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TF GLOBAL MARKETS (EUROPE) LTD

Sustainability Disclosures

Document	Sustainability Disclosures
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The Sustainable Finance Disclosure Regulation (“SFDR”) is an EU Regulation introduced to improve transparency in the markets for sustainable investment products, to prevent greenwashing and to increase transparency around sustainability claims made by the financial market participants and advisers.

TF Global Markets (Europe) Ltd (the “Company”) qualifies as a financial market participant pursuant to Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the “SFDR”). Under the SFDR, financial market participants are required to publish information on their website, including on their policies on the integration of Sustainability Risks in their investment decision-making process and on how they consider principal adverse impacts of investment decisions on sustainability factors.

According to the SFDR classification system a Company can be categorised as offering Article 6, 8, or 9 products, depending in the products’ characteristics and level of sustainability:

- Article 6 products which are products which either integrate Sustainability Risks into their investment decisions or explain the reasons why they are not relevant but do not meet the additional criteria of Article 8 or Article 9 products.
- Article 8 products which are products that promote, amongst other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices (light green).
- Article 9 products which are products that have a sustainable investment objective (dark green).
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Currently, the Company does not offer financial products that seek to promote one or more environmental or social characteristics, nor does it have sustainable investment as its objective. All the financial products offered by the Company are therefore categorised as "Article 6" products. Furthermore, please note that the Company’s Portfolio Management service is currently inactive. The information below is provided should the Company decide to resume offering this service in the future.

The statements below are made in accordance with applicable provisions under Articles 3, 4 and 5 of the SFDR.
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Integration of Sustainability Risks in the investment decision-making process

Pursuant to Article 3 of the SFDR, the Company is required to disclose the manner in which Sustainability Risks (as defined below) are integrated into the investment decision-making process and risk management process.

Sustainability Risks means an environmental, social or governance (ESG) event or condition that, if it occurs, could cause actual or potential material negative impact on the value of the investment. Sustainability Risks can either represent a risk of their own or have an impact on other risks and may contribute significantly to risks, such as market risks, operational risks, liquidity risks or counterparty risks. Sustainability Risks may have an impact on long-term risk adjusted returns for investors.

Even though we do not specifically pursue ESG objectives, we acknowledge that Sustainability Risks could still affect the underlying markets of the CFDs we offer. For example, significant events related to climate change, social unrest, or governance failures might influence market prices, which in turn can impact CFD valuations.
However, given the short-term, high-risk, derivative nature of CFD trading, Sustainability Risks are not actively integrated into our investment decision-making or risk management process when proving Portfolio Management. We have assessed that such Sustainability Risks are not directly relevant to CFDs and are not likely to materially affect the returns of our CFD products in the near term. If any sustainability risk were to materially impact an underlying asset or market, it could indirectly affect CFD prices. To that effect, when providing Portfolio Management, we will continuously monitor overall market risks (including economic and geopolitical events), but ESG-related factors are not expressly incorporated due to the speculative scope of the CFD products.

Further, the presence of an unfavourable ESG indicator or the discovery of a sustainability risk during the assessment of the investments are not necessarily reasons to exclude a specific investment from our services. In this regard, sustainability risk will be treated in our process like other risks (e.g. credit, market, liquidity, etc.) in that it allows us to more extensively assess the risk-return profile of a given investment. The Company further acknowledges that when Sustainability Risks occur, there may be negative impact on an instrument's value.
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No consideration of principal adverse impacts of investment decisions on sustainability factors

The SFDR requires the Company to make a "comply or explain" decision whether to consider the Principal Adverse Impact ("PAI") of its investment decisions on sustainability factors, in accordance with a specific regime outlined in SFDR.
Principal adverse impacts on sustainability factors refer to adverse impacts of investment decisions on sustainability factors that mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.
In accordance with the discretion granted pursuant to the SFDR, the Company does not currently consider the adverse impacts of investment decisions on sustainability factors, when providing the service of Portfolio Management (which is currently inactive).
The Company does not consider PAIs since considering the scale of the Company's activities and the types of products it offers, it would be challenging to comply with the said regime of the SFDR.

The Company further believes that some of its products cannot currently support the adoption of the PAI regime, as they involve underlying securities or products where it is impossible to conduct a detailed analysis on the adverse sustainability impact. Further sustainability factors are not considered material to the products the Company offers.

Finally, the Company is concerned about the current lack of readily available data to comply with the reporting requirements of the PAI Statement as companies and market data providers are not yet ready to make all necessary data available.

The Company reserves the right to change its position in the future. Further, in the event that sustainability factors do, in the future, become material, the Company will consider the principal adverse impacts of its investment decisions on sustainability factors.

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Integration of Sustainability Risks in the Company's Remuneration Policy

Pursuant to the SFDR, the Company is required to explain how its remuneration policy is consistent with the integration of Sustainability Risks when providing the service of Portfolio Management.
The Company does not encourage or reward an excessive assumption of Sustainability Risks according to its remuneration policy. The said policy is consistent with the integration of Sustainability Risks. In particular the Company ensures that performance is evaluated on a number of key principles, such as, for example:

- Remuneration should be consistent with and promote sound and effective risk management; amongst other through encouraging risk-taking approaches which are consistent with the risk profile of the Clients.
- Use of both quantitative (financial) as well as qualitative (non-financial) criteria for assessing individual performance, which will include ESG criteria (such as the integration of ESG risks into the investment decisions; and adherence to the Company's sustainability policies and standards), where this is relevant and applicable.

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EU Taxonomy criteria (Regulation EU 2020/852) on the establishment of a framework to facilitate sustainable investment) for environmentally sustainable economic activities

The Company does not offer products that take into account the EU criteria for environmentally sustainable economic activities.

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