

# 7Q HOLDINGS LIMITED

## PUBLIC DISCLOSURES REPORT FOR 2023

*April 2024*

**To** : Board of Directors  
**From** : MNK Risk Consulting Ltd  
**Date** : April 2024  
**Status** : Draft

## **DISCLOSURE**

*The Disclosure and Market Discipline Report for the year 2023 has been prepared by 7Q Holdings Ltd (the “Company”) for the Company and 7Q Asset Management Ltd, 7Q Financial Services Limited and 7Q Invest AIF V.C.I.C. Plc (its “Subsidiaries”) (together the “Group”) as per Part Six of Regulation (EU) No 2019/2033 and Law 165(I)/2021.*

*7Q Holdings Ltd states that any information that was not included in this report was either not applicable on the Group’s business and activities or such information is considered as proprietary to the Group and sharing this information with the public and/or competitors would undermine its competitive position.*

*The Board of Directors of each member Company of the Group is ultimately responsible for the risk management framework of the member Company. The Risk Management Framework is the sum of systems, policies, processes and people within the Group that identify, assess, mitigate and monitor all sources of risk that could have a material impact on the Group’s operations. The Board of Directors of each member Company of the Group where applicable 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 institutions’ profile and strategy.*

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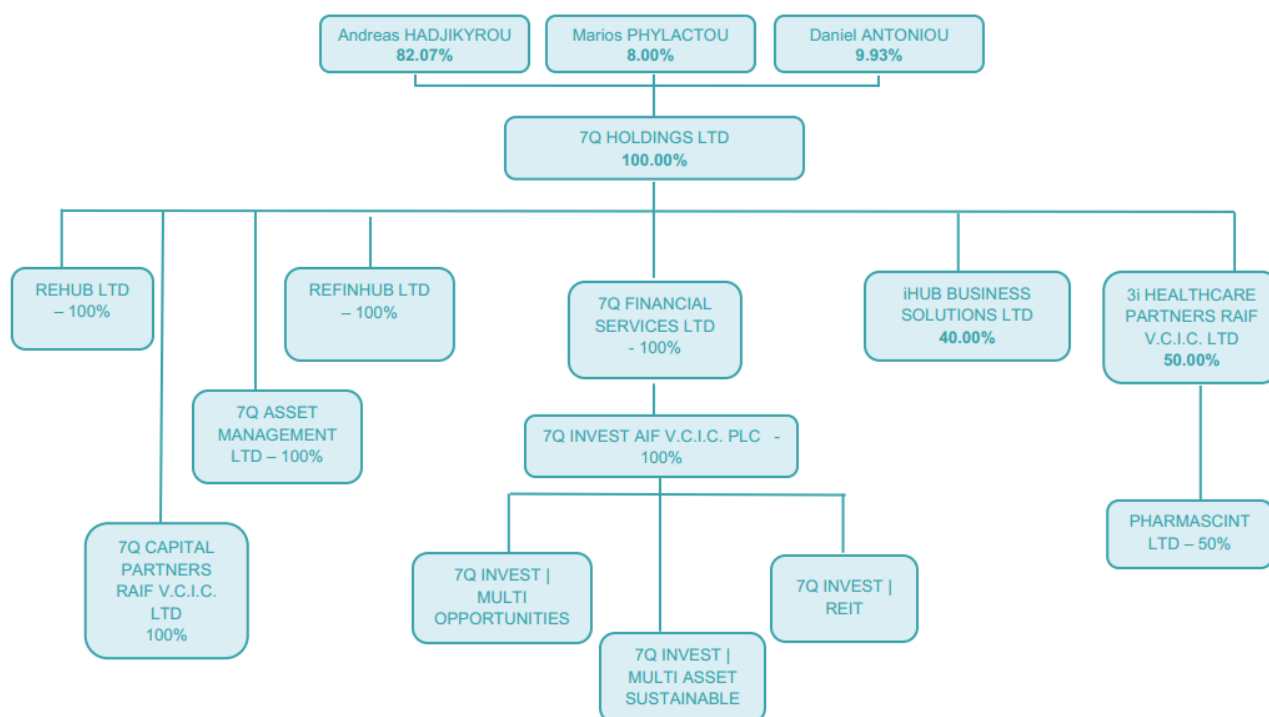
# 1. INTRODUCTION

The present report is prepared by 7Q Holdings Ltd (the “Company”), for the Company and 7Q Asset Management Ltd, 7Q Financial Services Limited and 7Q Invest AIF V.C.I.C. Plc (its “Subsidiaries”) (together the “Group”). 7Q Holdings Ltd is registered in Cyprus as a holding company under registration number HE 261726 and date of incorporation 01/02/2010.

In accordance with Regulation (EU) No. 2019/2033 (the “Investment Firms Regulation”, “IFR”), which came into force in 2021, the Company is required to disclose information relating to its risk management objectives and policies, own fund’s structure and requirements, as well as the most important characteristics of the Group’s corporate governance including its remuneration system, on a consolidated basis as laid down in Article 7 of the IFR. The scope of this report is to promote market discipline and to improve transparency of market participants.

The report provides the Public Disclosures for the Company and its regulated subsidiaries. The information disclosed in this report is related to the year ended 31st December 2023 (based on unaudited management accounts) and is prepared on a consolidated basis.

## 1.1 GROUP SHAREHOLDER STRUCTURE AS AT 31.12.2023



## 1.2 SUBSIDIARIES CORPORATE INFORMATION

### 1.2.1 7Q Financial Services Limited

**Table 1: Company information of 7Q Financial Services Limited**

<b>General Information:</b>	
Company name	7Q Financial Services Ltd
CIF Authorization date	04/11/2005
CIF License number	061/05
Company Registration Date	13/09/2016
Company Registration Number	HE 109709
Legal Entity Identifier code (LEI)	254900BGKB377HDURN37
<b>Investment Service:</b>	
<ol style="list-style-type: none"> <li>1) Reception and transmission of orders in relation to one or more financial instruments;</li> <li>2) Portfolio management; and</li> <li>3) Provision of investment advice.</li> </ol>	
<b>Ancillary Services:</b>	
<ol style="list-style-type: none"> <li>1) Safekeeping and administration of financial instruments for the account of clients, including custodianship and related services such as cash/collateral management; and</li> <li>2) Foreign exchange services where these are connected to the provision of investment services.</li> </ol>	
<b>Financial Instruments:</b>	
<ol style="list-style-type: none"> <li>1) Transferable securities;</li> <li>2) Money market instruments;</li> <li>3) Units in collective investments undertakings;</li> <li>4) Options, futures, swaps, forward rate agreements and any other derivative contracts relating to securities, currencies, interest rates or yields, or other derivatives instruments, financial indices or financial measures which may be settled physically or in cash;</li> <li>5) Options, futures, swaps, forward rate agreements and any other derivative contracts relating to commodities that must be settled in cash or may be settled in cash at the option of one of the parties other than by reason of a default or other termination event;</li> <li>6) Options, futures, swaps, and any other derivative contract relating to commodities that can be physically settled provided that they are traded on a regulated market, a MTF, or an OTF, except for wholesale energy products traded on an OTF that must be physically settled;</li> <li>7) Options, futures, swaps, forwards and any other derivative contracts relating to commodities, that can be physically settled not otherwise mentioned in point 6) of this Part and not being for commercial purposes, which have the characteristics of other derivative financial instruments;</li> <li>8) Derivative instruments for the transfer of credit risk;</li> <li>9) Financial contracts for differences (for differences in relation to MiFID instruments, currencies, interest rates or other financial indices); and</li> <li>10) Options, futures, swaps, forward-rate agreements and any other derivative contracts relating to climatic variables, freight rates or inflation rates or other official economic statistics that must be settled in cash or may be settled in cash at the option of one of the parties other than by reason of default or other termination event, as well as any other derivative contracts relating to assets,</li> </ol>	

rights, obligations, indices and measures not otherwise mentioned in this Part, which have the characteristics of other derivative financial instruments, having regard to whether, inter alia, they are traded on a regulated market, OTF, or an MTF.

### 1.2.2 7Q Asset Management Limited

**Table 2:** Company information of 7Q Asset Management Limited

<b>General Information:</b>	
Company name	7Q Asset Management Limited
AIFM Authorization date	16/12/2019
AIFM License number	AIFM36/56/2013
Company Registration Date	10/09/2019
Company Registration Number	HE 401803
Legal Entity Identifier code (LEI)	2549000C6NU3QYD1SW64
<b>Manager of:</b>	
<ol style="list-style-type: none"> <li>1) 7Q Invest AIF V.C.I.C. Plc</li> <li>2) LongeVC RAIF V.C.I.C. Ltd</li> <li>3) Klotho Capital Partners RAIF V.C.I.C. Ltd (dissolution and liquidation 16/12/2022)</li> <li>4) 3I HEALTHCARE PARTNERS RAIF V.C.I.C. LTD</li> <li>5) KROWNE GLOBAL INVESTMENT FUND AIF V.C.I.C. Ltd (ex NIO Global Fund AIF V.C.I.C. Ltd)</li> <li>6) ENSO ENERGY INVESTMENTS RAIF V.C.I.C. LTD</li> <li>7) S.E.E. CAPITAL PARTNERS RAIF V.C.I.C. LTD</li> <li>8) SELENA INVESTMENT FUND RAIF V.C.I.C. LTD (ex LUNA INVESTMENT FUND RAIF V.C.I.C. LTD)</li> <li>9) GXB CAPITAL RAIF V.C.I.C. LTD</li> <li>10) ATPMIPAKA RAIF V.C.I.C. LTD</li> <li>11) R.E.F. REAL ECONOMY FUND AIF V.C.I.C. LTD</li> <li>12) 7Q CAPITAL PARTNERS RAIF V.C.I.C. LTD</li> <li>13) PRIME PROPERTY SERVICES P.P. RAIF V.C.I.C. LTD</li> <li>14) ELINET RAIF V.C.I.C. PLC</li> <li>15) OCEANUS RAIF V.C.I.C. LTD</li> </ol>	
<b>Scope of Authorization:</b>	
AIFM whose authorisation under section 8 of the CySEC AIFM Law of 2013 covers the Investment management Functions of section 6(5) of the AIFM Law.	

### 1.2.3 7Q Invest AIF V.C.I.C. Plc

**Table 3:** Company information of 7Q Invest AIF V.C.I.C. Plc

<b>General Information:</b>	
Company name	7Q Invest AIF V.C.I.C. Plc
AIFM Authorization date	16/12/2019
AIFM License number	AIF60/2018
Company Registration Date	01/02/2016
Company Registration Number	HE 351835
Legal Entity Identifier code (LEI)	254900Y095ATWYYIPG08

#### *Umbrella Scheme*

- 1) AIF60\_1 7Q Invest I Multi Opportunities (16/12/2019)
- 2) AIF60\_2 7Q Invest I Multi Asset Sustainable (16/12/2019)
- 3) AIF60\_3 7Q Invest I REIT (16/12/2019)

## **2. BASIS OF PREPARATION OF FINANCIAL STATEMENTS**

The Company's financial statements are prepared in accordance with International Financial Reporting Standards (IFRSs) as adopted by the European Union (EU) and the requirements of the Cyprus Companies Law, Cap.113. The financial statements of the Company incorporate the results, position and cash flows of the Company's subsidiaries which are registered and operates in Cyprus.

The financial statements are the separate financial statements of the Company. The Company is not required by the Cyprus Companies Law, Cap.113, to prepare consolidated financial statements because the Company and its subsidiaries constitute a medium sized group as defined by Article 141A of the Law and the Company does not intend to issue consolidated financial statements for the year ended 31 December 2023.

## **3. DISCLOSURE POLICY**

According to Article 46 of the IFR the Company is obliged to make available the Public Disclosures Report on the same date as they publish their annual financial statements. The information that the Company discloses herein relates to the year ended 31 December 2023 (based on unaudited management accounts).

The Public Disclosures Report for 7Q Holdings Ltd was approved by the Board of Directors (hereafter, "BoD" or "Board"), approving the adequacy of risk management arrangements of the Group and providing assurance that the risk management systems in place are adequate with regards to the Group's profile and strategy.

The information contained in this Public Disclosures Report is not required to be audited by the Company's external auditor. However, the report is publicly available on the Company's website ([www.7qfs.com](http://www.7qfs.com)) on an annual basis.



## 4. SCOPE

The disclosures made here relate to the business and activities of the Group. It should be noted that any disclosures described herein apply to the Group on a consolidated basis.

The Company has the following subsidiaries which have not been consolidated for accounting purposes:

Subsidiary Companies	Holding (%) 31.12.2023	Description of main activities
7Q Financial Services Limited	100%	Cyprus Investment Firm ("CIF")
7Q Asset Management Limited	100%	Alternative Investment Fund Manager ("AIFM")
7Q Invest AIF V.C.I.C. Plc	100%	Alternative Investment Fund ("AIF")

## 5. RISK MANAGEMENT AND GOVERNANCE OF THE COMPANY AND THE GROUP

The Company's Board of Directors have the overall responsibility for the establishment and oversight of the Group's risk management framework, including aligning business strategy with risk appetite, and ensuring that all key risks are controlled through various control mechanisms.

The Board of Directors has overall responsibility in relation to risk management of the Group such as:

- (a) identification and evaluation of the risks the Company is exposed to;
- (b) implementation of objectives and risk strategy together with internal governance;
- (c) supervision of financial and accounting systems;
- (d) oversight of the process of disclosures and communication;
- (e) review and challenge capital and liquidity stress testing.

As part of its business activities (that is, the provision of financial services within the meaning and terms of the Investment Services Law 87(I)/2017 as amended) the Company faces a variety of risks the most significant of which are credit, market, operational, liquidity, reputational, compliance, political, group and strategic and are described in the Section 10 of this document.

Thus, the Company has established, implemented, and maintained adequate policies and procedures designed to manage any type of risks relating to the Company's activities. The current Risk Management framework sets the process applied in the activities of the Company, designed to identify potential events that may affect its business, to manage risks to be within

its risk appetite, and to provide reasonable assurance regarding the achievement of its mission and its objectives.

The Risk Management function ensures that relevant controls are in place to evaluate the effectiveness and the practical implementation of measures to mitigate and manage risks.

### **5.1 RECRUITMENT AND DIVERSITY POLICY**

One of the Board of Directors' main responsibilities is to identify, evaluate and select candidates for the Board of Directors 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 Board of Directors. The persons proposed for the appointment should have specialised skills and/or knowledge to enhance the collective knowledge of the Board of Directors 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.

Furthermore, and in order to ensure compliance with diversity in the Board of Directors, 50% of the Non-Executive Member positions will be held by professionals not employed in the Financial Services Industry i.e., not employed as:

- Works in a related industry (except in the case of 50% of the Non-Executive Directors);
- Holder of Advanced Legal Framework Qualification (except in the case of 50% of the Non-Executive Directors);
- Clean criminal record;
- Clean Non-bankruptcy;
- Investment Brokers; and
- Traders.

## 5.2 NUMBER OF DIRECTORSHIPS HELD BY MEMBERS OF THE BOARD

The table below provides the number of Directorships the members of the management body hold simultaneously in other entities, excluding the Group. Directorships in organisations which do not pursue predominately commercial objectives, such as non-for-profit or charitable organisations are not considered.

Name of Director	Position with 7Q Holdings Ltd	Number of Executive Directorships in other entities	Number of Non Executive Directorships in other entities
Daniel Antoniou	Non-Executive Director	0	1
Andreas Hadjikyrou	Non-Executive Director	0	1

## 5.3 RISK APPETITE FRAMEWORK (RAF)

Risk appetite is the amount and type of risk that the Group is able and willing to accept in pursuing its business objectives. Risk appetite is expressed in both quantitative and qualitative terms and covers all risks, both on-balance sheet and off-balance sheet. Such risks include, but are not limited to, credit, market, operational, conduct, reputational and compliance risk.

The overall risk profile of the Group remains low-medium.

According to Financial Stability Board (“FSB”) an appropriate risk appetite framework (“RAF”) should enable risk capacity, risk appetite, risk limits, and risk profile to be considered for business lines and legal entities as relevant, and within the group context. The RAF is defined as the overall approach, including policies, processes, controls, and systems through which risk appetite is established, communicated, and monitored. It includes a risk appetite statement, risk limits, and an outline of the roles and responsibilities of those overseeing the implementation and monitoring of the RAF. The RAF should consider material risks to the financial institution, as well as to the institution’s reputation vis-à-vis investors and customers. The RAF aligns with the institution's strategy.

The RAF has been designed to create links to the strategic long-term plan, capital planning and the risk management framework.

## 5.4 ICARA AND STRESS TESTING

The scope of the stress testing, in the context of the Annual Internal Capital Adequacy and Risk Assessment Process (hereinafter, the “ICARA”) is to evaluate the impact on the Group’s current and future profitability and capital and liquidity adequacy, as well as, to assess and quantify risks using forward looking stress testing scenarios.

The ICARA process helps the Company to determine the additional, to the IFR Own Funds Requirement, capital needed to cover all risks and to maintain an adequate surplus in respect to the minimum capital requirements under the IFR.

The ICARA is conducted in accordance to the CySEC's guidelines and the results are communicated to CySEC, upon its request, the BoD and the General Management.

**Stress tests consider the following:**

- Understanding the risk profile of the Group.
- Evaluating of the Group's capital adequacy in absorbing potential losses under stressed conditions from risks not covered or not adequately covered under the minimum regulatory and liquidity requirements. This takes place in the context of the CIF's ICARA.
- Evaluating the Group'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 Group's exposures correspond to its risk appetite.
- Establishing or revisioning 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 Group's stress testing policy rests with the Board of Directors. If the stress testing scenarios reveal vulnerability to a given set of risks, management should make recommendations to the Board of Directors for remedial 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 share capital; or
- Enhance contingency planning.

## **6. CONSOLIDATED REPORTING**

Management has complied with the requirements of Prudential Consolidated Supervision as stipulated in Article 7 of the IFR. The consolidation of exposures and own funds is performed at the parent's level, 7Q Holdings Limited, which is the 100% shareholder of the CIF, 7Q Financial Services Ltd.

The prudential framework for investment firms considers the particular business practises of different types of investment firms and especially their size and interconnectedness with other financial and economic actors. The prudential requirements are calibrated in a manner proportionate to the type of investment firm, the best interests of the clients of that type of

investment firm and the promotion of the smooth and orderly functioning of the markets in which that type of investment firm operates. They also mitigate identified areas of risk and help ensure that, if an investment firm fails, it can be wound down in an orderly manner with minimal disruption to the stability of financial markets.

According to Article 9 of the IFR, a CIF shall at all times satisfy the following own funds requirements:

1. A **CET1 ratio of at least 56%**, where CET1 ratio is the Company's CET1 capital expressed as a % of its total Own Funds Requirement\*;
2. A **Tier 1 (CET1+AT1) ratio of at least 75%**, where Tier 1 ratio is the Company's Tier 1 capital expressed as a % of its Own Funds Requirement\*;
3. A **Total ratio (Tier 1 and Tier 2) ratio of 100%**, where total capital ratio is the Company's own funds expressed as a % of its total Own Funds Requirement\*.

**\* Notes:**

1. For **7Q Financial Services Ltd** (solo basis), the Own Funds Requirement is given as the greatest of: (i) the company-specific Permanent Minimum Capital Requirement of EUR 750,000; (ii) the Fixed Overheads Requirement; and (iii) the K-Factors Requirement.
2. **7Q Financial Services Ltd** acts as a depositary to a number of regulated Alternative Investment Fund (AIFs). As such, the Company is required to comply with the initial capital requirement stipulated by Article 23 (3) (ii) of the AIFM Law (Law 157 (I)/2021). Therefore, the Permanent Minimum Capital Requirement for 7Q Financial Services Ltd (both on a **solo** and on a **consolidated** basis) amounts to EUR 750,000.

## 7. OWN FUNDS REQUIREMENTS & CAPITAL RATIOS

The primary objective of the Group with respect to capital management is to ensure that the Group complies with the minimum own funds' requirements stipulated in the IFR/IFD in regards to the minimum Common Equity Tier 1 ("CET1") ratio (being 56% of the total own funds requirement), Tier 1 (T1) ratio (75%), and the Total own funds ratio (100%).

During the Supervisory Review and Evaluation Process ("SREP"), CySEC can require investment firms to hold more capital (Additional Own Funds Requirement or previously known Pillar 2 capital) if there are material changes to a firm's business or risk profile. The Group has not received any requirement regarding Additional Own Funds Requirement.

The Consolidated Regulatory Own Funds and Capital Adequacy Ratio as at 31 December 2023 are presented below:

Date	Total Capital Ratio
<b>IFR/IFD</b>	
CET 1 Ratio	134.3%
Tier 1 Ratio	134.3%
Own Funds Ratio	134.3%

The Group only sustains CET1 Capital as eligible Own Funds. The CET1 Capital balance is adjusted by items such as Intangible Assets, investor Compensation Fund balances and investments in financial institutions.

### 7.1 COMPOSITION OF THE REGULATORY OWN FUNDS

**Table 4:** Composition of regulatory own funds of the Consolidated Entity (7Q Holdings Limited) based on Template EU IF CC1.01

Common Equity Tier 1 (CET1) capital: instruments and reserves		Amount EUR '000s	Source based on reference numbers/letters of the balance sheet in the unaudited management accounts
1	<b>OWN FUNDS</b>	<b>1,007</b>	<b>N/A</b>
2	<b>TIER 1 CAPITAL</b>	<b>1,007</b>	<b>N/A</b>
3	<b>COMMON EQUITY TIER 1 CAPITAL</b>	<b>1,007</b>	<b>N/A</b>
4	Fully paid-up capital instruments	2	N/A
5	Share premium	0	N/A
6	Retained earnings	1,053	N/A
7	Accumulated other comprehensive income	0	N/A

8	Other reserves	0	N/A
9	Minority interest given recognition in CET1 capital	0	N/A
10	Adjustments to CET1 due to prudential filters	0	N/A
11	Other funds	0	N/A
<b>12</b>	<b>(-) TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1</b>	<b>(48)</b>	<b>N/A</b>
17	(-) Losses for the current financial year	0	N/A
23	(-) CET1 instruments of financial sector entities where the institution does not have a significant investment	0	N/A
24	(-) CET1 instruments of financial sector entities where the institution has a significant investment	0	N/A
25	(-) Defined benefit pension fund assets	0	N/A
26	(-) Other deductions	0	N/A
27	CET1: Other capital elements, deductions and adjustments	(48)	N/A
28	<b>ADDITIONAL TIER 1 CAPITAL</b>	<b>0</b>	<b>N/A</b>
40	<b>TIER 2 CAPITAL</b>	<b>0</b>	<b>N/A</b>

The Group's share capital as at 31 December 2023 amounted to €1,500, divided into 1,500 ordinary shares of €1 each. The Share Capital and the Retained Earnings of the Group comprise its CET-1 Capital. The other capital elements, deductions and adjustments relate to the balance held with the Investor Compensation Fund.

*Table 5: Own funds: reconciliation of regulatory own funds of the Consolidated Entity (7Q Holdings Limited) to balance sheet in the unaudited management accounts based on Template EU IFCC2*

	<i>Under regulatory scope of consolidation - CONSOLIDATED ENTITY</i>	<i>Cross reference to EU IF CC1</i>
	<i>31/12/2023 (UNAUDITED) EUR'000s</i>	<i>31/12/2023 (UNAUDITED) EUR'000s</i>
<b>Assets - Breakdown by asset classes according to the balance sheet in the unaudited management accounts</b>		
Property, plant and equipment (Non-current assets)	32	
Intangible assets	0	
Other Assets (Non-current assets)	48	Ref. 27
Right-of-use assets	146	N/A
Trade and other receivables (Current assets)	1,536	
Investment in subsidiaries or other companies	856	
Cash and cash equivalents	150	
<b>Total Assets</b>	<b>2,767</b>	
<b>Liabilities - Breakdown by liability classes according to the balance sheet in the unaudited management accounts</b>		
Current liabilities	300	N/A
Lease Liabilities (Current liabilities)	188	N/A
<b>Total Liabilities</b>	<b>488</b>	
<b>Shareholders' Equity</b>		
Share Capital	2	Ref. 4
Other reserves	761	
Retained Earnings	1,053	Ref. 6
Current year earnings/ (losses)	463	
<b>Total Shareholders' equity</b>	<b>2,279</b>	

## 8. OWN FUNDS REQUIREMENTS

The primary objective of the Group with respect to its capital management is to ensure that the Group complies with the capital requirements regulation imposed by the European Union and regulated by CySEC. Under this framework, the Group needs to monitor its capital base and maintain a strong capital adequacy ratio in order to support its business and maximize shareholders' value. In this respect, the Own funds requirements should not be seen as a restriction of business but rather as proactive risk management imposed to help both the Group and its client base.

The Board, as well as the Risk Manager, monitor the reporting requirements and have policies and procedures in place to help meet the specific regulatory requirements. This is achieved through the preparation of accounts to monitor the financial and capital position of the Group. The Group manages its capital structure and makes adjustments to it in light of the changes in the economic and business conditions and the risk characteristics of its activities.

The prudential framework for Investment Firms (IFR/IFD) came into force in all EU Member States on June 26, 2021. Investment Firms, are categorised into three categories depending on their business activities, systemic importance, size, and interconnectedness.

7Q Financial Services Ltd and therefore, the parent company, 7Q Holdings Ltd (which falls under prudential consolidations) fall into the Class 2 category (IFs exceeding the categorisation thresholds for Small and Non-interconnected Investment Firms). The minimum Own Funds Requirement for the parent company of the Group is the greatest of:

- A company-specific **Permanent Minimum Capital Requirement** of EUR 750 000, due to the reason described in Section 6 above;
- A **Fixed Overhead Requirement** at 25% of the Company's fixed overheads in the previous year; and
- A **K-factors Requirement**, which is based upon risk exposure indicators ("K-factors") which are designed to measure risk to customers, counterparty credit risk, trading book market risk, and concentration risk (in the trading book and securities financing type of transactions including REPOs).



## 8.1 CAPITAL RATIOS

The total Own Funds Requirement for the parent company of the Group (on a consolidated basis) for the year 2023 totals to EUR 750K while the Total Own Funds amount to EUR 1.007mio, as indicated in the below table.

**Table 6: Total Own Funds Requirement, capital ratios and capital levels based on IFR<sup>1</sup>**

in EUR'000s	31.12.2023 <sup>1</sup>
<b>Available Eligible Own Funds<sup>2</sup></b>	<b>1,007</b>
<b>Own Funds Requirement, higher of:</b>	<b>750</b>
1. Permanent Minimum Capital Requirement	750
2. Fixed Overhead Requirement	177
3. Total K-factor Requirement	194
<b>CET-1 Ratio</b> (min. regulatory is 56% based on IFR)	<b>134.3%</b>
Surplus/(Deficit) over CET-1 Ratio	587
<b>Tier 1 Ratio</b> (min. regulatory is 75% based on IFR)	<b>134.3%</b>
Surplus/(Deficit) over CET-1 Ratio	445
<b>Own Funds Ratio</b> (min. regulatory is 100% based on IFR)	<b>134.3%</b>
Surplus/(Deficit) over CET-1 Ratio	257

**Notes:**

<sup>1</sup> Based on unaudited management accounts as at 31.12.2023

<sup>2</sup> Own Funds consist of CET1 instruments only (i.e. no AT1 instruments, no Tier 2 instruments)

## 8.2 FIXED OVERHEAD REQUIREMENTS

In accordance with Article 13 of the IFR, the Fixed Overheads Requirement is given as the 25% of the Company's fixed overheads of the preceding year (based on the Audited Financial Statements).

The following table presents the total Fixed Overhead Requirement for the Company over as at 31.12.2023:

**Table 7:** Calculation of Fixed Overheads Requirement of the Consolidated Entity (7Q Holdings Limited) as at 31.12.2023

	<b>31.12.2023</b>
	<b>EUR</b>
<b>Fixed Overhead Requirement</b>	<b>177</b>
<b>Annual Fixed Overheads of the previous year after distribution of profits</b>	<b>709</b>
<b>Total expenses of the previous year after distribution of profits</b>	<b>801</b>
of which: Fixed expenses incurred on behalf of the investment firm by third parties	0
<b>(-) Total Deductions</b>	<b>(92)</b>
(-) Staff bonuses and other remuneration	(14)
(-) Employees', directors' and partners' shares in net profits	0
(-) Other discretionary payments of profits and variable remuneration	0
(-) Shared commission and fees payable	0
(-) Fees, brokerage and other charges paid to CCPs that are charged to customers	(52)
(-) Fees to tied agents	0
(-) Interest paid to customers on client money where this is at the firm's discretion	0
(-) Non-recurring expenses from non-ordinary activities	0
(-) Expenditure from taxes	(26)
(-) Losses from trading on own account in financial instruments	0
(-) Contract based profit and loss transfer agreements	0
(-) Expenditure on raw materials	0
(-) Payments into a fund for general banking risk	0
(-) Expenses related to items that have already been deducted from own funds	0
<b>Projected fixed overheads of the current year</b>	<b>713</b>
<b>Variation of fixed overheads (%)</b>	<b>0.56%</b>

### 8.3 K-FACTOR REQUIREMENTS

The K-factor Requirement is based upon the risk exposure indicators (“K-factors”), capturing not only the balance sheet risks but P&L risks as well.

The **K-Factor Requirement** for the Company shall amount to, at least, the sum of the following:

1. **Risk-to-Client (“RtC”) K-Factors** capture client assets under management and ongoing advice (K-AUM), client money held (K-CMH), assets safeguarded and administered (K-ASA), and client orders handled (K-COH).
2. **Risk-to-Market (“RtM”) K-Factors** captures net position risk (K-NPR) in accordance with the market risk provisions of Regulation (EU) No 575/2013 or, where permitted by the competent authority, based on the total margins required by an investment firm’s clearing member (K-CMG). *The Company uses the K-NPR method to calculate market risk capital requirement.*
3. **Risk-to-Firm (“RtF”) K-Factors** capture an investment firm’s exposure to the default of their trading counterparties (K-TCD) in accordance with simplified provisions for counterparty credit risk based on Regulation (EU) No 575/2013, concentration risk in an investment firm’s large exposures to specific counterparties based on the provisions of that Regulation that apply to large exposures in the trading book (K-CON), and operational risks from an investment firm’s daily trading flow (K-DTF).

The table below provides information on total K-factor requirement for the parent Company and the applicable K-factors that form it, in accordance with its licensed investment services:

**Table 8:** Total k-factor requirement of the Consolidated Entity (7Q Holdings Limited) as at 31.12.2023

in EUR’000s	K-factor Requirement 31.12.2023
<b>Risk to client</b>	<b>57</b>
Assets under management	30
Client money–held - Segregated	9
Client money–held - non-segregated	0
Assets safeguarded and administered	18
Client orders handled - Cash trades	0
Client orders handled - Derivatives Trades	0
<b>Risk to market</b>	<b>137</b>
K-Net positions risk requirement	137
Clearing margin given	0
<b>Risk to firm</b>	<b>0</b>
Trading counterparty default	0
Daily trading–flow - Cash trades	0
Daily trading–flow - Derivative trades	0
K-Concentration risk requirement	0
<b>TOTAL K-FACTOR REQUIREMENT</b>	<b>194</b>

## 9. LIQUIDITY REQUIREMENT

Liquidity risk is the possibility that, over a specific horizon, the Company will be unable to raise cash and meet its financial obligations.

The Company shall hold liquid assets, as per the IFR liquidity requirement, that are equal to the sum of:

- i. A **third of the Company's fixed overheads capital requirement** (so a twelfth of the firm's fixed overheads in the preceding year); and
- ii. 1.6% of the value of any customer guarantees given by the Company (if applicable).

The total Liquidity Requirement and level of liquid assets for the Group as at 31<sup>st</sup> of December 2023 is presented in the below table.

*Table 9: Liquidity Requirement and level of Liquid Assets of the Consolidated Entity (7Q Holdings Limited) as at 31.12.2023*

Amounts in EUR	31.12.2023
<b>Liquidity Requirement <sup>1</sup></b>	<b>59</b>
<b>Client Guarantees<sup>2</sup></b>	<b>0</b>
<b>Total Liquid Assets</b>	<b>284</b>
<b>Unencumbered short-term deposits</b>	<b>150</b>
<b>Total eligible receivables due within 30 days</b>	<b>130</b>
<b>Level 1 assets</b>	<b>0</b>
Coins and banknotes	0.08
Withdrawable central bank reserves	0
Central bank assets	0
Central government assets	0
Regional government/local authorities' assets	0
Public Sector Entity assets	0
Recognisable domestic and foreign currency central government and central bank assets	0
Credit institution (protected by Member State government, promotional lender) assets	0
Multilateral development bank and international organisations assets	0
Extremely high-quality covered bonds	0
<b>Level 2A assets</b>	<b>0</b>
Regional government/local authorities or Public Sector Entities assets (Member State, RW20 %)	0
Central bank or central/regional government or local authorities or Public Sector Entities assets (Third Country, RW20 %)	0
High quality covered bonds (CQS2)	0
High quality covered bonds (Third Country, CQS1)	0
Corporate debt securities (CQS1)	0
<b>Level 2B assets</b>	<b>3.222</b>
Asset-backed securities	0

Corporate debt securities	0
Shares (major stock index)	3
Restricted-use central bank committed liquidity facilities	0
High quality covered bonds (RW35 %)	0
<b>Qualifying CIU shares/units</b>	<b>0</b>
<b>Total other eligible financial instruments</b>	<b>0</b>

**Notes:**

<sup>1</sup> Liquidity Requirement is calculated as the 1/3 of the Fixed Overhead requirement during the year of 2023.

<sup>2</sup> No client guarantees were given by the Company during 2023.

## 10. OTHER RISKS

### 10.1 CREDIT RISK

Credit risk is the risk of financial loss to the Company if a customer or counterparty to a financial transaction fails to meet its contractual obligations, and arises principally from the Firm's receivables, from related and/ or other parties and from bank balances. The Firm identifies and monitors credit related risks in response to the ongoing financial markets and economic uncertainty.

The Company limits exposure to credit risk in relation to credit granted to clients as the Firm refrains from granting credit to clients. With regards to receivables the Firm does not have any outstanding balances with clients since all transactions are done on a delivery versus payment basis. The receivable balances in the Company's Statement of Financial Position stem from transactions with related parties from which the Management can request immediate settlement.

### 10.2 OPERATIONAL RISK

Operational risk is defined as the possibility of economic loss resulting from inadequate or failed internal processes, system malfunctions or human errors.

Examples of operational risks that the Company could be exposed to, are outlined below:

- **Internal Fraud:** unauthorized limit excesses with intend, misappropriation of assets, tax evasion, bribery and theft from employees;
- **External Fraud:**
  - Theft and Fraud (theft/robbery, skimming, forgery, impersonation, manipulation of the clients' data); and
  - Systems (intrusions from hackers, unauthorized data retrieval, phishing, unauthorized entry to offices, internet virus, organized criminal attacks).
- **Compliance:** Complaint handling, third country regulator retaliation, commerce global taxation matters;

- **Clients, Products and Business Practice:** market manipulation, asymmetrical slippage, antitrust, improper trade, product defects, fiduciary breaches; and
- **Execution, delivery and process management:** wrong execution of orders, data entry mistakes when transmitting orders, trade miscapturing.

The Company manages operational risk through a control-based environment in which processes are documented and systems are reviewed and upgraded. This is enhanced by continuous monitoring. The Company's Internal Operations Manual outlines roles and responsibilities of each department and the procedures the Company has in place to mitigate operational risks arising from the investment and ancillary services it offers to clients, clients' assets and systems. Management is working in conjunction with the department heads to prepare separate manuals for each department.

In addition, the internal audit function, via a risk-based audit plan, provides independent and objective assurance to the BoD on the design and effectiveness of the internal controls relating to operational and other risks.

#### **10.2.1 Compliance Risk**

Compliance risk is the risk of financial loss, including fines and other penalties, which arises from noncompliance with laws and regulations of the EU and Cyprus. The risk is limited to a significant extent due to the supervision applied by the Compliance Officer of each company within the Group, as well as by the monitoring controls applied separately by each company within the Group.

The Group also engages, on an ad hoc basis, respectable legal consultants to advise on legal matters which may occur. The Boards of Directors within the Group are comprised of individuals with a diverse professional and academic background such as lawyers, investment professionals and accountants.

#### **10.2.2 Anti-Money Laundering Risk**

The Group's Management continually assesses the applicable laws and regulations that it operates under and believes that it has adequate and effective systems in place to affect this. The AML Compliance Officer (AMLCO) of each company within the Group provides regular reports on the effectiveness of these procedures to the relevant Board of Directors. The AMLCO is in continuous communication with regulatory bodies in order to remain up to date with the regulatory developments.

All procedures as per the pertinent section of each company's Internal Manual are followed in order to minimize such risk.

### **10.2.3 Legal and Regulatory Risk**

The Group ensures that it understands local conduct of business rules and regulations which apply in the jurisdictions in which it operates. It also ensures that it understands laws and regulations relevant to the securities in which it trades (e.g., shareholding disclosure requirements and foreign ownership rules) and can advise accordingly.

### **10.2.4 GDPR Risk**

GDPR Risk relates to the risk of non-compliance with the General Data Protection Regulation (“GDPR”) which has come in force in May 2018. The risk has to be managed to ensure compliance from the operational perspective and ensuring that customer data is kept safe and secure. The Group has invested in security systems and has appointed a Data Protection Officer as required by the Regulation. Furthermore, the Group has a secure network in place to mitigate the effects of security breach and has assigned the setup and maintenance of its systems to an established IT solutions provider.

### **10.2.5 IT/Data Security Risk**

IT risk could occur as a result of inadequate information technology and processing or arise from an inadequate IT strategy and policy or inadequate use of the Company’s information technology. The Company’s Business Continuity Policy and Disaster Recovery Plan are designed to prevent, manage and resolve crisis situations. They aim at the minimization of the risk of forcing the Company to suspend its operations, minimization of possible effect of temporary suspension of the Company activities and allowing the Firm to recover its normal course of business, which may slow down in a crisis situation.

## **10.3 MARKET RISK**

Market Risk is defined as the risk of financial loss as a result of changes in interest rates, exchange rates, stock prices and commodity prices. The objective of market risk management is to manage and control market risk exposures within acceptable parameters, while optimizing the return on risk.

### **10.3.1 Currency Risk**

Currency risk results from adverse movements in the rate of exchange on transactions in foreign currencies. The Group is exposed to currency risk on transactions that are denominated in a currency other than the functional currency of the Group. The proportion of transactions that are denominated in a currency other than the Group’s functional currency is not significant compared to the total volume of operations of the Group.

### **10.3.2 Interest Rate Risk**

Interest rate risk is the risk that the value of financial assets and liabilities will fluctuate due to changes in market interest rates. Borrowing on variable interest rates exposes the Firm to interest rate risk that concerns cash flow. Borrowing on fixed rates exposes the Firm to interest rate risk that concerns the fair value. The Firm's management monitors interest rate fluctuations on a regular basis in order to act accordingly.

The Firm's current income and operating cash flows are affected by fluctuations of the market interest in respect to the overdraft balance. Management aims to maintain a positive or a marginally negative balance in the overdraft account and hence the effect of the interest rates on the balance is considered immaterial, as is the amount.

### **10.3.3 Asset Price Risk**

Asset price risk is the Group's exposure to adverse movements in the assets held on its members Balance Sheets. The Group's Management is actively involved in the management of its portfolio and the Companies included therein. Investments in financial sector entities have been deducted from the Tier 1 Capital of the Group

## **10.4 REPUTATIONAL RISK**

Reputational risk is the risk arising from an adverse perception of the image of the Company (and any related company within the Group) that whether true or false, could harm the Group companies and lead to loss of clientele, reduction of income and/ or legal actions against the Company. The Company has transparent policies and procedures in place in order to provide the best possible service to its clients and mitigate such risks.

The Company strives to preserve its reputation by adhering to applicable laws and regulations, and by following the core values and principles of the Company, which includes integrity and good business practice. The Company centrally monitors certain aspects of reputation risk. It also places great emphasis on the information technology security which is one of the main causes of such reputational risk manifestation.

The Management is in continuous personal communication with the clients and regularly accepts client visits at their premises.

The Company has transparent policies and procedures in place when dealing with possible customer complaints in order to provide the best possible assistance and service under such circumstances, the possibility of having to deal with customer claims is very low as the Group's members have policies in place to provide high quality services to clients. In addition, the Board of Directors of each company within the Group is made up of high calibre professionals who are recognised in the industry for their integrity and ethos; this adds value to the Group.



Furthermore, the Risk Management function of the Group is monitoring reputational risk closely.

### **10.5 BUSINESS RISK**

It includes the current or prospective risk to earnings and capital arising from changes in the business environment including the effects of deterioration in economic conditions. Research on economic and market forecasts are conducted with a view to minimise the Group's exposure to business risk. These are analysed and taken into consideration when implementing the strategy of each company within the Group.

The management has introduced strategic plans to introduce additional service lines, to increase clients and recurring contracts and create cross selling opportunities. Actions taken to mitigate business risk include sales targets, management cascaded performance goals, brand awareness strategies and strategic partnerships.

### **10.6 POLITICAL RISK**

Political risk is the risk of financial, market or personnel losses because of political decisions or disruptions. The risk of loss of assets could arise because of the political or economic conditions of the country in which the assets of the Group and/or the Group's client funds have been placed through different local banks / financial institutions. Exposure to Political Risk stemming from operations in the Republic of Cyprus is significant but is purely geographical. Management has factored it in its strategic planning and is closely monitoring changes in the political scenery.

### **10.7 OUTSOURCING RISK**

The Management uses external third parties from managing and setting up its IT infrastructure including software solutions.

The Group ensures that careful due diligence on third party service providers is conducted before engaging them. The contracts with third party providers are reviewed regularly at the Group level and the performance of the outsourced services is monitored by the Department Heads responsible. The Group does not outsource any services described in the Investment Services Law and other applicable legislation.

### **10.8 STRATEGIC RISK**

Strategic risk is the risk of loss arising from adverse business decisions, improper implementation of decisions or lack of responsiveness to changes in the business environment. The Group's exposure to strategic risk is managed by the performance of a risk analysis of each of the constituting Company's future strategic actions, such as the development of a new

product or service and expansion to new market segments. The Management receives regular reporting on financial performance and internal developments.

### **10.9 GROUP RISK**

Group Risk could occur as adverse impact due to relationships (financial or non-financial) of the Company with other entities in the group or by risks which may affect the financial position of the whole group (e.g., reputational contagion). The company is reliant on certain services from other entities of the Group including the parent company and has significant holdings in the group companies.

Management ensures independence between entities to minimize impact of any regulatory or reputational events in other group operations. In the event of group structure change (i.e., new companies added to the Group) the Board, the Risk Management and the Risk Manager consider and analyze the risks under such a structure in relation to regulatory, reputational, credit and operational risks.

### **10.10 SANCTIONS RISK**

On 24th February 2022, Russia launched an undeclared war against Ukraine, a country Russia first invaded and partially occupied in 2014.

EU Sanctions:

As a result, the EU has imposed a series of new sanctions against Russia in response to the military aggression against Ukraine. The sanctions add to existing measures imposed on Russia since 2014 following the annexation of Crimea and the non-implementation of the Minsk agreements. The EU Sanctions include targeted restrictive measures (individual sanctions), economic sanctions and visa measures.

The aim of the economic sanctions is to impose severe consequences on Russia for its actions and to effectively prevent Russian abilities to continue the aggression.

The individual sanctions target people responsible for supporting, financing or implementing actions which undermine the territorial integrity, sovereignty and independence of Ukraine or who benefit from these actions.

The EU has also adopted sanctions against:

- Belarus, in response to its involvement in the invasion of Ukraine; and
- Iran, in relation to the use of Iranian drones in the Russian aggression against Ukraine.

### U.S. Sanctions:

Prior to 2022, the United States had imposed sanctions on Russia in response to Moscow's 2014 invasion of Ukraine and other malign activities. Beginning in December 2021, the United States and others warned Russia's leadership that a new attack on Ukraine would lead to severe new sanctions (in addition to increased security assistance to Ukraine and an enhanced NATO presence in Central and Eastern Europe).

Sanctions designations and related actions the Biden Administration and Congress have taken since February 2022 include actions targeting Russian government assets, international trade, broad economic sectors, and specific individuals and entities.

The Management has evaluated the effect of the war on liquidity, currency, interest rate, and credit risks, as well as potential impairment and revenue of the Company. Based on management's assessment, there is no significant impact on the Company's activities.

The Management will continue monitoring political developments in order to ensure compliance with all EU Council's and CySEC's decisions and take any further measures if needed.

## **11. REMUNERATION DISCLOSURES**

### ***11.1 REMUNERATION POLICY***

The Group focuses on performance management and is committed to the retention and ongoing development of its staff. The Group's Management in its supervisory function adopts and periodically reviews the remuneration policy.

The Remuneration Policy addresses both the fixed and variable component of remuneration, the governance around remuneration and the characteristics of performance measurement. The Remuneration Committees of the Group companies convene regularly within the year to address remuneration issues. To ensure that the elimination of gender pay gaps and to ensure gender neutrality in the remuneration process, Management has designed a remuneration policy based on the academic background and professional experience and performance of the employees which is corroborated by market benchmarking methods.

The Group has established a discretionary bonus payment scheme. The criteria for awarding the bonus are based on a profitability threshold of the Group and is determined on a range basis. The amount of the bonus awarded to each employee is dependent on the ratio of the employee's salary to the total salaries of the Group. The bonus is awarded bi-annually. The current risk management process as outlined above ensures that risks stemming from the financial criteria of the discretionary bonus scheme are monitored and managed.

Changes in salaries and bonuses lie at the discretion of the Remuneration committee of each subsidiary company, who must approve and authorize them before they can be processed.

The table below presents the 2023 annual gross remuneration of the Management and other staff of the Group whose actions have a material impact on the risk profile of the Company.

**Table 10:** Aggregate Annual Remuneration of the Consolidated Entity (7Q Holdings Limited) as at 31.12.2023 (in EUR)

Remuneration as at 31st December 2023	No. of staff during 2023	Annual Remuneration (EUR'000)			
		Fixed (EUR)	Variable pecuniary benefits (EUR)	Proportion of variable of fixed remuneration	TOTAL (EUR)
Executive directors	0	0	0	0.00%	0
Non-executive directors	2	110	3	2.41%	113
Senior Management	4	168	3	1.49%	171
Other Staff	5	66	0	0.59%	66
<b>Total</b>	<b>11</b>	<b>344</b>	<b>6</b>	<b>1.61%</b>	<b>350</b>

It should be noted that non-executive directors in companies within the Group are remunerated based on the Diversity and Remuneration Policy for the Board of Directors.

The following table provides aggregate quantitative information on remuneration, broken down by business line:

**Table 11:** Aggregate quantitative information on remuneration of the Consolidated Entity (7Q Holdings Limited), broken down by business line as at 31.12.2023 (in EUR)

As at 31 December 2023		
Business Line	No. of staff during 2023	Aggregate remuneration (EUR '000s)
Risk Management	2	64
Portfolio Management	2	113
Reception and Transmission	1	5
Finance	3	106
Other	3	62
<b>Total</b>	<b>11</b>	<b>350</b>

## APPENDIX 1 – MAIN FEATURES OF OWN FUNDS

Template EU IF CCA		CET1 instruments
1	Issuer	7Q Holdings Limited
2	Unique identifier (Legal Entity Identifier code)	254900WOQFGS2K2ZJT26
3	Public or private placement	Private
4	Governing law(s) of the instrument	Cyprus Company Law (Chapter 13)
5	Instrument type (types to be specified by each jurisdiction)	Ordinary Shares
6	Amount recognised in regulatory capital (EUR)	2
7	Nominal amount of instrument (EUR)	2
8	Issue price (EUR)	1
9	Redemption price	N/A
10	Accounting classification	Shareholders' equity
11	Original date of issuance	2010
12	Perpetual or dated	Perpetual
13	Original maturity date	No maturity
14	Issuer call subject to prior supervisory approval	No
15	Optional call date, contingent call dates and redemption amount	N/A
16	Subsequent call dates, if applicable	N/A
	<i>Coupons / dividends</i>	N/A
17	Fixed or floating dividend/coupon	Floating
18	Coupon rate and any related index	N/A
19	Existence of a dividend stopper	No
20	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary
21	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary
22	Existence of step up or other incentive to redeem	No
23	Non-cumulative or cumulative	Non-cumulative
24	Convertible or non-convertible	Non-convertible
25	If convertible, conversion trigger(s)	N/A
26	If convertible, fully or partially	N/A
27	If convertible, conversion rate	N/A
28	If convertible, mandatory or optional conversion	N/A
29	If convertible, specify instrument type convertible into	N/A
30	If convertible, specify issuer of instrument it converts into	N/A
31	Write-down features	No
32	If write-down, write-down trigger(s)	N/A
33	If write-down, full or partial	N/A
34	If write-down, permanent or temporary	N/A
35	If temporary write-down, description of write-up mechanism	N/A
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	N/A
38	Link to the full term and conditions of the instrument (signposting)	N/A

\* 'N/A' indicates that the particular field is not applicable

## APPENDIX 2 – SPECIFIC REFERENCE TO THE IFR

IFR Reference (Article)	High Level Summary	Compliance Reference
<b>Scope of Disclosure Requirements</b>		
46 (1)	Requirement to publish disclosures for Class 2 IFs	1
46 (2)	Requirement to publish disclosures for Class 3 IFs, issuing AT1 instruments	N/A
46 (3)	Requirement to publish disclosures when a Class 3 IFs no longer meets the criteria to be considered a small and non-interconnected IF	N/A
46 (4)	Determination of the appropriate medium and location to publish the disclosures	3
<b>Risk management objectives and policies</b>		
47	Investment firms shall disclose their risk management objectives and policies for each separate category of risk, including a summary of the strategies and processes to manage those risks and a concise risk statement approved by the investment firm’s management body succinctly describing the investment firm’s overall risk profile associated with the business strategy.	5
<b>Governance</b>		
48 (a)	Number of directorships	5.2
48 (b)	Diversity Policy	5.1
48 (c)	Risk Committee and number of times the risk committee has met annually	N/A
<b>Own Funds Composition</b>		
49 (1) (a) to (c)	Requirements regarding disclosure of own funds	7
49 (2)	Requirements regarding disclosure of own funds based on EBA Templates (Regulation (EU) 2021/2284)	7
<b>Own Funds Requirements</b>		
50 (a)	Summary of the investment firm’s approach to assessing the adequacy of its internal capital to support current and future activities	8
50 (b)	Upon a request from CySEC, the result of the investment firm’s internal capital adequacy assessment process, including the composition of the additional own funds based on the supervisory review process as referred to in point (a) of Article 39(2) of Directive (EU) 2019/2034 (“IFD”)	5.4
50 (c)	The K-factor requirements	8.3
50 (d)	The fixed overheads requirement	8.2

<b>Remuneration policy and practises</b>		
51 (a)	Most important design characteristics of the remuneration system, including the level of variable remuneration and criteria for awarding variable remuneration, pay out in instruments policy, deferral policy and vesting criteria	11
51 (b)	Ratios between fixed and variable remuneration	11
51 (c)	Aggregated quantitative information on remuneration, broken down by senior management and members of staff whose actions have a material impact on the risk profile of the investment firm	11
51 (d)	Information on whether the investment firm benefits from a derogation laid down in Article 32(4) of Directive (EU) 2019/2034 (“IFD”)	N/A
<b>Investment Policy</b>		
52 (1)	<p>Investment firms which <b>do not meet</b> the criteria referred to in point (a) of Article 32 (4) of Directive (EU) 2019/2034 (“IFD”) disclose the following in accordance with Article 46 of this Regulation:</p> <ul style="list-style-type: none"> <li>(a) the proportion of voting rights attached to the shares held directly or indirectly by the investment firm, broken down by Member State and sector;</li> <li>(b) a complete description of voting behaviour in the general meetings of companies the shares of which are held in accordance with Article 52 (2) of the IFR, an explanation of the votes, and the ratio of proposals put forward by the administrative or management body of the company which the investment firm has approved;</li> <li>(c) an explanation of the use of proxy advisor firms;</li> <li>(d) the voting guidelines regarding the companies the shares of which are held in accordance with article 52 (2) of the IFR</li> </ul>	<p>N/A – 7QFS meets the criterion of point (a) of Article 32 (4) of Directive (EU) 2019/2034</p> <p>(i.e., its total on and off-balance sheet assets are <b>less than EUR 100mio</b> over the last four-year period</p>
52 (2)	The investment firm referred to in Article 52 (1) of the IFR shall comply with that paragraph only in respect of each company whose shares are admitted to trading on a regulated market and only in respect of those shares to which voting rights are attached, where the proportion of voting rights that the investment firm directly or indirectly holds exceeds the threshold of 5% of all voting rights attached to the shares issued by the company. Voting rights shall be calculated on the basis of all shares to which voting rights are attached, even if the exercise of those voting rights is suspended.	N/A – as per comment in point 52 (1) above)

52 (3)	EBA, in consultation with ESMA, shall develop draft regulatory technical standards to specify templates for disclosure under Article 52 (1) of the IFR.	N/A – as per comment in point 52 (1) above)
<b><i>Environmental, social and governance risks</i></b>		
53	From 26 December 2022, investment firms which do not meet the criteria referred to in Article 32(4) of Directive (EU) 2019/2034 shall disclose information on environmental, social and governance risks, including physical risks and transition risks, as defined in the report referred to in Article 35 of Directive (EU) 2019/2034.	N/A – 7QFS meets the criterion of point (a) of Article 32 (4) of Directive (EU) 2019/2034  (i.e., its total on and off-balance sheet assets are <b><u>less than EUR 100mio</u></b> over the last four-year period