DISCLOSURE AND MARKET DISCIPLINE REPORT

As of 31st December 2020

April 2021

FX Central Clearing (FXCC)
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1. LICENSE INFORMATION

FX Central Clearing Ltd (hereafter the "Company") obtained a license from the Cyprus Securities and Exchange Commission (hereinafter, the "CySEC"), CIF 121/10 on the 03rd September 2010. Table 1 below, illustrates the current Cyprus Investment Firm license information of the Company.

Table 1 – Company License Information (based on the First Appendix of the Law 87(I)/2017)

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<tr><th colspan="2" rowspan="2"></th><th colspan="9">Investment services and activities</th><th colspan="7">Ancillary services</th></tr>
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2. SCOPE OF THE REPORT

The Company has prepared this report to fulfill its obligations regarding the public disclosure of information laid down in European Regulation (EU) No. 575/2013 (hereinafter, the "CRR"). The scope of the Report is to promote and strengthen market discipline and to improve and encourage transparency of market participants.

The Company is applying the exceptions of Article 432 of Part Eight of the CRR. Where information is excluded the reason is disclosed in the report. Information not disclosed since they are deemed as confidential and/or proprietary are the following:

(a) the exact composition of the Company's own funds as at 31 December 2020 (Section 5)
(b) the amount of operational risk as at 31 December 2020 (Section 7).
(c) the composition of its market risk as at 31 December 2020 (Section 8).
(d) the composition of remuneration as at 31 December 2020 (Section 9).

The CRR is based on the "Three Pillar Concept" as follows:

- **Pillar I** - *Minimum Capital Requirements*: the calculation of the total minimum capital requirements for credit, market and operational risk is presented, in addition to the calculation of the minimum ratio of capital to risk weighted-assets which is set to 8%.
- **Pillar II** - *Supervisory Review Process*: the key principles of supervisory review, transparency and risk management are discussed, with emphasis to be given to the development of an internal capital adequacy assessment process (hereinafter, the "ICAAP") for ensuring compliance with regulatory requirements regarding capital adequacy.
- **Pillar III** - *Market Discipline*: the introduction of disclosure requirements and recommendations enhances comparability through the dissemination of information to the market that enables better assessment of the financial strength of investment firms.

Under Pillar III, the Company is required to publicly disclose quantitative and qualitative information about the capital it holds and each material category of risk it faces, including the strategies and processes it has in place in order to manage and monitor these risks. Disclosures are made regarding the risks referred in Part 8 of the CRR and specifically Paragraphs 431-435 of CRR.

The Report has been approved by the Board of Directors (hereinafter, the "Board") of the Company on 16/04/2021.

3. THE COMPANY'S APPROACH TO RISK MANAGEMENT

3.1. General

The Company's Risk Management Policy was formed with the view to ensure the efficient monitoring of the risks inherent in the provision of the investment services to Clients as well as the risks underlying the operation of the Company.

Managing risk effectively in a multifaceted organisation, operating in a continuously changing risk environment, requires a strong risk management culture. As a result, the Company has established an effective risk oversight structure and the necessary internal organisational controls to ensure that the Company undertakes the following:

- the adequate risk identification and management,
- the establishment of the necessary policies and procedures,
- the setting and monitoring of the relevant limits, and
- compliance with the applicable legislation.

The principal responsibilities of the Board, the *Senior Management*, the Internal Auditor, the Risk Management Committee and the Risk Manager function in relation to the management of the Company's risks include the following:

- the Board reviews and discusses, during its meetings, the written reports prepared by the Risk Manager and identifies the risks faced by the Company,
- the Company's *Senior Management* also reviews the written reports prepared by the Risk Manager, applies the decisions of the Board with respect to risk management and monitors whether all the Company's risk management procedures are followed,
- the Internal Auditor evaluates the adequacy and effectiveness of the Company's internal control systems, policies and procedures with respect to risk management,
- the Risk Management Committee, *inter alia*, scrutinizes, and decides on various risks associated with the operation of the Company with the view to increase the awareness of, formulate internal policies and measure the performance of the said policies in dealing with the risks associated with the operation of the Company. Moreover, the Risk Management Committee reviews the risk management procedures in place (monitors and controls the Risk Manager in the performance of his/her duties and the effectiveness of the Risk Management Department),
- the Risk Manager ensures efficient management of the Company's risks in the provision of the investment and ancillary services to Clients, as well as the risks underlying the operation of the Company, in general. Furthermore, the Risk Manager bears the responsibility to monitor the following:
    - the adequacy and effectiveness of the risk management policies and procedures that are in place,
    - the level of compliance by the Company and its relevant persons with the adopted policies and procedures, in addition to the Company's obligations stemming from the relevant laws, and
    - the adequacy and effectiveness of measures taken to address any deficiencies with respect to those policies and procedures that are in place, including failures by the Company's relevant persons to comply with those policies and procedures.

Moreover, the Risk Manager is responsible for making recommendations and indicating in particular whether the appropriate remedial measures have been taken in the event of any deficiencies identified, as aforementioned.

3.2. Risk Appetite Framework

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

An effective risk appetite statement is empowering the Company in that it enables the decisive accumulation of risk in line with the strategic objectives of the Company while giving the Board and the Senior Management confidence to avoid risks that are not in line with the strategic objectives.

The Company is in the process of establishing its Risk Appetite Framework. This shall be expressed along multiple scenarios, including both “normal” business conditions and “stressed” periods with zero tolerance for regulatory, legal or compliance risks.
The risk appetite of the Company expresses its strategy through desirable and undesirable risk exposures. It is the aggregate level and types of risk the Company is willing to assume within its risk capacity to achieve its strategic objectives and business plan. Thus, Risk Appetite and Strategic Plan occur and evolve in parallel, The Risk Appetite enables the Company to demonstrate that the achievement of its strategic goals has not been the result of fortuitous circumstances.

Furthermore, the risk capacity/tolerance is the maximum amount of risk which the Company is technically able to assume before breaching one or more of its capital base, liquidity, borrowing capacity, reputational and regulatory constraints.

The risk capacity represents the upper limit beyond which a breach is likely to result in failure.

Taking into consideration the Company’s size, services offered, complexity and operations, the risks that are considered significant and/or material for the Company are credit risk, market risk, operations risk, liquidity risk and large exposures.

In regards to the above, setting the corporate risk appetite without taking into account the risk capacity of the Company may have serious consequences. Risk capacity may be easy to quantify in terms of capital or require funding but it is more challenging to consider the point at which the Company’s reputation is beyond repair.

The Board and Senior Management understand how the risk capacity impacts the business and have taken the necessary steps in order to be in constant awareness, mitigating any potential threats.

3.3. Risk Culture

The Board has a critical role in strengthening risk governance, including setting the “tone at the top", reviewing strategy, and approving the Risk Appetite Statement. It is the Board that it is ultimately responsible and accountable for risk governance.

A robust risk culture is a substantial determinant of whether the Company will be able to successfully execute its chosen strategy within its defined risk appetite. The risk culture that the Company wishes to build is reflected in its policies and procedures and these are closely aligned to its Risk Appetite. Risk culture is manifested in the day-to-day decisions that indicate how risk is identified, understood, discussed and acted upon.

The Company has focused primarily on the implementation of a Company-wide effective and pervasive risk culture. This is achieved through the following:

(a) Embedding the risk culture at all levels of the Company with clear ownership and accountability of tasks.
(b) Conducting Company-wide risk assessments.
(c) Implementing formal risk education presentations.
(d) Changes in policies and procedures, introducing additional risk criteria for the evaluation of credit and investment decisions.
(e) Changes in key personnel.
(f) Training.

3.4. Stress Testing

Stress testing is a key risk management toll used by the Company to rehearse the business response to a range of scenarios, based on variations of market, economic and other operating environment conditions. Stress tests are performed for both internal and regulatory purposes and serve an important role in:

(a) Understanding the risk profile of the Company.
(b) The evaluation of the Company's capital adequacy in absorbing potential losses under stressed conditions: This shall takes place in the context of the Company's ICAAP.
(c) The evaluation of the Company's strategy. The *Senior Management* considers the stress test results against the approved business plans and determines whether any corrective actions need to be taken. Overall, stress testing allows the Senior Management to determine whether the Company's exposures correspond to its risk appetite.
(d) The establishment or revision of limits: Stress test results, where applicable, are part of the risk management processes for the establishment or revision of limits across products etc.

The ultimate responsibility and ownership of the Company's stress testing policy rests with the Risk Management Committee. If the stress testing scenarios reveal vulnerability to a given set of risks, the Senior Management should make recommendations to the Board for remedial measures or actions. These may vary depending on the circumstances and include one or more of the following:

(a) Review of the overall business strategy, risk appetite, capital and liquidity planning.
(b) Review limits.
(c) Reduce underlying risk positions through risk mitigation strategies
(d) Consider an increase in capital
(e) Enhance contingency planning.

3.5. Internal Capital Adequacy Assessment Process

Further to the requirements of Pillar I, a more detailed approach in managing risks is achieved through the preparation of Pillar II requirements and more precisely the internal capital adequacy assessment process (ICAAP) report which follows the requirements under CRR and relevant guidelines issued by CySEC.

The ICAAP report is a key tool for both the Company and CySEC as it approaches the risk assessment from a holistic perspective enabling the Company to assess and match risks to the extent possible reducing its residual risk and enabling more precise future growth planning.

The Company, taking into consideration the requirements of the Law, has prepared, and updated thereafter, its ICAAP Report.

4. CAPITAL ADEQUACY

The Company ensures compliance with the imposed capital requirements of the Law with respect to its own funds and that the Company maintains healthy capital ratios in order to support its business and to maximize shareholders' value and optimise its debt and equity balance. The Company must have own funds which are at all times more than or equal to the sum of its capital requirements. In addition, they must not fall below the level of its initial capital.

In line with CRR, Pillar I sets out the minimum regulatory capital requirements to cover credit, market and operational risks. Furthermore, CySEC requires every Cyprus Investment Firm to maintain a minimum ratio of capital to risk weighted assets of 8%. The capital adequacy ratio expresses the capital base of the Company as a proportion of the total risk weighted assets. Moreover, with the introduction of Basel III/CRR, the minimum capital adequacy ratio has been further defined and fragmented providing more rigorous monitoring of core equity ratio which is set at 4.5% in contrast with the total ratio of 8% and within a period of 2-3 years the transitional introduction of capital buffers will provide more capital requirements and also enhanced security.

The Company is further required by the Law to report on its capital adequacy on a quarterly basis. CySEC may impose additional capital requirements for risks not covered by Pillar I.

The Company's capital core equity ratio (CET1) as at 31 December 2020 was equal to

12.12%, which is marginally above the minimum required ratio of 4.5%. Tier 1 capital ratio as well as the Total capital ratio are both 12.12% which is marginally above the respective minimum requirements (i.e. 6 and 8% respectively).

The table below illustrates the Company's capital adequacy ratios compared to the minimum requirements.

CET1 Capital ratio	12.12%	4.5%
T1 Capital ratio	12.12%	6%
Total capital ratio	12.12%	8%

5. OWN FUNDS

The Company's eligible own funds consist entirely of original own funds (tier 1 capital). The total eligible own funds of the Company are not subject to any capital deductions.

Tier 1 capital consists mainly of paid up share capital, retained earnings less any proposed dividends and unaudited current year profits or losses. Current year profits or losses are not added to own funds unless they are audited.

Throughout 2020, the Company's own funds have been constantly well above the minimum capital ratio of 8%.

The Company is not disclosing the exact composition of its own funds as at 31 December 2020 as it is deemed as proprietary information and the management is of the opinion that sharing this information could undermine the Company's competitive position.

6. CREDIT RISK

6.1. Management

Credit Risk arises when failures by counterparties to discharge their obligations could reduce the amount of future cash inflows from financial assets on hand at the balance sheet date. The Company's credit risk arises:

(a) By the Company's deposits in Financial Institutions
(b) By assets mainly held under the Investor Compensation Fund, debtors or prepayments.

The Company follows mitigation strategies in order to minimize the possibility of occurrence of this risk such as, inter alia:

(a) All Client funds are held in segregated accounts separated from the Company's own funds, with both qualifying and non-qualifying institutions.

(b) The Company performs regular credit review of counterparties, identifying the key risks faced and reports them to the Board which then determines the Company's risk appetite and ensures that an appropriate amount of capital is maintained.

Further to the above, the Company has policies to diversify credit risk and to limit the amount of credit exposure to any particular counterparty in compliance with the requirements of CRR.

6.2. Analysis

The Company has no significant concentration of credit risk while the Company uses the Standardized Approach to Credit Requirements for the calculation of its credit risk. Cash balances during the period under review were mainly held with financial institutions in Cyprus.

The Company is using the credit step mapping tables provided in the Directive to map credit assessment from the ECAI to risk weightings.

Further to the above the Company has policies to diversify risks and to limit the amount of credit exposure to any particular counterparty in compliance with the requirements of the CRR and CySEC Directives DI144-2014-14 and DI144-2014-15, as applicable.

The following table represents the Company's credit risk exposure and average exposure, risk weighted assets ("RWA") and minimum capital requirement as at 31 December 2020, broken down by exposure class.

Asset Class	**Exposure Amount** (US$, rounded up to thousands)
Institutions	197
Public Sector	0
Corporates	0
Other assets and other receivables	118
Risk weighted assets:	
Total risk weighted assets (RWA)	315
Credit Risk (8% of total RWA)	25

The table below illustrates the industry distribution of the Company's original exposures.

Industry	**Exposure Amount** (US$, rounded up to thousands)
Financial	197
Other	118

The table below illustrates the geographic distribution of the Company's financial exposures.

Geographic Distribution	Exposure Amount (US$, rounded up to thousands)
Cyprus	315
Other	0

The table below illustrates the effective maturities of the Company exposures:

Effective Maturity	Exposure Amount (US$, rounded up to thousands)
Below three (3) months: Institutions	197
N/A- Public Sector, Corporates, Other Assets and Other Receivables	118

The table below illustrates the risk weight assigned to the Company exposures:

Risk Weight	Exposure Amount (US$, rounded up to thousands)
Institutions (Risk weighted at 20%)	0
Institutions (Risk weighted at 100%)	197
Corporates (Risk weighted at 100%)	0
Other assets and other receivables (Risk weighted at 100%)	118

Past due exposures are those with delayed payments. Impaired exposures are those which are not considered fully collectable and for which a provision for impairment has been recognised on an individual basis or for which incurred losses exist at their initial recognition. The Company does not have any such exposures.

7. OPERATIONAL RISK & FIXED OVERHEAD REQUIREMENTS

7.1. Operational Risk

Operational risk is the risk of loss derived from the deficiencies relating to the Company's information technology, control systems, human error, natural disasters and unauthorized activities.
It is inherent in all Company's business functions and can occur from a variety of circumstances such as fraud, error, omission or system failure.

The Company manages operational risk through a control-based environment in which processes are documented and transactions are reconciled and monitored. This is supported by continuous monitoring of operational risk incidents to ensure that past failures are not repeated.

For calculating its capital requirements for operational risk the Company follows the Basic Indicator Approach.

The Company has omitted to disclose the amount of operational risk as at 31 December 2020 as it is deemed as proprietary information and the management is of the opinion that sharing this information could undermine the Company's competitive position.

7.2 Fixed Overhead Requirements

In accordance with the provisions of CRR, the Company falls under Article 95(1) as a limited scope investment firm therefore it is required to report its fixed overhead requirements instead of operational risk.

In this respect, the Company is required to hold eligible capital of at least one quarter of the fixed overheads of the previous year.

The approach for calculating fixed overheads is a subtractive approach, whereby variable cost items are deducted from the total expenses, as calculated according to the applicable accounting framework. The subtractive approach ensures that changes to the accounting framework are automatically taken into account and cannot be arbitraged by changing the accounting categorisation.

The Company's Fixed Overhead Requirement as at 31 December 2020 has been calculated at USD 131 thousand while the additional risk exposure due to fixed overheads was calculated at USD 1,642 thousand.

8. MARKET RISK

Market risk is the risk that the value of financial instruments will fluctuate as a result of changing market prices. The Company uses the Standardized Approach for measuring Market Risk. The Company does not have any market risk other than the foreign exchange risk disclosed in Section 8.1 below.

8.1. Foreign Exchange Risk

Foreign exchange risk is the effect that unanticipated exchange rate changes have on the Company. In the ordinary course of business, the Company is exposed to minimal foreign exchange risk, which is monitored through various control mechanisms.

The Company is exposed to foreign exchange risk arising from various currency exposures primarily with respect to the Euro. The Company's management monitors the exchange rate fluctuations on a continuous basis and acts accordingly. None-the-less, the Company's foreign exchange risk exposure is quite low.

8.2. Interest Rate Risk

Interest rate risk is the risk that the value of financial instruments will fluctuate due to changes in the market interest rates. The Company is exposed to interest rate risk in relation to its bank deposits.

However, the Company's income and operating cash flows are substantially independent from changes in market interest rates due to the fact that the Company, other than cash at bank which attracts interest at normal commercial rates, it has no other significant interest bearing financial assets or liabilities.

The Company's management monitors the interest rate fluctuations on a continuous basis and acts accordingly.

8.3. Funding Liquidity Risk

Funding liquidity risk is the possibility that, over a specific horizon, the Company will be unable to meet its demands/needs for money (i.e. cash) through mismatch of assets and liabilities. In order to mitigate the funding liquidity risk, the Company established policies and procedures for the measurement and management of the net funding position and requirements, on an ongoing and forward-looking basis. Furthermore, the Company has considered, alternative scenarios and the assumptions underpinning decisions concerning the net funding position were reviewed regularly by the Risk Manager.

The Company has omitted to disclose the composition of its funding liquidity risk as at 31 December 2020 as it is deemed proprietary information.

9. REMUNERATION POLICY

The Company has taken into account its size, internal organisation and the nature, the scope and the complexity of its activities and it does not deem necessary the establishment of a specific remuneration committee. Decision on these matters is taken on a Board of Directors level while the remuneration policy is periodically reviewed.

The Company's remuneration system and policy is concerned with practices of the Company for those categories of staff whose professional activities have a material impact on its risk profile, i.e. the Senior Management, members of the Board of Directors and the Heads of departments; the said practices are established to ensure that the rewards for the 'executive management' are linked to the Company's performance, to provide an incentive to achieve the key business aims and deliver an appropriate link between reward and performance whilst ensuring base salary levels are not set at artificially low levels.

The total remuneration of staff consists of fixed and variable components. Fixed and variable components are appropriately balanced and the fixed component represents a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components, including the possibility to pay no variable remuneration component.

(a) Fixed remuneration varies for different positions/roles depending on each position's actual functional requirements, and it is set at levels which reflect the educational level, experience, accountability, and responsibility needed for an employee to perform each position/role. Fixed remuneration is also set in comparison with standard market practices employed by the other market participants/ competitors.

(b) Variable remuneration is designed to ensure that the total remuneration remains in competitive levels and to reward the staff for its performance whilst remaining aligned with the department's and/or the Company's performance. Other factors taken into account are the following:

- the financial viability of the Company,
- the general financial situation of the state in which the Company operates,
- each employee's personal objectives (such as personal development, compliance with the Company's systems and controls, commitment and work ethics).

The variable remuneration component is mainly awarded in the form of cash while no remuneration is payable under deferral arrangements (with vested or unvested portions), nor were there any severance payments during the current year. The Company has omitted to disclose the composition of remuneration as at 31 December 2020 as it is deemed as proprietary information.

10. OTHER RISKS

10.1. Concentration Risk

This includes large individual exposures and significant exposures to companies whose likelihood of default is driven by common underlying factors such as the economy, geographical location, instrument type etc.

Some concentration of credit risk with respect to trade receivables exists due to the Company’s relatively small number of clients. The Company’s experience in the collection of trade receivables has never caused debts which are past due and have to be impaired. Due to these factors, management believes that no additional credit risk beyond any amounts provided for collection losses is inherent in the Company’s trade receivables. The Company has a policy in place to monitor debts overdue by preparing debtors ageing reports. Fees receivable which are past due the payment period are chased for collection.

10.2. Reputation Risk

Reputation risk is the current or prospective risk to earnings and capital arising from an adverse perception of the image of the Company on the part of customers, counterparties, shareholders, investors or regulators. Reputation risk could be triggered by poor performance, the loss of one or more of the Company’s key directors, the loss of large clients, poor customer service, fraud or theft, customer claims and legal action, regulatory fines.

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

10.3. Strategic Risk

This could occur as a result of adverse business decisions, improper implementation of decisions or lack of responsiveness to changes in the business environment. The Company's exposure to strategic risk is moderate as policies and procedures to minimize this type of risk are implemented in the overall strategy of the Company.

10.4. 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.

10.5. 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 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 quarterly and has to maintain at all times a minimum capital adequacy ratio which is set at 8%. 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 management accounts to monitor the financial and capital position of the Company.

10.6. Regulatory Risk

Regulatory risk is the risk the Company faces by not complying with relevant Laws and Directives issued by its supervisory body. If materialized, regulatory risk could trigger the effects of reputation and strategic risk. The Company has documented procedures and policies based on the requirements of relevant Laws and Directives issued by the Commission; these can be found in the Procedures Manual. Compliance with these procedures and policies are further assessed and reviewed by the Company's Internal Auditors and suggestions for improvement are implemented by management. The Internal Auditors evaluate and test the effectiveness of the Company's control framework at least annually. Therefore the risk of non-compliance is very low.

10.7. Legal and Compliance Risk

This could arise as a result of breaches or non-compliance with legislation, regulations, agreements or ethical standards and have an effect on earnings and capital. The probability of such risks occurring is relatively low due to the detailed internal procedures and policies implemented by the Company and regular reviews by the Internal Auditors. The structure of the Company is such to promote clear coordination of duties and 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 at least annually to discuss such issues and any suggestions to enhance compliance are implemented by management.

10.8. IT Risk

IT risk could occur as a result of inadequate information technology and processing, or arise from an inadequate IT strategy and policy or inadequate use of the Company's information technology. Specifically, policies have been implemented regarding back-up procedures, software maintenance, hardware maintenance, use of the internet and anti-virus procedures. Materialization of this risk has been minimized to the lowest possible level.

11. CORPORATE GOVERNANCE

11.1 Recruitment Policy

Recruitment into the Board combines an assessment of both technical capability and competency skills referenced against the Company's leadership framework.

Board recruitment is subject to the approval of the Executive Director and the Chairman and the Regulatory approval is co-ordinated through the Compliance Officer.

It will be required to establish the specific experience and skills needed to ensure the optimum blend of individual and aggregate capability having regard to the Company's long term strategic plan.

11.2 Number of Directorships in other CIFs held by members of the board

Name	Position with the Company	Directorships-Executive	Directorships-non executive
Mrs. Neda Herodotou	Independent non-executive director	0	2
Mr. Elenodoros Gavriel	Independent non-executive director	0	1
Mr. Thayer Attarifi	Executive director	2	0
Mr. Saed Shalabi	Executive director	1	0

11.3 Board - Diversity Policy

The Company is committed to promoting 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 Company.

11.4 Reporting and Control

In line with the requirements set out in the Law, directives and circulars issued thereof, the Company has been able to maintain a good information flow on risk the Senior Management and the Board as per the table below:

Report	Description	Responsible Person	Recipients	Frequency	Due Date
Annual Compliance Report	To inform the Senior Management & the BoD of the Company regarding the Performance of Compliance function during the year	Compliance Officer	BoD, CySEC	Annual	**30/04/2021**
Annual Internal Audit Report	To inform the Senior Management & the BoD of the Company regarding the Internal Auditor during the year	Internal Auditor	BoD, CySEC	Annual	**30/04/2021***
Annual Risk Management Report	Represents the work & activities undertaken by the Risk Manager during the year	Risk Manager	BoD, CySEC	Annual	**30/04/2021**
Annual Anti-Money	To inform the Senior	AML Compliance	BoD, CySEC	Annual	**31/03/2021****

Laundering Compliance Report	Management & the BoD of the Company regarding the Performance of Anti-Money Laundering function during the year	Officer			
Pillar III Disclosures (Market Discipline and Disclosure	The Company is required to disclose information regarding its risk management, capital structure, capital adequacy and risk exposures	Risk Manager	BoD, CySEC, Public	Annual	**30/04/2021**
Financial Reporting	It is a formal record of the financial activities of the CIF	External Auditor	BoD, CySEC	Annual	**30/04/2021**
Capital Adequacy Reporting	A measure of the CIF's capital. It is expressed as a percentage and is used to monitor and promote the stability and efficiency of financial systems all over the world	Risk Manager / Accounting	Senior Management, CySEC	Quarterly	**11/05/2020** **11/08/2020** **11/11/2020** **11/02/2021**

*Submission deadline has been extended to 30th June 2021, amid the impact of COVID-19.

**Submission deadline has been extended to 31st May 2021, amid the impact of COVID-19