Disclosure on risk management practices and internal governance for the year ended 31 December 2025

This disclosure has been developed in accordance with the requirements of Regulation (EU) 2019/2033 of the European Parliament and of the Council of 27 November 2019 on the prudential requirements of investment firms.

With effect from first quarter of 2025, by decision of the Latvijas Banka, Mintos AS has been identified as the Union parent investment holding company of the Mintos investment firm group within the meaning of Article 4(1)(57) of Regulation (EU) 2019/2033, and the group is supervised on a prudential consolidated basis by Latvijas Banka in accordance with Article 7 of that Regulation.

According to the IFR, the governing regulation for Investment Firms in Europe, Mintos Marketplace AS is a Class 2 investment firm, an authorized investment firm supervised by Latvijas Banka. Since obtaining the license on 17 August 2021, Mintos Marketplace AS has been required to publicly disclose information regarding its risk management objectives, internal governance arrangements, remuneration policy, own funds, and own funds requirements, and has complied with these requirements. Mintos AS is a Union parent investment holding company and must disclose this at the prudential consolidation group level.

The scope of prudential consolidation, including exemptions granted under Article 3(1) of Regulation (EU) 2024/1771.

The scope of prudential consolidation under Regulation (EU) 2019/2033, as determined by Latvijas Banka, includes:

- Mintos AS (Union parent investment holding company)
- Mintos Marketplace AS (investment firm)
- Mintos Payments SIA (financial institution)
- Mintos Finance Estonia OÜ, Mintos Finance SIA, Mintos Deutschland GmbH, Mintos Fractional Investments SIA (ancillary services undertakings).

By decision of Latvijas Banka, the remaining subsidiaries of Mintos AS are exempted from the prudential consolidation perimeter under Regulation (EU) 2024/1771.

Mintos Capital Management SIA and the 58 subsidiaries Mintos Finance SIA No.1 through Mintos Finance SIA No.58 are not classified as financial institutions or ancillary services undertakings within the meaning of Regulation (EU) 2019/2033 and accordingly do not fall within the consolidated financial situation as defined in that Regulation, in accordance with the position of the European Banking Authority on the classification of special purpose vehicles.

The term “Group” in this disclosure refers to the prudential consolidation group.

A detailed reconciliation between the accounting and prudential consolidation perimeters is provided in this Disclosure.

DISCLOSURE ON RISK MANAGEMENT PRACTICES

This disclosure on risk management practices is provided in accordance with the disclosure requirements set out in the IFR.

The Group treats risk management as an integral part of its business operations. We believe that an appropriate risk management process is essential to ensure sustainable business development.

Risk profile

The Group's core business is providing customers with convenient means to invest in multiple asset classes, such as loans, bonds, ETFs, real estate, and money market funds. These services are provided through AS Mintos Marketplace, which, as the key operational company within the Group, largely determines the Group's overall risk profile.

Risk appetite

Risk appetite is the amount of risk the Group is prepared to accept in pursuit of its business objectives. Each company within the prudential consolidation group conducting the annual risk assessment sets a risk appetite for each of its material risks. Where possible, the risk appetite is quantified, and compliance with it is measured regularly. Risk appetite is set by the Management board and approved by the Supervisory board. Companies whose sole purpose is to support another company in the Group (such as special purpose vehicles) are covered by the risk appetite of that company.

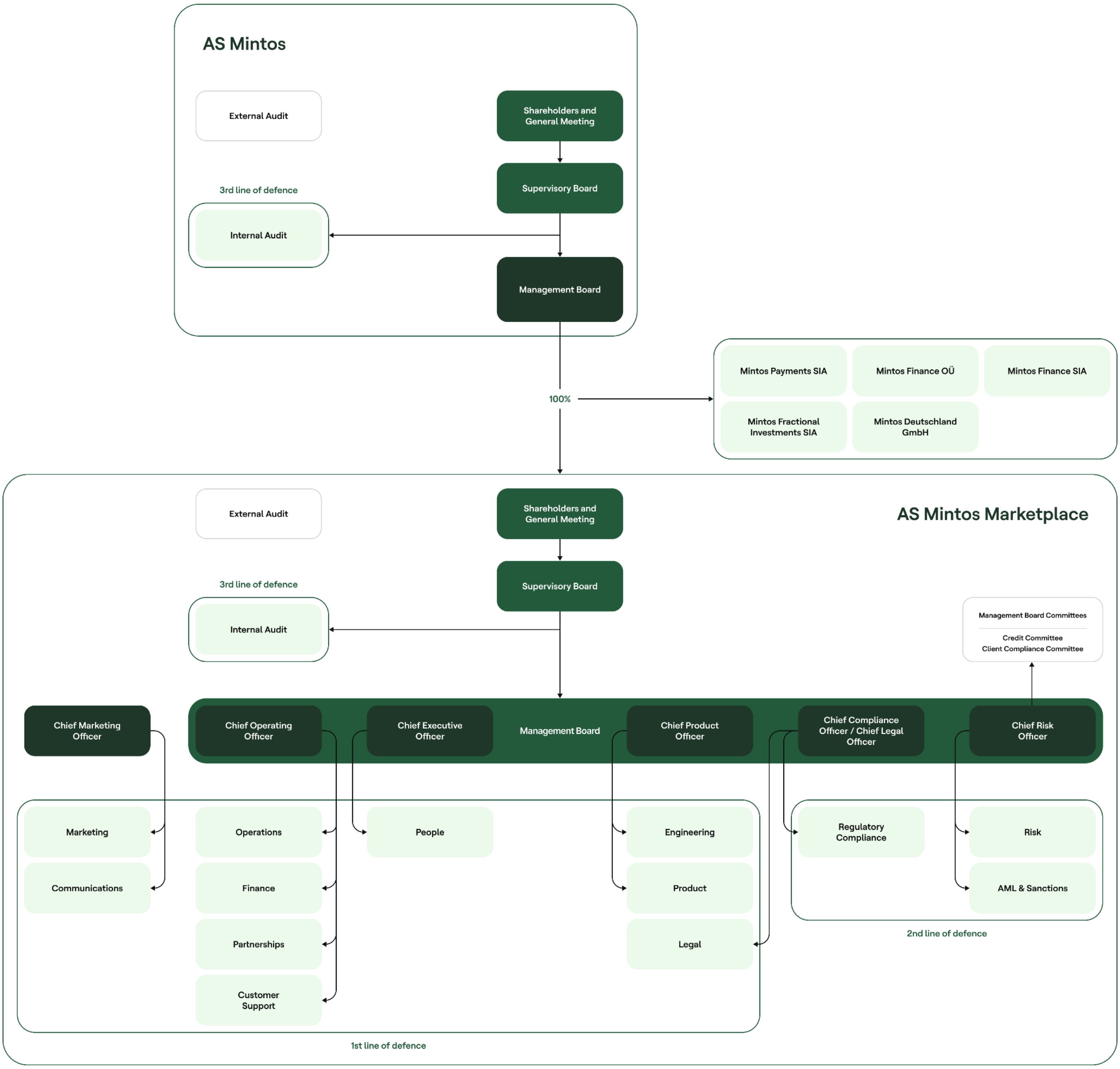
Our high-level risk appetite statement

In pursuit of our high-growth business strategy, we are ready to assume business risks, including operational, liquidity, concentration, and other risks, while maintaining a strong reputation and ensuring compliance with applicable laws and regulations.

Risk governance

The Group has built a risk governance framework in accordance with the three lines of defense model.

Governance structure



Most functions of the Group sit in Mintos Marketplace AS. The first line of defense includes all business units responsible for risk identification and management. The second line of defense consists of Risk, AML, and Regulatory Compliance units, which report to the Chief Risk Officer or Chief Compliance Officer and are responsible for monitoring and controlling the risks and setting the risk policies across the organization. The third line of defense consists of an independent internal audit, which is currently an outsourced function.

Risk Culture

The Group's Management Board believes that a strong risk culture is key to ensuring effective risk management. The Management Board facilitates risk awareness across all teams. The Group ensures that every team member understands the importance of the applicable risks and how to manage those through relevant training and risk procedures where necessary.

Risk management

The annual risk assessment is conducted and documented by those companies within the prudential consolidation group for which this is required by applicable regulation or warranted based on a risk-based approach. Each such company identifies the risks material to its operations and, for each material risk, establishes a policy outlining how it is managed, controlled, and monitored; these policies are approved by the Supervisory Board and updated annually. Companies whose sole purpose is to support another company in the Group (such as special purpose vehicles) are covered by the risk assessment of that company, provided the risks arising from their activities are adequately captured therein.

Principal risks

These are the risks identified as material to the operations of the Companies within the prudential consolidation group:

Risk description	Risk management
Counterparty and credit risk	
Credit risk is the risk that the Group might suffer losses due to its partners (counterparties) not fulfilling their financial obligations towards the Group. The main source of credit risk for the Group lies with its counterparties – banks and payment service providers holding the Group's funds and customers' funds.	Before starting a relationship with a counterparty, we assess the institution's credit risk. We have set limits on the amount of funds that can be held with a counterparty depending on the risk level. We regularly monitor the risk of our counterparties and check compliance with the limits. To decrease the risk, we do not hold all funds with one counterparty but distribute the funds among several counterparties.
Liquidity risk	
Liquidity risk is the risk that the Group can't meet its financial obligations. The Group invests a significant amount into scaling its business. It's important to ensure that the Group has sufficient funds to sustain the scale-up plan.	We constantly monitor our liquidity and do forecasting to ensure that there is always a sufficient cash buffer to meet all payments.
Reputational risk	
Reputational risk is the risk that the Group suffers losses due to a damaged reputation. Reputation is a cornerstone for successful operations for every financial institution. Loss of reputation may also lead to slower growth due to fewer customers entering into business relationships with the Group due to the damaged reputation.	When making strategic decisions, we continuously evaluate the reputational aspect of such decisions. Moreover, before starting a relationship with a new partner or customer, we assess whether the cooperation negatively affects our reputation.
Operational risk	
Operational risk is the risk that the Group might suffer losses due to process flaws, IT failure, human error, or external fraud. In a rapid growth environment, it's essential to ensure that the processes	We assess operational risk to identify processes where the risk is material. We apply risk-mitigating tools to ensure the residual risk is not above our risk appetite.

are adjusted promptly to keep up with the growth.	
Compliance risk	
Compliance risk is the risk that the Group suffers losses due to non-compliance with the applicable regulations (including ML/TPF risk). The Companies within the Group that hold authorisations or licences for the provision of regulated services and are subject to supervision by competent authorities must comply with regulatory requirements in multiple areas.	Our risk management process is built to ensure that we run our business in compliance with all applicable regulations. We have dedicated teams that control compliance with internal policies and external regulations.
Capital adequacy risk	
Capital adequacy risk is the risk that the Group might be unable to maintain sufficient capital to meet regulatory requirements or cover potential losses from its activities, which could lead to operational restrictions or supervisory measures.	We monitor our capital position on an ongoing basis against regulatory requirements and internally defined risk tolerance limits. Financial budgeting and forecasting are used to project future capital levels and identify potential shortfalls in advance. The ICAAP is performed on a regular basis by those Companies within the Group for which this is required by applicable regulation.
Interest rate risk	
The risk that the Group incurs losses or experiences a decrease in income due to potential adverse changes in interest rates in financial markets. The main source of interest rate risk is the partial dependence of income on market interest rates. When interest rates decrease, the Group's revenue also declines.	When planning our operations and cash flow, we take into account the forecasted changes in interest rates.
Concentration risk	
Concentration risk is the risk of the Group suffering losses due to excessive concentration of revenue sources. To have a sustainable business, it's important to limit concentration to a single product, customer, or market, the loss of which could significantly impact the financial stability of the Group.	While pursuing our business strategy, we strive to diversify our revenue sources across multiple geographies and customers to avoid having excessive concentrations that might substantially harm the business in case of negative scenarios.
Outsourcing risk	
Outsourcing risk is the risk that the Group suffers losses or operational disruption due to the inadequate performance, failure, or termination of services by third-party providers to whom business functions or processes have been delegated.	We apply due diligence when selecting and onboarding service providers. Outsourcing arrangements are subject to ongoing monitoring, and contractual agreements with providers include appropriate provisions to safeguard continuity, data security, and regulatory compliance.

The Group's trading book comprises short-term bond positions acquired for onward distribution to investors, with individual positions limited well below upper concentration thresholds and typical holding periods of a few weeks. The Group monitors and controls concentration risk in accordance with Article 35 IFR and calculates exposure values to individual issuers and groups of connected clients under Article 36 IFR. Throughout the period, no exposure exceeded the limits set out in Article 37(1) of the IFR, and accordingly, no own funds requirement under Article 39 of the IFR (K-CON) arose. The Group additionally monitors and reports concentration risk under Article 54(2) of the IFR in respect of institutions holding client money and the Group's own cash, custodians of client financial instruments, and sources of earnings.

Capital and Liquidity adequacy management

The Management Board is responsible for overseeing capital and liquidity management and ensuring compliance with capital and liquidity requirements. The Finance team conducts regular calculations to maintain adherence to these requirements. Additionally, Companies within the Group for which this is required by applicable regulation perform regular Internal Capital Adequacy Assessment (ICAAP) and Liquidity Adequacy Assessment to ensure that its capital and liquidity are sufficient to cover all relevant risks. As part of the budgeting process, the Group also conducts capital and liquidity adequacy forecasting to ensure ongoing compliance with regulatory requirements in the foreseeable future.

Internal governance

Mintos operates in accordance with the Articles of Association, the Commercial Law of the Republic of Latvia, and other laws. As Mintos is a Union parent investment holding company within the meaning of IFR, certain regulatory requirements in view of prudential consolidation apply.

The structure of the Group is organized as reflected in *Group governance structure* above. AS Mintos Marketplace is the investment firm of the Group and has the sole shareholder – AS Mintos, a Supervisory Board, a Management Board, internal and external audit functions, a Client Compliance Committee, and a Credit Committee. Mintos shareholders exercise their rights through the shareholder meetings. Mintos has a Supervisory Board, a Management Board, internal and external audit functions.

See the Management report’s general information section regarding the members of the Supervisory Board and the Management Board.

The Group’s management body and each member’s number of directorships:

Members of the management body	Non-executive directorships within Group	Executive directorships within the Group	Non-executive directorships outside the Group	Executive directorships outside the Group	Total number of directorships within the Group	Total number of directorships outside the Group
Janis Abasins	1	0	0	1	1	1
Mikus Janvars	1	0	3	3	1	6
Reinis Viba	1	0	0	1	1	1
Martins Sulte	0	1	2	1	1	3
Martins Valters	0	1	1	1	1	2
Karlis Kronbergs	0	1	0	0	1	0
Inese Lazdovska	0	1	0	1	1	1
Marcis Gogis	0	1	0	0	1	0

Client Compliance Committee of Mintos Marketplace AS is a collegial institution of that Group company, which reports to the Management Board of Mintos Marketplace AS and whose purpose is to ensure the evaluation of clients' business transactions and compliance with AML and sanctions laws and regulations.

Credit Committee is a collegial institution of Mintos Marketplace AS, which reports to the Management Board of Mintos Marketplace AS and whose purpose is to manage and oversee the decision-making and monitoring process for all credit risk-related actions and processes regarding loans and bonds placed on the Mintos platform and the companies which issue those loans or bonds.

Risk Committee – neither Mintos nor other Group companies has established a separate risk committee; the duties of the risk committee are performed by the Supervisory Board.

Diversity and Inclusion

In line with AS Mintos Marketplace Diversity and Inclusion Policy, the Group is committed to encouraging and promoting equality, fairness, respect, diversity, and inclusion among its employees and management. It is dedicated to preventing and eliminating any discrimination within its environment. The Group is committed to increasing diversity, including in management, and developing and engaging managers and leaders to actively champion inclusion and diversity in Mintos, share learnings, and accelerate change. The Group's employees and the management shall be guaranteed the same opportunities when working for the Group, and the Group has zero tolerance for discrimination, harassment, sexual harassment, and bullying.

To promote independent opinions and critical thinking, the Supervisory Board and the Management Board will also comprise diverse groups of members by gender, age, geographical origin, and educational and professional background – with due consideration for local regulations.

Remuneration

The Remuneration Policy sets the framework for the remuneration system, including all components of remuneration, to ensure that the Group manages remuneration practices in accordance with laws, regulations, and internal rules applicable to its business. The Remuneration Policy aims to promote sound and effective risk management and discourage excessive risk-taking. In accordance with the Remuneration Policy, the Management Board reviews and sets remuneration for the employees. The remuneration of the Management Board is reviewed and determined by the Supervisory Board. The Remuneration Policy principles establish, among others, the system of calculations of remuneration of the employees who hold positions affecting the company's risk profile and profits, which allows the company to attract highly qualified specialists and, at the same time, reduces risks of financially encouraged risky behaviors of employees.

The main principles of Remuneration Policy include:

1. Fair and equal approach to all the employees' pay, including those employees whose profile has an impact on the Group company's' risk profile, based on responsibilities assigned and capabilities demonstrated.
2. The pay principles are based on a structure of levels and sublevels within each team, which allows the Policy to comply with the gender neutrality principle and avoid the gender pay gap in the company.
3. Employees whose profile impacts the Group company's risk profile do not have a variable part of remuneration.
4. Alignment of the Remuneration Policy with the Group company's strategy, defined objectives, and interests of the shareholder.
5. High competitiveness in line with market practices and remuneration trends.
6. Enhancement of performance in terms of results and adherence to Mintos virtues.
7. Clear governance and compliance with regulatory requirements.
8. Equity participation for all employees to create long-term motivation and value.
9. Attraction and retention of top talent to ensure high performance, continuous growth, and the company's success.
10. The Remuneration policy is reviewed once a year and is subject to approval by the Management Board and the Supervisory Board.

The financial year 2025 Group information on remuneration, broken down by senior management and employees whose actions have a material impact on the Group's risk profile:

Employees that have an impact on the Group's risk profile	**Number of employees**	**The total amount of remuneration awarded in 2025 (EUR), incl. employer's social security contributions**
Supervisory Board	3	64 971
Management Board	5	893 425
Other employees that have an impact on the Group's risk profile	7	543 371
Total employees that have an impact on the Group's risk profile	**15**	**1 501 767**

During the financial year of 2025, Mintos had 3 members of the Supervisory Board and 2 members of the Management Board. Mintos Marketplace AS had 5 members of the Management Board and the same 3 members of the Supervisory Board. Two of the Mintos Management Board members are also serving on the management board of AS Mintos Marketplace. Aside from the management board and supervisory board members, there were 7 other employees that had an impact on the Group's risk profile; in total, 15 beneficiaries.

The total amount of remuneration awarded to the Supervisory Board consists of EUR 64 971, including share-based payments amounting to EUR 114; the total amount of remuneration awarded to the Management Board is EUR 893 425, including share-based payments amounting to EUR 63 thousand; the total amount of remuneration awarded to the other employees that have an impact on the Group's risk profile is EUR 543 371, including share-based payments amounting to EUR 24 thousand.

Fixed remuneration (base salary) is intricately linked to the employee's job description as part of the terms of employment, professional experience, and organizational responsibility, reflected in Mintos Levels and the salary review process. Fixed remuneration is determined annually, reviewed semi-annually, and paid out monthly. The amounts are based on market salary data and Mintos Levels, and the salary review process. In addition, fixed remuneration includes payments that are part of routine employment packages for specific categories of employees, such as mobile phone allowances (as documented in company policies). The fixed salary for the Senior Management is decided annually by the Management Board and confirmed by the Supervisory Board.

For some employees who do not have an impact on the Group's risk profile, remuneration during the financial year included a variable component. These employees are responsible for attracting new lending companies to use the Group's services and for curating them, and their variable remuneration is tied to business results.

Neither the Group's Senior Management nor employees who impact the Group's risk profile receive variable remuneration under the Remuneration Policy.

No severance payments were awarded to the employees that had an impact on the Group's risk profile during the financial year 2025.

The Group does not offer employees a payout in instruments policy and does not have deferred compensation. Mintos does not benefit from a derogation in Article 32(4) of Directive (EU) 2019/2034.

Capital adequacy

As of the reporting date, AS Mintos Marketplace is not classified as a small and non-interconnected investment firm. This Disclosure forms part of the mandatory disclosures applicable to AS Mintos as a Union parent investment holding company in accordance with the Regulation and is provided on a consolidated basis covering companies included in the prudential consolidation group. This section covers disclosures set by Article 49 – Own funds and Article 50 – Own funds requirements.

a. Own funds

The Group's own funds during the reporting period consisted of Common Equity Tier 1 items, including share capital, share premium, reserves, retained earnings, and deductions for certain intangible assets and subordinated debt and bonds classified as Tier 2 capital instruments. The Group's own funds position on 31 December 2025 was EUR 7 097 287.

In accordance with the Commission implementing Regulation (EU) 2021/2284, the Group uses templates to convey sufficiently comprehensive and comparable information on the composition and quality of its own funds. This is achieved through the quantitative disclosure template (EU I CC1.01) on the composition of own funds and a flexible template (EU I CC2) on the reconciliation of regulatory own funds with the audited financial statements. A template (EU I CCA) provides information on the most relevant features of own funds instruments issued by the Group.

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

		(a)	(b)
		Amounts	**Source based on reference numbers/letters of the balance sheet under the regulatory scope of prudential consolidation of the Group**
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	**OWN FUNDS**	7 097 287	
2	**TIER 1 CAPITAL**	4 866 839	
3	**COMMON EQUITY TIER 1 CAPITAL**	4 866 839	
4	Fully paid up capital instruments	1 159 252	1S
5	Share premium	13 120 951	2S
6	Retained earnings	(7 829 272)	5S
7	Accumulated other comprehensive income		
8	Other reserves	970 161	3S
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	(2 554 253)	
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	(2 269 244)	5S
18	(-) Goodwill		
19	(-) Other intangible assets	(285 009)	3A,4A
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 entities 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**	2 230 448	
41	Fully paid up, directly issued capital instruments	2 230 448	7L
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		

Deduction of intangible assets based on the prudential accumulated amortization calculated in accordance with the Commission delegated Regulation (EU) 2020/2176. Given the Group's policy on amortization of internally developed software assets within 3 years, essentially only the assets not finished yet and therefore not amortized, and other acquired intangible assets have been deducted.

Template EU I CC2: Reconciliation of regulatory own funds to balance sheet in the audited financial statements

		a	b	c
		Balance sheet as in published/audited financial statements	**Under regulatory scope of consolidation**	**Cross-reference to EU IF CC1**
		As of the period end	**As of the period end**	
	Assets - *Breakdown by asset classes according to the balance sheet in the published/audited financial statements*			
1A	Intangible assets	5 034 907	5 034 907	
2A	Internal software	4 749 898	4 749 898	
3A	Internal software in progress	273 877	273 877	19
4A	Trademarks, domains, licenses	11 132	11 132	19
5A	Fixed assets	186 485	186 485	
6A	Right-of-use leased assets	469 240	469 240	
7A	Other debtors and assets	3 032 070	3 271 973	
8A	Trade receivables	1 079 561	1 095 880	
9A	Cash at banks	5 786 635	5 112 521	
10A	**Total Assets**	**15 588 898**	**15 171 006**	
	Liabilities - *Breakdown by liability classes according to the balance sheet in the published/audited financial statements*			
1L	Lease	613 502	613 502	
2L	Contract liabilities	1 293 020	1 293 020	
3L	Trade and other payables	1 162 471	1 153 346	
4L	Corporate income tax	4 323	1 373	
5L	Taxes and State mandatory social insurance payments	902 184	483 349	
6L	Accrued liabilities	658 348	657 503	
7L	Borrowings	5 653 080	5 653 080	41
8L	Deferred tax liabilities	163 985	163 985	
9L	**Total Liabilities**	**10 450 913**	**10 019 158**	
	Shareholders' Equity			
1S	Share capital	1 159 252	1 159 252	4
2S	Share premium	13 120 951	13 120 951	5
3S	Other capital reserves	970 161	970 161	8
4S	Foreign currency exchange reserve	(35 839)	-	
5S	Retained losses	(10 076 540)	(10 098 516)	6
6S	**Total Shareholders' equity**	**5 137 985**	**5 151 848**	

The Group meets the obligations laid down in Part Six of Regulation (EU) 2019/2033 on a consolidated basis.

Template EU I CCA: Main features of own instruments issued by Group

		a	b	c
		Share capital	*Debt*	*Bonds*
1	Issuer	AS Mintos	AS Mintos Marketplace	AS Mintos Marketplace
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	LV0000108850 LV0000108868	N/A	LV0000105351 LV0000105518 LV0000106904 LV0000107183
3	Public or private placement	Private	Private	Public
4	Governing law(s) of the instrument	Latvian Commercial Law (Komerclikums)	The laws of the Republic of Latvia	The laws of the Republic of Latvia
5	Instrument type (types to be specified by each jurisdiction)	Ordinary share (akcija)	Debt - Art. 62 CRR	Debt - Art. 62 CRR
6	Amount recognized in regulatory capital (Currency in millions, as of most recent reporting date)	EUR 1.159	EUR 0.732	EUR 1.500
7	Nominal amount of instrument (Currency in million)	EUR 1.159 (11,592,520 shares @ EUR 0.10 each)	EUR 1.000	EUR 1.500
8	Issue price	N/A	100	100
9	Redemption price	N/A	100	100
10	Accounting classification	Shareholders' equity	Liability – amortized cost	Liability – amortized cost
11	Original date of issuance	Various	28/08/2024	11/07/2025 25/07/2025 10/10/2025 24/10/2025
12	Perpetual or dated	Perpetual	Dated	Dated
13	Original maturity date	No Maturity	28/08/2029	11/07/2035 25/07/2035 10/10/2035 24/10/2035
14	Issuer call subject to prior supervisory approval	No	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	No	After the lapse of 5 (five) years period as from the Issue Date
16	Subsequent call dates, if applicable	N/A	N/A	Any time after the lapse of 5 (five) years period as from the Issue Date
	Coupons / dividends			
17	Fixed or floating dividend/coupon	Floating	Floating	Fixed

18	Coupon rate and any related index	N/A	8% p.a. payable quarterly, 6% p.a. payment-in-kind interest, payable or capitalized annually. 0.95% p.a. additional interest on revenue growth	12%
19	Existence of a dividend-stopper	No	No	No
20	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretional	Mandatory	Mandatory
21	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretional	Mandatory	Mandatory
22	Existence of step up or other incentive to redeem	No	No	No
23	Noncumulative or cumulative	Noncumulative	Cumulative	Cumulative
24	Convertible or non-convertible	Nonconvertible	Nonconvertible	Nonconvertible
25	If convertible, conversion trigger(s)	N/A	N/A	N/A
26	If convertible, fully or partially	N/A	N/A	N/A
27	If convertible, conversion rate	N/A	N/A	N/A
28	If convertible, mandatory or optional conversion	N/A	N/A	N/A
29	If convertible, specify instrument type convertible into	N/A	N/A	N/A
30	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
31	Write-down features	No	No	No
32	If write-down, write-down trigger(s)	N/A	N/A	N/A
33	If write-down, full or partial	N/A	N/A	N/A
34	If write-down, permanent or temporary	N/A	N/A	N/A
35	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A
38	Link to the full term and conditions of the instrument (signposting)	N/A	N/A	N/A

b. Own funds requirement

The Group shall maintain adequate internal capital available in quantity, quality, and distribution to cover the specific risks to which it is or may be exposed. The Management Board is responsible for capital management and capital requirement compliance. During the reporting period, the total capital requirement was set according to the own fund requirements in accordance with Part Three of Regulation (EU) 2019/2033, and the regulator imposed no additional own funds requirement or guidance. There is no additional capital requirement in relation to the Minimum Requirement for own funds and Eligible Liabilities (MREL). During the reporting period, AS Mintos Marketplace completed a regular Internal Capital Adequacy Assessment Process (ICAAP), which is reviewed at least annually. As a result of ICAAP, no additional capital buffers to the own funds requirements were applied as of the reporting date.

The local regulator, Latvijas Banka, monitors the Group's capital requirements. In accordance with Regulation (EU) No 2019/2033 (IFR) of the European Parliament and of the Council on prudential requirements of investment firms, the minimum capital requirement is set by the higher of the Fixed overhead requirement (FOR), permanent minimum capital requirement (PMCR), and K- Factor requirement.

b. Own funds requirement (continued)

The own funds requirement is determined to be the highest of the three requirements.

	31.12.2025
	EUR
Applied own Funds requirement	4 227 697
Permanent minimum capital requirement	1 100 000
Fixed overhead requirement	4 227 697
Total K-Factor Requirement	691 905

The consolidated permanent minimum capital requirement is determined in accordance with Article 14 of Regulation (EU) 2019/2033 by reference to the initial capital levels in Article 9 of Directive (EU) 2019/2034, and is calculated on a consolidated basis as the sum of the requirements applicable at individual level to each undertaking within the prudential consolidation: EUR 750 000 for AS Mintos Marketplace (investment firm) and EUR 350 000 for SIA Mintos Payments (electronic money institution), totalling EUR 1 100 000.

The FOR shall amount to at least one-quarter of the fixed overheads of the preceding year. According to the audited financial results 2025, the annual fixed overheads amounted to EUR 16 910 789, and the FOR was EUR 4 227 697.

The K-factor requirement is calculated as at least the sum of each K-factor applicable to the Group.
The total K-factor requirement on 31 December 2025 was EUR 691 905.
K-factor requirement in aggregate of risk factor categories risk to market (RtM), risk to firm (RtF) and risk to client (RtC):

	31.12.2025
	EUR
Risk to client (RtC)	550 167
Risk to market (RtM)	141 563
Risk to firm (RtF)	175
Total K-Factor Requirement	691 905

The Group is required to maintain its own funds above the following thresholds, calculated as own funds over the own funds requirement:

a) Common equity Tier 1 capital (CET1) ≥56%
b) Common equity Tier 1 capital (CET1) + Additional tier 1 capital AT1 ≥75%
c) Common equity Tier 1 capital (CET1) + Additional tier 1 capital AT1 + Tier 2 capital ≥100%

The Group's own funds consisted of CET1 and Tier 2 capital; all conditions above were met. The ratios a) and b) were 115.12% on 31 December 2025; the ratio c) was 167.88% on 31 December 2025.

The Group has fulfilled all externally imposed capital requirements in full over the reported period.