The Investment Firm's Regulation (the "IFR") under Articles 49 & 50 requires investment firms to publicly disclose information relating to the firm's **Own Funds** and **Own Funds Requirements**.

NEAM Limited has developed an Internal Capital Adequacy Assessment Process (the "ICAAP") to inform the Board of Directors (the "Board") of the ongoing assessment of the Firm's risks, how the Firm intends to mitigate those risks and how much current and future capital is necessary having considered other mitigating factors.

The Firm implements a robust Risk Management Framework proportionate to the nature, scale and complexity of its business and which focuses on the Firm's key risk management objectives. As part of the Risk Management Framework, the Board approves a Risk Appetite Statement which sets out both the aggregate level and type of risk that the Firm is willing to assume given its risk capacity, in order to achieve its business strategy objectives. The Firm has developed a set of Risk Policies and Procedures to identify, manage and monitor its risks in accordance with its risk appetite.

As part of the Firm's Internal Capital Adequacy Assessment Process (the "ICAAP"), it prepares on a quarterly basis a Capital Plan – comprising a quantitative risk assessment and capital allocation calculation. The Plan sets out details of the Firm's Own Funds and the K-factor requirement and is reviewed and approved by the Risk Committee and the Board.

Own funds requirement

The own funds requirements are set out in Articles 9 and 10 of the IFR. Class 2 firms shall at all times have own funds (consisting of the sum of Common Equity Tier 1, additional Tier 1 and additional Tier 2, subject to certain conditions) which amount at least to the highest of the following:

- The fixed overheads requirement[1]
- The permanent minimum requirement[2]
- The K-factor requirement

The permanent minimum requirement for the Firm is EUR75K, as set out in the Investment Firm's Directive (the "IFD"). Therefore, for the Firm, the own funds requirement will always be either the Fixed Overhead Requirement ("FOR") or the K-factor requirement as they represent higher amounts.

K-factor requirement

The regulatory capital framework as set out in the IFR/IFD introduces the concept of K-factor requirements. The "K-factors" are quantitative indicators that are divided into three groups and aim to capture the risk the investment firm can pose to customers, to market access and the firm itself. Class 2 firms are required to calculate their capital requirement based on the K-factor formula.

The overall K-factor position is a sum of the K-factors relevant to a firm. The general principles concerning the calculation of the three groups of K-factors – Risk-to-Client (RtC), Risk-to-Market (RtM) and Risk-to-Firm (RtF) – can be found in Article 15 of the IFR. The Firm has determined that of the nine K-factors, two

[1] For the purposes of point (a) of Article 11(1), the fixed overheads requirement shall amount to at least one quarter of the fixed overheads of the preceding year. Investment firms shall use figures resulting from the applicable accounting framework. IFR

[2] For the purposes of point (b) of Article 11(1), the permanent minimum capital requirement shall amount to at least the levels of initial capital specified in Article 9 of Directive (EU) 2019/2034. IFR

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are relevant to the Firm, that is, K-AUM and K-NPR. The K-factors are continually monitored by the Risk Committee to ensure this assessment remains current.

The Firm has determined that the K-factor requirement does not take account of certain risks to which the Firm may be exposed and therefore, additional capital is allocated for Credit Risk, Operational Risk, Strategic Risk and Compliance Risk, to fully reflect all material risks to which the firm is exposed.

The Firm's K-factor calculation is greater than the FOR and represents the relevant own funds requirement for the Firm. As at 31st December 2025, the firm's calculated ICAAP is Eur4.897m. Article 43 of the IFR states "Investment firms shall hold an amount of liquid assets equivalent to at least one third of the fixed overhead requirement." The fixed overheads requirement is Eur1.346m, the Firm's liquid assets are Eur7.576m.

NEAM Limited is making the disclosures on own funds required in Article 49(1) of the IFR, in accordance with the templates of Annex VI in the ITS[3].

[3] The EBA's DRAFT Implementing Technical Standards on reporting requirements for investment firms under Article 54(3) and on disclosures requirements under Article 49(2) of the IFR: EBA/ITS/2021/02 (the ITS)

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Template EU IF CC1.01 - Composition of regulatory own funds (linvestment firms other than small and non-interconnected)

		(a)	(b)
		Amounts	Source based on reference numbers/letters of the balance sheet in the audited financial statements
	Common Equity Tier 1 (CET1) capital: instruments and reserves		
1	**OWN FUNDS**	7,575,627	SHAREHOLDERS' FUNDS
2	**TIER 1 CAPITAL**	7,575,627	NET ASSETS
3	**COMMON EQUITY TIER 1 CAPITAL**	7,575,627	NET ASSETS
4	Fully paid up capital instruments	1	1 Called-up share capital
5	Share premium	2,099,999	2 Capital Reserve
6	Retained earnings	5,475,627	3 Profit and Loss Account
7	Accumulated other comprehensive income		
8	Other reserves		
9	Minority interest given recognition in CET1 capital		
10	Adjustments to CET1 due to prudential filters		
11	Other funds		
12	(-)TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1		
13	(-) Own CET1 instruments		
14	(-) Direct holdings of CET1 instruments		
15	(-) Indirect holdings of CET1 instruments		
16	(-) Synthetic holdings of CET1 instruments		
17	(-) Losses for the current financial year		
18	(-) Goodwill		
19	(-) Other intangible assets		
20	(-) Deferred tax assets that rely on future profitability and do not arise from temporary differences net of associated tax liabilities		
21	(-) Qualifying holding outside the financial sector which exceeds 15% of own funds		
22	(-) Total qualifying holdings in undertaking other than financial sector entities which exceeds 60% of its own funds		
23	(-) CET1 instruments of financial sector entites where the institution does not have a significant investment		
24	(-) CET1 instruments of financial sector entities where the institution has a significant investment		
25	(-)Defined benefit pension fund assets		
26	(-) Other deductions		
27	CET1: Other capital elements, deductions and adjustments		
28	**ADDITIONAL TIER 1 CAPITAL**		
29	Fully paid up, directly issued capital instruments		
30	Share premium		
31	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1		
32	(-) Own AT1 instruments		
33	(-) Direct holdings of AT1 instruments		
34	(-) Indirect holdings of AT1 instruments		
35	(-) Synthetic holdings of AT1 instruments		
36	(-) AT1 instruments of financial sector entities where the institution does not have a significant investment		
37	(-) AT1 instruments of financial sector entities where the institution has a significant investment		
38	(-) Other deductions		
39	Additional Tier 1: Other capital elements, deductions and adjustments		
40	**TIER 2 CAPITAL**		
41	Fully paid up, directly issued capital instruments		
42	Share premium		
43	(-) TOTAL DEDUCTIONS FROM TIER 2		
44	(-) Own T2 instruments		
45	(-) Direct holdings of T2 instruments		
46	(-) Indirect holdings of T2 instruments		
47	(-) Synthetic holdings of T2 instruments		
48	(-) T2 instruments of financial sector entities where the institution does not have a significant investment		
49	(-) T2 instruments of financial sector entities where the institution has a significant investment		
50	Tier 2: Other capital elements, deductions and adjustments		

Template EU IF CC1.02 - Composition of regulatory own funds (Small and non-interconnected investment firms)

		(a)	(b)
		Amounts	Source based on reference numbers/letters of the balance sheet in the audited financial statements
	Common Equity Tier 1 (CET1) capital: instruments and reserves		
1	**OWN FUNDS**		
2	**TIER 1 CAPITAL**		
3	**COMMON EQUITY TIER 1 CAPITAL**		
4	Fully paid up capital instruments		
5	Share premium		
6	Retained earnings		
7	Accumulated other comprehensive income		
8	Other reserves		
9	Adjustments to CET1 due to prudential filters		
10	Other funds		
11	(-)TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1		
12	(-) Losses for the current financial year		
13	(-) Goodwill		
14	(-) Other intangible assets		
15	(-) Deferred tax assets that rely on future profitability and do not arise from temporary differences net of associated tax liabilities		
16	(-) Qualifying holding outside the financial sector which exceeds 15% of own funds		
17	(-) Total qualifying holdings in undertaking other than financial sector entities which exceeds 60% of its own funds		
18	(-) Other deductions		
19	CET1: Other capital elements, deductions and adjustments		
20	**ADDITIONAL TIER 1 CAPITAL**		
21	Fully paid up, directly issued capital instruments		
22	Share premium		
23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1		
24	Additional Tier 1: Other capital elements, deductions and adjustments		
25	**TIER 2 CAPITAL**		
26	Fully paid up, directly issued capital instruments		
27	Share premium		
28	(-) TOTAL DEDUCTIONS FROM TIER 2		
29	Tier 2: Other capital elements, deductions and adjustments		

Template EU IF CC1.01 - Composition of regulatory own funds (linvestment firms other than small and non-interconnected)

		(a)	(b)
		Amounts	Source based on reference numbers/letters of the balance sheet in the audited financial statements
	Common Equity Tier 1 (CET1) capital: instruments and reserves		
1	**OWN FUNDS**	7,575,627	SHAREHOLDERS' FUNDS
2	**TIER 1 CAPITAL**	7,575,627	NET ASSETS
3	**COMMON EQUITY TIER 1 CAPITAL**	7,575,627	NET ASSETS
4	Fully paid up capital instruments	1	1 Called-up share capital
5	Share premium	2,099,999	2 Capital Reserve
6	Retained earnings	5,475,627	3 Profit and Loss Account
7	Accumulated other comprehensive income		
8	Other reserves		
9	Minority interest given recognition in CET1 capital		
10	Adjustments to CET1 due to prudential filters		
11	Other funds		
12	(-)TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1		
13	(-) Own CET1 instruments		
14	(-) Direct holdings of CET1 instruments		
15	(-) Indirect holdings of CET1 instruments		
16	(-) Synthetic holdings of CET1 instruments		
17	(-) Losses for the current financial year		
18	(-) Goodwill		
19	(-) Other intangible assets		
20	(-) Deferred tax assets that rely on future profitability and do not arise from temporary differences net of associated tax liabilities		
21	(-) Qualifying holding outside the financial sector which exceeds 15% of own funds		
22	(-) Total qualifying holdings in undertaking other than financial sector entities which exceeds 60% of its own funds		
23	(-) CET1 instruments of financial sector entites where the institution does not have a significant investment		
24	(-) CET1 instruments of financial sector entities where the institution has a significant investment		
25	(-)Defined benefit pension fund assets		
26	(-) Other deductions		
27	CET1: Other capital elements, deductions and adjustments		
28	**ADDITIONAL TIER 1 CAPITAL**		
29	Fully paid up, directly issued capital instruments		
30	Share premium		
31	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1		
32	(-) Own AT1 instruments		
33	(-) Direct holdings of AT1 instruments		
34	(-) Indirect holdings of AT1 instruments		
35	(-) Synthetic holdings of AT1 instruments		
36	(-) AT1 instruments of financial sector entities where the institution does not have a significant investment		
37	(-) AT1 instruments of financial sector entities where the institution has a significant investment		
38	(-) Other deductions		
39	Additional Tier 1: Other capital elements, deductions and adjustments		
40	**TIER 2 CAPITAL**		
41	Fully paid up, directly issued capital instruments		
42	Share premium		
43	(-) TOTAL DEDUCTIONS FROM TIER 2		
44	(-) Own T2 instruments		
45	(-) Direct holdings of T2 instruments		
46	(-) Indirect holdings of T2 instruments		
47	(-) Synthetic holdings of T2 instruments		
48	(-) T2 instruments of financial sector entities where the institution does not have a significant investment		
49	(-) T2 instruments of financial sector entities where the institution has a significant investment		
50	Tier 2: Other capital elements, deductions and adjustments		

Template EU IF CC1.02 - Composition of regulatory own funds (Small and non-interconnected investment firms)

		(a)	(b)
		Amounts	Source based on reference numbers/letters of the balance sheet in the audited financial statements
	Common Equity Tier 1 (CET1) capital: instruments and reserves		
1	**OWN FUNDS**		
2	**TIER 1 CAPITAL**		
3	**COMMON EQUITY TIER 1 CAPITAL**		
4	Fully paid up capital instruments		
5	Share premium		
6	Retained earnings		
7	Accumulated other comprehensive income		
8	Other reserves		
9	Adjustments to CET1 due to prudential filters		
10	Other funds		
11	(-)TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1		
12	(-) Losses for the current financial year		
13	(-) Goodwill		
14	(-) Other intangible assets		
15	(-) Deferred tax assets that rely on future profitability and do not arise from temporary differences net of associated tax liabilities		
16	(-) Qualifying holding outside the financial sector which exceeds 15% of own funds		
17	(-) Total qualifying holdings in undertaking other than financial sector entities which exceeds 60% of its own funds		
18	(-) Other deductions		
19	CET1: Other capital elements, deductions and adjustments		
20	**ADDITIONAL TIER 1 CAPITAL**		
21	Fully paid up, directly issued capital instruments		
22	Share premium		
23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1		
24	Additional Tier 1: Other capital elements, deductions and adjustments		
25	**TIER 2 CAPITAL**		
26	Fully paid up, directly issued capital instruments		
27	Share premium		
28	(-) TOTAL DEDUCTIONS FROM TIER 2		
29	Tier 2: Other capital elements, deductions and adjustments		