

Disclose Report

On the Audited Financial Statements of

International Fund Services & Asset Management

Société Anonyme

hereinafter: „ifsam“

as of 31<sup>st</sup> December 2024

## 1. Scope and modalities of disclosure obligations

In accordance with Article 46 of Regulation (EU) 2019/2033 of the European Parliament and of the Council of 27 November 2019, investment firms disclose the information specified in Part 6, Articles 48 to 53.

Information relating to Article 47 "Risk Management Objectives and Policies" is published in the management report of ifsam as part of the audited financial statements as of 31 December 2024.

Since ifsam meets the criteria set out in Article 32(4a) of Directive (EU) 2019/2034, the disclosure requirements under Article 52 "Investment Policy" and Article 53 "Environmental, Social and Governance Risks" do not apply.

The information listed in this document is published on ifsam's website (<https://www.ifsam.lu>).

## 2. Informationen

### 2.1. Governance Arrangements (Article 48)

As of 31 December 2024, the Board of Directors of ifsam is composed as follows:

- Muhammad F. B. Mustaffa (Chairman)
- Luc Duarte, Member of the board of directors
- Catherine Brown, Member of the board of directors

As of 31 December 2024, the Authorized Management of ifsam is composed as follows:

- Luc Duarte, Authorized Management Member
- Nicolas Ernster, Authorized Management Member
- Gerrit Mundt, Authorized Management Member

Mr. Luc Duarte holds both a position on the Board of Directors and an Authorized Management role within ifsam. The remaining members of the Authorized Management are not part of the Board of Directors.

#### 2.1.1. Number of executive and supervisory roles by members of the management body

	Number of executive functions as of 31.12.2024	Number of supervisory functions as of 31.12.2024
Members of the Authorized Management	3	2
Members of the Board of Directors	3	25

*and supervisory functions within the institution itself are included. Multiple listings are possible.*

### 2.1.2. Diversity Strategy for the Selection of Members of the Management Body, Objectives, and Relevant Targets of the Strategy, Degree of Achievement

When appointing members of the Executive Management and the Board of Directors, care is taken to ensure a broad range of skills, attributes, and competencies are included. This aims to foster diverse perspectives and experiences, promote independent judgement, and support efficient and balanced decision-making within both the Executive Management and the Board of Directors.

Accordingly, candidates for Executive Management and Board positions are assessed based on various criteria, including educational and professional background, industry knowledge, and relevant technical expertise. In addition, professional integrity and personal qualities are also considered to ensure an appropriate level of diversity.

Compliance with diversity objectives is reviewed annually as part of the review of the guiding principles on the composition and qualification of the Board of Directors, as well as the policies on the suitability and qualifications of the Executive Management and key function holders. In cases of non-achievement, reasons are provided and appropriate measures are initiated.

### 2.1.3. Risk Committee

In accordance with Article 48 of Regulation (EU) 2019/2033, investment firms are required to disclose whether a separate risk committee has been established.

ifsam has established a standing Risk Committee at Board level, referred to as the Board Risk & Compliance Committee (BRCC). The BRCC is responsible for the oversight of key risk and compliance matters, including strategic regulatory developments, emerging legal requirements, and the overall risk profile of the firm. It convenes regularly as part of the Board's governance framework.

In addition to the BRCC, ifsam has implemented the following supporting committees at the executive level:

- Risk Evaluation Committee (REC):  
Focused on the identification and assessment of risks across the firm, this committee is composed of members of the Risk function and authorised management.
- Management Risk & Compliance Committee (MRCC):  
This committee brings together representatives from Risk, Compliance, and authorized management. It addresses cross-functional topics including risk and compliance developments, regulatory changes, gap analyses, and new CSSF circulars or EU-level requirements.

## 2.2. Own Funds (Article 49)

As of 31 December 2024, ifsam's own funds were composed as follows:

Description	Amount in EUR
Subscribed capital	732 000
Legal reserve	73 200
Free reserve	8 428 858
Retained earnings	0
<b>CET 1 – Common Equity Tier 1 capital</b>	<b>9 234 058</b>
Additional Tier 1 capital	0
<b>Tier 1 capital</b>	<b>9 234 058</b>
<b>Tier 2 capital</b>	<b>0</b>
Intangible assets	- 36 336
<b>Total eligible own funds</b>	<b>9 230 931</b>

The Common Equity Tier 1 (CET1) capital consists of subscribed capital and free reserves. The Tier 1 capital is identical to the CET1 capital. Since ifsam does not hold any Tier 2 capital, the Tier 1 capital represents the total own funds of the firm.

## 2.3. Own Funds Requirements (Article 50)

Since 26 June 2021, ifsam has been subject to Regulation (EU) 2019/2033 of the European Parliament and of the Council of 27 November 2019 (IFR), in conjunction with Directive (EU) 2019/2034 of the European Parliament and of the Council of 27 November 2019 (IFD).

Based on this framework, ifsam is classified as a non-SNI IFR investment firm, also referred to as a “Class 2 IF” pursuant to Article 1, point 9a-2 of the Luxembourg Financial Sector Law (*Loi modifiée du 5 avril 1993 relative au secteur financier*).

ifsam calculates its own funds requirements based on a set of K-factors that capture risk-to-client (RtC), risk-to-market (RtM), and risk-to-firm (RtF).

As of 31 December 2024, the situation is as follows:

Risk to client	K-Factor short	Coefficient	Average Volume in EUR	TOTAL in EUR
<i>Assets under management (currently not applicable)</i>	<i>K-AUM</i>	<i>0.02%</i>	<i>0.00</i>	<i>0.00</i>
<i>Client money held - Segregated (currently not applicable)</i>	<i>K-CMH (on segregated accounts)</i>	<i>0.40%</i>	<i>0.00</i>	<i>0.00</i>
<i>Client money held - non - segregated (currently not applicable)</i>	<i>K-CMH (on non - segregated accounts)</i>	<i>0.50%</i>	<i>0.00</i>	<i>0.00</i>
<b>Assets safeguarded and administered</b>	<b>K-ASA</b>	<b>0.04%</b>	<b>25 079 256 893</b>	<b>10 031 703</b>
<b>Client orders handled - Cash trades</b>	<b>K-COH cash trades</b>	<b>0.10%</b>	<b>54 321 483</b>	<b>54 321</b>
<i>Client orders handled - Derivatives Trades (currently not applicable)</i>	<i>K-COH derivatives</i>	<i>0.01%</i>	<i>0.00</i>	<i>0.00</i>
			<b>Total Risk to client:</b>	<b>10 086 024</b>

Risk to market	K-Factor short	Coefficient	Average Volume in EUR	TOTAL in EUR
<i>K-Net positions risk requirement (currently not applicable)</i>	<i>K-NPR</i>		0.00	0.00
<i>Clearing margin given (currently not applicable)</i>	<i>K-CMG</i>		0.00	0.00
			<b>Total Risk to market:</b>	<b>0.00</b>

Risk to firm	K-Factor short	Coefficient	Average Volume in EUR	TOTAL in EUR
<i>Trading counterparty default (currently not applicable)</i>			0.00	0.00
<i>Daily trading flow - Cash trades (currently not applicable)</i>	<i>K-DTF cash trades</i>	0.10%	0.00	0.00
<i>Daily trading flow - Derivative trades (currently not applicable)</i>	<i>K-DTF derivatives</i>	0.01%	0.00	0.00
<i>K-Concentration risk requirement (currently not applicable)</i>	<i>K-CON</i>		0.00	0.00
			<b>Total Risk to firm:</b>	<b>0.00</b>

ifsam makes use of the transitional provision under Article 57(3)(a) of the IFR, which allows investment firms, for a period of five years following the entry into force of the IFR (i.e. until 26 June 2026), to comply with an own funds requirement equal to twice the relevant capital requirement set out in Part Three, Title I, Chapter 1 of Regulation (EU) No 575/2013.

Fixed Overheads as of 31 December 2024	EUR 9 219 393
Own funds requirements pursuant to Part 3, Titel I, Chapter 1 of Regulation (EU) No 575/2013	EUR 2 304 848
200% of the own funds requirements pursuant to Part 3, Titel I, Chapter 1 of Regulation (EU) No 575/2013	<b>EUR 4 609 697</b>
Eligible own funds as of 31 December 2024	EUR 8 188 722
<b>Solvency ratio:</b>	<b>16.02%</b>

As of 31 December 2024, ifsam complies with the minimum own funds requirements by applying the transitional provision in accordance with Article 57(3)(a) of the IFR.

## 2.4. Remuneration Policy and Practices (Article 51)

ifsam has established principles for its remuneration system in accordance with applicable legal and regulatory requirements. These principles are consistent with, and supportive of, a sound and effective risk management framework. The remuneration system is aimed at promoting long-term and sustainable business success and, in particular, avoiding incentives for taking disproportionate risks.

The remuneration policy and practices are reviewed annually by the Board of Directors and adjusted where necessary to ensure appropriateness and compliance with legal requirements.

Employee remuneration at ifsam may consist of fixed and variable components, whereby the individual variable performance-related remuneration may not exceed 100% of the fixed annual base salary. Both components reflect the employee's role within the company, their qualifications and professional experience, as well as their organisational responsibilities, as defined in the employment contract and corresponding job description. Furthermore, when determining the components, care is taken to ensure an appropriate ratio between them within the overall remuneration structure, allowing for full flexibility, including the option of awarding no variable remuneration at all.

In the financial year 2024, total remuneration of EUR 1,918 thousand was granted to members of the supervisory and management functions, as well as to other staff whose professional activities have a material impact on ifsam's risk profile. All remuneration was paid in euro.

ifsam is also subject to the provisions of Article 32(4a) of Directive (EU) 2019/2034.

No guaranteed variable remuneration or severance payments were granted during the financial year.

Contern, April 2025