



Plum Money CY Limited

Public disclosures in accordance with Part Six of
Regulation (EU) 2019/2033 on the prudential requirements
of investment firms for the year ended 31 December 2025

Table of Contents

1. INTRODUCTION	4
1.1. Corporate Information & Business Profile	4
1.2. Regulatory Framework	5
1.2.1. Basis of Disclosures	5
1.2.2. Scope of Disclosures	6
1.2.3. Frequency and Means	6
2. RISK MANAGEMENT OBJECTIVES AND POLICIES	8
2.1. Risk Management Strategies and Processes	8
2.2. Risk Management Framework	8
2.2.1. Risk Appetite Statement	8
2.2.2. Risk Management Policy	8
2.3. Risk Governance	9
2.3.1. Board of Directors	9
2.3.2. Executive Risk Committee	10
2.3.3. Risk Management Function	10
2.3.4. Three Line of Defence Model	10
2.4. Risk Profile	11
2.5. OWN FUNDS REQUIREMENTS	12
2.5.1. Capital Adequacy Risk	12
2.5.2. Capital Management	12
2.5.3. Capital Regulatory Requirements	12
2.5.4. Permanent minimum capital requirement	15
2.5.5. Fixed overheads requirement	15
2.5.6. K-Factor Requirements	15
2.5.7. Concentration Risk	17
2.5.8. Liquidity Requirement	18
2.6. Other Business Risks	19
2.6.1. Operational Risk	19
2.6.2. Market Risk	19
2.6.3. Credit Risk	19
2.6.4. Compliance & Regulatory Risk	20
2.6.5. Legal & Reputational Risk	20
2.7. Internal Capital Adequacy & Risk Assessment Process	20
2.8. Stress Tests	21
2.9. Concise Risk Statement	22
3. GOVERNANCE ARRANGEMENTS	23
3.1. Board Recruitment	23
3.2. Directorships held by Members of the BoD	23
3.3. Remuneration Policy	24
3.3.1. Overview	24
3.3.2. Link between pay and performance	25

3.3.3. Remuneration Committee	26
3.3.4. Aggregate quantitative information on remuneration	27
4. OWN FUNDS	29
5. INVESTMENT POLICY	33
6. ENVIRONMENTAL, SOCIAL AND GOVERNANCE RISKS	34
7. APPENDIX	35
7.1. Appendix I: Template EU IF CCA: Own funds: main features of own instruments issued by the firm	35
7.2. Appendix II: References to the IFR	37
7.3. Appendix III: Abbreviations	39
7.4. Appendix IV: List of tables	40

1. INTRODUCTION

1.1. *Corporate Information & Business Profile*

Plum Money CY Limited (“the Company” or the “Firm”) was incorporated in Cyprus on 29 October 2020 as a private limited liability company under the provisions of the Cyprus Companies Law Cap 113 (Registration number HE414587). The Company operated as a Cyprus Investment firm (“CIF”) (CIF License number 407/21), under the freedom to provide services across the European Economic Area (EEA), and is subject to the regulations and supervision of the Cyprus Securities and Exchange Commission (CySEC). The principal activities of the Company comprise the provision of (a) Reception and Transmission of orders in relation to one or more financial instruments and (b) Execution of orders on behalf of clients. In addition, the Company is licensed to provide the ancillary services of safekeeping and administration of financial instruments, including custodianship and related services.

The Firm is a subsidiary of Plum Fintech Limited (Account Information Services Provider (AISP)) in the UK regulated by the Financial Conduct Authority (“FCA”). The Firm also has sister entities: Saveable Limited (a UK investment firm regulated by the FCA), Plum Fintech Payments Limited (Electronic Money Institution (EMI) regulated by the FCA), Plum Fintech CY Limited (an AISP in Cyprus regulated by the Central Bank of Cyprus (“CBC”)), and Plum Fintech Greece (a Greek non-regulated entity offering operational services/support to the group). Together these are referred to as the “Plum Group”.

The Plum Group provides smart, AI-driven financial management and savings solutions through the Plum App, supporting users’ financial resilience by analysing spending behaviour and offering automated tools to help them save and invest. The Company’s business strategy focuses on providing accessible, transparent investment options to individual retail clients, supported by a sustainable and proportionate operating model. This includes a balanced capital allocation approach, a geographically diversified structure, and a strong emphasis on regulatory compliance, robust risk management, and AML/CTF controls. The Company promotes a culture of ethical conduct and accountability, ensuring that employees uphold high professional standards consistent with regulatory expectations.

Operationally, the Company follows a straight-through, non-discretionary order-execution model, limited strictly to the reception and transmission of orders and the execution of client orders via the Plum App. The model is transparent and non-complex in nature: The Company does not provide investment advice, portfolio management, or discretionary authority; does not engage in proprietary trading, dealing-desk activity, or multi-venue routing; and does not accept inducements or operate sales-linked incentives. For all product categories - U.S. stocks, Money Market Funds (MMFs), and Exchange Traded Funds (ETFs) the Company uses a single execution venue per asset class, transmitting all client orders via API to regulated third-party providers. For stock and ETF investments, the Company transmits client orders to regulated third-party brokers—Alpaca Securities LLC for U.S. equities and Upvest GmbH for ETFs—while MMF investments are made into a fund issued by BlackRock Asset Management Ireland Limited, authorised and supervised by the Central Bank of Ireland (ref. C21345). Execution outcomes are determined solely by the rules, capabilities, and market access of the selected execution venue, as the Company does not influence price formation or execution parameters.

In line with the proportional application of IFR Part Six disclosure requirements, the Company’s Pillar III disclosures reflect the nature, scale, and complexity of its business model. As a firm with a simplified,

execution-only structure, no trading book, no discretionary mandates, and no proprietary risk-taking, the Company applies the IFR disclosure framework proportionately, focusing on material risk exposures, governance arrangements, capital adequacy, and operational resilience relevant to its activities. The disclosures presented later in this Report are therefore tailored to the Company's risk profile and operational footprint, consistent with the proportionality principles embedded in the IFR.

1.2. *Regulatory Framework*

1.2.1. *Basis of Disclosures*

The present report has been prepared in accordance with the requirements laid out in Part Six of the Investment Firm Regulation 2019/2033 (IFR) (hereinafter the 'Disclosures' or the 'Report'), and sets out both quantitative and qualitative information in relation to risk management objectives and policies for each separate category of risk, including a summary of the strategies and processes to manage those risks, a description of governance arrangements, information on own funds and own funds requirements and remuneration policy and practices, as applicable.

Therefore, the Disclosures have been prepared in accordance with:

- a) Regulation (EU) No. 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) No 1093/2010, (EU) No 575/2013, (EU) No 600/2014 and (EU) No 806/2014 (the "IFR") and;
- b) Directive (EU) 2019/2034 of the Council of 27 November 2019 on the prudential requirements of investment firms and amending Directives 2002/87/EC, 2009/65/EC, 2011/61/EU, 2013/36/EU, 2014/59/EU and 2014/65/EU (the "IFD").
- c) The Commission Implementing Regulation 2021/2284 of 10 December 2021 laying down implementing technical standards for the application of Regulation 2019/2033 of the European Parliament and of the Council with regard to supervisory reporting and disclosures of investment firms.

IFD on the prudential supervision of CIFs was transposed into national legislation by CySEC by issuing Law L.97(I)/2021 on the capital adequacy of CIFs applicable as from 26th June 2021, Amending Law L.164(I)/2021 on the capital adequacy of CIFs applicable as from the 5th November 2021 and Law L.165(I)/2021 on the prudential supervision of CIFs applicable as from 5th November 2021 ("L.165(I)/2021"). The IFD is a capital adequacy framework and consists of three (3) 'Pillars':

- Pillar I: sets minimum capital requirements comprising the permanent minimum capital requirements; K-Factor (Risk to Client, Risk to Market and Risk to Firm) requirements; and the Fixed Overheads requirement.
- Pillar II: requires firms to undertake an overall internal assessment of their capital adequacy and their liquid assets, taking into account all the risks to which the firm is exposed and whether additional capital should be held to cover risks not adequately covered by Pillar I requirements. This is achieved through the Internal Capital Adequacy Assessment Process and Internal Risk- Assessment Process ("ICARA").

- Pillar III: complements Pillars I and II and improves market discipline by requiring firms to disclose information on their capital resources and Pillar I capital requirements, risk exposures and their risk management framework.

The Company is categorised as a 'Class 2 Firm' mainly driven by the Assets Under Management (AUM) it does not meet the criteria to be qualified as a small and non-interconnected investment firm in accordance with Article 12(1) of the Regulation 2019/2033 on the prudential requirements of investment firms ('IFR').

The Company consistently maintained capital and liquidity ratios well above regulatory thresholds, reinforcing its commitment to financial stability and regulatory compliance.

The minimum permanent capital that the Company shall maintain at all times amounts to €150k, in accordance with Article 9 of IFR. Thus, the Company is supervised for compliance with prudential requirements under Article 1(1) of the IFR in relation to the following:

- (a) own funds requirements relating to quantifiable, uniform and standardised elements of risk-to- firm, risk-to-client and risk-to-market;
- (b) requirements limiting concentration risk;
- (c) liquidity requirements relating to quantifiable, uniform and standardised elements of liquidity risk;
- (d) reporting requirements related to points (a), (b) and (c);
- (e) public disclosure requirements.

1.2.2.Scope of Disclosures

In accordance with Article 46 of the IFR and applying the proportionality principles embedded in Part Six, Plum Money CY Limited prepares these disclosures as an integral component of its broader regulatory reporting framework, which defines the scope, content, internal responsibilities, governance processes, and annual timing of all public disclosures required under the IFR.

Given the nature, scale, and complexity of the Company's business model—characterised by a simplified, execution-only service offering, no trading book, no discretionary mandates, and limited risk exposures—the Company applies the IFR disclosure requirements proportionately. The disclosures included in this Report therefore reflect the material risks, capital adequacy position, governance arrangements, and the relevant operational footprint, ensuring proportionality is applied .

The Report has been prepared on a solo basis, as the Company is not subject to prudential consolidation under the IFR. The Company does not maintain a standalone disclosure policy, however these disclosures are prepared in accordance with the Firm's regulatory reporting framework, which defines the scope, content, internal responsibilities and annual timing of public disclosures under Part Six of the IFR - as applicable to Plum.

This report should be read in conjunction with the Company's annual audited financial statements, which are prepared on a standalone basis in accordance with the International Financial Reporting Standards. Information in this Report is presented in thousands of euros, unless otherwise stated within this Report.

1.2.3.Frequency and Means

In accordance with Article 46(4) of the IFR, the Report is updated and published annually on the Company's official website: <https://withplum.com/en-cy>.

2. RISK MANAGEMENT OBJECTIVES AND POLICIES

2.1. *Risk Management Strategies and Processes*

Implementing a high-performance and efficient risk management structure is a critical undertaking for the Company, in all businesses, markets and regions in which it operates, as is maintaining a strong risk culture and promoting good corporate governance throughout the development of its activities. The objectives of the Company's risk management structure include aiding the Company in reaching its goals and maintaining financial stability, reducing potential financial losses for both the Company and its clients, ensuring sufficient capital to cover significant risks while adhering to regulatory requirements and keeping the Company's directors fully informed about risks.

2.2. *Risk Management Framework*

Plum offers similar services to its clients through its Group entities in UK and Cyprus, catering to UK and EU citizens, accordingly. Therefore, it is critical for Plum to ensure a unified approach to operations while maintaining flexibility to adapt to local requirements and best practices. On that basis, the Firm leverages on shared systems, partnerships, and resources. Consequently, risk management is conducted at the group level, taking into account the local regulatory frameworks and localized risks specific to each jurisdiction. Examples of localized risks include Regulatory Compliance Risks, Market Risks, Operational Risks, etc.

As such, the Firm maintains a global risk management framework taking into consideration local requirements and based on established group governance arrangements. It is therefore expected that the BoD of the Firm will act as a control mechanism to ensure that the Firm follows standards and regulatory requirements applicable to EU markets.

2.2.1. Risk Appetite Statement

The Risk Appetite Statement ("RAS") acts as a key component to the risk management framework. The RAS outlines a comprehensive list of key risks applicable to Plum, defines qualitative statements for the risk tolerance levels for each risk, and a set of quantitative thresholds measured in the form of Key Risk Indicators (KRIs).

The RAS is a high-level strategic document that forms a key consideration in the Risk treatment decision. When identified risks are not within the risk appetite, actions are taken for avoidance, transferring or mitigation of risks. Where Senior Management wishes to retain an amount and/or type of risk which is not within the risk appetite, as defined by the RAS, the matter is escalated for decision for acceptance or rejection, and consideration of whether RAS limits should be assessed to better reflect the current business / regulatory requirements. The RAS is reviewed and re-approved on an annual basis and on an ad-hoc basis when Plum's attitude towards risk changes as a result of new strategic objectives or changes in market conditions, and other regulatory requirements.

2.2.2. Risk Management Policy

The Risk Management Policy and Procedure formally introduces roles and responsibilities across the three lines of defence, describes the guiding principles in risk management and details the processes to be followed for performing risk assessments. The document is subject to annual review and approval by the BoD.

Moreover, this document is complemented by a risk register which includes a set of risk categories. The risk register is a structured document used to identify, assess, and manage risks associated with the Firm's operations, and serves as the practical reflection of the Risk Management process. It includes:

- (a) Risk Identification: A list of potential risks identified.
- (b) Risk Assessment: Evaluation of each risk's likelihood and potential impact on the Firm, reflected in a risk score. The risk score enables an evaluation of whether the risk is within Plum's risk appetite and is a key consideration for the risk treatment decision. The risk score (Low, Medium or High) is assigned in accordance with the risk assessment matrix that captures the probability and impact score mapping.
- (c) Risk Mitigation Strategies: Actions or controls in place to reduce or manage the identified risks. The average probability and impact after controls are estimated subjectively for each respective risk to provide the risk's current state.
- (d) Risk Ownership: Assignment of responsibility to specific individuals or teams for monitoring and addressing each risk.
- (e) Monitoring and Review: Regular updates to ensure the register reflects current risks and their status.

This approach helps the Firm maintain transparency, compliance, and resilience in a dynamic financial environment.

2.3. Risk Governance

The BoD and the Senior Management have the overall responsibility for implementation of the risk management framework and to ensure that effective processes have been established to properly identify, measure, monitor the full spectrum of risks faced by the Company and that controls are in place to minimise adverse outcomes.

2.3.1. Board of Directors

Plum Money CY Limited's Board of Directors (BoD) holds ultimate responsibility for the Company's governance. This includes defining, overseeing, and implementing arrangements that ensure effective and prudent management. The BoD ensures the segregation of duties, prevents conflicts of interest, and promotes market integrity and client interests, all in accordance with regulatory requirements. Specifically, the BoD is tasked with:

- overall responsibility for the Company and approving/overseeing strategic objectives, risk prevention, and internal governance;
- ensuring the integrity of accounting and financial reporting systems, including financial/operational controls and legal compliance;
- overseeing disclosures and announcements; providing effective supervision of senior management; and
- adhering to the stipulation that the BoD chairman does not simultaneously serve as General Manager without justification approved by CySEC.

BoD members must commit sufficient time, consider the number of directorships held based on individual circumstances and company complexity, collectively possess adequate knowledge/skills/experience to understand the company's activities and risks, and act with honesty, integrity, and independence to assess and challenge senior management decisions.

2.3.2.Executive Risk Committee

The Executive Risk Committee (ERC) is a management-level committee that oversees risk developments across the Plum Group. The risks outlined in the RAS are regularly reported to this committee to report on key changes to the risk profile as a result of business operations, risk events, or through results from assessments and monitoring activities performed by the second line of defence. Where appropriate, remediation plans are discussed, agreed, and monitored.

During the reporting period ended 31 of December 2025, the ERC met four times.

2.3.3.Risk Management Function

The Company has a Risk Management function consisting of the Risk Manager, that is responsible for establishing, implementing, maintaining the risk management framework, set by the BoD. In addition, the Risk Management Function is responsible to coordinate with risk owners to ensure at least annual assessment of the risk register in line with the Company's risk appetite, which is determined by the Board of Directors. The procedures set by the Company ensure that identified risks are managed and measured against the set level of risk tolerance. The procedures' effectiveness and efficiency are monitored continuously.

The Risk Management Function operates independently, and the Risk Manager reports directly to the Board of Directors of the Company and the ERC to ensure significant issues are escalated accordingly. In addition, the Risk Manager submits the Annual Risk Management Report to Senior Management and BoD for review and informative decision making to ensure that appropriate remedial measures have been taken/are to be taken in the event of any deficiencies. The Risk Manager provides a regular reporting to the ERC and BoD on the risk profile for each of the risks outlined in the RAS.

2.3.4.Three Line of Defence Model

The Company has established separate control functions that work independently from its operations and include compliance, risk management, information security and internal audit functions that supervise the risk management framework so that all units identified as risk owners perform their roles effectively on a continuous basis. The head of each control function has direct access to the BoD to raise concerns and warn in relation to any matter that may affect the Company. The BoD ensures that each control function has adequate resources to perform their responsibilities in accordance with the size and complexity of the Company.

The *first line of defence* owns and manages risks, consists of the functions charged with producing the products and services that the firm offers to its clients and those who interact directly or indirectly with clients, and other counterparties. This includes all teams within Product Management, Engineering, Operations, Marketing and Partnerships & Strategy. They are responsible for identifying, assessing, and mitigating risks as part of their day-to-day activities. As well as ensuring that risks which cannot be effectively addressed at the first line of defence, are escalated to relevant governance bodies.

The *second line of defence* consists of the control functions, namely Risk Management, Compliance (including the AMLCO function) and Information Security. These functions' independence from the operational and business functions; allows them to exercise unbiased monitoring and control of the extent to which risks are mitigated. Compliance's main duty is to ensure that Plum follows all applicable regulations and through this

role it acts as the main contributor amongst the control functions, to the reduction of compliance risk. Information Security's main duty is to ensure that Plum has an effective and operational ICT risk management framework.

The *third line of defence* is the Internal Audit function. During its periodic audits, it assesses the effectiveness of the Firm's overall control environment (including 1st and 2nd line of defence), its regulatory compliance and the extent to which the Firm applies its approved policies and procedures and accordingly provides independent assurances to the BoD. Internal auditors assess whether risk management processes are robust and aligned with Plum's objectives.

2.4. Risk Profile

Plum Money CY operates under a comprehensive risk management framework, ensuring regulatory compliance, financial stability, and operational resilience. The firm adheres to prudential regulations outlined in the IFR, maintaining a robust control environment to mitigate key risks associated with its business model.

The Company maintains a low-risk prudential profile, consistent with its simplified, execution-only business model and the proportional application of the IFR disclosure requirements. As previously mentioned in this Report, the Company does not operate a trading book, does not take proprietary positions, does not provide investment advice or portfolio management, and does not assume credit, market-making, underwriting, or liquidity-provision risks. Its activities are limited to the reception and transmission of client orders and the execution of orders through regulated third-party brokers.

Operationally, the Company's risk profile is characterised by low market and credit risk, with prudential exposures concentrated in operational, outsourcing, ICT, and conduct-related risks. These risks arise primarily from the reliance on regulated third-party brokers and the use of intra-group ICT infrastructure.

The Company mitigates these exposures through its outsourcing oversight framework, ICT and cybersecurity controls, and the risk management system aligned with CySEC expectations and EBA Guidelines.

The Company maintains capital above its regulatory minimums, ensuring adequate coverage for operational and business risks, and applies the IFR disclosure requirements proportionately, consistent with Article 46. The disclosures in this Report therefore reflect the Company's limited risk profile, less complex operational structure, and execution-only business model, focusing on the prudential metrics that are material and relevant to Plum Money CY Limited.

2.5. *OWN FUNDS REQUIREMENTS*

The Company maintains a prudent and proportionate risk-management framework aligned with the requirements of the IFR. The risk management framework is designed to identify, assess, monitor and mitigate all material risks relevant under the IFR, including capital adequacy risk (Part Three), concentration risk (Part Four) and liquidity risk (Part Five), in line with the Firm's business model and proportionality principle.

Given its execution-only model, serving EU retail clients through the Plum App, with no proprietary trading, no client money, no dealing desk, and single-venue execution per product, the Company is exposed only to a limited set of risks, which are actively monitored and managed as described below.

2.5.1. *Capital Adequacy Risk*

Capital adequacy risk may arise from potential insufficient capital reserves as required by regulatory requirements to absorb adverse financial results and minimum capital licensing requirements, which may lead to financial, regulatory and reputational damage. Plum Money CY maintains capital and liquidity ratios well above regulatory thresholds, ensuring a strong financial position to absorb risks. Refer to table Own Funds Requirements. The capital adequacy threshold is reported quarterly to the Board of Directors against the defined risk appetite tolerance levels.

2.5.2. *Capital Management*

Capital management is implemented by the Senior Management to meet the expectations of the Company's various stakeholders: supervisors, debt and equity investors, and shareholders, customers and other key counterparties. As part of managing its capital, the Company ensures that its solvency level is always compatible with the following objectives:

- Maintaining its financial solidity and respecting the Risk Appetite targets.
- Preserving its financial flexibility to finance organic growth.
- Adequate allocation of capital among the various business lines according to the Company's strategic objectives.
- Maintaining the Company's resilience in the event of stress scenarios.
- Ensuring that appropriate capital is allocated to ensure compliance with the regulatory capital ratios as outlined below.

2.5.3. Capital Regulatory Requirements

The regulatory capital adequacy is assessed according to the own funds requirements set out in Article 9 of the IFR, and shall satisfy the following own funds requirements at all times:

(a)	$\frac{CET\ 1}{D} \geq 56\%$	Where D, equals the highest of: <ul style="list-style-type: none"> - Permanent minimum capital (Article 14/IFR) - Fixed overhead (Article 13/IFR) - Total K-Factor (Article 15(1)/IFR)
(b)	$\frac{CET\ 1 + Additional\ Tier\ 1}{D} \geq 75\%$	
(c)	$\frac{CET\ 1 + Additional\ Tier\ 1 + Tier\ 2}{D} \geq 100\%$	

Table 1: Capital Regulatory Ratios

The Company's own fund requirements as at 31 December 2025 and 31 December 2024 are shown in the table below

Own Fund requirements	31 December 2025 (€'000)	31 December 2024 (€'000)
Common Equity Tier 1 Capital	1.431	675
Additional Tier 1 Capital	0	0
Tier 1 Capital	1.431	675
Tier 2 Capital	0	0
Own Funds requirements	640	375
Permanent minimum capital requirement	150	150
Fixed overhead requirement	640	375
Total K-Factor Requirement	2,80	1,86
Capital Ratios		
CET 1 Ratio	224%	180%
Surplus(+)/Deficit(-) of CET 1 Capital	1.073	465
Tier 1 Ratio	224%	180%
Surplus(+)/Deficit(-) of Tier 1 Capital	951	394
Own Funds Ratio	224%	180%
Surplus(+)/Deficit(-) of Total capital	791	300

Table 2: Own fund requirements

The Company's capital structure consists exclusively of Common Equity Tier 1 (CET1) capital, with no Additional Tier 1 or Tier 2 instruments in issue. CET1 capital increased from €675k as at 31 December 2024 to €1.431k as at 31 December 2025. The increase primarily reflects:

- (i) adjustments arising from the implementation of an updated transfer pricing framework, which had a positive effect on the Company's capital position. This is due to being structured around the target operating profitability, therefore improving retained earnings year on year, and
- (ii) a capital contribution of €500k received from the parent entity during the year.

As a result, the Company's capital ratios strengthened significantly, with the CET1 ratio increasing to 224% (2024: 180%), remaining well above the applicable regulatory requirements.

2.5.4. Permanent minimum capital requirement

The Company's permanent minimum capital requirement pursuant to Section 16 of the L.87(l)/2017 and in accordance with Article 9 of the IFD is €150k as the Company holds securities belonging to its clients.

2.5.5. Fixed overheads requirement

In accordance with the provisions of Article 13 of the IFR, fixed overheads requirement shall amount to at least one quarter of the fixed overheads of the preceding year as reported in the Firm's annual financial statements, subject to specific deductions as per Article 13 (4) of the IFR.

The primary objective of this requirement is to ensure that firms have sufficient financial resources to cover administrative and operating expenses, thereby enhancing financial stability and resilience against adverse business conditions. The fixed overhead requirement acts as a financial safeguard, preventing firms from operating with excessively low levels of capital that could compromise their ability to sustain operations during periods of economic downturn or financial stress.

The table below outlines the Fixed Overhead requirement amounted to €640k (2024: €375k).

Fixed overheads requirements calculation		31 December 2025 (€'000)	31 December 2024 (€'000)
Fixed overhead requirement		640	375
Annual fixed overheads of the previous year after distribution of profits		2.558	1.500
	Total expenses of the previous year after distribution of profits	2.558	1.500
	(-)Total deductions	-	-
Projected fixed overheads of the current year		2.584	1.849
Variation of fixed overheads (%)		1%	23%

Table 3: Fixed overheads requirements calculation

The increase in the fixed overhead requirement is due to the higher annual fixed overheads during 2025 compared to 2024 which were primarily driven by increases in administrative expenses, additional staff hiring - increasing staff costs, and other direct costs related to the services we receive from our third parties.

2.5.6. K-Factor Requirements

K-factors are specific quantitative indicators under the IFR that measure the risks an investment firm poses to clients, markets, and the firm itself. These factors help determine regulatory capital requirements and are categorized into three main groups:

1. Risk to Client (RtC): Measures the firm's risk to its clients based on activities such as client assets under management, client orders handled, and client money held.
2. Risk to Market (RtM): Assesses the firm's impact on financial markets through trading activity, specifically measuring positions held, counterparty credit risk, and trading exposure.
3. Risk to Firm (RtF): Evaluates risks specific to the firm, such as operational risks arising from its business model and ongoing operations.

These K-factors ensure that investment firms maintain appropriate levels of capital to mitigate risks and safeguard financial stability. The investment firms are required to calculate the K-factor requirement only for the K-factor components that are relevant to the services and activities that they are authorized to provide.

During the year under review, the Firm's prudential risk profile remained limited and fully aligned with its execution-only business model, with prudential exposures arising solely from risk-to-client (RtC) activities. As the Firm does not engage in proprietary trading, does not hold client money, and does not assume market-making or credit-counterparty exposures, its capital requirements are driven primarily by the Fixed Overheads Requirement and a narrow set of K-factors relevant to client-order handling. The Firm monitors its K-factor values on an ongoing basis to identify any trends that could materially affect its own-funds requirement and reports these exposures to senior management and the Board on a quarterly basis. This approach ensures that prudential resources remain appropriate, proportionate, and reflective of the Firm's low-risk operational footprint under the IFR.

Risk to Client

The K-factors under the RtC captures the following:

- K-AUM (Assets Under Management) – This factor quantifies risk based on the total value of assets managed on behalf of clients. It assesses the potential for financial loss due to mismanagement or unfavorable market changes affecting client portfolios. The factor does not apply to the Company services offered. The Company does not provide discretionary portfolio management or ongoing non-discretionary investment advice and therefore does not manage client assets on a discretionary basis. As a result, the Company has no Assets Under Management (AUM) for the purposes of the Investment Firm Regulation (IFR).
- K-CMH (Client Money Held) – Evaluates the risk associated with holding client funds. It addresses the potential financial impact and compliance requirements of managing and safeguarding these funds against misappropriation or operational errors. Though the Company is allowed to hold client money under its licence and in accordance with the safeguarding obligations, the Company does not hold client money.
- K-ASA (Assets Safeguarded and Administered) – Relates to the risks incurred from safeguarding and administering assets that are not owned by the firm but are held in custody, including duties such as ensuring the integrity of asset ownership, record-keeping, and protection against fraud. In line with

its execution-only business model, the Company solely safeguards client financial instruments held through third-party custodians. Accordingly, the Company reports Assets Safeguarded and Administered (ASA), which represent the total value of client financial instruments—such as ETF units, MMF units held in custody on behalf of clients, while US stocks and fractional US stocks are held in custody by Alpaca, with which clients maintain a direct contractual relationship for order execution. These assets fall under the safeguarding requirements of DI87-01 and form the basis for the Company's K-ASA capital requirement under the IFR.

- K-COH (Client Orders Handled) – Measures the risk associated with the volume and nature of client orders handled by the firm, focusing on the potential for financial loss due to errors in order processing or execution failures.

Item	Factor amount (volume, '000)		K-factor requirement	
	31 December 2025	31 December 2024	31 December 2025	31 December 2024
TOTAL K-FACTOR REQUIREMENT	-	-	2,80	1,86
Risk to client	-	-	2,80	1,86
Assets under management	-	-	-	-
Client money held - Segregated	-	-	-	-
Client money held - Non - segregated	-	-	-	-
Assets safeguarded and administered	6.674,16	4.451,17	2,67	1,78
Client orders handled - Cash trades	126,16	84,33	0,13	0,08
Client orders handled - Derivatives Trades	-	-	-	-
Risk to market	-	-	-	-
K-Net positions risk requirement	-	-	-	-
Clearing margin given	-	-	-	-
Risk to firm	-	-	-	-
Trading counterparty default	-	-	-	-
Daily trading flow - Cash trades	-	-	-	-
Daily trading flow - Derivative trades	-	-	-	-
K-Concentration risk requirement	-	-	-	-

Table 4: K-Factor Requirements

2.5.7. Concentration Risk

Concentration risks refers to the risk arising in cases where counterparties/ partners in a transaction defaults on their contractual obligations which may result in ultimate customer financial impact and may lead to financial loss and / or reputational damage.

Concentration risk for the Firm arises primarily from operational dependencies rather than prudential exposures under the IFR framework. These dependencies relate to the use of single execution venues, critical third-party service providers, and banking or payment partners, which together form the core infrastructure supporting the Firm's execution-only business model. The Firm manages concentration risk through a structured programme of due-diligence, outsourcing oversight, ICT and cybersecurity assessments, and operational-resilience monitoring, supported by regular reporting to senior management and the Board.

2.5.8. Liquidity Requirement

Liquidity risk refers to the risk that the Firm may be unable to meet its cash or collateral obligations as they fall due and at a reasonable cost. Under the IFR liquidity requirement, the Firm must maintain sufficient liquid assets to ensure resilience against unexpected liquidity shocks.

The Firm's objective is to manage liquidity in a prudent and cost-effective manner, ensuring that its funding profile remains aligned with its risk appetite and regulatory obligations. Liquidity risk tolerance is set by the Board of Directors, which reviews the Firm's liquidity position on a quarterly basis, while Senior Management oversees day-to-day liquidity planning and monitoring. Key controls include regular monitoring and reporting on liquidity practices and reporting on liquidity buffers to the Board. As the Company does not hold client money, liquidity risk is operational rather than client-driven.

In accordance with Article 43 IFR, the Firm calculates its liquidity requirement based on the Fixed Overheads Requirement (FOR), which equals at least one quarter of the previous year's fixed overheads. The Firm maintains liquid assets sufficient to meet this requirement at all times, ensuring a liquidity buffer and a conservative risk profile consistent with its operational footprint.

The Company calculates its Liquidity requirement in accordance with Article 43 of IFR. Specifically, in accordance with Article 13(1) of the IFR the fixed overhead requirement shall amount to at least one quarter of the fixed overhead of the preceding year and accordingly, the Company holds such an amount of liquid assets to meet liquidity requirement.

Item	31 December 2025 (€'000)	31 December 2024 (€'000)
Liquidity Requirement	213	125
Client guarantees		
Total liquid assets	286	215
Unencumbered short term deposits	286	204
Total eligible receivables due within 30 days	0	11

Table 5: Liquidity Requirements

The year-on-year increase in total liquid assets of €71k (2025: €286K, 2024: €215K), as presented in Table 5, is attributable to the increase in the Firm's cash balances during the year. As disclosed in Table 10 (EU IF CC2), cash and bank balances increased to €286k (2024: €204k), primarily driven by the capital contribution received from the parent entity. This movement is consistent with the Firm's liquidity profile, as liquid assets comprise primarily unencumbered short-term deposits.

2.6. Other Business Risks

The following section presents a summary of the risk management objectives and policies for each other business category of risk, and a summary of the strategies and processes to manage those risks. These risks are managed through the Group's Risk Management Framework, which includes processes for risk identification, assessment, treatment and monitoring. Risks are identified through regular risk assessments and, where applicable, the Risk and Control Self-Assessment ("RCSA") process performed by Risk Owners and Risk and Control Champions and are evaluated based on their probability and impact. Following the risk assessment, risk treatment decisions are taken in accordance with the Group's processes. Ongoing monitoring is performed through Key Risk Indicators ("KRIs"), with results reported to the Executive Risk Committee and the Board of Directors.

2.6.1. Operational Risk

Operational risks refers to the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. Operational risk is inherent in the Firm's activities and may give rise to financial loss, regulatory breaches or harm to clients if not appropriately managed.

Specifically, operational risk stems from process failures, ICT disruptions, cybersecurity threats, outsourcing and third-party dependencies, and human error. The Company monitors this risk through incident reporting, risk assessments, resilience testing, and performance reviews.

2.6.2. Market Risk

Market risk refers to the potential adverse significant market movements that may result in financial loss to Plum group or individual entities.

Market risk exposure is limited, given the nature of the Firm's business model. The Company does not take proprietary positions or operate a trading book, it retains a low level of market risk arising from FX conversion, market-driven execution variability, and settlement timing. These exposures are operational in nature, immaterial from a prudential perspective, and fully consistent with the Firm's lower-complexity, execution-only business model under the IFR.

2.6.3. Credit Risk

Credit risk is defined as the risk that the Firm may incur financial losses arising from the failure of counterparties or clients to meet their contractual obligations as they fall due.

The Company does not extend credit, engage in lending, or hold client funds.

Credit risk is limited to exposures to regulated third-party providers (e.g., payment institutions, brokers, custodians) and is managed through due-diligence, onboarding assessments, and ongoing monitoring. Other type of credit risk may arise from the provision of reception, transmission, and execution of orders, including operational failures or disruptions that could affect client outcomes.

This risk is measured through the K-factor framework, specifically the risk-to-client K-factors and is covered by maintaining capital in accordance with Article 14 IFR.

2.6.4. Compliance & Regulatory Risk

Compliance and regulatory risk arises in cases of non-adherence to laws and regulations (such as safeguarding of customer funds, outsourcing, customer conduct risks and data privacy risks, amongst other regulatory risks) which may result in financial loss, reputational damage, and regulatory fines.

Specifically for Plum, compliance risk arises from potential breaches of CySEC, MiFID II, DORA, and AML/CFT requirements. It is monitored through compliance reviews, internal audit findings, regulatory breach logs, and supervisory interactions.

2.6.5. Legal & Reputational Risk

Legal and reputational risk may arise from contractual disputes, regulatory sanctions, or negative publicity. Monitoring includes complaint metrics, legal claims, and external investigations.

2.7. Internal Capital Adequacy & Risk Assessment Process

Class 2 CIFs are required to undertake the Internal Capital Adequacy and Risk Assessment ("ICARA") process annually or any time there are material changes to the business strategy, the balance sheet, the nature or scale of activities or the control environment.

The ICARA's purpose in accordance with the IFR requirements is to ensure that a firm:

- (a) Has appropriate systems and controls in place to identify, monitor and, where proportionate, reduce all potential material harms that may result from the ongoing operation of its business or winding down its business; and
- (b) Holds financial resources that are adequate for the business it undertakes

The aim of holding adequate financial resources is:

- (a) To enable the firm to remain financially viable throughout the economic cycle, with the ability to address any potential material harms that may result from its ongoing activities (including both regulated activities and unregulated activities); and
- (b) To enable the firm to conduct an orderly wind-down while minimising harm to consumers or to other market participants, and without threatening the integrity of the wider financial system.

Key actions performed to complete the ICARA include:

- Detailing Plum Money CY's business model, activities and strategy, in order to be able to identify the risks arising from those activities.
- Determining any potential changes to Plum Money CY's business, strategy, nature or scale of its activities or operating environment, which may impact the firm's financial resources.
- Determining Plum Money CY's categorisation under the IFR, whose requirements are proportionally applied based on the firm's activities and size.
- Assessing the level of own funds and liquid assets required prior to the risk assessment and capital and liquidity modelling performed (Pillar 1 requirements).

- Reviewing Plum Money CY's risk appetite to ensure it remains fit-for-purpose and aligned to its strategy.
- Identifying, monitoring, and mitigating all potential material harms that may arise from its ongoing operations and might result from winding down its business.
- A Risk Register has been developed to document the material risks of harm, their inherent impact and likelihood, mitigating controls, and residual risk and value
- The own funds and liquid assets required to cover residual risks from ongoing operations or wind-down has also been also calculated.
- Assessing Plum Money CY's Overall Financial Adequacy Requirement ("OFAR") based on its risk assessment and assessment of funds and liquid assets which are required to cover ongoing operations and wind-down (Pillar 2 requirements).
- Conducting business model planning and forecasting, using severe but plausible stress scenarios to test the business' ability to generate profit and maintain sufficient own funds and liquid assets in adverse circumstances (Pillar 2 requirements).
- Preparing wind-down plans as part of ICARA planning.
- Presenting to Plum Money CY's Board for review and approval on the ICARA document.

The actions above ensure that the ICARA performed by the Firm is fit for purpose.

2.8. *Stress Tests*

As part of the ICARA process, Plum Money CY must conduct relevant severe but plausible stresses that could affect its business and consider whether it would still have sufficient own funds to meet the own funds requirement and liquid assets to meet the liquidity requirement.

The stress scenarios must be relevant to the Firm's business model and the market in which it operates, based on forward-looking hypothetical events. They should cover both investment and non-investment business lines as well as any impacts from scenarios impacting the wider Plum Group.

Plum Money CY's approach to stress testing is outlined in the Firm's ICARA. Plum Money CY has undertaken a detailed approach to evaluating a range of potential stress scenarios that could occur based on the key risks in the business.

The following steps have been undertaken in developing and assessing the impacts of stress on the business:

- Brainstorming: The working group, including the Finance & Accounting Lead, Director of Financial Control, and Head of Compliance, reviewed the Firm's risk register and assessed the top risks to Plum Money CY, and drew upon the team's deep knowledge of the industry and stress scenario formulation.
- Subject matter expert scenario development workshops: meetings were held with SMEs to flesh out scenarios and ensure they are both plausible and severe, and also to discuss the relevant controls in place and feasible management actions.
- Leadership team review: Feedback and challenge was provided on the scenarios and stress testing outcomes by the Leadership team and the Executive Risk Committee (ERC).

In carrying out the stress tests, Plum Money CY has estimated the impact of each scenario on its financial resources and has compared this against the overall financial adequacy rule to assess the adequacy of the

resources. These scenarios are covered in the subsequent sections of the ICARA and will be reviewed and approved on an annual basis by the Executive Risk Committee, with new scenarios added as appropriate.

The ultimate responsibility and ownership of the Company's stress testing policy rests with the BoD. If the stress testing scenarios reveal vulnerability to a given set of risks, the management should make recommendations to the BoD for mitigation measures or actions.

These may vary depending on the circumstances and include one or more of the following:

- Review the overall business strategy, risk appetite, capital and liquidity planning.
- Reduce underlying risk positions through risk mitigation strategies.
- Consider an increase in capital.
- Enhance contingency planning.

2.9. Concise Risk Statement

The Firm's overall risk profile is shaped by its operational structure and the nature of its execution-only services. During the reporting period, the Firm continued strengthening its risk-management framework, including the establishment of a dedicated Group Risk function within the second line of defence to support the Firm's growth and drive consistent oversight across the organisation. The Firm manages its material risks through a structured governance framework, defined risk-appetite parameters, and proportionate controls across its operations. The relevant prudential requirements under the IFR—particularly those relating to capital adequacy and liquidity buffers—were met, with the Firm maintaining capital and liquidity levels in excess of the applicable regulatory thresholds. The Firm's management body monitors the Firm risk profile on a regular basis, ensuring that the Firm's risk profile remains aligned with its business strategy, operational footprint, and regulatory obligations. The management body oversees the effectiveness of these processes and confirms that the Firm's risk profile remains consistent with its business strategy and regulatory requirements.

3. GOVERNANCE ARRANGEMENTS

3.1. *Board Recruitment*

The Company recognizes the value of a diverse and skilled workforce and management body, which includes and makes use of differences in age, skills, experience, background, race and gender between them. A balance of these differences will be considered when determining the optimum composition. The Company is committed to creating and maintaining an inclusive and collaborative workplace culture that will provide sustainability for the organization into the future.

One of the BoD's main responsibilities is to identify, evaluate and select candidates for the Board and ensure appropriate succession planning. The persons proposed for the BoD appointment should have diversified skills and/or knowledge to enhance the collective knowledge of the BoD and must be able to commit the necessary time and effort to fulfil their responsibilities and the Company implements the principles of individual and collective suitability assessment in accordance with EBA/ESMA Joint Guidelines on Suitability (EBA/GL/2021/06). The final approval of a member of the Management Body is given by CySEC.

Factors considered in the review of potential candidates include:

- Specialised skills and/or knowledge in accounting, finance, banking, law, business administration or related subjects.
- Knowledge of and experience with financial institutions ("fit-and-proper").
- Integrity, honesty and the ability to generate public confidence.
- Knowledge of financial matters including understanding financial statements and financial ratios.
- Demonstrated sound business judgment.
- Clean criminal record.
- Risk management experience.

Diversity Policy

The Company is committed to promoting diversity within its governance structure and applies the principles set out in the EBA/ESMA Joint Guidelines on Suitability (EBA/GL/2021/06) when assessing the composition of the Board of Directors and the suitability of individual members. As part of the appointment process, the Company ensures that Board members collectively possess the appropriate skills, experience, and expertise necessary to oversee the Company's activities effectively. Nevertheless, the Company applies principles of equal opportunity, non-discrimination, and merit-based selection in all recruitment and appointment processes.

In accordance with Article 48(b) of the IFR, the Company considers diversity aspects, including skills, experience and background, as part of its suitability assessment for Board appointments. Given the Company's size, internal organisation and the nature and scale of its activities, the Company has not adopted a formal standalone diversity policy or quantitative diversity targets. The composition of the Board is assessed on an ongoing basis in line with regulatory suitability requirements.

3.2. Directorships held by Members of the BoD

As at 31st December 2025, the Board is composed of two (2) executive and three (3) non-executive directors. Mr Apostolos Foteinakis and Mr George Psomas were appointed during 2025. The table below indicates the number of directorships held by the Company's directors excluding the directorship held in the Company.

Name	Position	Number of Executive Directorships (including Group positions if applicable) ¹	Number of Non-Executive Directorships ¹
Mr. Victor Trokoudes	Executive Director	2	0
Mr. Demos Kanellas	Executive Director	1	0
Mr. Panagiotis Demetriades	Independent non executive Director	1	1
Mr. Apostolos Foteinakis	Independent non executive Director	-	2
Mr. George Psomas	Independent non executive Director	-	3

Table 6: BoD Directorships as at 31.12.2025

3.3. Remuneration Policy

3.3.1. Overview

This Company maintains a Remuneration Policy, which details how Plum manages remuneration, in line with its business strategy and ensure a consistency of approach within the Company to attract, retain and reward employees for contributing to Plum's success, whilst maintaining financial stability and robust and effective risk management.

As such, the Policy aims to ensure that employees' compensation is enough to retain and attract individuals with appropriate skills and experience, and that it is in line with the business strategy, objectives, values and long-term interests of the Company.

The Policy also aims to mitigate any conflicts of interest that may arise from the compensation packages that are given to the Company's employees. In addition, remuneration is designed so that it does not encourage risk-taking that exceeds the Company's approved risk tolerance. Accordingly, the operating standards and

¹ In accordance with the section 9(5) of the Investment Law, the following shall be counted as one board member position:

(a) Executive or non-executive board member positions held within the same group;

(b) executive or non-executive board member positions held in-

(i) institutions that are members of the same institutional protection scheme, provided that the conditions of Article 113, paragraph 7, of Regulation (EU) No. 575/2013 are met, or

(ii) undertakings (including non-financial entities) in which the CIF holds a qualifying holding.

mechanisms which have been adopted ensure that the level of reward provided to employees are directly linked to the desired behaviours and results, as defined by the Board of Directors as well as the Company's documented policies and procedures.

3.3.2.Link between pay and performance

Remuneration refers to payments or compensations received for services or employment. The remuneration system includes the base salary and any bonuses or other economic benefits that an employee or executive receives during employment and shall be appropriate to the CIF's size, internal organization and the nature, scope and complexity of its activities.

Staff remuneration consists of two components:

Fixed Remuneration:

- Includes base salary and benefits such as pension contributions, and death in service.
- The performance of each member of staff is reviewed every six months. Assessment of performance is based on the achievement of objectives, their conduct, behaviour, and how this aligns to the Company values. The leadership team has budgetary control over the remuneration of staff, within salary bands which are benchmarked by the People team and approved every year.

Variable Remuneration:

The Group Holding Company - Plum Fintech Ltd (UK) - offers variable remuneration in the form of options linked to its shares. The share options of Plum Fintech Ltd are granted to all employees of the Group, regardless of location and the subsidiary entity they have the employment contract with. Therefore, they are offered to the employees of the Company as well.

Share options are granted to employees as a form of long-term incentive compensation. The options confer the right – but not the obligation – to purchase ordinary shares in Plum Fintech Ltd at a pre-determined exercise price, subject to vesting conditions and the occurrence of a liquidity event. The vesting period is standardised across all employees and all grants at four (4) years from the date of grant, including a one-year cliff (i.e. if an employee leaves before the first anniversary, no options are vested). Options may only be exercised upon the occurrence of one or more of the following liquidity events:

- IPO – the admission of the Group Holding Company's shares (or securities representing those shares) to trading on a recognised investment exchange, including NASDAQ, the Official List of the UKLA, or AIM;
- Share Sale – a transaction resulting in a third party acquiring a controlling interest in Plum Fintech Limited;
- Asset Sale – the disposal by the Group Holding Company of all or substantially all of its business and assets; or
- Other circumstances – as determined at the absolute discretion of the Directors of Plum Fintech Limited.

Options that have not yet vested cannot be exercised.

Upon joining the company, eligible employees receive an initial share option grant. In addition to the initial grant, Plum Fintech Ltd may issue additional option grants to employees on an annual basis, typically aligned with the annual performance review cycle. These supplementary grants recognise individual and company-wide performance and are intended to retain and incentivise high-performing employees.

The following principles are applied:

- The variable component shall not exceed 100% of the fixed component of the total remuneration for each individual.
- Shareholders of the Group Holding Company may approve a higher maximum level of the ratio between the fixed and variable components of remuneration provided the overall level of the variable component shall not exceed 200% of the fixed component of the total remuneration for each individual. The relevant process for such cases is fully prescribed in the Plum remuneration policy, in line with applicable regulatory framework.
- In order to encourage behaviours in line with the business strategy, objectives, values and long-term interests of the Group, the Group Holding Company will consider the performance against business objectives set, behaviours displaying the core values of the Company and treating customers fairly, before awarding variable compensation.

The Group Holding Company will base the total amount of remuneration on an assessment of the performance of the employee, the business unit and Plum's overall results. When assessing individual performance, financial as well as non-financial criteria will be taken into account, including effective risk management, compliance with regulations and appropriate conduct in line with the Plum's values. Poor performance in non-financial criteria will override financial performance.

No other form of variable remuneration is currently offered.

3.3.3. Remuneration Committee

An investment firm with on and off-balance-sheet assets valued on average at more than €100m over the four-year period immediately preceding the given financial year must establish a remuneration committee to advise the management body in its supervisory function and to prepare the decisions to be taken by this body. Since this criterion is not applicable to the Company, no Remuneration Committee has yet been established.

Therefore, the provisions concerning the remuneration committee apply to the supervisory function of the Company, being its management body and Board of Directors.

Accordingly, the Board of Directors is responsible for the following, with the support of the Company's Human Resource Function:

- Adopt, maintain and periodically review the general principles of the Remuneration Policy.
- Ensure that the Remuneration Policy is implemented and enforces the prevention / mitigation of any risks which may arise as a result of the Remuneration Policy and practices of the Company;
- Approve employment of new members of the management body and key function holder and or other key risk takers ("management members") alongside the proposed salary of each new member;
- Approve any subsequent material exemptions made for individual management members and changes to the remuneration policy and carefully consider and monitor their effects. Any exemptions should not be based on gender considerations or other aspects that would be discriminating, should be well reasoned and should be in line with the remuneration requirements under national law;
- Prepare decisions regarding remuneration, including those which have implications for the risk and risk management of the Company. When preparing such a decision, the Board of Directors should consider the long-term interests of shareholders, investors or other stakeholders of the Company, CySEC requirements relating to remuneration and the public interest;
- Have adequate knowledge, skills and experience with regard to remuneration policies and practices as well as of incentives and risks that can arise therefrom. This should include knowledge, skills and

experience with regard to the mechanisms for aligning the remuneration structure to Company's risk profile and capital structure; and

- Ensure that the Remuneration Policy and practices are appropriately implemented and aligned with the Company's overall corporate governance framework, corporate and risk culture, risk appetite and the related governance processes.

3.3.4. Aggregate quantitative information on remuneration

The table below presents the total remuneration of all members of staff whose professional activities have a material impact on the Company's risk profile, for the year ended 31 December 2025. The table also presents the respective number of beneficiaries per category of staff outlined below.

The quantitative information listed below comprises both fixed remuneration and variable remuneration.

	No. of Beneficiaries	Fixed (€'000s)	Variable (€'000s)	Of which were cash	Of which were shares	Of which were share-linked (€'000s)	Of which were other type of instruments	Total (€'000s)
Board of Directors	5	89	4	-	-	4	-	93
Other Key Staff	6	569	26	-	-	26	-	595
Grand Total	11	658	30	-	-	30	-	688

Table 7: Aggregate Quantitative Information on Remuneration (2025)

	No. of Beneficiaries	Fixed (€'000s)	Variable (€'000s)	Of which were cash	Of which were shares	Of which were share-linked (€'000s)	Of which were other type of instruments	Total (€'000s)
Board of Directors	3	53	-	-	-	-	-	53
Other Key Staff	3	162	3	-	-	3	-	165
Grand Total	6	215	3	-	-	3	-	218

Table 8: Aggregate Quantitative Information on Remuneration (2024)

The main reason for the increase in the fixed remuneration due to the onboarding of new members; For the Board of Directors, two new non-executive directors were appointed at the Board of Directors, and Other Key Staff increase to include 2025 hirings; General Manager of CY, EU Director of Compliance and Regulatory

Risk, and Group Risk Director. Increases in key staff remuneration included also the VP of Engineering hired at the end of 2024.

The Company also notes the following for the years ended 31 December 2024 and 31 December 2025:

- There were no Retirement Benefit Schemes, or Other Benefits granted to the members of staff whose professional activities have a material impact on the Company's risk profile.
- No individuals were remunerated with an amount exceeding €1 million.
- There were no new sign-on or severance payments awarded and paid out .
- No outstanding deferred remuneration has been awarded or paid out.

Finally, it is noted that variable remuneration in the form of share-linked instruments (options over the shares of the Group Parent Company) has been included in the prior year figures to ensure completeness, consistency and comparability with the current year disclosures.

4. OWN FUNDS

In accordance with Article 9 of the IFR, the Company's total own funds consist of Common Equity Tier 1 capital as defined by reference to the relevant provisions of Regulation (EU) No 575/2013 (CRR). These are presented in the following table as at -31 December 2025 and 2024.

The Company's own funds consist entirely of Common Equity Tier 1 Capital, as shown in the table below and Table 2.

Table 9 below presents the composition of the Company's Own Funds as at 31/12/2025 and 31/12/2024, while Table 10 indicates how these Own Funds reconcile with the Company's Audited Financial Statements. These have been prepared using the format set out in the Final Report on the Draft Implementing Standards issued by the EBA on reporting and disclosure requirements of investment firms under the IFR (EBA/ITS/2021/02).

Table 10 in Appendix I provides a description of the main features of capital instruments eligible as CET1. As the Company has not issued AT1 or T2 capital instruments, the corresponding disclosures are not applicable.

Common Equity Tier 1 (CET1) capital: Instruments and Reserves				
		31 December 2025 (€'000)	31 December 2024 (€'000)	Source based on reference numbers/letters of the balance sheet in the audited financial statements
1	OWN FUNDS	1.431	675	
2	TIER 1 CAPITAL	1.431	675	
3	COMMON EQUITY TIER 1 CAPITAL	1.431	675	
4	Fully paid up capital instruments	50	50	Ref 10
6	Retained earnings	(1.929)	(2.184)	Ref 11
8	Other reserves	3.310	2.809	Ref 12
12	(-)TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	-	-	Ref 11
17	(-) Losses for the current financial year	-	-	
18	(-) Other Deductions*	-	-	
28	ADDITIONAL TIER 1 CAPITAL	-	-	

Common Equity Tier 1 (CET1) capital: Instruments and Reserves

40	TIER 2 CAPITAL	-	-	
----	----------------	---	---	--

Table 9: Template EU IF CC1.01 - Composition of regulatory own funds

As at 31 December 2025, the Company's Own Funds amounted to €1.431K, compared to €675K as at 31 December 2024. The increase in other reserves of c.€500k relates to a capital contribution made by the Firm's sole shareholder on 31 December 2025. This, alongside the decrease in retained earnings (losses) following a profitable year during 2025 with profit for the year of €256k, are the primary drivers of the increase in own funds.

*Note: As per CySEC's circular C162, CIFs must deduct the ICF contribution as presented in their records from the Common Equity Tier 1 Capital. The annual ICF contribution of the Firm is already deducted in Own funds (row 1 for EU CC1.01). The annual ICF contribution as at 31 December 2025 increased to €6.434 from €4.503 as at 31 December 2024. The increase is solely driven by the increase in financial instruments safeguarded.

As per CySEC's circular C344, the Firm also deducts an additional cash buffer of 3 per thousand of the eligible funds and financial instruments of their clients from the Common Equity Tier 1 capital.

Reconciliation of regulatory own funds to balance sheet in the audited financial statements				
		a	-	c
		Balance sheet as in published/audited financial statements as at 31 December 2025 (€'000)	Balance sheet as in published/audited financial statements as at 31 December 2024 (€'000)	Cross reference to EU IF CC1
Assets - Breakdown by asset classes according to the balance sheet in the published/audited financial statements				
	Non-current assets			
1	Property and equipment	119	2	
2	Right-of-use assets	136	20	
3	Investment in subsidiaries	150	150	
	Current Assets			
4	Receivables	3.547	795	
5	Cash and bank balances	286	204	
	Total Assets	4.238	1.171	
Liabilities - Breakdown by liability classes according to the balance sheet in the published/audited financial statements				
	Non-current liabilities			
1	Lease liabilities	115	2	
	Current liabilities			
2	Trade and other payables	2.653	474	
3	Lease liabilities	39	20	
	Total Liabilities	2.807	496	
Shareholders' Equity				

Reconciliation of regulatory own funds to balance sheet in the audited financial statements				
		a	-	c
		Balance sheet as in published/audited financial statements as at 31 December 2025 (€'000)	Balance sheet as in published/audited financial statements as at 31 December 2024 (€'000)	Cross reference to EU IF CC1
1	Share Capital	50	50	
2	Capital Reserve	3.310	2.809	Ref 8
3	Accumulated losses	(1.929)	(2.184)	Ref 6 + Ref 9
	Total Shareholders' equity	1.431	675	Ref 1,2,3

Table 10: Template EU IFCC2: Own funds: reconciliation of regulatory own funds to balance sheet in the audited financial statements

The increase in receivables was primarily driven by new intercompany balances due from related parties, while the growth in Property and equipment reflects capital expenditure incurred for leasehold improvements, specifically premises renovations and the acquisition of fixtures and fittings, under a new five-year lease agreement executed in February 2025 that replaced a terminated prior lease. This new long-term arrangement concurrently resulted in the recognition of a corresponding lease liability. Regarding cash, the net increase was primarily driven by a €500k capital injection from the parent entity, which was partially offset by the cash outflows for the Property and equipment additions and a negative working capital movement as receivables grew faster than payables.

5. INVESTMENT POLICY

In accordance with Article 52 of the IFR, investment firms should disclose the specific information in relation to their investment policy, where the value of their on and off-balance sheet assets is on average more than €100m over the four-year period immediately preceding the given financial year in accordance with Article 32(4) of the IFD:

- the proportion of voting rights attached to the shares held directly or indirectly by the investment firm, broken down by Member State and sector;
- a complete description of voting behaviour in the general meetings of companies the shares of which are held in accordance with paragraph 2 of Article 52, an explanation of the votes, and the ratio of proposals put forward by the administrative or management body of the company which the investment firm has approved; and
- an explanation of the use of proxy advisor firms;
- the voting guidelines regarding the companies the shares of which are held in accordance with paragraph 2 of Article 52.

As at 31st December 2025, the Company meets the criteria referred to in point (a) of Article 32(4) of the IFD: *“an investment firm, where the value of its on and off-balance sheet assets is on average equal to or less than EUR 100 million over the four-year period immediately preceding the given financial year”*, hence, the Article 52 of the IFR to not apply and no further disclosure is made.

6. ENVIRONMENTAL, SOCIAL AND GOVERNANCE RISKS

In accordance with Article 53 of the IFR, from 26 December 2023, investment firms should disclose information on environmental, social and governance risks, including physical risks and transition risks, as defined in the report referred to in Article 35 of Directive (EU) 2019/2034, where the value of their own on and off-balance sheet assets is on average more than €100m over the four-year period immediately preceding the given financial year. As at 31st of December 2025 the Firm does not meet the requirement therefore, no further disclosure is made.

The Company does not consider adverse sustainability impacts in its investment process, as it provides execution-only services and does not offer investment advice or portfolio management.

7. APPENDIX

7.1. Appendix I: Template EU IF CCA: Own funds: main features of own instruments issued by the firm

		Common Equity Tier 1 Instruments
1	Issuer	Plum Money CY Limited
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	N/A
3	Public or private placement	Private
4	Governing law(s) of the instrument	Cyprus
5	Instrument type (types to be specified by each jurisdiction)	Ordinary shares
6	Amount recognised in regulatory capital (currency as of most recent reporting date)	€50k
7	Nominal amount of instrument	€50k
8	Issue price	€1,00
9	Redemption price	N/A
10	Accounting classification	Ordinary Shares
11	Original date of issuance	29/10/2020
12	Perpetual or dated	N/A
13	Original maturity date	N/A
14	Issuer call subject to prior supervisory approval	N/A
15	Optional call date, contingent call dates and redemption amount	N/A
16	Subsequent call dates, if applicable	
	Coupons / dividends	N/A
17	Fixed or floating dividend/coupon	N/A
18	Coupon rate and any related index	N/A
19	Existence of a dividend stopper	
20	Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/A
21	Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/A
22	Existence of step up or other incentive to redeem	N/A
23	Noncumulative or cumulative	N/A

		Common Equity Tier 1 Instruments
24	Convertible or non-convertible	N/A
25	If convertible, conversion trigger(s)	N/A
26	If convertible, fully or partially	N/A
27	If convertible, conversion rate	N/A
28	If convertible, mandatory or optional conversion	N/A
29	If convertible, specify instrument type convertible into	N/A
30	If convertible, specify issuer of instrument it converts into	N/A
31	Write-down features	N/A
32	If write-down, write-down trigger(s)	N/A
33	If write-down, full or partial	N/A
34	If write-down, permanent or temporary	N/A
35	If temporary write-down, description of write-up mechanism	N/A
36	Non-compliant transitioned features	N/A
37	If yes, specify non-compliant features	N/A
38	Link to the full term and conditions of the instrument (signposting)	N/A

Table 10: Template IF EU CCA

7.2. Appendix II: References to the IFR

IFR Article ref.	High-level summary	Public Disclosures Section Reference
<i>Scope</i>		
46 (1)	Publicly disclosure of the information specified in Part Six on the same date as the publication of the annual financial statements.	Section 1
46 (2)	Investment firms that meet the conditions for qualifying as small and non-interconnected investment firms which issue Additional Tier 1 instruments shall publicly disclose the information set out in Articles 47, 49 and 50 on the same date as they publish their annual financial statements.	Not applicable – not a small and non-interconnected investment firm
46 (3)	Investment firms no longer meeting all the conditions for qualifying as a small and non-interconnected investment firm, shall publicly disclose the information set out in Part 6 of IFR as of the financial year following the financial year in which it ceased to meet those conditions.	Section 1
46 (4)	Determine the appropriate medium and location to comply effectively with the disclosure requirements referred to in Article 46(1) and 46(2). All disclosures shall be provided in one medium or location, where possible.	Section 1.2.3
<i>Risk management objectives and policies</i>		
47	Disclosure of information on strategies and processes to manage each separate category of risk set out in Parts Three – Five of the IFR, and a concise risk statement describing the investment firm's overall risk profile associated with the business strategy.	Refer to section 2.9
<i>Governance</i>		
48 (a)	Number of directorships held by member of the management body.	Section 3.2
48 (b)	Diversity policy with regard to the selection of members of the management body, its objectives and any relevant targets set out in that policy, and	Section 3.1

IFR Article ref.	High-level summary	Public Disclosures Section Reference
	the extent to which those objectives and targets have been achieved.	
48 (c)	Disclosure of whether a separate risk committee is in place, and number of meetings in the year.	Section 2.3.2
<i>Own Funds</i>		
49	Information regarding the Company's Own Funds.	Section 4 & Appendix I
<i>Own Funds Requirements</i>		
50 (a)	Summary of institution's approach to assessing adequacy of capital levels.	Section 5.1
50(b)	Result of ICAAP on demand from competent authority.	Not applicable since not demanded by CySEC
50 (c)	The K-factor requirements in aggregate form RtM, RtF and RtC, based on the sum of the applicable K-factors.	Section 5.2.3
50 (d)	The fixed overhead requirement.	Section 5.2.2
<i>Remuneration policy and practices</i>		
51	Remuneration Policy.	Section 3.3
<i>Investment Policy</i>		
52	Investment Policy	Section 7 – Not applicable to the Company
<i>Environmental, social and governance risks</i>		
53	Information on environmental, social and governance risks, including physical risks and transition risks.	Section 8

7.3. Appendix III: Abbreviations

Abbreviation	Description
AML	Anti-Money Laundering
ASA	Assets Safeguarded and Administered
AT1	Additional Tier 1
AUM	Assets Under Management
BoD	Board of Directors
CET1	Common Equity Tier 1
CIF	Cyprus Investment Firm
CMH	Client Money Held
COH	Client Orders Handled
CON	Concentration
CRD	Capital Requirement Directive
CRR	Capital Requirements Regulation
CySEC	Cyprus Securities and Exchange Commission
DTF	Daily Trading Flow
EBA	European Banking Authority
ETF	Exchange traded funds
EU	European Union
FOR	Fixed Overhead Requirement
ICAAP	Internal Capital Adequacy Assessment Process
ICARA P	Internal Capital Adequacy and Risk Assessment Process
IT	Information Technology
NPR	Net Position Risk
PMCR	Permanent Minimum Capital Requirement
RMF	Risk Management Function
RtC	Risk to Client
RtF	Risk to Firm
RtM	Risk to Market
TCD	Trading Counterparty Default
SM	Senior Management
REP	Supervisory Review Process

Table 11: Abbreviations

7.4. *Appendix IV: List of tables*

Table 1: Capital Regulatory Ratios	13
Table 2: Own fund requirements	14
Table 3: Fixed overheads requirements calculation	15
Table 4: K-Factor Requirements	17
Table 5: Liquidity Requirements	18
Table 6: BoD Directorships as at 31.12.2025	25
Table 7: Aggregate Quantitative Information on Remuneration (2025)	28
Table 8: Aggregate Quantitative Information on Remuneration (2024)	28
Table 9: Template EU IF CC1.01 - Composition of regulatory own funds	31
Table 10: Template EU IFCC2: Own funds: reconciliation of regulatory own funds to balance sheet in the audited financial statements	33