

ECOMMBX
INVESTMENTS LTD

SUSTAINABILITY
DISCLOSURE

1. INTRODUCTION

ECOMMBX Investments Limited (“**CIF**” or the “**Company**” or the “**Firm**”) whose headquarters are at 27 Pindarou Str., Ground Floor, Alpha Business Center, Block B, 1060 Nicosia, Cyprus is a company incorporated and registered in the Republic of Cyprus under Cyprus Company Law and is authorised and regulated as a Cyprus Investment Firm (“**CIF**”) by the Cyprus Securities and Exchange Commission (“**CySEC**”) under license number 228/14 to provide investment and ancillary services in accordance with the provisions of the Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2001/65/EU, as the same may be in force from time to time and modified or amended from time to time (the “**Markets in Financial Instruments Directive (2014/65/EU)**” or “**MiFID II**”) which was transposed into Cypriot Law, the Investment Services and Activities and Regulated Markets Law of 2007 (Law 87(I)/2017) as amended from time to time (hereinafter the “**Law**”).

2. SUSTAINABILITY DISCLOSURE

Understanding SFDR: The Sustainable Finance Disclosure Regulation (EU) 2019/2088 (SFDR) aims to create a unified standard for transparency in how financial market participants and advisers integrate sustainability risks and consider adverse impacts on sustainability in their processes and products.

Our Approach to Sustainability: While we deeply value sustainability and ESG principles, we currently, as part of our investment advice provision, do not assess Principal Adverse Impacts (PAI) on sustainability factors as outlined in Article 4 of the SFDR. This decision is based on the current regulatory landscape and the availability of detailed data.

Responsible Practices: Despite this, our remuneration policy aligns with our risk management framework, ensuring we do not incentivize activities that could harm sustainability factors. We are dedicated to responsible business practices and long term value creation for our stakeholders.

Future Considerations: We will regularly review our stance on PAI and may adjust our approach as more comprehensive data and methodologies become available.