



Greenpost Trading Europe

**Disclosures in accordance with
Part Six of Regulation (EU)
2019/2033 of the European
Parliament and of the Council
on the prudential requirements
for investment firms**

Year ended 31 December 2022

1. Introduction

1.1. Company Information

Enterprise Trading Europe Ltd (hereinafter the 'Company') was incorporated in the UK as a limited liability company under the Companies Act, 1985, number 14146747.

The Company is a private limited liability company with a share capital of £100,000.

1.2. Granting of CySEC Authorisation

The Company received its Cyprus investment firm (hereinafter the 'CIF') licence on 11 October 2022 and was added to the public register of the Cyprus Securities and Exchange Commission (the 'CySEC') on 29 November 2022.

The Company is only authorised to deal in own accounts.

1.3. Scope of Disclosures

The disclosures are prepared in accordance with the requirements as laid out in Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on disclosures of environmental facts.

1.4. Reference Period & Currency

The disclosures are covering the year ended on 31 December 2022. The Company currency is the Euro (€), as well the financial statements included in the disclosures in Euros.

1.5. Accounting Standards & Level of Consolidation

The disclosures are prepared on a consolidated basis and are in line with the Consolidated Financial Statements, which are prepared in accordance with the IFRS Reporting Standards. The disclosures may be verified by the external auditor.

2. Risk Management Objectives and Policies

2.1. Three Lines of defence model

The Company uses the three lines of defence governance model to ensure transparency, accountability and consistency through the clear identification of roles.

The first line of defence consists of the Chief Investment Officer (CIC) and the first line management in identifying and managing risks. This includes an ongoing day-to-day effective management of risk in accordance with agreed risk policies and controls. Effectively first line management includes:

- the proactive self-identification of risks and risks;
- the design, implementation and ownership of appropriate controls;
- a strong, positive culture of efficiency and management risk participation.

The second line of defense (symbols) of the risk management and the system that line reaches for effective control of risks and ensures they are aligned with the defined risk appetite.

The third line of defense provides independence and objective assurance to Senior Management on the effectiveness of the first and second lines of responsibility line with the internal audit function.

2.2.Particularities of the Company's business model

The Company is considered to be a class B investment firm under the relevant and would be classified as such under the applicable regulatory framework on B-factor investment or being the circumstances of the following:

- Risk to client
- Risk to market
- Risk to firm

Due to the fact that the Company does not and it will not base any other client's factors will always be zero.

In addition, as the Company did not have any activity during 2022 the "Other" factor will also be zero.

During the reference year, the company had a strong "Risk to market" and "Risk to client" of its idle capital.

2.3.Policies, systems and controls

The Company established a thorough internal operations manual which contains policies and procedures on how the company shall monitor, identify its exposure.

The Company shall utilize operational systems for the risk free risk monitoring activity when the Company will commence its operations.

During the last quarter of 2022, the Company's risk management system underwent audit in order to assess and confirm their efficiency and participation of the management of the Company's operations.

2.4.Crisis Risk Statement

The Company reviewed its CRF announcements in October 2022 and aimed to assess and improve its risk management systems and controls to further efficiency and reliability.

The Company is expected to commence its operations during 2023. The Company shall be permitted to a risk controlled environment with well defined controls.

J. Governance

J.1. Number of Directorships

The table below presents the number of directorships held by each member Director as at 31 December 2022.

It should be noted that the information in the below table is based only on those held by the Company's directors.

Director	Number of Directorships (including the Company)
Sudheep Gupta	1
Nicholas Kanchala	2
Ramaji Ganesalingam Pillai	1
Konstantinos Avdiu	1
Srinivas Ganesalingam	2
Selvaraj Desamudhan	1

J.2. Recruitment Policy

Directors are appointed based on their academic knowledge and professional appointment of each director has been independently from recruitment and appointment following a thorough review of parties to the Group and appropriate approvals.

J.3. Diversity Policy

The Company is committed to possessing a diverse and wide-ranging mix of the organization, whether that represents, among others, the background perspective. It endorses the diversity in the organization, which it recognizes the benefit the same can deliver to its growth in both its business strategy and development level in the organization.

J.4. Absence of a Risk Committee

As the Company is not a Qualified CF, as defined by CFSBC, it has not established a Risk Committee.

K. Debt Profile

As at 31 December 2022, the Company's eligible Debt Profile consisted of zero Deposits, Tier 1 Capital. The Company's level of debt (both total and capital debt) above the tolerance required by the regulator.

4.1. Composition of regulatory own funds (excluding EU HF CCLB)

		Amounts as at 31 December 2012 (€'000)
	<i>Amounts apply the EU HF Capital Requirements and Reporting</i>	
1	OWN FC-YEN	0
2	TIER 1 CAPITAL	0
3	COMMON EQUITY TIER 1 CAPITAL	0
4	Full paid up capital instruments	0
5	Share premium	0
6	Reserved earnings	0
7	Accumulated other comprehensive income	0
8	Other reserves	0
9	Minority interest in any portion of CET1 capital	0
10	Adjustments on CET1 due to regulatory filters	0
11	Other items	0
12	HYBRID TIER 1 FROM OTHER COMMON EQUITY TIER 1	0
13	1-1 Dividends	0
14	1-2 Dividends of CET1 instruments	0
15	1-3 Dividends of CET1 instruments	0
16	1-4 Dividends of CET1 instruments	0
17	1-5 Dividends of CET1 instruments	0
18	1-6 Dividends of CET1 instruments	0
19	1-7 Dividends of CET1 instruments	0
20	1-8 Dividends of CET1 instruments	0
21	1-9 Dividends of CET1 instruments	0
22	1-10 Dividends of CET1 instruments	0
23	1-11 Dividends of CET1 instruments	0
24	1-12 Dividends of CET1 instruments	0
25	1-13 Dividends of CET1 instruments	0
26	1-14 Dividends of CET1 instruments	0
27	1-15 Dividends of CET1 instruments	0
28	ADDITIONAL TIER 1 CAPITAL	0
29	Full paid up direct issued capital instruments	0
30	Other items	0

31	(i) TOTAL DEDUCTIONS FROM CREDITORS TIER 1	0
32	(i) Own ATE instruments	0
33	(i) Direct holdings of ATE instruments	0
34	(i) Indirect holdings of ATE instruments	0
35	(i) Wholly owned holdings of ATE instruments	0
36	(i) ATE instruments of financial sector entities where the issuer has a significant relationship	0
37	(i) ATE instruments of financial sector entities where the issuer has a significant relationship	0
38	(i) Other adjustments	0
39	Adjustments Tier 1 - Other capital elements, deductions and adjustments	0
40	TIER 2 CAPITAL	0
41	Full paid up, directly issued capital instruments	0
42	Other elements	0
43	(i) TOTAL DEDUCTIONS FROM TIER 2	0
44	(i) Own T2 instruments	0
45	(i) Direct holdings of T2 instruments	0
46	(i) Indirect holdings of T2 instruments	0
47	(i) Wholly owned holdings of T2 instruments	0
48	(i) T2 instruments of financial sector entities where the issuer has a significant relationship	0
49	(i) T2 instruments of financial sector entities where the issuer has a significant relationship	0
50	Tier 2 - Other capital elements, deductions and adjustments	0

4.2. Breakdown of regulatory own funds to finance debt (excluding EA)

	Balance sheet as presented Financial statements As at 31 December 2013 (€ million)	Change
1. Property, plant and equipment	1	
2. Intangible assets	0	
3. Goodwill	0	
4. Financial assets at fair value through profit or loss	0	
5. Cash and funds held by bank	0	
Total Assets	0	
1. Trade and other payables	0	
Total Liabilities	0	
1. Share Capital	0	
2. Accumulated losses	0	
Total Shareholders' equity	0	

CU Over-the-counter features of over-the-counter instruments issued by the Company (IF CC2)

Issuer	Company
Original instrument (Type, Maturity, Interest Rate)	24/09/2014
Public offering procedure	1
Governing law(s) of the instrument(s)	EU
Instrument type (Type to be issued (EU) by (such jurisdiction))	EU
Approved or supervised or regulatory approval (if any) issued by the competent authority	EU
Nominal amount of instrument(s)	EU
Issue price	EU
Redemption year(s)	
Accounting classification	EU
Original date of issuance	EU
Perpetual or dated	EU
Original maturity date	EU
Issuer still subject to prior regulatory approval	
Original call date, subsequent call dates and redemptions/premium	
Subsequent call dates, if applicable	
Company is a financial	
Fixed or floating, fixed or coupon	
Coupon rate and any related index	
Presence of a dividend coupon	
Fully discretionary, partially discretionary or mandatory (for terms of timing)	
Fully discretionary, partially discretionary or mandatory (for terms of amount)	
Features of any other type, specified in Article 17	
Semi-automatic or mandatory	EU
Company is non-financial	EU
Warrantable, convertible (EU)	
Warrantable, EU or non-EU	
Warrantable, convertible	
Warrantable, mandatory or optional conversion	
Warrantable, equity, financial type convertible only	
Warrantable, equity, issuer or environment if convertible only	
Warrantable features	
all-terms, any, semi-term triggered	
all-terms, any, call or amount	
all-terms, any, premium or coupon	
If company is non-financial, description of warrant-up mechanism	
Asset compliance disclosure demands	
EU or non-EU, does it include issuer	
EU or non-EU, full personal liability, EU or instrument (depending)	

3. Own Funds Management

As per the regulatory requirements, the own funds requirement of the Company at the close of the financial year is as follows: Due to the low fixed operational requirement as factor requirement, it is computed that the permanent requirements are nil. ASBANK shall be the Company's credit funds requirement. The historic Allow Funds requirement of the Company as of 31 December 2022:

OWN FUNDS REQUIREMENTS	₹ 0000
Permanent minimum capital requirement	Nil
Fixed operational requirements - Low Factor Requirement	Nil
Total own funds requirement	Nil

3.1 Capital Adequacy Ratio

The Company's capital adequacy ratio as at 31 December 2022 are presented below according to the regulatory required ratio of 100%.

CAR Ratio	100.00%
Tier 1 Ratio	100.00%
Core Equity Ratio	100.00%

3.2 8-Factor Requirement

The below table contains the 8-factor requirements of the Company as of 31 Dec

TOTAL EVALUATION REQUIREMENT	₹ 0000
Mark to client	
- Assets under management	-
- Client money held - Segregated	-
- Client money held - Non-segregated	-
- Assets not segregated and administered	-
- Client money handled - Cash Assets	-
- Client money handled - Derivatives/Equity	-
Mark to market	
- Net positions and requirement	Nil
- Currency margin given	-
Mark to Firm	
- Trading counterparty default	-
- Daily settling flow - Cash Assets	-
- Daily settling flow - Derivative trades	-
- Commitment and requirement	-

3.3 Assessment of Capital Adequacy

In December 2022, the Company completed the prudential questionnaire applicable to newly licensed CIBs. Following review of the information provided, the Company is categorized as a Class 2 investment firm.

The Company shall report the new 8-factors and capital adequacy ratio at CSEB twice. The first reporting schedule to CIB of 2022 was made in Q1 2023.

6. Remuneration Policy and Practices

The remuneration policy of the Company is set by the Board of Directors. In the reference year, the Company paid a fixed salary to all of its employees.

As the Company did not have any trading activity during the reference year, metrics were applicable for the assessment of the performance of the employees.

The remuneration is paid in cash. The Company does not have any deferring criteria as it does not pay any deferred remuneration.

The remuneration of the Non-Executive Directors is fixed and is not linked to the results and performance of the Company.

6.1. Aggregate quantitative information on remuneration

The table below outlines the total remuneration of all members of staff whose activities have a material impact on the Company's risk profile for the December 2022.

	Number of Beneficiaries	Total Rem (100% fixed, €)
Directors & Senior Management (Including Non-Executive Directors)	5	5