exposures in default	-
Other exposures (e.g. equity, securitizations, and other non-credit obligation assets)	378

9. 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

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. 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.

10. 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.	1.1
431(4)	Explanation of ratings decisions to SMEs upon request.	N/A
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)		2, 4, 5 and 6
435(1) (b)	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) (c)		2, 4, 5 and 6
435(1) (d)		2, 4, 5 and 6
435(1) (e)	Declaration approved by the BoD on adequacy of risk management arrangements	Preface
435(1) (f)	Concise risk statement approved by the BoD	Preface
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

3

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)		3.4
437 (1)		3.4
437 (1) (a)		3.4
437 (1) (b)		3.4
437 (1) (c)		3.4
437 (1) (d) (i)		3.4
437 (1) (d) (ii)		3.4
437 (1) (d) (iii)		3.4
437 (1) (e)		3.4
437 (1) (f)		3.4
437(2)	EBA shall develop implementation standards for points (a), (b), (d) and (e) above	N/A
Capital Requirements		
438(a)	Summary of institution's approach to assessing adequacy of capital levels.	2.10
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
438(d)		N/A
438(d) (i)		N/A
438(d) (ii)	Capital requirements amounts for credit risk for each Internal Ratings Based approach exposure class.	N/A
438(d) (iii)		N/A
438(d) (iv)		N/A
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)	Exposures post value adjustments by residual maturity and by material exposure class.	4.2
442(f)	Exposures post value adjustments by residual maturity and by material exposure class.	4.2
442(g)	Exposures post value adjustments by residual maturity and by material exposure class.	N/A
442(g) (i)	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) (ii)	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) (iii)	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(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)	Reconciliation of changes in specific and general credit risk adjustments.	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.	4.1
444(b)	Exposure classes associated with each ECAI.	4.1
444(c)	Description of the process used to transfer the issuer and issue credit assessments onto items not included in the trading book;	4.1
444(d)	Mapping of external rating to credit quality steps.	4.1
444(e)	Exposure values pre- and post-credit risk mitigation, by credit quality step.	4.1
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. 3.5	
451(1) (b)		3.5
451(1) (c)		3.5
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	



11. Appendix - Risk Statement

The Company's Risk Appetite remains the same as last year. The Company regularly monitors its Capital Adequacy Ratio, ensures that it is not lower than 11%, and considers the option to increase its capital in the case of acceptable increasing exposure (if the Board decides so). In terms of operational issues, the Company has a low appetite for risk. The Company makes resources available to control operational risks to acceptable levels. The Company recognizes that it is not possible or necessarily desirable to eliminate some of the risks inherent in its activities. Acceptance of some risk is often necessary to foster innovation and efficiencies within business practices.



12. Appendix Balance Sheet Reconciliation

	At 31 December 2019 €thousands	Transitional Definition	Full-phased in Definition
Common Equity Tier 1 capital: instruments and reserves			
Capital instruments and the related share premium accounts	3,401	3,401	3,401
Retained earnings	-1,698	-1,698	-1,698
Accumulated other comprehensive income (and other reserves, to include unrealised gains and losses under the applicable accounting standards)	0	0	0
Funds for general banking risk	0	0	0
Common Equity Tier 1 (CET1) capital before regulatory adjustments	1,703	1,703	1,703
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
Additional value adjustments	-1	-1	-1
Contribution to ICF	-93	-93	-93
Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability)	0	0	0
Total regulatory adjustments to Common Equity Tier 1 (CET1)	-94	-94	-94
Common Equity Tier 1 (CET1) capital	1,609	1,609	1,609
Additional Tier 1 (AT1) capital	0	0	0
Tier 1 capital (T1 = CET1 + AT1)	1,609	1,609	1,609
Tier 2 (T2) capital	0	0	0
Total capital (TC = T1 + T2)	1,609	1,609	1,609
Total risk weighted assets	13,857	13,857	13,857
Capital ratios and buffers			
Common Equity Tier 1	11.61%	11.61%	11.61%
Tier 1	11.61%	11.61%	11.61%
Total capital	11.61%	11.61%	11.61%

