PARTNERS INVESTMENTS, o.c.p., a.s.
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Information Disclosed by Securities Dealer

pursuant to Section 74b of Act 566/2001 on securities and investment services and on amendments to certain laws, as amended (hereinafter only the "**Securities Act**") and Article 46 of Regulation (EU) 2019/2033 of the European Parliament and of the Council of 27 November 2019 on the prudential requirements of investment firms and amending Regulations (EU) 1093/2010, (EU) 575/2013, (EU) 600/2014, and (EU) 806/2014 (hereinafter only "**Regulation 2019/2033**")

as of: 31 December 2024

I.
Risk Management Objectives and Policies
(Article 47 of Regulation 2019/2033)

Summary of Risk Management Strategies and Procedures:

With reference to Article 23 (2) of Commission Delegated Regulation (EU) 2017/565 of 25 April 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive (hereinafter only "**CDR 2017/565**"), Securities Dealer (hereinafter only "**SD**" or "**PI**") does not establish a separate risk management function (i.e. the risk manager position) as it is not reasonable in view of the nature, scope, and complexity of SD´s line of business and the scope of provided investment services, ancillary investment services, and execution of investment services.

SD has decided to set up a risk management committee consisting of members of the Supervisory Board. The Risk Management Committee is an independent advisory and consultancy body for CEO and DCEO in the area of management of both current and future risk tolerances and risk management strategy. Furthermore, the Risk Management Committee proposes strategies to SD´s Executive Board to maintain business continuity in case of a serious failure. Activities of the Risk Management Committee are governed by separate rules.

a) **Organisation of the Management of Individual Risks**
The basic risk management system requirements are complied with on the basis of SD´s approved organisation structure defining responsibilities and competences in respect of the system of reporting of individual risks, risk assessment, follow-up checks, and securing of adequate information flows required for the performance of individual responsibilities and competences defined in SD´s internal regulations. Individual risks are identified, measured, and assessed within the regular process of monitoring of the risks associated with activities carried out by individual departments. CEO is responsible for compliance with the long-term risk management strategy and performance of operational activities associated with the risk monitoring and carries out those activities in close cooperation with DCEO, PI´s Executive Board, and the compliance officer.

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

In view of the nature and scope of provided investment services, SD has identified the following risks:
- Credit risk,
- Market risk,
- Liquidity risk,

- Operational risk, and
- Business risk.

c) **Credit Risk Management**
Credit risk arises in connection with cash and cash equivalents, financial derivatives and deposits with banks and other financial institutions, transactions with clients and customers, including outstanding receivables and agreed future transactions. An outstanding receivable is PI´s receivable in the payment of which the debtor is in default. An allowance for a receivable is to be created where it is assumed that the debtor will fail to settle the receivable in full. When creating allowances, PI reviews each receivable individually on the basis of the financial situation and long-term cooperation with the debtor.

An impaired receivable is a receivable whose fair value has been reduced below its carrying value. SD defines the credit risk as the level of uncertainty resulting from business activities, i.e. the risk of a failure by debtors, business partners, and other contracting parties to comply with their obligations. PI applies a standardized approach to the calculation of capital requirements for credit risk.

d) **Market Risk Management**
Within its activities, SD is exposed to the market risks resulting primarily from the transactions with interest instruments and currency instruments sensitive to the volatility of financial and capital markets.

Currency risk is the risk of a change in the values of assets and liabilities due to exchange rate fluctuations. SD applies a standard method to calculate the own funds requirements to cover foreign-exchange risk. PI continuously checks the foreign exchange position and monitors ratios between the volumes of assets and liabilities in foreign currencies.

Interest risk relates to the possibility of loss due to interest rate movements. Receivables and debt securities with floating interest rates expose PI to the risk of cash flow variability. Receivables and debt securities with fixed interest rates expose SD to the risk of changes in fair value.

e) **Liquidity Risk Management**
SD defines liquidity risk as the possibility of loss of revenues and own funds due to PI´s inability to comply with its obligations at the time of their maturity without incurring unnecessary losses and the risk of loss in the event of low or limited liquidity in the financial and capital markets where individual financial instruments are traded.

f) **Operational Risk Management**
Operational risk represents the risk of direct or indirect loss incurred due to inappropriate or faulty internal processes of SD, a human factor, a failure of systems, or independent external events. To minimize operational risk and identify it in a timely and efficient manner, SD has in place a functional organisational structure, internal audit system, modern information system, and regularly updated formal and informal regulations and procedures.

g) **Business Risk Management**
As regards the operational risk management, SD identifies the following risks:
- **Reputational risk** – threats to PI´s reputation on the market,
- **Tax risk –** losses incurred due to changes in tax regulations,
- **Currency convertibility risk –** losses incurred due to the impossibility to fully convert capital, dividend, and interest income from investments,

- **Regulatory risk –** the risk of loss due to the inability to comply with regulatory requirements and measures;
- **Legal risk –** the risk of loss due to legal requirements or legal unenforceability and possible insolvency of the counterparty.

Out of all the above, PI focuses, in particular, on the management of legal, tax, reputational, and regulatory risks. To ensure their timely identification, monitoring, and efficient management, PI also uses services of various external consultants.

Concise risk statement approved by SD´s management body, succinctly describing the investment firm´s overall risk profile associated with the business strategy:

SD declares that it has implemented reliable strategies, policies, procedures, and systems to identify, measure, manage, and monitor significant sources of risks and their effects in compliance with Section 71c (2) of the Securities Act, which are appropriate to the complexity, risk profile, and scope of activities of SD and the risk tolerance determined by the Executive Board and that they are adequate in view of SD´s business strategy and importance in the Slovak Republic.

II.
SD´s Management and Administration
(Article 48 of Regulation 2019/2033)

SD discloses the following information about internal management and administration mechanisms:

a) **Number of directorships held by members of the management body (as of 31 December 2024):**

Number of members of the Executive Board: 4
out of that, members of the Executive Board hold the following directorships:

Ing. Maroš Ovčarik, Chairman of the Executive Board
number of executive directorships: 3 (out of that, 2 executive directorships within one business group and 1 executive directorship in a legal entity not established for business – Investment Guarantee Fund)
number of non-executive directorships: 0

Ing. Daniel Petrakovič, Deputy Chairman of the Executive Board
number of executive directorships: 1
number of non-executive directorships: 0

Mgr. Martin Čája, Member of the Executive Board
number of executive directorships: 2 (out of that, 2 executive directorships within one business group)
number of non-executive directorships: 0

Ing. Jozef Bartánus, Member of the Executive Board
number of executive directorships: 5 (out of that, 5 executive directorships within one business group)
number of non-executive directorships: 4 (out of that, 4 non-executive directorships within one business group)

Number of members of the Supervisory Board: 3
out of that, members of the Supervisory Board hold directorships as follows:

Ján Müller, Member of the Supervisory Board
number of executive directorships: 4 (out of that, 3 executive directorships within one business group)
number of non-executive directorships: 4 (out of that, 4 non-executive directorships within one business group)

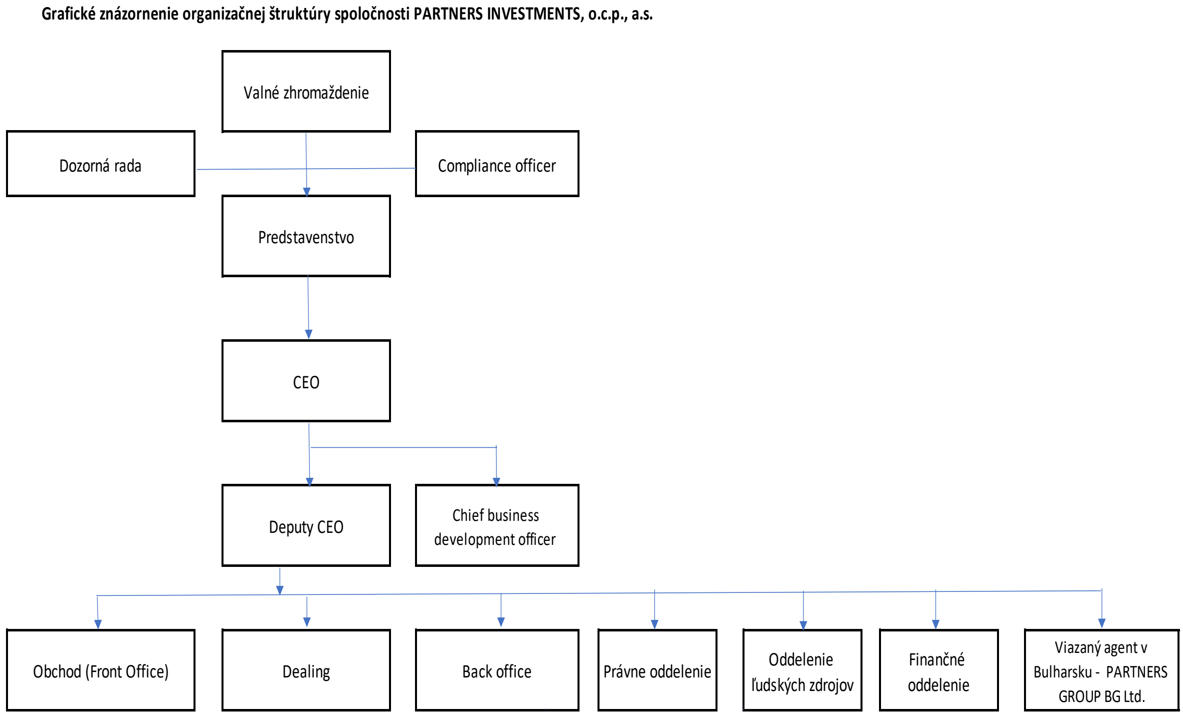
Marcel Kohút, Member of the Supervisory Board
number of executive directorships: 1
number of non-executive directorships: 3 (out of that, 3 non-executive directorships within one business group)

Ing. Peter Matovič, Member of the Supervisory Board
number of executive directorships: 1
number of non-executive directorships: 3 (out of that, 3 non-executive directorships within one business group)

Total number of employees: 19

Organisational structure (as of 31 December 2024):

Organisational structure of PARTNERS INVESTMENTS, o.c.p., a.s.



Valné zhromaždenie – General Meeting
Dozorná rada – Supervisory Board
Predstavenstvo – Executive Board
Právne oddelenie – Legal Department or Legal
Oddelenie ľudských zdrojov – Human Resources Department or Human Resources
Finančné oddelenie – Finance Department or Finance

b) **Diversity policy in relation to the selection of members of the management body:**

The diversity policy aims to ensure sufficient collective knowledge and experience of PI´s management body as a whole. Each candidate nominated as a member of PI´s management body must meet certain criteria as concerns, in particular, expertise, professional experience, skills, and good reputation in addition to meeting the criteria related to potential conflicts of interest.
Each specific nomination as a member of SD´s Executive Board is subject to the approval procedure carried out by Národná banka Slovenska (National Bank of Slovakia – NBS), i.e. the prior approval by NBS of their election as a member of SD´s Executive Board. Only an individual meeting legal criteria can become a member of the Supervisory Board and although nominations to SD´s Supervisory Board are not subject to the approval by NBS, SD subsequently informs NBS about members of the Supervisory Board and demonstrates their professional competence and credibility; NBS is entitled to verify whether a member of the Supervisory Board meets the requirements under Section 8 (b), Section 55 (10), and Section 71 of the Securities Act and where the member does not meet the requirements, NBS is authorized to order replacement of that member of the Supervisory Board in accordance with Section 144 (1)(u) of the Securities Act. The said competence of NBS also applies to members of SD´s Executive Board.
In addition, in selecting management body members, SD proceeds in compliance with the gender equality principle and although it does not apply any quotas for the mandatory representation of men and women in the management body, any discrimination on grounds of sex is prohibited as regards the selection of management body members.
The diversity policy objectives were achieved in the preceding period and PI´s diversity policy fully complied with applicable legislation.

c) **Information about the establishment of a special risk management committee and number of its meetings during the year:**

SD has decided to set up a risk management committee consisting of members of the Supervisory Board. The Risk Management Committee is an independent advisory and consultancy body for CEO and DCEO in the area of management of both current and future risk tolerances and risk management strategy. Furthermore, the Risk Management Committee proposes strategies to SD´s Executive Board to maintain business continuity in case of a serious failure. Activities of the Risk Management Committee are governed by separate rules

Number of meetings of the Risk Management Committee in 2024: 1

III.
Own Funds
(Article 49 of Regulation 2019/2033)

a) **Reconciliation of own-fund items with the balance sheet in the financial statements:**

Along with the balance sheet, SD discloses the data evidencing the full reconciliation of Common Equity Tier 1 items, Additional Tier 1 items, Tier 2 items, and relevant filters and deductions applied to SD´s own funds in the Financial Statements of SD, an investment firm, verified by an auditor. SD discloses that above data on its website https://www.partnersinvestments.sk/dokumenty.

b) **Description of the main features of Common Equity** Tier 1 and Additional Tier 1 instruments and Tier 2 instruments issued by SD:

As of 31 December 2024, PI reported own funds, Tier 1 capital, and Common Equity Tier 1 in the amount of EUR 1,907,838.19 Those items included fully paid-up capital instruments amounting to EUR 300,000, other reserves amounting to EUR 106,000, and retained earnings amounting to EUR 1,549,105.55.

c) **Description of all restrictions applied to the calculation of own funds** and the instruments and deductions to which those restrictions apply:

Own funds were reduced by intangible assets amortisation in the amount to EUR 96,701.46 calculated in accordance with COMMISSION DELEGATED REGULATION (EU) 2020/2176.

IV.
Own Funds Requirements
(Article 50 of Regulation 2019/2033)

SD discloses a summary of its approach to assessing the adequacy of SD´s internal capital to support its current and future activities:

- PARTNERS INVESTMENTS, o.c.p., a.s., as an investment firm that does not meet the criteria for qualifying as a small and not-interconnected investment firm set out in Article 12 (1) of Regulation 2019/2033, has in place measures, strategies, and procedures to continuously assess and maintain the level, types, and distribution of internal capital and liquid assets appropriate and proportionate to the nature, scale, and complexity of PI´s activities, which are subject to regular internal reviews.

  At the regular general meeting held on 16 June 2025, the Executive Board´s proposal for distribution of the retained earnings in the amount of **EUR 1,549,105.55** to be paid out as dividend to shareholders, and the proposal for the settlement of PI´s income for the year 2024, i.e. the net profit amounting to **EUR 3,176,032.61**, which shall be carried to the retained earnings account.

  At the same time, PI is careful and diligent in its approach to the accurate reporting of intangible assets and software.

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

K-Factor requirement calculations

				Factor amount	K-factor requirement
				0010	0020
Total K-Factor requirement			0010	-	EUR 483,104.57
	Risk to client		0020	-	EUR 481,900.22
		Assets under management	0030	EUR 642,802,205.74	EUR 128,560.44
		Client money held – Segregated	0040	EUR 7,239,950.50	EUR 28,959.80
		Client money held - Non-segregated	0050		
		Assets safeguarded and administered	0060	EUR 810,396,108.33	EUR 324,158.44
		Client orders handled - Cash trades	0070	EUR 221,530.79	EUR 221.53
		Client orders handled - Derivatives trades	0080		
	Risk to market		0090	-	
		K-Net positions risk requirement	0100		
		Clearing margin given	0110		
	Risk to firm		0120	-	EUR 1,204.35
		Trading counterparty default	0130		
		Daily trading flow - Cash trades	0140	EUR 1,204,349.89	EUR 1,204.35
		Daily trading flow - Derivative trades	0150		
		K-Concentration risk requirement	0160	-	

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

Fixed overheads requirements calculation

				Amount
				0010
Fixed overhead requirement			0010	EUR 650,024.73
Annual fixed overheads of the previous year after distribution of profits			0020	EUR 2,600,098.92
	Total expenses of the previous year after distribution of profits		0030	EUR 11,813,172.91
		Of which: Fixed expenses incurred on behalf of the investment firms by third parties	0040	
	(-)Total deductions		0050	-EUR 9,213,073.99

		(-)Staff bonuses and other remuneration	0060	
		(-)Employees', directors' and partners' shares in net profits	0070	
		(-)Other discretionary payments of profits and variable remuneration	0080	
		(-)Shared commission and fees payable	0090	-EUR 62,713.81
		(-)Fees, brokerage and other charges paid to CCPs that are charged to customers	0100	
		(-)Fees to tied agents	0110	-EUR 8,549,426.75
		(-)Interest paid to customers on client money where this is at the firm's discretion	0120	
		(-)Non-recurring expenses from non-ordinary activities	0130	
		(-)Expenditures from taxes	0140	-EUR 600,933.43
		(-)Losses from trading on own account in financial instruments	0150	
		(-)Contract based profit and loss transfer agreements	0160	
		(-)Expenditure on raw materials	0170	
		(-)Payments into a fund for general banking risk	0180	
		(-)Expenses related to items that have already been deducted from own funds	0190	
Projected fixed overheads of the current year			0200	EUR 2,700,000.00
Variation of fixed overheads (%)			0210	10.00%

Composition of own funds

		Amount (0010)
Own funds	0010	EUR 1,907,838.19
Own funds > Tier 1 Capital	0020	EUR 1,907,838.19
Tier 1 Capital > Common Equity Tier 1 Capital	0030	EUR 1,907,838.19
CET1 > Fully paid-up capital instruments	0040	EUR 300,000.00
CET1 > Share premium	0050	
CET1 > Retained earnings	0060	EUR 1,549,105.55
Retained earnings > Previous years retained earnings	0070	EUR 1,549,105.55
Retained earnings > Profit eligible	0080	
CET1 > Accumulated other comprehensive income	0090	
CET1 > Other reserves	0100	
CET1 > Minority interest given recognition in CET1 capital	0110	EUR 106,000.00
CET1 > Adjustments to CET1 due to prudential filters	0120	
CET1 > Other funds	0130	
CET1 > (-)Total deductions from Common Equity Tier 1	0140	-EUR 47,267.36
(-)Total deductions from Common Equity Tier 1 > (-) Own CET1 instruments	0150	
(-) Own CET1 instruments > (-) Direct holdings of CET1 instruments	0160	
(-) Own CET1 instruments > (-) Indirect holdings of CET1 instruments	0170	
(-) Own CET1 instruments > (-) Synthetic holdings of CET1 instruments	0180	
(-)Total deductions from Common Equity Tier 1 > (-) Losses for the current financial year	0190	
(-)Total deductions from Common Equity Tier 1 > (-) Goodwill	0200	
(-)Total deductions from Common Equity Tier 1 > (-) Other intangible assets	0210	-EUR 47,267.36
(-)Total deductions from Common Equity Tier 1 > (-) Deferred tax assets that rely on future profitability and do not arise from temporary differences net of associated tax liabilities	0220	
(-)Total deductions from Common Equity Tier 1 > (-) Qualifying holding outside the financial sector which exceeds 15% of own funds	0230	
(-)Total deductions from Common Equity Tier 1 > (-) Total qualifying holdings in undertaking other than financial sector entities which exceeds 60% of its own funds	0240	
(-)Total deductions from Common Equity Tier 1 > (-) CET1 instruments of financial sector entities where the investment firm does not have a significant investment	0250	
(-)Total deductions from Common Equity Tier 1 > (-) CET1 instruments of financial sector entities where the investment firm has a significant investment	0260	
(-)Total deductions from Common Equity Tier 1 > (-) Defined benefit pension fund assets	0270	
(-)Total deductions from Common Equity Tier 1 > (-) Other deductions	0280	
CET1 > CET1: Other capital elements, deductions and adjustments	0290	
Tier 1 Capital > Additional Tier 1 Capital	0300	
Additional Tier 1 Capital > Fully paid up, directly issued capital instruments	0310	
Additional Tier 1 Capital > Share premium	0320	
Additional Tier 1 Capital > (-) Total deductions from	0330	
(-) Total deductions from > (-) Own AT1 instruments	0340	
(-) Own AT1 instruments > (-) Direct holdings of AT1 instruments	0350	

		Additional Tier 1		(-) Indirect holdings of AT1 instruments	0360	
				(-) Synthetic holdings of AT1 instruments	0370	
			(-) AT1 instruments of financial sector entities where the investment firm does not have a significant investment		0380	
			(-) AT1 instruments of financial sector entities where the investment firm has a significant investment		0390	
			(-) Other deductions		0400	
		Additional Tier 1: Other capital elements, deductions and adjustments			0410	
	Tier 2 Capital				0420	
		Fully paid up, directly issued capital instruments			0430	
		Share premium			0440	
		(-) Total deductions from Tier 2			0450	
			(-) Own T2 instruments		0460	
				(-) Direct holdings of T2 instruments	0470	
				(-) Indirect holdings of T2 instruments	0480	
				(-) Synthetic holdings of T2 instruments	0490	
			(-) T2 instruments of financial sector entities where the investment firm does not have a significant investment		0500	
			(-) T2 instruments of financial sector entities where the investment firm has a significant investment		0510	
		Tier 2: Other capital elements, deductions and adjustments			0520	

Own funds requirements

			Amount
			0010
Own fund requirement		0010	EUR 650,024.73
	Permanent minimum capital requirement	0020	EUR 150,000.00
	Fixed overhead requirement	0030	EUR 650,024.73
	Total K-Factor Requirement	0040	EUR 483,104.57
Transitional own funds requirements		0049	(Abstract)
	Transitional requirement based on CRR own funds requirements	0050	
	Transitional requirement based on fixed overhead requirements	0060	
	Transitional requirement for investment firms previously subject only to an initial capital requirement	0070	
	Transitional requirement based on initial capital requirement at authorisation	0080	

	Transitional requirement for investment firms that are not authorised to provide certain services	0090	
	Transitional requirement of at least 250 000 EUR	0100	
Memorandum items		0109	(Abstract)
	Additional own funds requirement	0110	
	Additional own funds guidance	0120	
	Total own funds requirement	0130	EUR 650,024.73

Capital ratios

		Amount
		0010
CET 1 Ratio	0010	801.03%
Surplus(+)/Deficit(-) of CET 1 Capital	0020	EUR 3,219,391.55
Tier 1 Ratio	0030	801.03%
Surplus(+)/Deficit(-) of Tier 1 Capital	0040	EUR 3,137,289.40
Own Funds Ratio	0050	801.03%
Surplus(+)/Deficit(-) of Total capital	0060	EUR 3,029,260.26

V.
Remuneration Policy and Procedures
(Article 51 of Regulation 2019/2033)

1) **The most important conceptual characteristics of the remuneration system,** including the variable remuneration component level and the criteria for the grant of thereof, the policy of payment in the form of instruments, the deferral policy, and criteria for acquisition of rights:

SD applies the remuneration policy under Section 71da (2) of the Securities Act in respect of the following persons:
a) All members of PI´s Executive Board,
b) All members of PI´s Supervisory Board,
c) Top management,
d) Persons responsible for risk-taking,
e) Staff engaged in control functions,
f) All employees not referred to in subclauses (a) to (e), whose professional activities have a significant impact on the risk profile of PI, as a securities dealer, or the assets under its

management and who are entitled to the total remuneration equal to at least the minimum remuneration of the persons referred to in subclause (c) or subclause (d).

Pursuant to the Remuneration Policy, the remuneration consists primarily of the following components:

a) the fixed remuneration component:
   - a1) annual wages paid to employees, i.e. persons employed on the basis of employment contracts;
   - a2) annual remuneration paid to members of Executive Board and Supervisory Board on the basis of contracts of service;

b) the variable remuneration component (so-called annual bonus):
   - b1) annual bonuses paid to employees, i.e. persons employed on the basis of employment contracts;
   - b2) annual royalties paid to members of the Executive Board and Supervisory Board on the basis of contracts of service.

CEO determines a specific amount of the fixed employee wage component. The fixed annual remuneration to be paid to members of the Executive Board is approved by the Supervisory Board and the fixed annual remuneration to be paid to members of the Supervisory Board is approved at the general meeting as part of contracts of service.
Due to (i) the cumulation of functions of CEO and senior employees reporting directly to CEO pursuant to PI´s Organisational Structure and Staff Regulations and (ii) the fixed remuneration component paid out to members of the Executive Board and the Supervisory Board for performance of their functions, no variable remuneration component (so-called annual bonus) is paid out to them.
Variable wage component percentages for individual groups of employees are determined on the basis of annual basic wages and specified in Annex 1 to the Remuneration Policy.
PI has neither any guaranteed variable remuneration component nor any legal commitments in relation thereto.
The annual bonuses may be granted to an employee upon meeting the following criteria:

a) funds have been approved for the payment of annual bonuses and included in the budget;
b) individual objectives have been defined in an assessment sheet for the employee and the employee has undergone an individual assessment interview (individual objective assessments);
c) individual objectives have been met at 70% a minimum; no annual bonus is paid if the employee fails to reach the above threshold;
d) the employee has worked for at least 6 months during the assessed period;
e) the employee has not received any notice of misconduct during the last 6 months;
f) the employee is still employed as of 31 December of the calendar year for which the bonus is to be paid out and has not given a notice of employment termination as of the same date.

Where employment of the employees with a deferred variable remuneration component is terminated, the payment of the variable remuneration component is re-assessed as of the date of employment termination while considering the reason behind the employment termination. No variable remuneration component is paid out in case of a serious misconduct or serious breach of generally applicable legal regulations or internal regulations. PI´s Executive Board may reconsider the payment thereof.
The payment of the variable component, including its deferred portion, is subject to re-assessment – ex post risk adjustment, and it will be paid out or granted only if PI´s client assets under management and results have no influence on PI´s ability to comply with its obligations under Section 74 of the Securities Act. In determining the variable component of the total remuneration, PI shall monitor the balance of own funds and refrain from granting

the variable component of the total remuneration where the payment thereof could negatively affect PI´s own funds. In addition, if PI incurs loss, the variable remuneration component may be reduced significantly. Nevertheless, the capital requirements applicable to PI are a priority when deciding on remuneration. The Executive Board may re-consider it in cooperation with the risk manager function (if established). The variable component may also be reduced in the following cases:

a) fraud or other unlawful actions by the employee during the assessed period;
b) the employee has provided misleading information with a real or potential material impact on the assessment of the employee´s work;
c) the employee´s inappropriate conduct or serious error, e.g. a very serious violation of internal regulations.

The Executive Board decides on withdrawal or reduction of the variable component in respect of so-called specified people.

PI pays out the variable component only in cash and the reasons behind that are as follows: (i) the given requirement based on the proportionality principle is not applied and PI does not issue any financial instruments specified by Section 71bd (10) of the Securities Act, which could serve for the purposes of the non-financial remuneration component.

2) **Ratios between the variable and fixed remuneration components** set out in Article 30 (2) of Directive (EU) 2019/2034:

PI sets a reasonable proportion between the fixed and variable components of the total remuneration of employees in compliance with its business strategy, related risks, and employees´ influence on PI´s risk profile, as a securities dealer. In order to harmonize the payment of the variable remuneration component with the PI´s, as a securities dealer, business cycle, a portion of the variable remuneration component is paid out to so-called specified persons as follows:

a) immediately (instant portion) after the end of the calendar year in respect of which the variable component is granted;
b) the remaining portion is paid out later (deferred portion). The deferral period commences at the moment the instant (advance) portion is paid out.
In this case, 60% of the variable remuneration component (instant portion) is paid out via a single transfer in the year following the performance measurement period and 40% of this remuneration (deferred portion) is retained as three instalments for three years after the payment of the instant portion as follows: 15% in the first year, 15% in the second year, and 10% in the third year.

A remuneration amount is considered to be significantly high when it exceeds EUR 100,000 and in such a case, the instant portion amounts to 40% and the deferred portion amounts to 60% of the variable remuneration component (the deferred portion is paid out throughout three years after the payment of the instant portion as follows: 20% in the first year, 20% in the second year, and 20% in the third year).

3) **Aggregated quantitative information on remuneration broken down by top management members and staff whose activities have a significant impact on SD´s risk profile:**

Remuneration amounts for the year 2024:

The fixed component paid out to 3 top management members for the year 2024 – EUR 241,126.32

The variable component paid out to 3 top management members for the year 2024 – EUR 29,155.

No remuneration in the form of shares, shares related instruments, or other remuneration forms were paid out to employees.

Deferred remuneration amount granted for the preceding assessed period: EUR 16,074.

Deferred remuneration amounts the entitlement to which arose during the accounting period concerned, which were to be paid out during the accounting period and were reduced due to the adjustments made on the basis of achieved results: EUR 6,027.

Guaranteed fixed remuneration amounts granted during the accounting period and the number of recipients thereof: EUR 48,591; number of recipients: 3

Severance allowances granted in previous periods and paid out during the accounting period: EUR 0

Severance allowance amount granted during the accounting period: EUR 0

4) **Information on the application by SD of the exception** set out in Article 32 (4) of Directive (EU) 2019/2034:

   In the reporting period, SD has not applied the exception under Article 32 (4)(b) of Directive (EU) 2019/2034, i.e. the conditions for provision of the variable component of the total remuneration under Clause 2 of this Article are not applied to an individual whose annual variable remuneration does not exceed EUR 50,000 and does not represent more than one fourth of that individual´s total annual remuneration.

5) Application of the gender equality principle:

   Within the application of the remuneration policy, SD proceeds on the basis of the gender equality principle without any exceptions being permitted. Any discrimination in renumerating men and women for the same work or the work of identical value is prohibited.

VI.
Investment Policy
(Article 52 of Regulation 2019/2033)

SD does not invest any of its clients´ funds into the shares of companies admitted for trading on a regulated market. Currently, investing into such financial instruments is not a part of the investment strategy. In providing the "portfolio management" investment service, SD invests exclusively in unit trusts of domestic and foreign collective investment undertakings and in exchange-traded funds. Thus, it does not carry our any direct investments in shares admitted to trading on a regulated market. As a result, SD:
- has no voting rights attached to the shares it holds directly or indirectly;
- does not vote at general meetings of joint-stock companies (as SD does not hold any shares either directly or indirectly);
- does not make use of any authorized consultancy company in voting at general meetings of joint-stock companies.

VII.
Environmental, Social, and Administrative Risks
(Article 53 of Regulation 2019/2033)

SD discloses the relevant data on its website in following documents:
- Client Documentation section: ESG predzmluvné informácie k investičným stratégiám
  (ESG Pre-Contractual Information on Investment Strategies)
- Information under MIFID section: Politika začleňovania rizika udržateľnosti do investičného rozhodovacieho procesu
  (Sustainability Risk Integration Policy for Investment Decision-Making process)