TradingHub

Code of Conduct

2026/27

Message from the CEO

At TradingHub, our success is built on a foundation of strong values, trusted relationships, and a shared commitment to doing what is right, for our customers, our colleagues, our communities, and the global financial markets we serve. Everything we do is rooted in serving our customers with integrity, clarity and accountability, and in helping them meet their regulatory obligations in an increasingly complex market environment.

This Code of Conduct sets out the standards we expect of ourselves and one another as we partner with customers, engage with regulators, and contribute to the integrity and stability of global markets.

Our flagship MAST platform brings these commitments to life. Designed to support fair, orderly and transparent markets, MAST helps customers identify and prevent market abuse, strengthen controls, and respond confidently to regulatory scrutiny. Through close collaboration with customers and ongoing dialogue with regulators and industry bodies, we aim not only to meet regulatory expectations but to help shape best practice and advance the effectiveness of market oversight.

Our culture, defined by ambition, accountability, partnership and trust, enables this impact. We succeed when we listen to our customers, act responsibly, and work constructively with regulators and industry stakeholders to raise standards across the ecosystem. This culture is sustained by the diverse, inclusive and supportive community we have built at TradingHub, where people are empowered to speak up, take ownership and do the right thing.

By living these principles every day and upholding this Code of Conduct, we protect TradingHub, support our customers on their regulatory journey, and play our part in shaping a more transparent, resilient and trusted financial system for the long term.

Mike Coats

Chief Executive Officer

Contents

The TradingHub Code

What is the Code of Conduct

The TradingHub Code of Conduct (the ‘Code’) sets a floor of minimum commitments for our business conduct. These commitments are focused on key policy areas affecting TradingHub, to ensure that we act in line with relevant laws and regulations, industry standards and stakeholder expectations.

It is important that we all know and own our part in complying with the Code. Our colleagues can find information on our commitments, and their responsibilities for fulfilling them, in our Group Policies. We also have Standards & Procedures available to support our colleagues to comply with the Code.

Although our Code sets the floor of minimum commitment, we know that our businesses often go above and beyond to deliver for our customers, colleagues, suppliers and the community. Whilst we all must comply with the Code, we should also be guided by our core values; ambition, partnership, accountability and trust.

Who the code applies to

The Code applies to everyone at TradingHub, no matter their role or seniority. This includes our Board, our management team and all our global colleagues. The Code also applies to our contractors, consultants and agents that conduct our business, working on our behalf or in our name.

However, it is important to note that, while every policy area may not be relevant to every colleague, we should all read and understand these commitments made by the business and comply with them as far as they are relevant to us.

Our Commitments

Our Executive team is charged with the responsibility, amongst other things, for managing and monitoring the ethical business conduct of TradingHub on behalf of the Board. It has a duty to ensure that the company has adequate procedures in place for both financial and non-financial controls. This Code and the policies listed in it, which set out minimum business standards, form an important component of TradingHub’s internal controls framework and are based on our legal commitments, regulatory obligations, principal risks and stakeholder expectations. The Executive team will annually review the effectiveness of the Code and we welcome your feedback.

Your Responsibilities

For each of our key policy areas, we set out how these commitments apply to your role and the actions expected of you in supporting TradingHub’s standards. All colleagues are expected to read, understand and comply with the Code and their individual responsibilities.

Employees are required to complete all mandatory training relevant to their role, including areas such as code of conduct, responsible AI, fraud, data protection, financial crime prevention, workplace conduct and sustainability.

Failure to comply with the Code or required standards may result in disciplinary action and could expose TradingHub to legal, regulatory and reputational risk.

Relationship to your employment contract

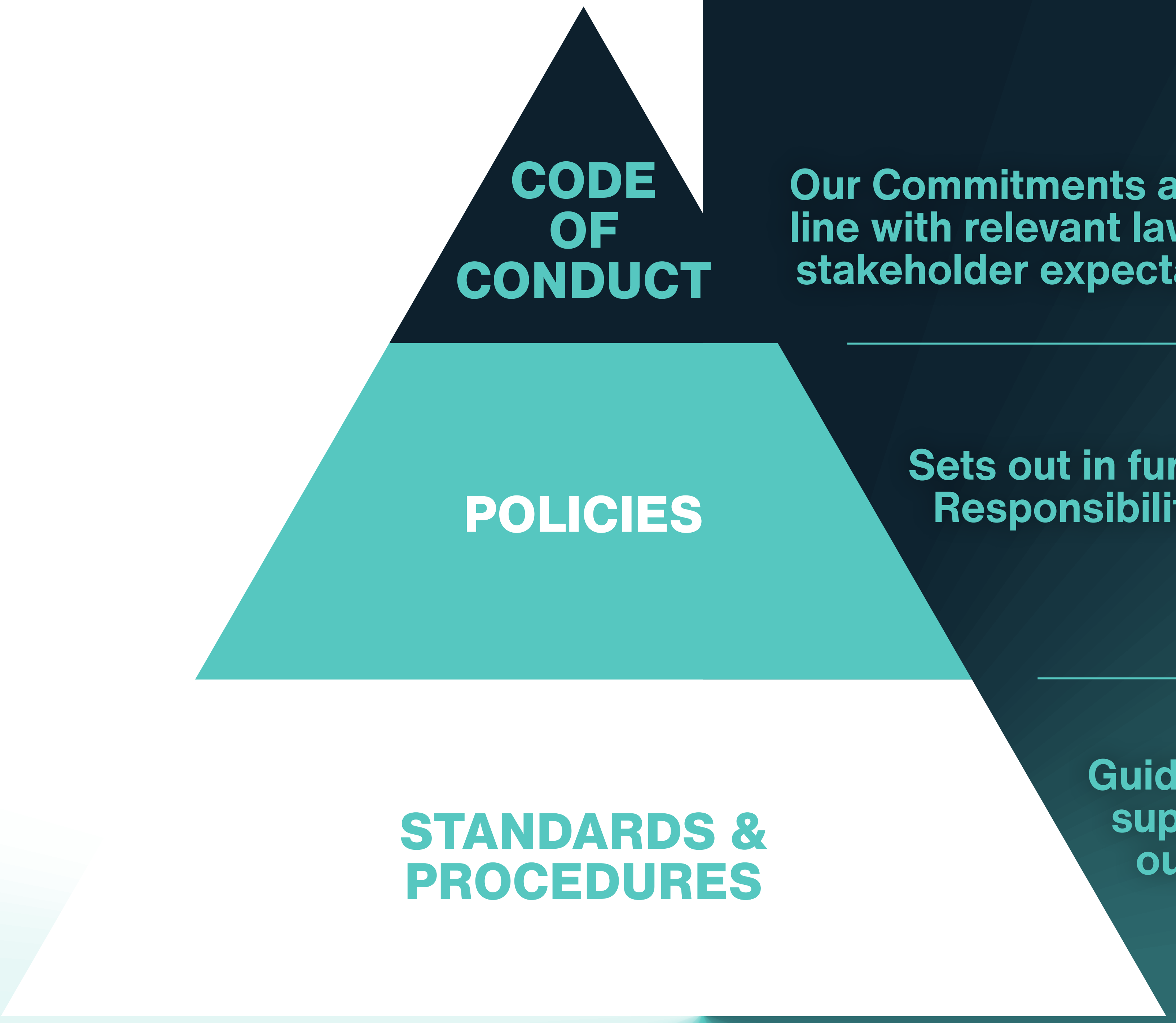
This Code should be read alongside your employment contract, Employee Handbook and TradingHub policies. It does not replace your contractual obligations but sets out the standards of conduct and behaviours expected across TradingHub.

The TradingHub Code

Demonstrating Compliance

TradingHub monitors compliance with this Code to ensure we meet our legal, regulatory and ethical obligations and maintain an effective control framework. Compliance is monitored through mandatory training, annual policy attestation, management oversight, risk assessments, audits, incident reporting, whistleblowing reports and other compliance reviews. These activities help us identify areas for improvement, address non-compliance and promote accountability across the business.

Each section of this Code sets out our commitments, employee responsibilities and the behaviours expected to support compliance with TradingHub's standards.



Our Commitments and Responsibilities to act in line with relevant laws, industry standards and stakeholder expectations

Sets out in further detail our Commitments and Responsibilities for our business conduct

Guidance and process information to support colleagues in complying with our Code of Conduct and Policies

All employees are required to complete annual Policy Attestation, confirming their understanding of and compliance with this Code and relevant policies. These attestations must be made to the best of the individual's knowledge and belief and reflect their responsibilities under the Code.

Further Guidance

Each section of this Code signposts the relevant TradingHub policies, procedures and support resources. Employees can find the full set of TradingHub Policies published on the Hub.

How to speak up

TradingHub provides safe, confidential and accessible channels for raising concerns. All reports are taken seriously, managed fairly, and protected from retaliation, supporting a culture where colleagues feel empowered to speak up and uphold the highest ethical standards.

Employees are expected to report concerns promptly where they become aware of misconduct, policy breaches, unsafe practices, or behaviour that may pose a risk to colleagues, customers, or market integrity. Employees must act in good faith, maintain confidentiality, and must not engage in retaliation.

In the first instance, employees should raise concerns with their line manager, where it is appropriate and safe to do so. Where this is not appropriate, or where concerns cannot be resolved, employees should use the approved reporting channels set out in the **Whistleblowing Policy**, which explains how to raise concerns and the protections available.

Ethics Reporting Hotline

How TradingHub Does Business

Purpose, Values & Ethical Standards

Our commitment

At TradingHub, we ensure our purpose and values are embedded into every decision, product and interaction. Our culture is built on ambition, accountability, partnership and trust, and we uphold the highest ethical standards to ensure our technology and behavior consistently strengthen global market integrity.

What this means for you

As employees, you are expected to uphold our values of ambition, accountability, partnership and trust in every action you take. You must make principled decisions that strengthen market integrity and model the behaviors that reflect our culture. You are expected to read and understand this Code of Conduct to ensure your actions align with our ethical and cultural expectations.

How you can demonstrate this

- Demonstrate ambition, accountability, partnership and trust in daily behaviour.
- Complete mandatory **Code of Conduct training** and **Policy Attestation** and follow the Employee Handbook and the Code of Conduct.
- Speak up if decisions or behaviours conflict with our values.

Human Rights and Modern Slavery

Our commitment

TradingHub is committed to upholding internationally recognised human rights and maintaining a zero-tolerance approach to modern slavery, forced labour and human trafficking. We take active steps to prevent human rights abuse across our operations and supply chain through due diligence, risk assessment and clear expectations for ethical behaviour.

As part of our commitment to responsible employment practices, TradingHub is an accredited Living Wage employer. This means we are committed to paying all directly employed colleagues at or above the independently calculated Living Wage, as defined by the Living Wage Foundation.

What this means for you

Employees must respect human rights in all business activities and remain vigilant to potential risks of modern slavery or exploitation. TradingHub expects all colleagues, suppliers and partners to act in line with applicable human rights laws and ethical labour standards. Any concerns relating to forced labour, human trafficking or unfair employment practices must be raised immediately.

How you can demonstrate this

- Stay alert to human rights risks and treat others fairly and with dignity.
- Complete mandatory Modern Slavery training and follow the **Anti-Slavery and Human Trafficking Policy**.
- Escalate any concerns in accordance with the **Anti-Slavery and Human Trafficking Policy**.

How TradingHub Does Business

Anti-Bribery and Corruption

Our commitment
TradingHub has a zero tolerance approach to bribery, corruption and improper influence. We maintain clear controls, transparent decision making and rigorous oversight to ensure all business interactions uphold the highest ethical and regulatory standards.

What this means for you
Employees must avoid any behaviour that could amount to bribery, corruption or improper influence. All gifts, hospitality and third party engagements must follow company rules. Employees are required to familiarise themselves with the **Anti Bribery & Corruption Policy**, which sets clear expectations for acceptable conduct and reporting obligations.

How you can demonstrate this

- Never offer, request or accept anything that could improperly influence decisions.
- Complete mandatory Fraud, Bribery and Corruption training.
- Declare gifts, hospitality or third-party benefits in accordance with the **Gifts and Hospitality Policy** and follow the **Anti Bribery & Corruption Policy**.
- Escalate suspected bribery/corruption in accordance with the **Anti Bribery & Corruption Policy**.

Conflicts of Interest

Our commitment
TradingHub is committed to identifying, managing and transparently mitigating conflicts of interest. We expect colleagues to always act with impartiality and fairness, safeguarding the integrity of our decisions and maintaining trust with customers, partners, and regulators.

What this means for you
Employees must disclose any actual or potential conflicts of interest promptly and avoid situations where personal, financial, or external interests could improperly influence their professional judgement or responsibilities. Conflicts are managed in line with TradingHub's Code, supported by specific policies and controls.

How you can demonstrate this
- Avoid conflicts and act objectively and fairly in all decisions.
- Complete mandatory **Policy Attestation** and follow the **Share Dealing Policy and Gifts and Hospitality Policy.**
- Declare and escalate actual or potential conflicts promptly.

Confidentiality and Inside Information

Our commitment
TradingHub is committed to protecting confidential, commercially sensitive and inside information entrusted to us by our customers, partners and colleagues. We safeguard non public information to maintain customer trust, protect our reputation and support fair, orderly and transparent markets.

What this means for you
Employees must not misuse, disclose or improperly access confidential or inside information for personal benefit or the benefit of others. This includes commercially sensitive information, non public data and any information that could influence trading decisions. These obligations apply during and after employment.

How you can demonstrate this
- Protect confidential and commercially sensitive information and only share it where permitted and on a need to know basis.
- Do not use inside or non public information for personal gain or to benefit others.
- Follow the **Duty of Confidentiality Policy, Share Dealing Policy, Acceptable Use Policy and Information Classification Policy.**

How TradingHub Does Business

Anti Facilitation of Tax Evasion

Our commitment

TradingHub is committed to preventing, detecting, and responding to the facilitation of tax evasion. We operate a zero tolerance approach to dishonest or unethical conduct and expect colleagues to act honestly, ethically, and with integrity at all times, safeguarding TradingHub's assets, customers, and market integrity.

What this means for you

Employees must not engage in, assist, or the facilitation of tax evasion, whether directly or indirectly. Tax evasion and the facilitation of tax evasion are criminal offenses involving deliberate and dishonest conduct.

This includes any dishonest act, such as misappropriation of assets, manipulation of records, or misuse of information or systems, or behaviour intended to secure an improper benefit, conceal wrongdoing, or enable another party to evade tax including third parties or persons acting on TradingHub's behalf. These risks are managed in line with TradingHub's Code of Conduct, supported by the **Anti Facilitation of Tax Evasion Policy**, which set out expected standards, risk areas, reporting routes, and protections for those who raise concerns.

How you can demonstrate this

- Act honestly and remain alert to fraud and tax evasion risks.
- Complete mandatory Criminal Finances Act and Fraud, Bribery and Corruption training and follow the **Anti-Facilitation of Tax Evasion Policy**.
- Escalate suspicions promptly via **the Whistleblowing Policy.**

Fraud

Our commitment

TradingHub takes a zero tolerance approach to fraud. We are committed to preventing, detecting and responding to fraud, whether committed by someone acting alone, by people acting together, or by an internal or external party. We expect everyone working for or on behalf of TradingHub to act honestly, ethically and with integrity, safeguarding our assets, our customers and market integrity.

What this means for you

Employees must not engage in, assist, or ignore fraudulent activity. Fraud is any dishonest act or omission intended to secure an improper benefit or cause loss. This may include misrepresentation, abuse of position, false expenses, invoices or records, or misuse of company money, property, systems or information. Fraud risk can arise across the business, including procurement, supplier onboarding, payroll, expenses, customer onboarding and record keeping. You must stay alert to the warning signs and raise concerns at the earliest opportunity.

How you can demonstrate this

- Act honestly, remain alert to the warning signs of fraud, and follow all approval, due diligence, expense and record keeping controls.
- Complete mandatory Fraud training and follow the Fraud Policy.
- Escalate suspicions promptly via the Whistleblowing Policy.

How TradingHub Does Business

Risk Management & Legal Compliance

Our commitment

TradingHub delivers strong governance, disciplined risk management and unwavering legal compliance across all operations. We design our products and processes to meet regulatory expectations, ensuring that we operate safely, ethically and in alignment with our customers' obligations.

What this means for you

Employees must comply with applicable laws, regulatory obligations and TradingHub policies. This includes following established controls, maintaining accurate records and escalating risks when identified. Where roles involve customer onboarding, employees must comply with TradingHub's **KYC Policy** and ensure appropriate customer due diligence is completed and approved before entering into contracts, enabling services or granting access. TradingHub manages risk through its suite of policies. Employees are therefore required to understand and adhere to these policies, including the **Information Security Policy**, which collectively define how we manage risk, protect information and operate as a business.

How you can demonstrate this

- Follow established controls, keep records accurate and escalate risks when identified.
- Complete mandatory Criminal Finances Act and Fraud, Bribery and Corruption training.
- Comply with TradingHub's key policies, including the **KYC Policy, AML Policy, Anti Bribery and Corruption, Information Security and Data Protection policies**.
- Where your role involves customer onboarding, ensure any required customer due diligence and approval processes are completed and approved before entering into contracts, enabling services or granting access; escalate any KYC red flags promptly and maintain accurate, audit ready records to evidence compliance.

Where your role involves supplier onboarding, ensure appropriate supplier due diligence and risk assessments are completed in accordance with the Supplier Management Policy, and escalate any sanctions, ESG or compliance concerns.

Artificial Intelligence

Our commitment

TradingHub is committed to the responsible, secure and ethical use of Artificial Intelligence (AI). We recognise the benefits of AI in enhancing efficiency and insight; while also acknowledging the risks it may present to data security, confidentiality, customer trust, intellectual property and market integrity.

We ensure that AI solutions are governed, approved and used in line with our legal, regulatory and ethical obligations.

What this means for you

Employees must only use AI tools that have been reviewed and approved by TradingHub. The use of AI must comply with all applicable policies, including data protection, information security, confidentiality, intellectual property and customer obligations. Employees must apply appropriate human oversight and understand the limitations of AI, including the risk of inaccurate, biased or misleading outputs.

AI must not be used to process, input or generate:

- Confidential, customer or commercially sensitive information without approval.
- Personal data unless explicitly authorised and permitted by company policy.
- Regulated, market-sensitive or licensed market data;
- TradingHub intellectual property, including source code, algorithms, product designs or proprietary information, unless authorised.
- Outputs that could mislead customers, regulators or other stakeholders.

Employees must understand the limitations of AI, including the risk of inaccurate or biased outputs, and must apply appropriate human oversight when using AI-generated content.

How you can demonstrate this

- Use only approved AI tools and platforms.
- Do not input confidential, customer or sensitive data into AI tools unless explicitly authorised.
- Follow the AI Usage Policy , Information Security Policy and complete Responsible AI training.
- Raise concerns if AI use may breach policy, customer obligations, or create security/compliance risk.

Our Colleagues

Integrity & Personal Responsibility

Our commitment

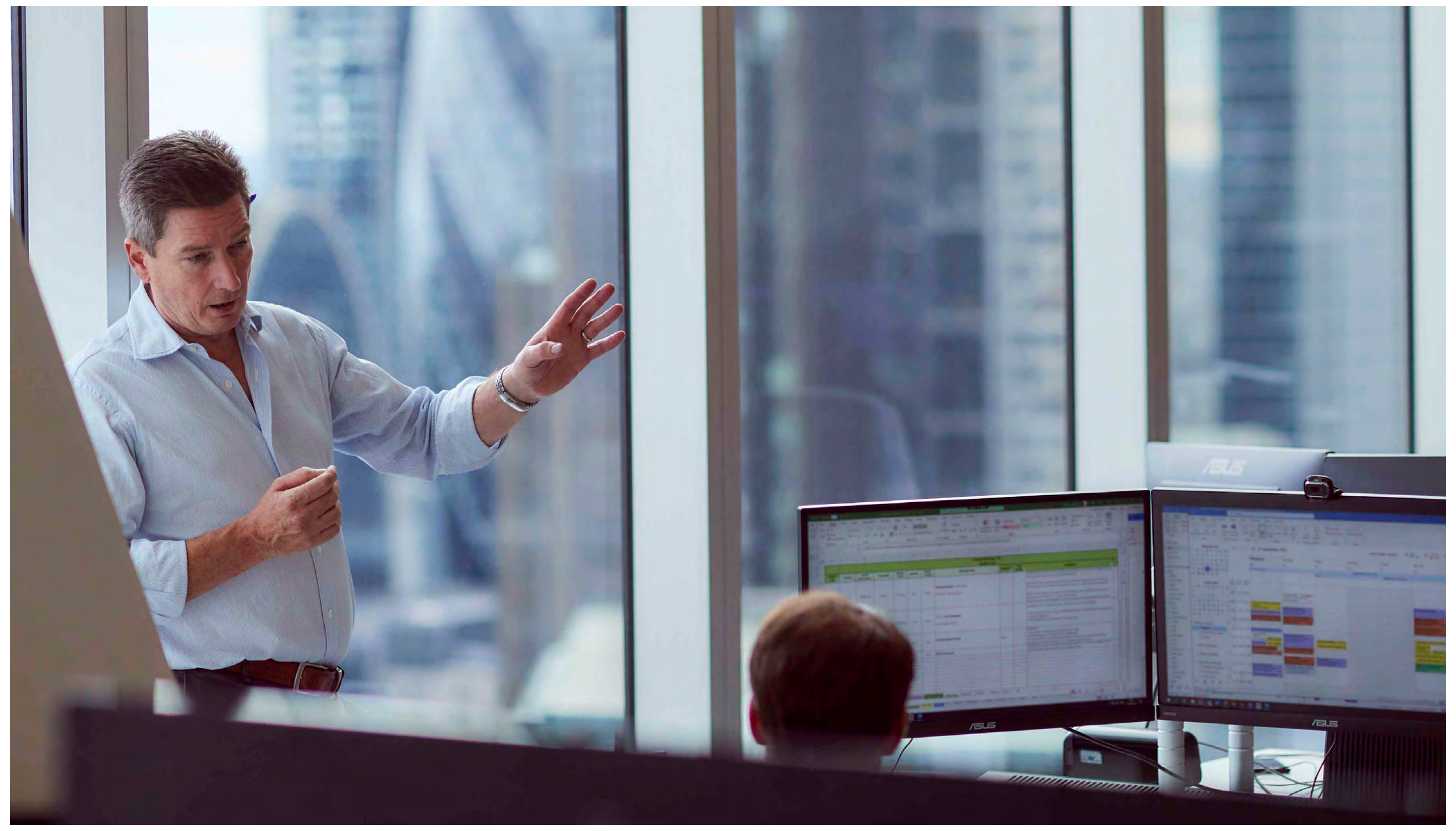
TradingHub expects all colleagues to act with honesty, sound judgement and integrity in everything they do. Personal responsibility is central to our culture, and each of us is accountable for our actions, decisions and the impact they have on others and on the organisation.

What this means for you

Employees must take ownership of their work, follow internal processes and controls, and raise issues early. Acting with integrity means doing the right thing, even where this is difficult, and never taking shortcuts that could compromise quality, compliance or trust.

How you can demonstrate this

- Take ownership of decisions, act honestly and avoid shortcuts.
- Complete mandatory training and **Policy Attestation** and follow the **Employee Handbook and Code of Conduct.**
- Escalate mistakes, risks or misconduct early using appropriate channels.



Inclusion, Diversity and Equal Opportunities

Our commitment

TradingHub is committed to providing a workplace where everyone is treated fairly and has equal opportunity to succeed. We value diversity of backgrounds, perspectives and experience, recognising that this strengthens our performance and decision making.

We promote equal access to opportunities in recruitment, development and progression, and do not tolerate discrimination or unfair treatment. All employment decisions must be made objectively, based on merit, skills and business need, and in line with applicable laws and internal policies.

What this means to you

Employees must treat others with respect; be mindful of language, behaviour, and decision-making that may exclude or disadvantage others. All employment decisions (hiring, pay, promotion, performance) must be objective and based on merit and business need.

How you can demonstrate this

- Support inclusive ways of working and challenge inappropriate behaviour.
- Complete mandatory DEI and bullying/harassment training and read the **Diversity, Equity and Inclusion policy**.
- Raise concerns via your manager/HR or the grievance route.

Our Colleagues

Employee Voice, Engagement and Social Dialogue

Our commitment

TradingHub is committed to meaningful social dialogue and open, constructive engagement with employees on matters that affect their work, wellbeing and the direction of the organisation. We believe that employee voice is essential to building a respectful, inclusive and high performing workplace.

We respect the right to freedom of association and collective bargaining, including the right of employees to join, not join, or form a trade union or other representative body of their choosing, without fear of retaliation or disadvantage. While we do not currently have trade union representation, we fully support these rights and ensure that employees have alternative channels to express their views and be heard.

We promote a culture of openness, transparency and mutual respect. Employees are encouraged to raise concerns, share feedback and contribute ideas freely and without fear of retaliation. We actively seek and value employee input through a range of engagement channels, including our quarterly employee Net Promoter Score (eNPS) survey, town halls, leadership forums, employee networks, HR Surgery and ongoing dialogue with managers via the Manager Forum.

Employee feedback is used to inform decision making and continuous improvement across the business. We are committed to transparency and accountability in this process and report on employee engagement outcomes, including eNPS, in our annual Sustainability Report.

What this means for you

Employees are expected to actively participate in engagement opportunities and contribute constructively to shaping our culture and workplace.

How you can demonstrate this

- Participate in town halls and engagement forums and share feedback openly.
- Complete quarterly eNPS survey honestly and constructively.
- Raise concerns, ideas and feedback through appropriate channels.
- Contribute to a culture of openness, respect and continuous improvement.

Talent and Performance

Our commitment

TradingHub is committed to attracting, developing and retaining high performing talent to support our long term success. We invest in our people by providing opportunities for growth, continuous learning and meaningful career progression, ensuring individuals are equipped to perform at their best and contribute to the success of the organisation.

We promote a high performance culture grounded in fairness, transparency and accountability. Performance is assessed objectively against clear expectations and aligned to our values of ambition, accountability, partnership and trust. We recognise and reward contribution, support development, and address underperformance in a constructive and consistent way.

What this means for you

Employees are expected to take ownership of their development, perform to the best of their ability, and actively contribute to a culture of continuous improvement. Managers are responsible for setting clear objectives, providing regular feedback, and supporting the growth and wellbeing of their teams.

How you can demonstrate this

- Take ownership of performance, development and maintaining your PDP.
- Provide fair, constructive feedback and support the development of others.
- Complete mandatory training, follow the **Learning and Development Policy**, **Capability Procedure**, and (where relevant) **Disciplinary Procedure** and Rules
- Escalate concerns impacting performance or fairness via your manager or the **Grievance Procedure**

Our Colleagues

Fire, Health and Safety

Our commitment

TradingHub is committed to providing a safe, healthy and psychologically secure working environment for all colleagues. We prioritise both physical and mental wellbeing and expect everyone to help maintain a safe workplace—whether on site, working remotely, or undertaking lone working activities. We take steps to identify and manage health and safety risks across our offices and ensure colleagues have access to the guidance, training and support needed to work safely in all contexts, including when working alone or outside standard hours.

What this means for you

Employees are expected to follow all health and safety instructions, signage, protocols and training, and to report any hazards, incidents, near misses or wellbeing concerns promptly through the appropriate channels. Each colleague must take reasonable care of their own physical and mental wellbeing and act in ways that do not put others at risk. When working alone, whether outside standard hours, in an isolated space, or remotely, employees must follow TradingHub's lone working guidance, ensuring that their location, schedule and safety check ins are managed responsibly. Employees undertaking business travel must also follow relevant travel safety guidance, exercise appropriate judgement, and take reasonable steps to ensure their personal security and wellbeing while representing TradingHub away from the office.

How you can demonstrate this

- Use the designated emergency, incident reporting, wellbeing, and medical outreach support channels, cooperating fully with any follow up actions.
- Work safely and take reasonable care of yourself and others' wellbeing, reporting hazards, incidents or near misses promptly through the appropriate channels.
- Complete mandatory Health and Safety in the Office and Physical Security training and follow the **Health and Safety Policy and Lone Working Policy.**
- Respond promptly to reported health and safety concerns and, where appropriate, take action to make situations safe and support follow-up actions.
- If in doubt, seek assistance from key support teams. We acknowledge that individuals or operational teams may need further support.

Our Colleagues

Social Media

Our commitment

TradingHub recognises that social media is an important tool for communication and engagement. We expect all colleagues to use social media responsibly, both in a professional and personal capacity, and to protect TradingHub's reputation, customers and confidential information at all times.

The use of social media must reflect our values of ambition, accountability, partnership and trust. Colleagues must not post, share or engage in content that could harm TradingHub, its people, customers or partners, or that is misleading, inappropriate or discriminatory.

What this means for you

Employees must not speak on behalf of TradingHub unless authorised to do so. Any business-related communication must be made through approved channels and in line with internal approvals and governance processes. Sensitive or confidential information must never be disclosed, and colleagues must ensure that personal views are clearly expressed as their own.

All colleagues are expected to comply with the **Social Media policy**, which provides detailed guidance on appropriate use, prohibited conduct, business communications and escalation procedures.

How you can demonstrate this

- Use social media responsibly and protect TradingHub's reputation and confidentiality.
- Complete mandatory **Policy Attestation** and follow the **Social Media Policy and Acceptable Use Policy.**
- Escalate reputational or conduct concerns to your manager HR.
- Do not represent yourself as speaking on behalf of TradingHub unless authorised to do so, and ensure personal views are clearly your own.

Information Security (controls and systems)

Our commitment

TradingHub protects the confidentiality, integrity and availability of information through robust security controls, systems and processes. We safeguard sensitive data and systems to maintain customer trust and meet regulatory expectations.

What this means for you

Employees must protect information, systems and devices by following TradingHub's security standards, using approved tools and maintaining appropriate access controls. All security incidents or concerns must be reported promptly.

How you can demonstrate this

- Use approved systems and protect information, devices and credentials.
- Complete mandatory Information Security, GDPR and Physical Security training.
- Follow the **Information Security Policy**, **Access Control Policy**, **Acceptable Use Policy** and related standards.
- Report any security incidents, vulnerabilities or concerns promptly in line with the Incident Response Standard (and the **Personal Data Breach Policy** where personal data is involved).

Our Colleagues

Data Protection & Privacy

Our commitment

TradingHub is committed to protecting personal data relating to our customers, employees and partners. We process personal data lawfully, fairly and transparently, in line with applicable data protection laws and our contractual obligations.

What this means for you

Employees must ensure that personal data is accessed, used, stored and shared only where authorised and for legitimate business purposes. Personal data must be handled securely and only retained where necessary.

How you can demonstrate this

- Only access, use or share personal data where authorised and required for your role.
- Complete mandatory GDPR and Information Security training and follow the **Data Protection Policy and Information Classification Policy**.
- Report suspected personal data breaches or misuse promptly in line with the **Personal Data Breach Policy**.

Safeguarding Our Physical, Digital and Intellectual Assets

Our commitment

At TradingHub, we are continuously safeguarding our physical, digital and intellectual property assets. These resources, including our analytics, systems, data and technology, must be used securely, responsibly and only for legitimate business purposes to protect customers and our organisation.

What this means for you

Employees must safeguard TradingHub systems, devices, intellectual property and all other assets. This means using assets only for legitimate business purposes, following security protocols and reporting any loss or misuse immediately. Employees must comply with the **Acceptable Use Policy**, **Portable Device Policy**, **Access Control Policy**, **Asset Management Policy** and **Information Security Policy**, which set out specific expectations for asset protection, system access and responsible use.

How you can demonstrate this

- Complete annual training on Physical Security, GDPR and Information Security.
- Use TradingHub equipment and systems strictly for authorised business purposes and report lost devices, security incidents or misuse immediately.
- **Follow the Acceptable Use Policy, Portable Device Policy, Access Control Policy, Asset Management Policy and Information Security Policy.**

Our Colleagues

Business Continuity

Our commitment

TradingHub is committed to maintaining resilient operations and ensuring continuity of critical services in the event of disruption. We take a proactive approach to identifying risks and implementing controls to minimise the impact of incidents on our people, customers and operations.

Our Business Continuity framework supports our ability to respond effectively to a range of potential disruptions, including technology failures, cyber incidents, operational issues and external events. We regularly review and test our plans to ensure they remain effective and aligned with regulatory expectations and customer requirements.

What this means for you

Employees play an important role in maintaining business continuity and are expected to understand their responsibilities, follow established procedures and respond appropriately during incidents.

How you can demonstrate this

- Follow continuity procedures and act calmly and responsibly during disruptions.
- Follow the **Business Continuity and Disaster Recovery Standard** and complete any required mandatory training.
- Participate in our annual Business Continuity exercises, and (if required by your job role) participate in our six-monthly Disaster Recovery tests for our products.
- Escalate disruptions/incidents promptly via the appropriate incident/continuity channels.

Relationships at Work

Our commitment

TradingHub is committed to fostering professional, constructive working relationships across the organisation. Positive working relationships support collaboration, performance and wellbeing, and are essential to a high performing culture.

What this means for you

Employees must maintain appropriate professional boundaries in all working relationships. Personal relationships must not influence decision making, create conflicts of interest or impact fairness in the workplace. Any situations that could give rise to bias, perceived or actual conflicts, or inappropriate behaviour must be disclosed and managed appropriately.

How you can demonstrate this

- Maintain professional boundaries and ensure personal relationships do not affect objectivity.
- Complete mandatory Bullying & Harassment training and follow the Employee Handbook and Code of Conduct.
- Declare and escalate risks arising from personal relationships via your manager or the Grievance Procedure.

Our Customers

Customer Focus & Market Conduct

Our commitment

TradingHub delivers fair, transparent and reliable technology that supports customers in meeting their regulatory obligations. Our conduct, communication and analytics must always uphold market integrity and reflect the highest professional and ethical standards.

What this means for you

Employees must act with professionalism, accuracy and transparency in all customer interactions. You must not misrepresent information and must ensure that all outputs, communications and behaviours support fair and orderly markets. When working with customers or customer environments, you must use only approved systems, comply with applicable security, access and data handling requirements, and act in accordance with TradingHub's contractual commitments. You must not use tools, methods or practices that could breach customer agreements, weaken security controls or expose TradingHub or its customers to risk.

How you can demonstrate this

- Act professionally, communicate clearly and never misrepresent information, exaggerate or make misleading statements.
- Act in a way that supports market integrity and customer regulatory obligations.
- Escalate any customer-related risks or conduct concerns promptly.

Information Security & Responsible Use of Technology

Our commitment

TradingHub uses technology responsibly to safeguard customer data, meet contractual commitments and maintain trust.

What this means for you

When working with customers or customer environments, employees must use only approved systems and follow agreed security and access requirements. Do not use tools or methods that could breach customer agreements, weaken security controls or expose TradingHub or customers to risk

How you can demonstrate this

- Use approved systems and comply with customer security, access and data handling requirements.
- Follow the Information Security and Data Protection requirements set out in the “Our Colleagues” sections of this Code.
- Escalate any customer-related security concerns promptly via the Incident Response process.

Our Customers

Customer Trust, Communication & Issue Management

Our commitment

TradingHub is committed to building long-term, trusted relationships with our customers through responsible behaviour, clear communication and effective issue management.

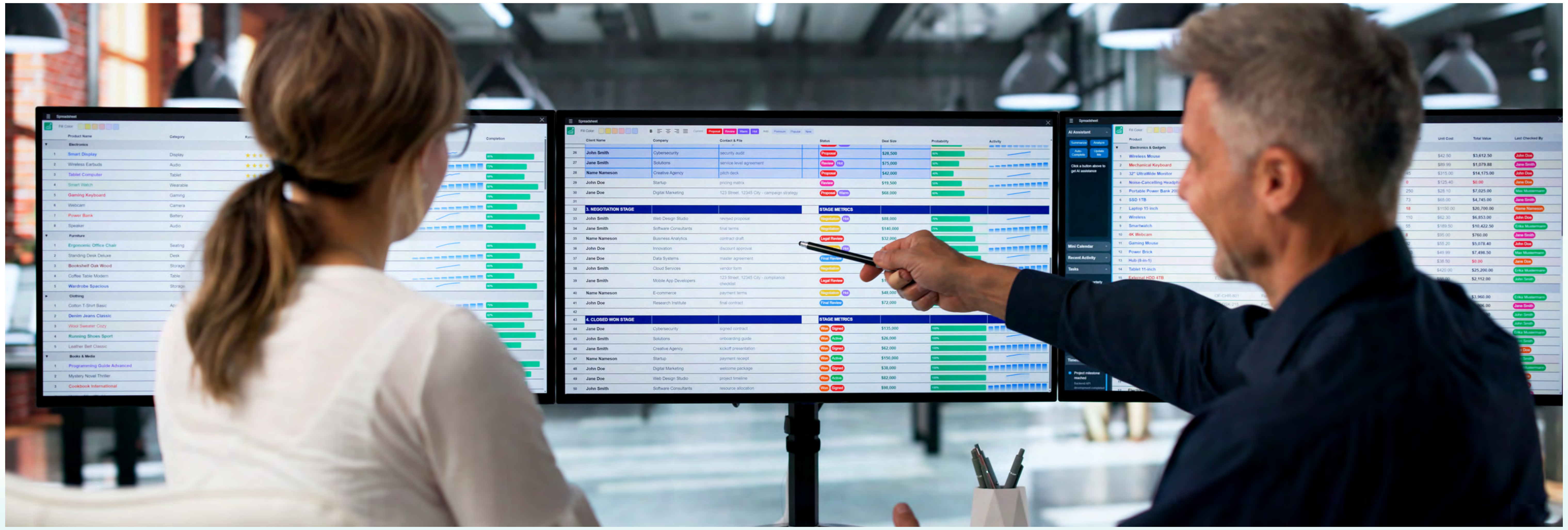
We communicate with customers and regulators in a transparent, accurate and professional manner. Issues, risks or concerns must be identified early, escalated appropriately and managed in line with internal processes. Only authorised individuals may communicate on behalf of TradingHub in formal or regulatory contexts.

What this means for you

Employees must communicate with customers and regulators in a professional, accurate and transparent manner. You must not misrepresent information, make commitments outside agreed terms, or attempt to resolve issues outside established processes. Where an issue, complaint or risk is identified, you must escalate it promptly through the appropriate internal channels so it can be managed consistently and in line with TradingHub's governance. Only authorised individuals may communicate on behalf of TradingHub in formal or regulatory contexts.

How you can demonstrate this

- Communicate professionally, accurately and transparently in all customer interactions.
- Follow internal communication, approval and escalation processes and complete relevant mandatory training.
- Escalate customer issues, complaints or risks promptly through appropriate channels.



Our Suppliers

Responsible Sourcing & Supplier Standards

Our commitment

TradingHub is committed to responsible sourcing and working with suppliers who meet our ethical, legal and ESG expectations. Supplier selection and management must be conducted fairly and in line with TradingHub's procurement, risk management and finance policies.

TradingHub is a signatory to the Fair Payment Code, demonstrating our commitment to accurate, transparent and prompt payment to suppliers in line with agreed terms.

What this means for you

Employees must ensure suppliers meet appropriate standards and that ESG considerations are incorporated into supplier selection, onboarding and ongoing management processes. All supplier interactions should align with the **Supplier Code of Conduct** and the **Sustainable Procurement** and **Supplier Management Policy**.

How you can demonstrate this

- Select and manage suppliers balancing cost, quality, delivery and ensure ESG considerations are applied where relevant.
- Complete mandatory Fraud, Bribery and Corruption training and follow t**he Supplier Code of Conduct and Sustainable Procurement and Supplier Management Policy**.
- Escalate any concerns relating to supplier conduct, ESG risks or compliance issues.

Supplier Relationships & Commercial Integrity

Our commitment

TradingHub maintains professional, fair and transparent relationships with suppliers. All interactions must be conducted with integrity and free from conflicts of interest or improper influence.

What this means for you

Employees must act professionally and ensure decisions are not influenced by personal relationships or incentives. All supplier engagements must follow approved processes and governance standards.

How you can demonstrate this

- Act professionally, transparently and with integrity in all supplier interactions.
- Complete mandatory Fraud, Bribery and Corruption training and follow the **Anti Bribery and Corruption Policy**, **Gifts and Hospitality Policy**, and relevant finance procedures.
- Declare and escalate any conflicts of interest, inappropriate incentives or improper conduct.

Our Community

Community Engagement & Partnerships

Our commitment
TradingHub is committed to making a positive impact in the communities in which we operate. We support social initiatives and partnerships that create meaningful and lasting value, including our work with organisations such as Inspire.

What this means for you
We encourage employees to engage with community initiatives, including volunteering, fundraising and employee led activities, helping to strengthen our culture of responsibility and inclusion.

How you can demonstrate this
- Participate in community and charitable initiatives where possible.
- Support TradingHub partnerships, including Inspire.
- Contribute to a culture of social responsibility and inclusion.

Responsible Conduct in the Community

Our commitment
TradingHub is committed to acting as a responsible corporate citizen. We expect all colleagues to behave professionally and ethically in all external interactions, ensuring our actions reflect our values and protect our reputation.

What this means for you
Employees must ensure that their behaviour outside the workplace does not negatively impact TradingHub, its people, customers or stakeholders.

How you can demonstrate this
- Represent TradingHub appropriately in all external interactions.
- Act responsibly and in line with company values in the wider community.
- Avoid behaviour that could damage TradingHub's reputation.

The Environment

The Environment

Our commitment

TradingHub is committed to reducing our environmental impact and contributing to a low carbon, sustainable future. As a cloud-based service provider, we are proud that our operating model generates relatively low direct emissions, and we focus on managing our footprint responsibly as we grow.

We are committed to reducing our greenhouse gas emissions, with a target to reduce Scope 1 and 2 emissions by 42% by 2030 and to achieve net zero emissions by 2050. We continue to improve energy efficiency, reduce waste and work with partners to monitor and manage our environmental performance across our operations. Where direct reductions are not yet possible, we offset Scope 3 emissions from business travel through the Trees for Travel programme as part of our broader carbon management approach.

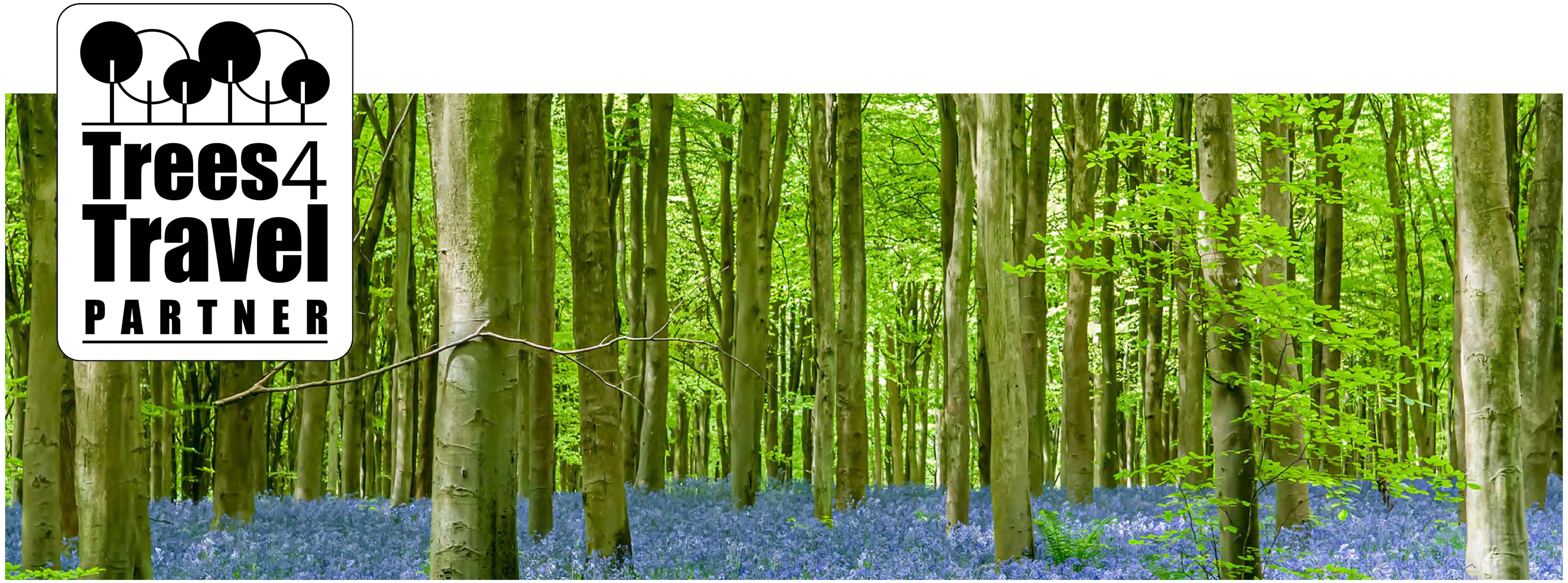
We support these commitments through internal procedures and standards, including our Smart Tips guidance on paper, waste, email, travel and meetings, which helps employees adopt responsible environmental practices in their day-to-day work.

What this means for you

Employees are expected to act responsibly in relation to environmental impact and support TradingHub's sustainability commitments in day-to-day activities.

How you can demonstrate this

- Use resources responsibly, including energy, water and materials.
- Support recycling and waste reduction initiatives.
- Complete mandatory Sustainability training and follow the Environmental and Sustainability policy.
- Follow Smart Tips guidance (including paper, waste, email, travel and meetings) in day activities.



Employee Acknowledgement

By signing below, I acknowledge that I have received, read and understood the TradingHub Code of Conduct. I agree to comply with all standards, expectations and responsibilities set out in this document, including those relating to employee voice, engagement and social dialogue.

I understand that I am expected to act in accordance with this Code at all times and to raise any concerns or potential breaches through the appropriate channels without fear of retaliation. I also acknowledge that TradingHub may amend or update this Code periodically and that I am responsible for reviewing and adhering to any changes communicated to me.

Name:

Signature:

Date:

Document Control

Document Title: TradingHub Code of Conduct

Document Owner: CAO

Approved by: ExCo

Effective from 20 July 2026

Next review date 20 July 2027