PRIMUS GLOBAL LTD

Disclosure of Information (Pillar 3)

For the year ended December 31st, 2025

April 2026

FXPRIMUS

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1. Introduction

Primus Global Ltd (the "Company") is a Cypriot Investment Firm ("CIF") regulated by the Cyprus Securities and Exchange Commission (the Commission" or the "CySEC") with license number 261/14 in line with the L. 87(I)/2017 LAW WHICH PROVIDES FOR THE PROVISION OF INVESTMENT SERVICES, THE EXERCISE OF INVESTMENT ACTIVITIES, THE OPERATION OF REGULATED MARKETS AND OTHER RELATED MATTERS (the "Law").

On 26 June 2021, most investment firms became subject to a new prudential framework, composed of Regulation (EU) 2019/2033, also known as the Investment Firms Regulation (IFR), and Directive (EU) 2019/2034, also known as the Investment Firms Directive (IFD).

Pursuant to Article 14 of the Regulation (EU) 2019/2034 (the "Regulation" or "IFR") and Article 9 of the Directive (EU) 2019/2033 (the "Directive" or "IFD") the Company is categorised as "Full Scope" CIF with minimum/initial capital requirement of €750,000.

According to Article 12 of the IFR the Company is not deemed to be small and non-interconnected Investment Firm and pursuant to Article 46 of the IFR is required to proceed to disclosures (Pillar III disclosures).

The above has resulted to the respective amendments of the Investment Services and Activities and Regulated Markets Law (Law 144(1)/2007) and the implementation of the respective Regulations and the release of Law L.165(I)/2021, for the purpose of harmonization with the actions of the European Directive (IFD) and Regulation (IFR).

Following the implementation of the above, the Company is required to disclose information relating to its capital, the risks that the Company is exposed to, its own funds, its remuneration policies and practices as well as its investment policy. These disclosures are for the year ended 31 December, 2025. The Company's policy is to meet all required Pillar III disclosure requirements as detailed in the Prudential framework for Investment Firms Capital Requirements Regulations (IFR & IFD).

This report is published and will be available on the Company's website at www.fxprimus.eu

1.1. Reporting Frequency

The Company's policy is to publish the disclosures required on an annual basis. Should there be a material change in approach used for the calculation of capital, business structure or regulatory requirements, the frequency of disclosure will be reviewed.

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1.2. Verification

The Company's Pillar 3 disclosures are subject to internal review and validation prior to being submitted to the Board of Directors (the "Board") for approval. This includes approval by the CEO, the Risk Manager, the Head of Accounting and External Auditor.

The Company's Pillar III disclosures have been reviewed and approved by the Board. In addition, the Remuneration disclosures, as detailed in Section 6 of this document, have been reviewed by the Board, which has responsibility of the Remuneration Policy in the absence of a Remuneration Committee.

1.3. Reporting Details

The Company reports on a Solo basis and the reporting currency is USD.

1.4. Non-Material, Proprietary or Confidential Information

This document has been prepared to satisfy the Pillar III disclosure requirements set out in the IFR. The Company does not seek any exemption from disclosure on the basis of materiality or on the basis of proprietary or confidential information.

2. Corporate Governance – Board and Committees

2.1. Board of Directors

The Board has overall responsibility for the business. It sets the strategic aims for the business, in line with delegated authority from the shareholder and in some circumstances subject to shareholder approval, within a control framework, which is designed to enable risk to be assessed and managed. The Board satisfies itself that financial controls and systems of risk management are robust. The Board comprises of 2 executive directors, 3 non-executive director and 2 non-executive / independent directors.

Full name of Director	Position/Title / Capacity	Country
Neophitos Katsaras	Executive Director, "4 eyes"	Cyprus
Andreas Avgoloupis	Executive Director, "4 eyes"	Cyprus
Costas Georgiades	Non-Executive Director	Cyprus
Manmohan Singh Balbir Singh	Non-executive Director	United Arab Emirates
Kevin Vimal De Silva	Non-executive Director	Malaysia
Elena Economides Demetriou	Independent non-executive Director	Cyprus
Anastasia Maria Lianos	Independent non-executive Director	Cyprus

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The principal responsibilities of the Board, the Senior Management, the Internal Auditor, the Risk Management Committee, and the Risk Management Function in relation to the management of the Company's risks are briefly described in the following subsections.

Board of Directors

The Board of Directors, which carries the ultimate responsibility for the approval of the ICARAP, has unequivocal responsibilities as regards the management of the Company's risks, their internal control and the Company's capital adequacy. With the Board, at all times, lies the responsibility for defining the Company's risk profile in terms of its risk tolerance and for making the necessary arrangements so as for the Company to operate within this predetermined profile at all times, as well as regarding the adequacy of the Company's capital allocated in proportion to the nature and level of material risks and the respective capital requirements.

The Board holds meetings where the written reports generated by the internal control functions of the Company are reviewed and approved. The Board is responsible to address any deficiencies identified throughout the said reports at the soonest possible, especially where there is a breach of the regulatory framework which could potentially harm the Company. The said control functions are the Risk Management, the Internal Audit, the Compliance Department, and the Money Laundering Compliance Department. In this manner the Board remains up to date with the Company's position as regards the aforementioned functions.

Senior Management

The Senior Management reviews the written reports prepared by the internal control function of the company including the Risk Manager's report, applies the decisions of the Board with respect to risk management and monitors whether all the Company's risk management procedures are followed.

Risk Manager

The Risk Manager is responsible to identify, assess, quantify, monitor, and manage the Company's financial and non-financial risks ensuring that all the different types of risks assumed by the Company are in compliance with its obligations as those derive from applicable legislation and that all necessary risk management procedures are in place. Further, it is the responsibility of the Risk Manager to make recommendations and indicate whether the appropriate remedial measures have been taken in the event of any deficiencies identified.

Internal Auditor

The Internal Auditor evaluates the adequacy and effectiveness of the Company's internal control systems, policies, and procedures with respect to risk management. The Internal Audit function acts independently and is separated from the other functions and activities of the Company, with

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the Internal auditor being appointed by the Board of Directors and reports directly to the senior Management of the Company. The Internal Auditor is responsible for the application of an effective Internal Control System, and the performance at least on annual basis, of checks as these are required by the Internal Control System. The Internal Auditor is provided with access to the Company's personnel and books and any audit issues identified, are considered by the Board when these are presented to it through the appropriate reports.

2.2. Board Recruitment Policy

Recruitment of Board members combines an assessment of both technical capability and competency skills referenced against the Company's regulatory and operational framework. It seeks to resource the specific experience and skills needed to ensure the optimum blend (diversity) of individual and aggregate capability having regard to the Company's long term strategic plan.

The persons proposed for appointment to the Board should commit the necessary time and effort to fulfill their obligations. Prior to their appointment the proposed persons should obtain the approval of the Commission. Main factors influencing the decision to propose the appointment of potential Directors include:

- Integrity and honesty;
- High business acumen and judgement;
- Knowledge of financial matters including understanding of financial statements and important financial ratios;
- Knowledge and experience relevant to financial institutions;
- Risk Management experience; and
- Specialized skills and knowledge in finance, accounting, law, or related subject.

2.3. Policy on Diversity

The Company is committed to promote a diverse and inclusive workplace at all levels, reflective of the communities in which it does business. It approaches diversity in the broadest sense, recognizing that successful businesses flourish through embracing diversity into their business strategy, and developing talent at every level in the organisation.

For this purpose, the Company takes into consideration various aspects such as broad industry experience, knowledge, independence, gender, age, cultural and educational background, for the Board appointments.

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2.4. Number of Directorships Held by the Board Members

According to Section 9 of the Investment Services and Regulated Markets Law of 2017 there is a limitation to the number of directorships held by members of the Board of a CIF that is significant in terms of its size, internal organisation and in terms of the nature, the scope, and the complexity of its activities. Thus, only one of the below listed combinations of maximum directorships that can be held simultaneously is allowed:

- One executive directorship with two non-executive directorships;
- Four non-executive directorships

We note that the Company is not Significant as defined by the current definitions by the regulator, thus the application of the above restriction is not applicable.

The number of executive and non-executive / independent directorships held with any entity by those who are also directors in the members of the group is listed below. It should be noted that Executive or non-executive directorships held within the same group shall count as a single directorship:

Full name of Director	Position/Title	# Executive	# Non-Executive
Neophitos Katsaras	Executive Director, "4 eyes"	1	0
Andreas Avgoloupis	Executive Director, "4 eyes"	1	0
Costas Georgiades	Non-executive Director	0	1
Manmohan Singh Balbir Singh	Non-executive Director	0	1
Kevin Vimal De Silva	Non-executive Director	0	1
Elena Economides Demetriou	Independent non-executive Director	0	1
Anastasia Maria Lianos	Independent non-executive Director	0	1
Full name of Directors Resigned	**Position/Title**	**# Executive**	**# Non-Executive**
Theodoros Chrysanthou	Executive Director, "4 eyes"	1	0

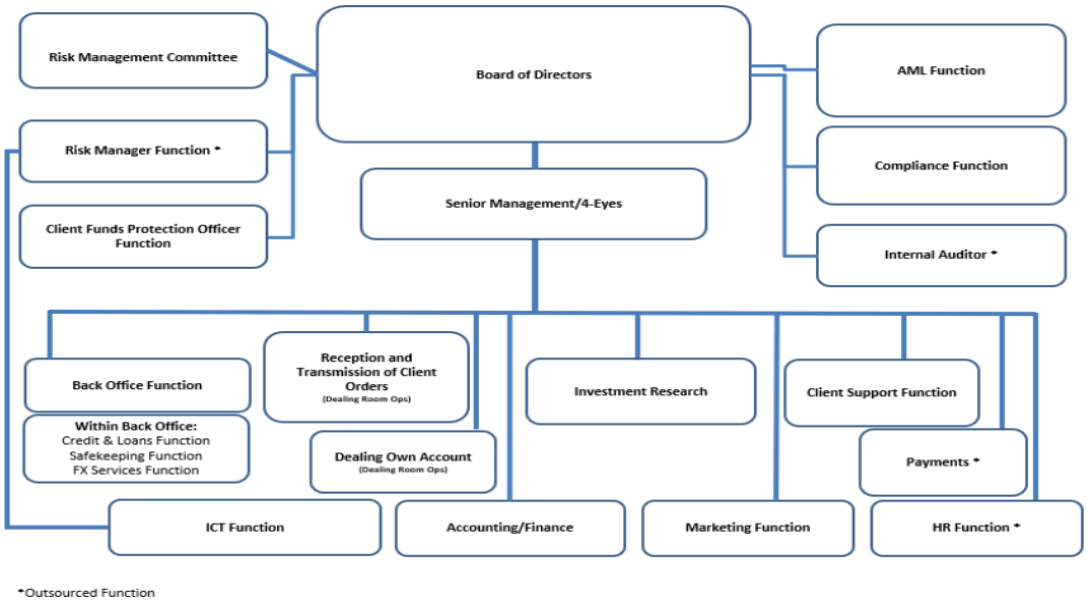
2.5. Risk Management Committee

The Risk Management Committee ensures that the risks of the Company from the provision of investment and ancillary services to clients are efficiently managed, as well as any other risks underlying the operation of the Company. Moreover, the Committee bears the responsibility to monitor the level of compliance by the Company and its relevant persons with the policies and procedures adopted, in addition to the Company's obligations stemming from the relevant laws. Further, it evaluates the adequacy and effectiveness of the risk management policies and procedures that are in place and the measures taken to address any deficiencies with respect to

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those policies and procedures, including failures by the Company's relevant persons to comply with those policies and procedures. The Committee met once in 2025.

2.6. Organizational Structure



*Outsourced Function

3. Risk Management Objectives and Policies

There is a formal structure for monitoring and managing risks across the Company comprising of detailed risk management frameworks (including policies and supporting documentation) and independent governance and oversight of risk.

To ensure effective risk management the Company has adopted the "three lines of defense" model of governance with clearly defined roles and responsibilities.

First line of defense: Managers are responsible for establishing an effective control framework within their area of operations and identifying and controlling all risks so that they are operating within the organizational risk appetite and are fully compliant with Company policies and where appropriate defined thresholds.

Second line of defense: The Risk Management Function is responsible for proposing to the Board appropriate objectives and measures to define the Company's risk appetite and for devising the suite of policies necessary to control the business including the overarching framework and for independently monitoring the risk profile, providing additional assurance where required. Risk

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will leverage their expertise by providing frameworks, tools, and techniques to assist management in meeting their responsibilities, as well as acting as a central coordinator to identify enterprise-wide risks and make recommendations to address them.

Third line of defense: comprises the Internal Audit Function which is responsible for providing assurance to the Board and senior management on the adequacy of design and operational effectiveness of the systems of internal controls.

3.1. Risk Appetite

Risk Appetite limits the risks which the business can accept in pursuit of its strategic objectives. Risk Appetite is formally reviewed annually and is monitored on an ongoing basis for adherence. The Company's strategy, business plan and capital and liquidity plans are set with reference to Risk Appetite.

The Board approves the Risk Appetite, which defines the level of risk that the Company is prepared to accept to achieve its strategic objectives and is translated into specific risk measures that are tracked, monitored, and reported to the Board. The Risk Appetite framework has been designed to create clear links to the strategic long-term plan, capital planning, stress testing and the Company's risk management framework. The review and approval process are undertaken at least annually. The Company's Risk Appetite covers the core areas of, Risk to the Clients of the firm, Risk the firm poses to the Market, Risk to the Firm, Concentration risk and Liquidity risk.

The Board approves the Company's business plans, budget, Internal Capital Adequacy Assessment Process (the "ICARAP") and also monitors the Company's risk profile, capital adequacy, liquidity and concentration position.

3.1.1. Risk Identification

The Risk Identification process provides guidance on the sources to investigate and research in order to identify new and emerging risks and sets out consistent principles, which should be applied.

3.1.2. Risk Assessment

The Risk Assessment process is the means through which the Company understands and estimates the effect of risk on the business and the processes, systems and controls that mitigate those risks to an acceptable level. This is achieved through the documentation and regular update of a detailed

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Risk Register /Map where all financial and non-financial risks the Company faces are identified and recorded by the Risk Manager as well as the relevant risk management controls. The Risk Register is discussed and finalised during the Risk Management Committee's meetings.

3.1.3. Risk Management Function

The Risk Management Function (the "RMF") operates under the leadership of the Risk Management Officer (the "RMO") who reports directly to the Senior Management and the Board. The Risk Management function comprises by individuals with specific expertise and is structured to provide analysis, challenge, understanding and oversight of each of the principal risks faced by the Company.

3.1.4. Stress Testing

Stress Testing is the process by which the Company's business plans are subjected to severe stress scenarios in order to assess the impact of those potential stresses on the Company's business including the projected capital and liquidity positions.

The Company is required to prepare and make available upon request periodic ICARAP reports which set out future plans, their impact on capital availability and requirements and the risks to capital adequacy under potential stress scenarios.

3.1.5. ICARAP and Approach to assessing adequacy of Internal Capital

The Company, in accordance with EU regulation 2019/2033 (IFR), is implementing an ICARAP (ICAAP+ILAAP) procedure in order to evaluate the risks to clients, risks to market and risks to the firm as well as any additional risks that are not covered by the IFR/IFD framework and the calculation of K-Factors. The ICARAP process considers all of the risks faced by the Company, the likely impact of them if they were to occur, how these risks can be mitigated and the amount of capital that it is prudent to hold against them both currently and in the future.

The Company performs a full ICARAP annually with approval provided by the Board. For this purpose, all departments of the organization will complete the Risk Records Charts. After the evaluation of the complete Risk Records charts, the Risk Manager creates a Risk Register with Assessments. The Financial department prepares Business Plans and Capital Plans for the next 3 years based on rolling P&L and Balance Sheet. The Risk Manager implements Stress Test of the Capital Plan, based on "What if" approach in each department of the Company. All stress tests are then summarized by the Risk Manager, assessed, identified, and submitted as a "Stress Test

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Register" to the Risk Committee and to ICARAP Committee. The Financial department prepares stress tests on the Capital Plan based on Stress Test Register. It also prepares Budget of the Company, based on stress tested Capital Plan. The Financial department compares the calculated Capital Plan and stress tested Capital Plan: Pillar I Risks + Pillar II risks (uncovered Pillar I Risks).

These measures allow the Management to evaluate Gap Analysis (what we have at hands and what we should have), and to create Action Plan to monitor and mitigate the consequences of the risks in order to make the Board of Directors to be able to assess and approve Action Plan along with outcomes of ICARAP.

3.1.6. Control Functions

3.1.6.1. Internal Audit

The Company, taking into account the nature, scale and complexity of its business activities, as well as the nature and the range of its investment services and activities, establishes and maintains an internal audit function through the appointment of a qualified and experienced Internal Auditor.

The Internal Auditor is appointed and reports to the Senior Management and the Board of the Company. The Internal Auditor is separated and independent of the other functions and activities of the Company. The Internal Auditor bears the responsibility to:

(a) establish, implement, and maintain an audit plan to examine and evaluate the adequacy and effectiveness of the Company's systems, internal control mechanisms and arrangements
(b) issue recommendations based on the result carried out in accordance with point (a)
(c) verify compliance with the recommendations of point (b)
(d) provides timely, accurate and relevant reporting in relation to internal audit matters to the Board of Directors and the Senior Management of the Company, at least annually.

The Internal Auditor is responsible for applying the Internal Control System (hereinafter, the "ICS"), which confirms the accuracy of the reported data and information. Furthermore, the role of the Internal Auditor is the programming, on an at least annual basis (as applicable), of checks on the degree of application of the required ICS.

The Internal Auditor has clear access to the Company's personnel and books. Likewise, the Company's employees have access to the Internal Auditor for the reporting of any significant deviations from the guidelines provided.

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The Board ensures that internal audit issues are considered when presented to it by the Internal Auditor and appropriate actions shall be taken. The Board ensures all issues are dealt with and prioritised according to the Board's assessment.

3.1.6.2. Compliance Officer

Pursuant to the regulatory obligations of the Company and with the view to complement the Internal Governance framework of the Company, the Board has appointed a Compliance Officer, to head the Compliance Function of the Company in order to establish, implement and maintain adequate policies and procedures designed to detect any risk of failure by the Company to comply with its obligations, to put in place adequate measures and procedures designed to minimize such risks and to enable the competent authorities to exercise their powers effectively.

The Compliance Officer is independent and reports directly to the Senior Management of the Company, having at the same time the necessary authority, resources, expertise, and access to all relevant information.

The Compliance Officer is responsible, inter alia, to:

a) liaising with all relevant business and support areas within the Company
b) monitor on a permanent basis and to assess, on a regular basis, the adequacy and effectiveness of the measures, policies and procedures put in place, and the actions taken to address any deficiencies in the firm's compliance with its obligations;
c) monitor and assess the level of compliance risk that the Company faces, taking into account the investment and ancillary services provided, as well as the scope of financial instruments traded and distributed
d) monitor the adequacy and effectiveness of the measures and procedures of the Company
e) advise and assist the relevant persons responsible for carrying out the investment services to be in compliance with the Law.

3.1.6.3. Anti-Money Laundering Compliance Officer

The Board retains a person to the position of the Company's Anti-Money Laundering Compliance Officer (hereinafter the "AMLCO") to whom the Company's employees report their knowledge or suspicion of transactions involving money laundering and terrorist financing. The AMLCO belongs to the higher hierarchical levels/layers of the Company so as to command the necessary authority. The AMLCO leads the Company's Anti-Money Laundering Compliance procedures and processes and report to the Senior Management and the Board of the Company. Scope and objectives of the AMLCO:

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a) The improvement of mechanisms used by the Company for counteraction of legalization (laundering) of criminally earned income
b) To decrease the probability of appearance among the Customers of the Company of any persons/organizations engaged in illegal activity and/or related with such persons/organizations
c) To minimize the risk of involvement of the Company in any unintended holding and realization of operations with any funds received from any illegal activity or used for its financing
d) To ensure compliance with anti-money laundering laws and directives issued by CySEC as well as the identification and proper reporting of any money laundering activity to the relevant authorities.

3.1.7. Information flow on risk to the management body

Risk information flows up to the Board directly from the business departments and control functions. The Board ensures that it receives on a frequent basis, at least annually written reports regarding Internal Audit, Compliance, Anti-Money Laundering and Terrorist Financing and Risk Management, Risk, and Investment Committees (where applicable) and approves the Company's ICARAP report.

Furthermore, the Company believes that the risk governance processes and policies are of utmost importance for its effective and efficient operation. The processes and policies are reviewed and updated on an annual basis or when deemed necessary and are approved by the Board.

3.2. Board Declaration - Adequacy of the Risk Management Arrangements

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

The Board is responsible for reviewing the effectiveness of the Company's risk management arrangements and systems of financial and internal control. These are designed to manage rather than eliminate the risks of not achieving business objectives, and, as such, offer reasonable but not absolute assurance against fraud, material misstatement and loss.

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The Board considers that it has in place adequate systems and controls with regard to the Company's profile and strategy and an appropriate array of assurance mechanisms, properly resourced and skilled, to avoid or minimize loss.

3.3. Board Risk Statement

Considering its current nature, scale and complexity of operations, the Company has developed a policy that establishes and applies processes and mechanisms that are most appropriate and effective in monitoring activities.

The operations of the Company expose it to the economies and financial markets and more specifically to a variety of risks, the most material of which are credit risk, market risk, operational risk, compliance risk, regulatory risk, reputational risk and liquidity risk.

The Company remains focused on key risks, including ongoing regulatory developments across the EU and in the other jurisdictions where it operates, as well as continued financial market volatility driven by geopolitical tensions and macroeconomic uncertainty. Geopolitical risks remain elevated, particularly in relation to the Russia-Ukraine war and instability in the Middle East, which continue to affect energy markets, trade routes and investor sentiment. These factors have contributed to periods of heightened market volatility and the risk of sudden corrections in global and EU financial markets, although markets have generally shown resilience.

At the same time, the macroeconomic environment in Cyprus has been relatively supportive, with positive real GDP growth in 2025 and favourable labour-market conditions, underpinned by domestic demand and services sectors such as tourism, retail and ICT. Despite this, the external environment remains challenging, with prolonged volatility in Europe, persistent geopolitical risks and the possibility of renewed trade tensions, all of which could adversely affect economic activity and investor confidence.

The Company continues to closely monitor these developments, assess their impact on its risk profile, and adjust its risk management framework, capital planning and liquidity management as necessary to ensure it remains adequately capitalised and resilient under a range of adverse scenarios.

The Company has taken all necessary steps and adapted its business model to ensure that its employees have access to its technology infrastructures necessary for the completion of their tasks including access to sanction lists. It has further amended its Business Continuity Plan and monitors closely the financial impact of the pandemic.

The aim is to promptly identify, measure, manage, report, and monitor risks that interfere with the achievement of the Company's strategic, operational, and financial objectives. The policy includes

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adjusting the risk profile in line with the Company's stated risk tolerance to respond to new threats and opportunities in order to minimize risks and optimize returns.

Risk appetite measures are integrated into decision making, monitoring, and reporting processes, with early warning trigger levels set to drive any required corrective action before overall tolerance levels are reached. Risks are assessed systematically and evaluated as to the probability of a risk scenario occurring, as well as the severity of the consequences should they occur.

The following table sets out a number of key measures used to monitor the Company's risk profile:

Risk Area	Metrics	Comment	Measure as at 31/12/2025
Capital	Common Equity Tier1 (CET1) ratio, Tier 1 ratio and Total Own Funds ratio	The Company's objective is to maintain regulatory ratios well above the minimum thresholds set by CySEC. It therefore aims to maintain its capital ratios at least 2% points above the required level (regulator's current limits are 56% for CET1, 75% for Tier 1 and 100% for Total Own Funds ratio).	CET1 ratio: 596.9% Tier1 ratio: 596.9% Total own funds ratio: 596.9%
Liquidity	Liquid assets	The Company aims to keep its Liquid assets at least 10% above the required level (regulator's current limit is set to 1/3 (or 33%) of fixed overheads requirement).	Liquid Assets as percentage of minimum requirement: 1,474%
Credit Risk	Exposure to single financial institution	The Company's objective is to minimize the potential loss from counterparties. It thus aims to limit its exposure to a single financial institution holding either client funds or own funds of the Company at levels of 80% or less of client funds or its own funds respectively	Current exposure: 85.3%

The Company had an exposure to a single credit institution marginally above its internal limits. The current exposure remains manageable although addressing concentration risk is a key priority for the Company, with plans to diversify banking partners over the coming year.

4. Own Funds

Own Funds (also referred to as capital resources) is the type and level of regulatory capital that must be held to enable the Company to absorb losses. Own funds consist of the sum of Common Equity Tier 1 capital, Additional Tier 1 Capital and Tier 2 Capital and the Company is required to

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hold own funds in sufficient quantity and quality in accordance with IFR which sets out the characteristics and conditions for own funds.

The Company throughout the year under review managed its capital structure and made adjustments to it in light of the changes in the economic and business conditions and the risk characteristics of its activities. During the year under review, the Company complied fully with its initial capital requirement (i.e. €750,000) and fulfilled its obligations by successfully submitting, on a quarterly basis, the IFR/IFD Forms.

Tier 1 & Tier 2 Regulatory Capital

Investment Firms shall disclose information relating to their own funds. Furthermore, Investment Firms shall disclose a description of the main features of the Common Equity Tier 1 and Additional Tier 1 instruments and Tier 2 instruments issued by the Investment Firm. In this respect, the Company's Tier 1 capital is wholly comprised of Common Equity Tier 1 Capital and other reserves.

At 31st of December 2025 the Capital base of the Company was as indicated in the Tables of Appendix 1.

Under the Law, Own Funds consists mainly of paid-up share capital, retained earnings less any proposed dividends, translation differences, investor compensation fund and un-audited current year losses. Current year profits are not added to own funds unless these are audited.

5. Own Funds requirements

The primary objective of the Company's capital management is to ensure that the Company complies with externally imposed capital requirements and that the Company maintains healthy capital ratios in order to support its business and maximize shareholders' value.

Based on the Company's classification, quarterly Capital Adequacy Reports are prepared and submitted to the CySEC. The Capital Adequacy Reports is prepared on a solo basis and the reporting currency is US Dollar.

It should be noted that the Company does not have any material Crypto-asset holdings and the risks emanating from trading in crypto assets, and/or in financial instruments relating to crypto

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assets for its own account or for its clients is immaterial. Therefore, no information is included in this report on:
- the exposure amounts of different crypto-asset exposures,
- the capital requirement for such exposures and
- the accounting treatment of such exposures.

At 31st of December 2025 the composition of the Company's Capital base and its capital ratios were as follows:

Item	**$000**
Own Funds	5,260
Common Equity Tier 1 Capital	-
Additional Tier 1 Capital	5,260
Tier 1 Capital	-
Tier 2 Capital	-
Own Funds requirement	
Permanent minimum capital requirement	881
Fixed overhead requirement	177
Total K-Factor Requirement	80
Total own funds requirement	**881**

According to the Regulation and the Law, the minimum CET1, Tier 1 and Own Funds ratios of the Company should be 56%, 75% and 100% respectively. As at 31 December, 2025, the Company's ratios are presented below and they are higher than the minimum requirements.

Capital Ratios	
CET 1 Ratio	596.9%
Tier 1 Ratio	596.9%
Own Funds Ratio	596.9%

The Company is classified as Class 2 and is therefore required to calculated its Own Funds requirements as the highest of:

a) its Permanent Minimum Capital (PMC)
b) K-Factor capital Requirement (KFR)
c) Fixed Overheads Requirements (FOR)

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where the permanent minimum capital (PMC) of the Company is €750,000 and a summary of the Company's K-Factor and Fixed overheads requirements is provided in the following sections.

5.1. K- Factor requirements

The K-factor requirements are calculations introduced by the new framework of IFR/IFD and are tailored to the respective activities of an investment firm according to its authorisation. K-factors are quantitative indicators targeting the services and business practices that are most likely to generate risk to the Company. K-Factors are categorised into three main groups, risk to clients, risk to markets and risk to the firm, reflecting the risk of the Company on each of these areas.

5.1.1. Risk to Clients (RtC)

Risk to Clients refers to the Company's aspects of operation which could cause harm to clients and as such they pose a risk. RtC captures the Company's exposure to risk to clients taking into consideration assets under management, client money held, assets safeguarded and administered and client orders handled.

5.1.2. Risk to Market (RtM)

This is the risk the Company may pose to the markets and it relates to the trading book positions of the Company either they are for its clients or for its own account.

5.1.3. Risk to Firm (RtF)

Risk to Firm refers to the Company's exposure to its trading counterparties, concentration risk from large exposures and operational risk from daily trading flow which could affect the orderly operation of the firm. The respective K-Factor Captures the Company's exposure to these risks.

The Company has been constantly monitoring its K-Factors during the year under review and the K-Factor and the respective requirements of the Company as at 31st of December 2025 are presented below:

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	Factor amount	K-factor requirement
TOTAL K-FACTOR REQUIREMENT		**80**
Risk to client (RtC)		**2**
Assets under management		-
Client money held - Segregated	393	2
Client money held - non-segregated		-
Assets safeguarded and administered		-
Client orders handled - Cash trades		-
Client orders handled - Derivatives Trades	1,136	-
Risk to market (RtM)		**77**
K-Net positions risk requirement		77
Clearing margin given		-
Risk to firm (RtF)		**1**
Trading counterparty default		1
Daily trading flow - Cash trades		-
Daily trading flow - Derivative trades	4,593.30	-
K-Concentration risk requirement		-

5.2. Fixed Overheads Requirement

The fixed overheads requirement shall amount to at least one quarter of the fixed overheads of the preceding year. Investment firms shall use figures resulting from the applicable accounting framework and where an investment firm has not been in business for one year from the date on which it started providing investment services or performing investment activities, it shall use the projected fixed overheads included in its projections for the first 12 months' trading.

At 31st of December 2025 the Company's Capital fixed overhead requirement was as follows:

	$000
Fixed Overhead Requirement	177
Annual Fixed Overheads of the previous year after distribution of profits	710
Total expenses of the previous year after distribution of profits	710
Of which: Fixed expenses incurred on behalf of the investment firms by third parties	-
(-) Total deductions	-

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5.3. Liquidity Requirement

An additional requirement for Investment firms is the Liquidity requirement. According to it the company must hold an amount of liquid assets equivalent to at least one third of its fixed overhead requirement.

Liquidity risk is the risk that the Company may not have sufficient liquid financial resources to meet its obligations when they fall due or would have to incur excessive costs to do so. The Company's policy is to maintain adequate liquidity and contingent liquidity to meet its liquidity needs under both normal and stressed conditions. To achieve this, the Company monitors and manages its liquidity needs on an ongoing basis. The Company also ensures that it has sufficient cash on demand to meet expected operational expenses. It also monitors the Company's exposures and diversification avoiding high concentration risk. This excludes the potential impact of extreme circumstances that cannot reasonably be predicted, such as natural disasters. Currently the Company is not subject to any liquidity risk as it maintains Liquid assets above its Liquidity requirement as indicated in the table below.

	$000
Liquidity Requirement	59.1
Client guarantees	-
Total liquid assets	870.4
Unencumbered short-term deposits	870.4
Total eligible receivables due within 30 days	-
Level 1 assets	-

5.4. Other Risks

5.4.1. Strategic Risk

Strategic risk corresponds to the unintended risk that can result as a by-product of planning or executing the strategy. A strategy is a long-term plan of action designed to allow the Company to achieve its goals and aspirations. Strategic risks can arise from:

- Inadequate assessment of strategic plans;
- Improper implementation of strategic plans; or
- Unexpected changes to assumptions underlying strategic plans.

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Risk considerations are a key element in the strategic decision-making process. The Company assesses the implications of strategic decisions on risk-based return measures and risk-based capital in order to optimize the risk-return profile and to take advantage of economically profitable growth opportunities as they arise.

5.4.2. Reputation Risk

Reputational risk can arise from direct Company actions or by actions of third parties that it may or may not have a relationship with. Such Company actions may include internal security breaches, employee fraud, client misinformation, mistakes in handling client requests and any other actions that can lead to significant negative public opinion and subsequently loss of business and income. Third party actions can include problems with the provision of the outsourced services that can lead to operational interruptions, database hosting and security, spreading of rumors and unsubstantiated information.

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 manages certain aspects of reputation risk, for example communications, through functions with the appropriate expertise. It also places great emphasis on the information technology security which is one of the main causes of such reputational risk manifestation.

5.4.3. Business Risk

This 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 minimize the Company's exposure to business risk. These are analyzed and taken into consideration when implementing the Company's strategy.

5.4.4. Capital Risk Management

This is the risk that the Company will not comply with capital adequacy requirements. The Company's objectives when managing capital are to safeguard the Company's ability to continue as a going concern in order to provide returns for shareholders and benefits for other stakeholders. The Company has a regulatory obligation to monitor and implement policies and procedures for capital risk management. Specifically, the Company is required to test its capital against

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regulatory requirements and has to maintain a minimum level of capital. This ultimately ensures the going concern of the Company.

The Company is further required to report on its capital adequacy on a regular basis and has to maintain at all times a minimum own funds ratio which is set at 100%. The capital adequacy ratio expresses the capital base of the Company as a proportion of the total risk weighted assets. Management monitors such reporting and has policies and procedures in place to help meet the specific regulatory requirements. This is achieved through the preparation on a monthly basis of Company's Management Accounts to monitor the financial and capital position of the Company.

5.4.5. Regulatory Risk

This may arise as a result of negligent actions by the Company's Senior Management and / or staff members, and may lead to fines, loss of license and / or other form of disciplinary action by the regulatory authority. As a result, the Company's reputation will be adversely affected.

The Company maintains strong compliance / internal audit departments, which perform frequent inspections on the Company's processes and procedures. Should a non-compliance issue arise, all appropriate measures are immediately taken to rectify the issue. Both the compliance officer and the internal auditor are qualified and well trained and remain abreast with any new regulatory developments. The potential of such risk arising is considered low.

5.4.6. Legal and Compliance Risk

The Company may, from time to time, become exposed to this type of risks, which could manifest because of non-compliance with local or international regulations, contractual breaches, or malpractice.

The probability of such risks manifesting is relatively low due to the detailed internal procedures and policies implemented by the Company and regular reviews performed by the compliance officer. Additionally, the management consists of individuals of suitable professional experience, ethos and integrity, who have accepted responsibility for setting and achieving the Company's strategic targets and goals. In addition, the Board meets regularly to discuss such issues and any suggestions to enhance compliance are implemented by management. From the Company initiation until the date of this report no legal or compliance issues arose. Any changes to local, EU and third country Regulations, Directives, and Circulars are being constantly monitored and acted upon ensuring that the Company is always compliant with them.

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5.4.7. Information Technology Risk

Information technology risk could occur because of inadequate information technology security, or inadequate use of the Company's information technology. For this purpose, policies have been implemented regarding back-up procedures, software maintenance, hardware maintenance, as well as use of both hardware and software intrusion aversion measures such as (but not limited to) firewalls, anti-virus software, use of security keys, access restrictions, network fencing, and encryption techniques. Materialization of this risk has been minimized to the lowest possible level given the Company's current complexity of its operations and the services it offers to its clients.

6. Remuneration Policy

The purpose of the Company's Remuneration Policy is to ensure the consistent implementation of the MiFID conflicts of interest and conduct of business requirements in the area of remuneration.

The remuneration policy and practices of the Company are designed in such a way to avoid exposing the Company into excessive or undue risks. Moreover, they are targeted to avoid creating incentives that may lead relevant persons to favor their own interest, or the firm's interests, to the potential detriment of clients. The Company has set up adequate controls for compliance with the regulatory requirements on the remuneration policy and practices. The controls are implemented throughout the Company and subject to periodic review.

The Company's remuneration policy takes into consideration a number of factors in relation to the remuneration of senior management, risk takers, staff engaged in control functions and any employee receiving remuneration equal to at least the lowest remuneration received by the senior management, or risk takers whose professional activities have material impact on the risk profile of the Company or of the assets it manages. These factors are:

(a) the remuneration policy is clearly documented and proportionate to the size, internal organisation, and nature, as well as to the scope and complexity of the activities of the investment firm;
(b) the remuneration policy is a gender-neutral remuneration policy;
(c) the remuneration policy is consistent with and promotes sound and effective risk management;
(d) the remuneration policy is in line with the business strategy and objectives of the investment firm, and also takes into account long term effects of the investment decisions taken;

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(e) the remuneration policy contains measures to avoid conflicts of interest, encourages responsible business conduct and promotes risk awareness and prudent risk taking;
(f) the investment firm's management body in its supervisory function adopts and periodically reviews the remuneration policy and has overall responsibility for overseeing its implementation;
(g) the implementation of the remuneration policy is subject to a central and independent internal review by control functions at least annually;
(h) staff engaged in control functions are independent from the business units they oversee, have appropriate authority, and are remunerated in accordance with the achievement of the objectives linked to their functions, regardless of the performance of the business areas they control;
(i) the remuneration of senior officers in the risk management and compliance functions is directly overseen by the remuneration committee referred to in Article 33 of the IFD or, where such a committee has not been established, by the management body in its supervisory function;
(j) the remuneration policy, taking into account national rules on wage setting, makes a clear distinction between the criteria applied to determine the following:
    i. basic fixed remuneration, which primarily reflects relevant professional experience and organizational responsibility as set out in an employee's job description as part of his or her terms of employment;
    ii. variable remuneration, which reflects a sustainable and risk adjusted performance of the employee, as well as performance in excess of the employee's job description;
(k) the fixed component represents a sufficiently high proportion of the total remuneration so as to enable the operation of a fully flexible policy on variable remuneration components, including the possibility of paying no variable remuneration component

The Board of Directors is responsible for determining and approving the Company's remuneration policy and practices. The Board is also responsible to monitor the Company's compliance towards the approved policy and to identify and work towards any deficiencies. The Board meets at least once a year, and whenever the need arises, to discuss issues and to reformulate the policy where this is necessary on account of changes and developments, whether internal to the Company or external in its market environment. Any changes in the Company's remuneration policy can be brought about only as a result of a decision of its Board.

The Company's annual remuneration to senior management and members of staff whose actions have a material impact on the risk profile of the investment firm for 2025 was as follows:

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	Senior Management	Staffs whose actions have material impact on the Company's Risk Profile
Fixed Remuneration	91,600	415,893
Variable Remuneration	0	0
Total	507,493	507,493
Number Of beneficiaries	6	0

The forms of variable remuneration awarded by the Company is broken down as below

	Senior Management	Staffs whose actions have material impact on the Company's Risk Profile
Cash	0	0
Shares	0	0
Share linked instruments	0	0
Other	0	0

Guaranteed variable remuneration awarded by the Company is broken down as below

	Senior Management	Staffs whose actions have material impact on the Company's Risk Profile
Total	0	0
Number Of beneficiaries	0	0

Deferred remuneration breakdown for previous performance periods:

	Senior Management	Staffs whose actions have material impact on the Company's Risk Profile
Amount Due to vest in the financial year	0	0
Of which: Amount of which was paid	0	0
Of which: Amount which was reduced through performance adjustments	0	0
Amount Due to vest in the subsequent years	0	0
Total	0	0

Severance Payments breakdown:

	Senior Management	Staffs whose actions have material impact on the Company's Risk Profile
Awarded in previous periods and paid during the financial year	0	0
Awarded during the financial year	0	0

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Of which: amount paid upfront	0	0
Of which: amount deferred	0	0
Number Of beneficiaries	0	0
Highest amount awarded to a single person	0	0

When implementing its remuneration Policy, the investment firm does not benefit from the derogation laid down in Article 32(4) of Directive (EU) 2019/2034.

7. Investment Policy

Investment firms shall disclose information on their Investment policy risks, including physical risks and transition risks as listed in Article 52 of the IFR.

The Company does not meet the criteria mentioned in Article 52 of the IFR thus it is not required to make any disclosures on Investment Policy Risks.

8. Environmental Social Governance Policy

Investment firms shall disclose information on environmental, social and governance risks (ESG risks), including physical risks and transition risks, as defined in the EBA's report referred in Article 35 of the IFD. The information on ESG shall be disclosed once in the first year and biannually thereafter.

The Company does not meet the criteria mentioned in Article 53 of the IFR thus it is not required to make any disclosures on ESG Risks.

Publication of disclosures

According to the IFR/IFD Framework adopted by CySEC, the risk management disclosures should be included in either the financial statements of the investment firms if these are published, or on their websites. In addition, these disclosures must be verified by the external auditors of the investment firm. The investment firm will be responsible to submit its external auditors' verification report to CySEC. The Company has included its risk management disclosures as per the Directive on its website as it does not publish its financial statements. Verification of these disclosures have been made by the external auditors and sent to CySEC.

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Appendix 1 Template EU IF CC1.01 - Composition of regulatory own funds		Amounts $000	Source based on reference numbers/letters of the balance sheet in the audited financial statements
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	**OWN FUNDS**	**5,260**	
2	**TIER 1 CAPITAL**	**5,260**	
3	**COMMON EQUITY TIER 1 CAPITAL**	**5,260**	
4	Fully paid-up capital instruments	317	
5	Share premium	1,446	
6	Retained earnings	3,498	
7	Accumulated other comprehensive income		
8	Other reserves		
12	(-) TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1		
26	(-) Other deductions		
27	CET1: Other capital elements, deductions, and adjustments	-1	
28	**ADDITIONAL TIER 1 CAPITAL**		
40	**TIER 2 CAPITAL**		

Template EU IF CC2 - Own funds: reconciliation of regulatory own funds to balance sheet in the audited financial statements		Balance sheet as in published/audited financial statements $000	Cross reference to EU IF CC1
		As at period end	
Assets - *Breakdown by asset classes according to the balance sheet in the published/audited financial statements*			
1	Non-Current Assets	16	
2	Current Assets	5,343	
	Total Assets	**5,359**	
Liabilities - *Breakdown by liability classes according to the balance sheet in the published/audited financial statements*			
1	Non-Current Liabilities	0	
2	Current Liabilities	98	
	Total Liabilities	**98**	
Shareholders' Equity			
1	Share Capital	317	
2	Retained earnings	3,498	
3	Share premium	1,446	
	Total Shareholders' equity	**5,261**	

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	Template EU IF CCA - Own funds: main features of own instruments issued by the firm	*Common Equity Tier 1*	*Additional Tier 1*	*Tier 2*
1	Issuer	PRIMUS GLOBAL LTD	n/a	n/a
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	n/a	n/a	n/a
3	Public or private placement	n/a	n/a	n/a
4	Governing law(s) of the instrument	The Companies Law (Cap.113)	n/a	n/a
5	Instrument type (types to be specified by each jurisdiction)	Ordinary Shares	n/a	n/a
6	Amount recognised in regulatory capital (as of most recent reporting date)	$5,260,000	n/a	n/a
7	Nominal amount of instrument	$317,000	n/a	n/a
8	Issue price	1	n/a	n/a
9	Redemption price	n/a	n/a	n/a
10	Accounting classification	Shareholder's equity	n/a	n/a
11	Original date of issuance	07/11/2014	n/a	n/a
12	Perpetual or dated	Perpetual	n/a	n/a
13	Original maturity date	No maturity	n/a	n/a
14	Issuer call subject to prior supervisory approval	No	n/a	n/a
15	Optional call date, contingent call dates and redemption amount	n/a	n/a	n/a
16	Subsequent call dates, if applicable	n/a	n/a	n/a
	Coupons / dividends	*Floating*	n/a	n/a
17	Fixed or floating dividend/coupon	*Floating*	n/a	n/a
18	Coupon rate and any related index	n/a	n/a	n/a
19	Existence of a dividend stopper	Yes	n/a	n/a
20	Fully discretionary, partially discretionary, or mandatory (in terms of timing)	Fully discretionary	n/a	n/a
21	Fully discretionary, partially discretionary, or mandatory (in terms of amount)	Fully discretionary	n/a	n/a
22	Existence of step up or other incentive to redeem	No	n/a	n/a
23	Noncumulative or cumulative	Non-cumulative	n/a	n/a
24	Convertible or non-convertible	Non-Convertible	n/a	n/a
25	If convertible, conversion trigger(s)	n/a	n/a	n/a
26	If convertible, fully or partially	n/a	n/a	n/a
27	If convertible, conversion rate	n/a	n/a	n/a
28	If convertible, mandatory, or optional conversion	n/a	n/a	n/a
29	If convertible, specify instrument type convertible into	n/a	n/a	n/a
30	If convertible, specify issuer of instrument it converts into	n/a	n/a	n/a
31	Write-down features	No	n/a	n/a
32	If write-down, write-down trigger(s)	n/a	n/a	n/a
33	If write-down, full or partial	n/a	n/a	n/a
34	If write-down, permanent or temporary	n/a	n/a	n/a
35	If temporary write-down, description of write-up mechanism	n/a	n/a	n/a
36	Non-compliant transitioned features	No	n/a	n/a
37	If yes, specify non-compliant features	n/a	n/a	n/a
38	Link to the full term and conditions of the instrument (signposting)	n/a	n/a	n/a

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