

## **ESG AND SUSTAINABILITY DISCLOSURE**

### **1. Purpose and Scope**

This disclosure describes how Tesseract Investment Oy (“Tesseract” or “the Company”) considers environmental, social and governance (ESG) factors in its business operations and risk management. Tesseract provides crypto-asset services under the EU Markets in Crypto-Assets Regulation (MiCA). The Company offers custody, portfolio management, investment advice, reception and transmission of orders, and crypto-asset transfer services.

Tesseract does not issue crypto-assets and does not market its services based on ESG characteristics. Accordingly, this disclosure focuses on the Company’s general approach to sustainability and governance rather than on product-level ESG considerations.

### **2. ESG Risk Management**

ESG-related risks are assessed as part of the Company’s overall risk management framework. These risks may include, for example:

- Environmental: the energy consumption and environmental impact associated with blockchain networks and third-party service providers;
- Social: data protection, client privacy and responsible business practices across the value chain;
- Governance: operational integrity, counterparty governance, and compliance with regulatory obligations.

While the Company’s own operations have a limited environmental footprint, Tesseract monitors developments in sustainable finance regulation and integrates ESG awareness into its operational and counterparty due diligence processes where relevant.

### **3. Sustainability Indicators and Methodology**

Tesseract monitors sustainability indicators in line with the ESMA Final Report on MiCA technical standards (July 2024). Given the nature and scale of Tesseract’s business, the Company has assessed that its activities do not currently give rise to material sustainability impacts that would require quantitative disclosure. Accordingly, sustainability indicators (such as network energy consumption, emissions, or blockchain type distribution) are not published at this stage. Should these indicators become relevant or material in the future, Tesseract will disclose them in accordance with MiCA and ESMA guidance, including information on data sources, methodology, and limitations.

### **4. Principal Adverse Impacts (PAI)**

As Tesseract does not issue or manage crypto-assets on its own balance sheet and does not market products as ESG-focused investments, the Company currently does not identify any material principal adverse impacts on sustainability factors within the meaning of Article 4 of the Sustainable Finance Disclosure Regulation (SFDR).

Should Tesseract’s business model or regulatory obligations change in a way that makes detailed PAI assessment relevant, the Company will conduct a formal evaluation of material sustainability indicators in accordance with ESMA and EBA guidance and update this statement accordingly.

### **5. Governance and Ethical Standards**

Tesseract maintains a robust governance framework designed to ensure compliance, transparency and accountability in all operations.



Key elements include:

- Independent compliance and risk management functions;
- Policies and procedures addressing anti-money laundering (AML), counter-terrorist financing (CTF) and sanctions compliance;
- Ethical standards promoting integrity, confidentiality, and fair treatment of clients;
- Oversight of outsourcing partners and service providers, including assessment of their governance and operational resilience.

ESG principles are reflected in the Company's code of conduct and internal controls, ensuring responsible and sustainable business practices consistent with regulatory expectations.

## **6. Review and Publication**

This disclosure is reviewed at least annually and updated as needed to reflect changes in the Company's services, operations or applicable regulation.

Tesseract monitors ongoing developments in MiCA sustainability disclosure standards, SFDR, and the European Sustainability Reporting Standards (ESRS), and will align this disclosure with future regulatory updates to ensure continued compliance.

The latest version of this statement is available on Tesseract's website.