

TradingHub

Sustainability Report

2026

Continuing our sustainability journey

As a provider of trade surveillance and financial analytics solutions, ethics and integrity sit at the heart of what we do at TradingHub. Our technology helps support fair and transparent financial markets, enabling customers to detect market abuse and strengthen compliance, an approach that naturally shapes how we think about ESG.

As we publish our third Sustainability Report, we are proud to reflect on a year of real progress. We have strengthened our approach across the board: setting Science Based Targets (SBTi) for our emissions, completing our first double materiality assessment, broadening our supplier ESG programme and enhancing our sustainability reporting with reference to the Global Reporting Initiative (GRI) Standards.

We are proud of how far we have come, and equally excited about what lies ahead. We remain committed to building on these strong foundations, strengthening our governance and delivering meaningful outcomes across our Climate, Community and Culture priorities.



Elaine

Elaine Thomas
Chief Administration Officer

External Validation
Frameworks and Accreditations

SILVER | Top 15%
ecovadis
Sustainability Rating
FEB 2026

SUSTAINABILITY RATING

EcoVadis Silver Badge

Citation ISO Certification
Information security management
ISO 27001: 2022
REGISTERED
Certificate No:301852019

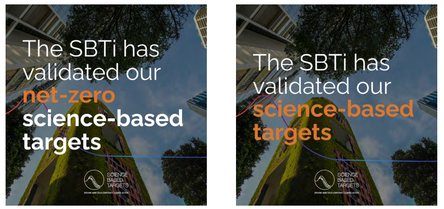
CERTIFICATES

ISO 27001

Citation ISO Certification
Environmental management
ISO 14001: 2015
REGISTERED
Certificate No:445092024

CERTIFICATES

ISO 14001



SCIENCE BASED TARGETS

SBTi targets

We are a Living Wage Employer

ACCREDITED

Living Wage Employer

CDP
Discloser
2025

ENVIRONMENTAL DISCLOSURE

Carbon Disclosure Project

Fair Payment Code | Gold Until 2027

SUPPLIER PAYMENT SERVICES

Fair payment gold award

Our Vision, Purpose, Mission And Values

Our Vision

To create the world's leading financial markets analytics platform.

Our Purpose

Our purpose is to create the world's leading financial markets analytics platform and develop solutions that transform our customers' business.

Mission Statement

Our mission is to help financial institutions maintain the integrity of the markets by detecting and preventing financial crime and enhancing trading performance.

VALUES



AMBITION

At TradingHub, we have ambitious plans to grow our business. Everyone at TradingHub is best placed to use and maximise their valuable skills. We align roles and people so that our customers always receive excellent service.



ACCOUNTABILITY

TradingHub's proactive approach to supporting customers means we lead by example and own our actions and the results they generate. Everyone gets involved and contributes to this.



PARTNERSHIP

We value collaboration and diversity in every partnership we build. Our culture fosters inclusivity and teamwork, which provides the foundation for lasting customer connections.



TRUST

Our customers trust us with their highly confidential data and information. TradingHub is worthy of that trust.

Understanding what matters most – our first Double Materiality Assessment

In 2026, we completed our first Double Materiality Assessment (DMA) to identify the sustainability topics most relevant to our business, our stakeholders and our long-term strategy. We worked with an independent third-party sustainability specialist to support the assessment, bringing external expertise, challenge and benchmarking to the process. Aligned to CSRD/ESRS and informed by the GRI Standards, the assessment considered each topic through two lenses: our impact on people and the environment, and the sustainability-related risks and opportunities that could affect TradingHub. It marks an important step in maturing our approach and ensuring this report reflects the issues that matter most.

Who we engaged

We considered the perspectives of key stakeholder groups including employees, customers, regulators, investors, suppliers and the communities we serve. For this first assessment, these perspectives were represented by internal stakeholders with direct knowledge of those groups, supported by external benchmarking and industry standards.

What we found

The assessment confirmed 14 material topics, grouped under the three pillars that structure this report; Climate, Community and Culture. Reflecting our role in safeguarding market integrity, product- and governance-related topics feature strongly, alongside our people and environmental priorities.



Climate

- Climate change mitigation



Community

- Talent attraction & retention
- Employee health, safety and wellbeing
- Diversity, equity & inclusion
- Learning & development

Culture

- Market integrity
- Financial crime prevention
- Cybersecurity & data privacy
- Responsible AI
- Business ethics
- Anti-bribery & corruption
- Whistle-blower protection
- Data governance
- Supplier ESG & procurement



How this guides us

These material topics help focus our sustainability approach, informing where we direct our attention and how we report on the areas that matter most. As our approach continues to mature, we will regularly review them, so they remain relevant to our business and our stakeholders.

Reporting Period

This report covers TradingHub's sustainability activities and performance from 1 September 2025 to 30 September 2026, unless otherwise stated.

Environmental data, including greenhouse gas emissions, energy, waste and water metrics, is reported on a calendar year basis (1 January 2025 to 31 December 2025) to align with data collection and verification processes.

ESG Priorities

Climate

Energy, Emissions and Resource Use

Our Commitment

We are committed to reducing our environmental impact through data-led energy management, efficient office design, and targeted emissions reduction, including achieving a 42% reduction in Scope 1 and 2 emissions by 2030 and Net Zero by 2050.

Progress in 2025/26

- **Scope 2 performance:** Continued year-on-year reductions through improved energy procurement and lower electricity emissions
- **Overall footprint:** Reduced total emissions from 795.8 tCO_2e (2023) to 465.1 tCO_2e (2025)
- **Energy and offices:** Delivered LED upgrades and relocated to a high-efficiency Toronto office, with ongoing building optimisation
- **Governance and targets:** Maintained ISO 14001 and established approved SBTi targets
- **Engagement:** Promoted lower-carbon behaviour through cycle schemes, season ticket loans and office awareness campaigns.
- **Toronto office relocation:** Delivered the relocation to a high-efficiency Class A building ahead of schedule, enhancing building efficiency and environmental performance.
- **Employee travel:** Promoted sustainable commuting through cycle and electric bike partnerships, supporting lower-carbon travel choices for employees.
- **Value chain:** Continued landlord engagement to support Scope 3 alignment.
- **Offices:** Opened a new Manchester office in May 2026, a WELL™ Gold certified building, aligned to our ambition to operate from high-quality, sustainable office environments.

2027 Targets

- Continue to improve the data quality and standardisation across offices by December 2027.
- Achieve >80% waste diversion from disposal across all offices by December 2027.
- Secure Tokyo office with ESG credentials by December 2027.
- Ensure all new office decisions consider strong ESG building credentials, including energy efficiency, wellbeing, accessibility and environmental performance by December 2027.

Culture

Governance, Ethics and Responsible Business

Our Commitment

We maintain strong governance and ethical standards, embedding accountability, transparency and responsible business practices across all areas of our operations.

Progress in 2025/26

- **Governance and standards:** Maintained ISO and SOC 2 accreditations, reinforcing our control environment
- **External ESG performance:** Achieved EcoVadis Silver, reflecting improved ESG performance from Bronze the previous year.
- **Ethics and compliance:** Delivered mandatory training across key areas with 100% completion.
- **Code of Conduct:** Published a clear framework for ethical behaviour, integrity and compliance.
- **Speak-up culture:** Introduced an independent third-party whistleblowing channel.
- **Policies and financial responsibility:** Strengthened policy framework and achieved the Fair Payment Code Gold award.
- **People data and insights:** Implemented HiBob as our core HR system, strengthening data capture, reporting and the quality of DEI insights across the business.

2027 Targets

- Complete ESG assessments for 100% of suppliers included within the agreed risk-based supplier governance framework by December 2027.
- Achieve ISO42001 to govern responsible AI by December 2027.
- Implement an automated spend-based emissions data solution to improve the accuracy, efficiency and scalability of our carbon footprint reporting by December 2027.

Community

People, Wellbeing and Social Impact

Our Commitment

We create an inclusive and supportive workplace, enabling employee development, wellbeing and engagement, while delivering meaningful social impact across the communities we operate in.

Progress in 2025/26

- **Employee engagement:** Achieved an eNPS score of 35, exceeding our target of 30, with strong survey participation (71%).
- **Inclusive culture and community:** Expanded employee networks, including the Parents Network, and strengthened community partnerships.
- **People platforms:** Delivered HiBob Core HR globally and launched the Talent module to support continuous performance.
- **Wellbeing and experience:** Enhanced global benefits through Happl and continued investment in wellbeing and inclusion.
- **Fair employment:** Maintained Living Wage accreditation.
- **Data and insight:** Strengthened people data and DEI reporting to support better decision making.

2027 Targets

- Increase employee participation in our employee Net Promoter Score (eNPS) survey to 75% by the end of 2027.
- Sustain an employee Net Promoter Score (eNPS) of 30 or above through to December 2027.

SUSTAINABLE DEVELOPMENT GOALS

Alignment to UN Sustainable Development Goals (SDGs)

	Material Topic Area	TradingHub Contribution	Key KPI / Performance Indicator	GRI Alignment
5 GENDER EQUALITY	**Diversity, equity and inclusion**	Building a balanced and inclusive workforce, with particular focus on female representation at senior levels, supported by employee-led networks and family-friendly policies	Female representation ; female representation maternity return rate; paternity leave taken	GRI 405: Diversity and Equal Opportunity GRI 401-3: Parental Leave
8 DECENT WORK AND ECONOMIC GROWTH	**Talent attraction and retention; employee health and wellbeing; learning and development**	Creating a high-performing, inclusive workplace through strong employee engagement, fair employment practices and continued investment in wellbeing and development	eNPS score; eNPS participation rate; employee retention rate; Living Wage accreditation	GRI 401: Employment GRI 404: Training and Education
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	**Responsible AI; data governance; cybersecurity and data privacy**	Strengthening financial market infrastructure through trade surveillance, financial analytics and regulatory insight technology, supported by responsible AI and robust data governance	Information security controls, testing, incidents, ISO 27001 and progress towards ISO 42001.	GRI 418: Customer Privacy
12 RESPONSIBLE CONSUMPTION	**Supplier ESG and procurement**	Embedding ESG standards across our supply chain and reducing resource use through responsible procurement and improved waste management	ESG assessments completed under the agreed risk-based supplier governance framework; waste diverted from disposal; total waste generated; Fair Payment Code Gold Award	GRI 306: Waste GRI 308: Supplier Environmental Assessment GRI 414: Supplier Social Assessment
13 CLIMATE ACTION	**Climate change mitigation**	Reducing emissions across our operations and value chain in line with approved science-based targets, supported by efficient office design and energy management	Total emissions; Scope 1 and 2 reduction; Scope 3 reduction; electricity use; ISO 14001	GRI 302: Energy GRI 305: Emissions
16 PEACE, JUSTICE AND STRONG INSTITUTIONS	**Market integrity; financial crime prevention; business ethics; anti-bribery and corruption; whistle-blower protection**	Supporting global market integrity through technology that detects market abuse and financial crime, underpinned by strong governance, ethical conduct and a speak-up culture	Reportable incidents relating to whistleblowing, corruption, human rights and mandatory training completion; policy attestation. Number of customers supported, countries covered and trades and orders analysed daily.	GRI 205: Anti-corruption GRI 2-26: Mechanisms for Seeking Advice and Raising Concerns GRI 203: Indirect Economic Impacts

Our Roadmap

DELIVERED

2023 Foundations

- ✓ Emissions baseline established
- ✓ CSR strategy defined
- ✓ First external ESG assessment
- ✓ Trees for Travel launched

2024 Transparency

- ✓ First Sustainability Report
- ✓ Green Guardians established
- ✓ Sustainability training introduced
- ✓ EcoVadis Bronze
- ✓ Living Wage Employer accreditation

2025 Targets set

- ✓ Science based targets approved
- ✓ Zero Scope 1 emissions
- ✓ EcoVadis Silver, up from Bronze
- ✓ Toronto Class A office relocation
- ✓ Fair Payment Code Gold Award

2026 Delivered this year

- ✓ First Double Materiality Assessment
- ✓ First Code of Conduct published
- ✓ eNPS 35, above our target of 30
- ✓ Independent whistleblowing service
- ✓ Training expanded to fraud, artificial intelligence and conduct
- ✓ WELL Gold Manchester office relocation
- ✓ 2030 Scope 1 and 2 target met, four years early
- ✓ HiBob implemented globally

UNDERWAY



2026 In progress

- Establish a unified supplier risk classification framework aligned across ESG, Procurement and Finance.

COMMITTED

2027 Short term

- ISO 42001 certification
- Spend based emissions data automated
- Over 80 per cent waste diversion
- eNPS score of 30 sustained and employee participation increased to 75%
- Complete ESG assessments for all suppliers within the agreed risk-based supplier governance framework
- Migration of on-premises infrastructure to a sustainable data centre
- New Tokyo office to the Sustainable Workplace Framework

2030 Medium term

- Scope 1 and 2 held below our science based pathway
- Material Scope 3 emissions reducing
- All offices meet the Sustainable Workplace Framework

2050 Net Zero

- Net Zero across Scope 1, Scope 2 and Scope 3

Climate

Introduction

2025 marked a step change in TradingHub's environmental performance, with meaningful reductions achieved across emissions, energy, water and waste. Reduced total emissions by 41.6% since the 2023 baseline to 465.05 tCO_2e while meeting Scope 1 and 2 targets ahead of the 2030 timeline.

These improvements reflect sustained operational efficiencies, with reductions in electricity use, water withdrawal and total waste achieved despite the addition of a new office in Sydney.

As our business continues to grow, our focus is on maintaining this momentum, reducing our direct environmental impact while strengthening the quality, consistency and transparency of our reporting.

Scope 1, 2 and 3 Emissions

Year	Scope 1	Scope 2	Scope 3
2023	53.95	1.04	740.81
2024	6.31	0.35	745.66
2025	0.00	0.11	464.94

GRI 305-1, 305-2, 305-3: Greenhouse gas emissions

Methodology note: Emissions are calculated in line with the GHG Protocol. Scope 1 includes direct emissions such as refrigerants and fuel use. Scope 2 uses a market-based approach. Scope 3 is based on supplier data and industry emission factors used on business travel and supplier-related emissions.

Greenhouse Gas Emissions

Total market-based emissions reduced to 465.05 tCO_2e (2023: 795.80 tCO_2e), driven by eliminating Scope 1 emissions and continued Scope 2 reductions, a 99.8% cut since 2023 and ahead of our 2030 target.

Scope 3 remains our largest emissions component, falling from 740.8 tCO_2e in 2023 to 464.9 tCO_2e in 2025, a 37.2% reduction. Business travel remains the largest category, though it fell significantly in 2025. We will continue improving Scope 3 data quality.

Scope 3 boundary: As a software business, TradingHub does not manufacture physical products. We have screened all fifteen Scope 3 categories under the GHG Protocol and identified four as material to our operating model: purchased goods and services, fuel- and energy-related activities, waste generated in operations, and business travel. Downstream categories linked to the use or disposal of physical products are not applicable to TradingHub's business model.

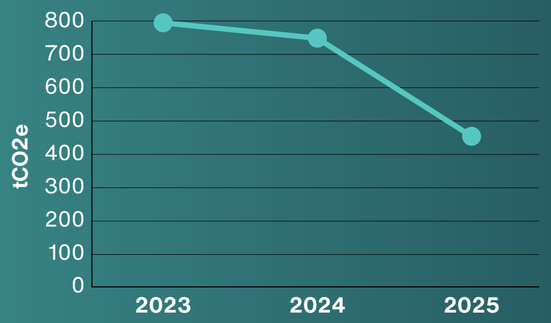
Scope 3 Emissions by Category

Scope 3 category	2023 tCO_2e	2024 tCO_2e	2025 tCO_2e
Purchased goods and services	320.879	134.727	139.540
Fuel- and energy-related activities	4.706	6.159	3.409
Waste generated in operations	0.523	1.938	1.044
Business travel	414.702	602.836	320.948

GRI 305-3: Other indirect (Scope 3) GHG emissions

Environmental performance data is reported for the period 1 January 2025 to 31 December 2025. All other information within this report relates to the reporting period 1 September 2025 to 30 September 2026 unless otherwise stated.

Total Market- Based Emissions



GRI 305-5: Reduction of greenhouse gas emissions

99.8%

Reduction in scope 1 and 2 emissions since 2023

Zero

Scope one emissions

Climate

Waste

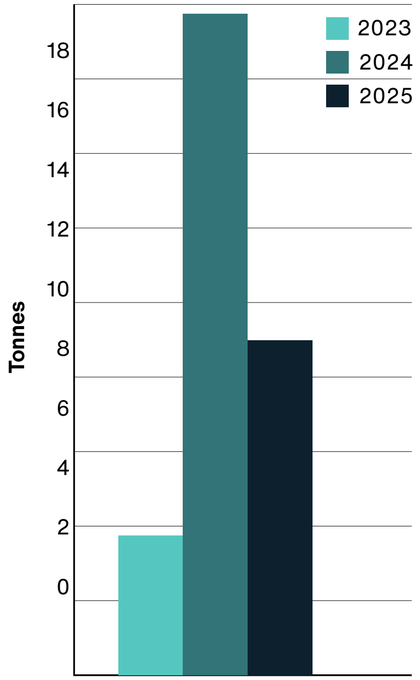
TradingHub does not generate any hazardous waste through its core SaaS operations. All waste reported is non-hazardous and office based, covering both total volumes generated and the methods by which that waste is treated.

Total waste generated reduced to 8.981 tonnes in 2025 (2024: 17.750 tonnes), reflecting a return to normal operating levels following the temporary increase associated with our 2024 office relocation. Of this, 7.04 tonnes were recovered and diverted from disposal through reuse, recycling and composting, representing a diversion rate of 78.4 per cent, with absolute disposal volumes continuing to fall year on year.

In 2026, we expanded our waste reporting to include the weight of waste diverted from disposal through reuse, recycling and composting, providing a more complete view of our waste management performance. TradingHub continues to focus on reducing the total weight of waste generated and on improving treatment methods, prioritising recovery through recycling, reuse and composting over disposal via landfill, incineration or energy recovery.

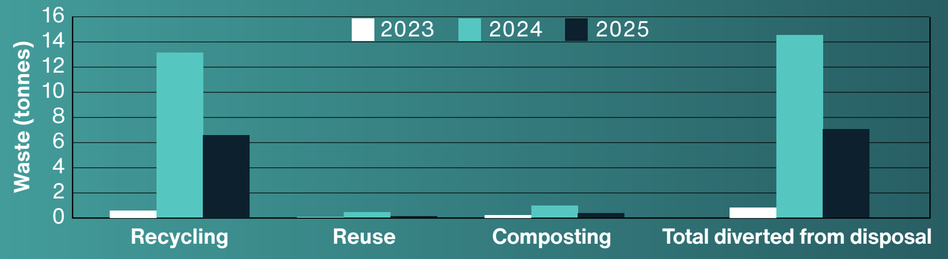
Methodology note: Waste data is primarily based on supplier-reported weights where available. Where measured data is not provided, estimates are used based on collection volume and standard conversion factors.

Total Waste Generated



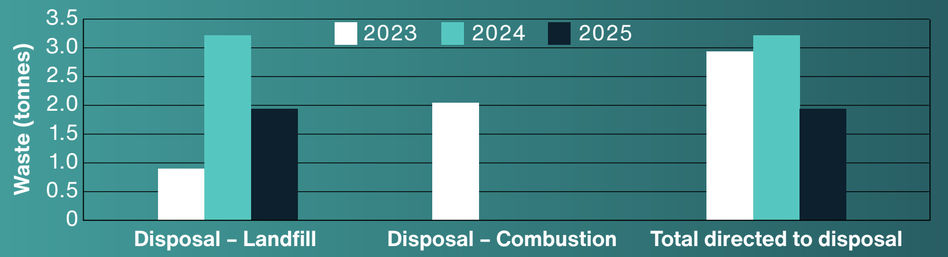
GRI 306-3 Waste Generated

Waste diverted from disposal



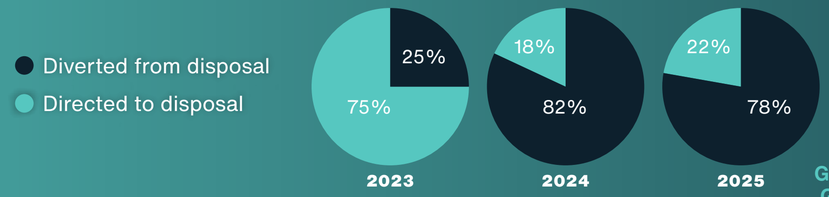
GRI 306-4

Waste directed to disposal



GRI 306-4

Waste treatment by year



GRI 306-4, GRI 306-5

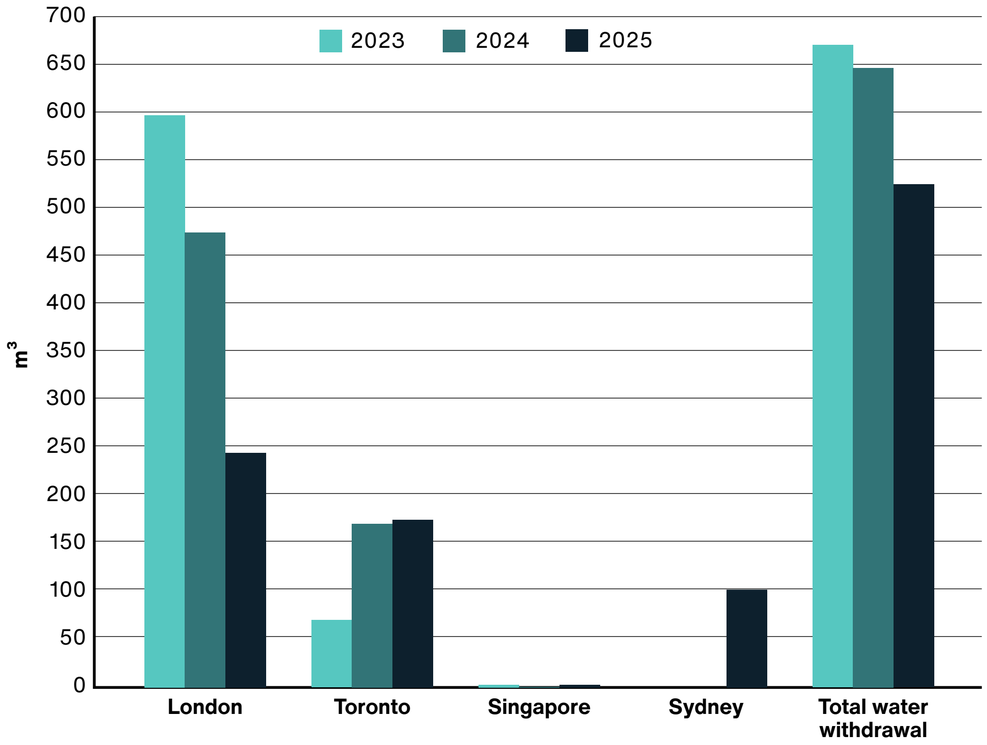
Climate

Water

As a SaaS business, TradingHub is not water-intensive, with water use limited to standard office operations.

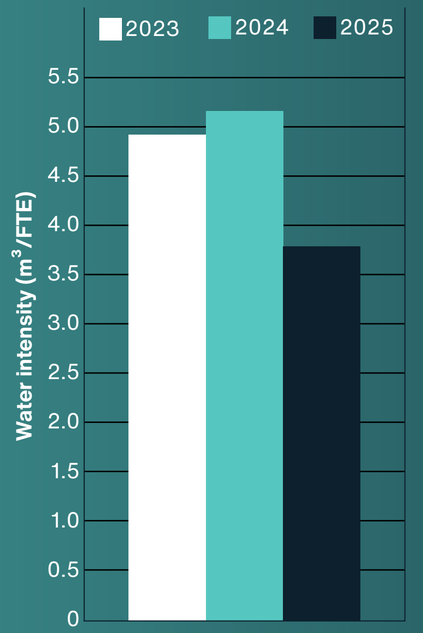
In 2025, total water withdrawal fell to 525.0 m^3, down from 646.6 m^3 in 2024. This reduction is particularly encouraging as 2025 was the first year in which water use from our Sydney office was included, meaning overall consumption decreased despite the addition of a new office location.

Water withdrawal by office



GRI 303-3

Water intensity ratio per FTE



GRI 303

Methodology note: Prior-year water intensity figures included both water supply and water treatment data. This year, the metric has been corrected to use water withdrawal only, so figures may differ from those published previously.

Climate

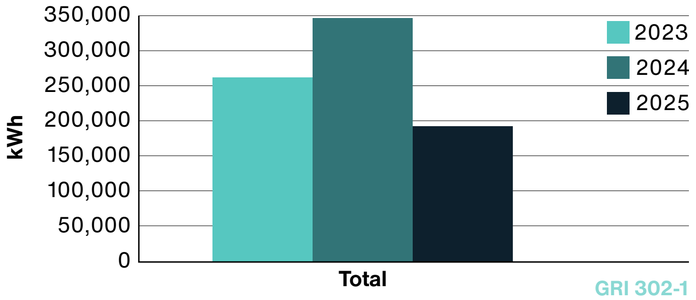
Electricity

In 2025, total electricity usage reduced significantly to 193,151.98 kWh, down from 346,461.00 kWh in 2024 and 262,500.19 kWh in 2023, reflecting a strong reduction in overall energy demand.

The higher consumption in 2024 was primarily driven by the transition to a new head office, during which TradingHub operated across two buildings for a temporary period, resulting in elevated energy use.

The 2025 reduction reflects consolidation into a single office footprint and improved energy management.

Energy Consumption



GRI 302-1

Methodology note: Electricity consumption data is derived from a combination of direct metering and landlord-provided data, depending on building arrangements. Where direct metering is unavailable, consumption is estimated based on landlord reports or floor area allocation.

Digital Infrastructure and Data Usage

TradingHub operates through digital infrastructure rather than physical products. Emissions from digital operations, including web and cloud hosting, are reported within Scope 3. Our infrastructure is hosted on AWS. As a cloud-based business, these emissions are minimal and remain a very small component of our overall footprint, with web and cloud hosting contributing just c.0.05–0.06 tCO_2e annually between 2023 and 2025.

Sustainable Buildings

TradingHub monitors the environmental performance of its office spaces through local building classifications. As at 2025, the Company operates from Class A buildings in Toronto, Singapore and Sydney, while its London office is classified as Class B.

TradingHub has set a target to transition its London office to a building that meets its sustainable workplace framework by 2030. This commitment supports the Company's broader approach to improving operational efficiency and reducing environmental impact.

Carbon Offsetting

TradingHub prioritises direct emissions reduction and uses carbon offsetting to address residual emissions. Through its partnership with Trees for Travel, the Company has funded the planting of 6,872 trees (as at June 2026), linked directly to business travel emissions.

Biodiversity

TradingHub's operations are based in leased office space within commercial buildings, resulting in no direct land use, deforestation or habitat disturbance associated with our business activities. We do not use water resources in manufacturing or production processes, as covered elsewhere in this report. As our environmental approach matures, we will continue to consider biodiversity and natural resource impacts as part of our wider sustainability strategy.

6872

Trees planted to date

Community

Social dialogue and employee engagement

TradingHub is committed to structured and ongoing dialogue with our employees. This is delivered through regular company-wide town halls with anonymous Q&A, HR Surgery drop-ins, CSR ambassadors representing employee voice across the business, and annual engagement surveys. Feedback gathered through these channels directly informs decisions on policy, benefits and workplace practices.

Participation remains strong, with eNPS engagement at 71% and CSR survey participation at 80%, demonstrating an engaged workforce and a culture of openness.

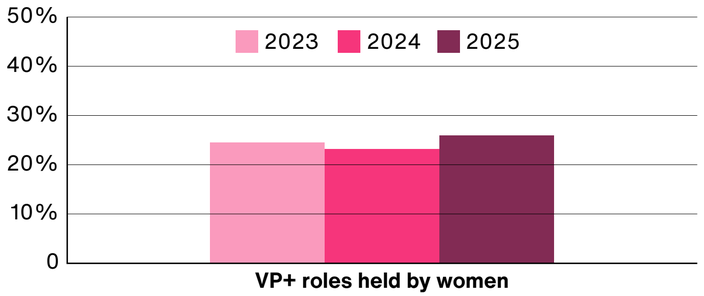
People and workforce

In 2026, TradingHub implemented a new HR information system to improve workforce data and reporting, strengthening visibility of diversity, inclusion and employee experience across its global operations.

Workforce composition and diversity*

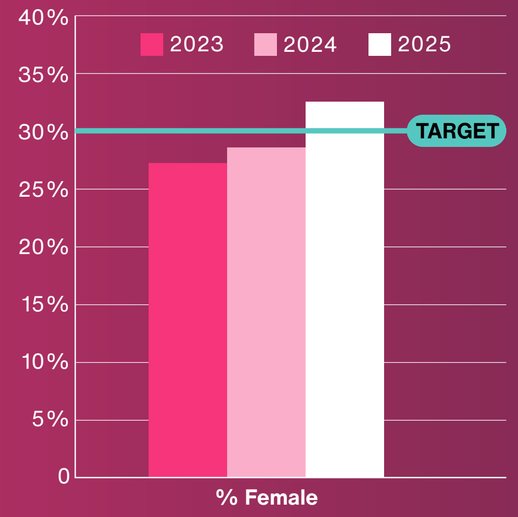
Gender

Gender diversity has strengthened steadily over the past three years, with female representation increasing from 27.1% in 2023 to 32.4% in 2025, exceeding our target of 30% for the first time. While we are pleased with this progress, our focus is on sustaining this level of representation. Women hold 26.3% of Vice President and more senior positions, supported by initiatives including our Women's Network, mentoring and development opportunities, and inclusive recruitment practices.



VP+ roles held by women

Female representation in the workplace



% Female

* Includes permanent, FTC and contractors

GRI 401
GRI 404

Community

Ethnicity

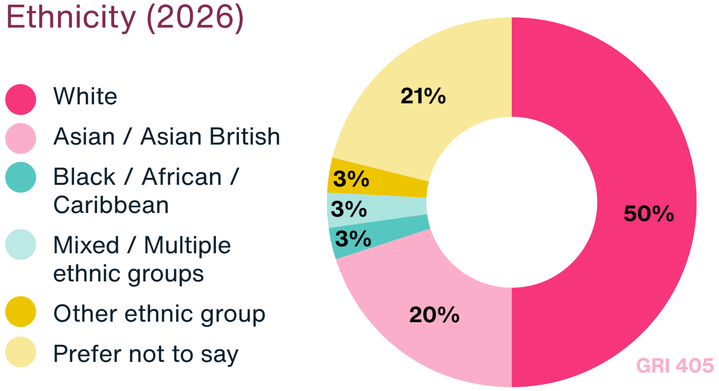
The introduction of global ethnicity reporting has provided a more complete picture of workforce composition across TradingHub. In 2026, 50% of employees identified as white, with 29% across other ethnic groups and 21% choosing not to disclose.

We also track neurodiversity, disability, sexual orientation and parental status, supporting a more data-driven approach to inclusion.

Employee-led networks, including DEI, Women's, Parents and Social networks, continue to play an important role in building an inclusive and engaged workplace community.

Diversity and equal opportunity

Ethnicity (2026)



GRI 405

Retention

Employee retention has improved consistently, rising from 71.1% in 2023 to 82.3% in 2025. This reflects a strengthening employee experience and greater workforce stability, supported by continued investment in engagement, wellbeing and inclusive working practices.

Employee engagement

Our people are more engaged than ever, and more of them are telling us so. We measure engagement through our employee Net Promoter Score (eNPS), which reflects how likely employees are to recommend TradingHub as a place to work, on a scale of –100 to +100. Our score has risen for four consecutive years, from 7 in 2023 to 23 in 2024, 27 in 2025 and 35 in 2026, ahead of our target of 30. Participation has grown too, with survey engagement reaching 71% and CSR participation rising to 80%. Rising scores and rising participation together reflect a more positive workforce that is increasingly willing to share its voice.

35
eNPS Score ahead of target of 30

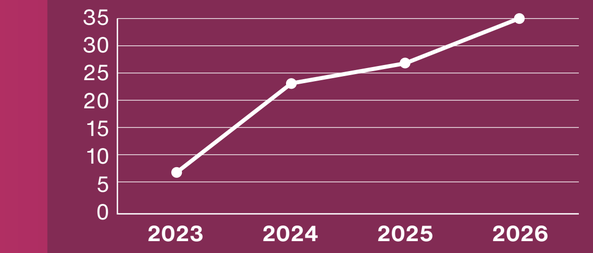
71%
eNPS participation

Learning and development

We are committed to helping employees build the skills and knowledge needed to succeed and grow at TradingHub. In 2025, employees completed an average of 32.8 learning hours each (2024: 25.7; 2023: 31.0), through a combination of instructor-led learning, e-learning, videos and mandatory compliance training.

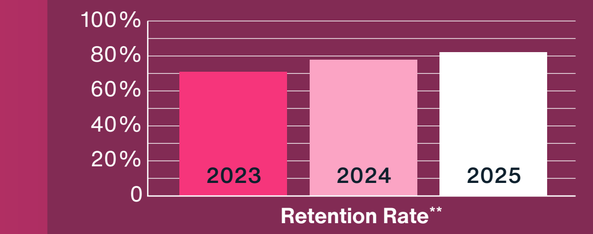
Employee experience

Highest eNPS Score Recorded Each Year



GRI 2-29

Employee retention rate in 2025



GRI 401-1

** Retention rate measures permanent employees

Community

Wellbeing and employee support

TradingHub takes a proactive and holistic approach to employee wellbeing, combining inclusive policies, workplace design and targeted initiatives to support both physical and mental health.

Our workplace environment is designed to support both wellbeing and collaboration, including:

- A wellbeing room and multi-faith / prayer room
- Employee benefits such as private healthcare, life assurance and income protection, giving employees security and peace of mind.
- On-site showers, supporting employees who cycle to work, participate in the TradingHub running club, or exercise during the working day
- Collaborative working enabled by laptops and agile workspaces
- Wellbeing-focused nutrition, including fresh fruit and complimentary lunches twice weekly

Support for parents and carers includes:

- Maternity, paternity, adoptive and shared parental leave
- Neonatal and carers' leave
- Flexible working arrangements
- Parents Network
- Maternity and paternity coaching, supporting employees through key transition points

Our policies and support networks are reflected in strong outcomes including 100% of eligible employees took their full paternity leave and 100% of employees on maternity leave returned following maternity leave. This is evidence of a supportive and inclusive culture where employees can balance family commitments while continuing to grow their careers.

Health and Safety

TradingHub maintains a structured approach to workplace health and safety, focused on prevention, employee awareness and emergency preparedness. Our arrangements include workplace risk assessments, trained First Aiders and Mental Health First Aiders, workstation assessments and appropriate workplace adjustments. At our Head Office, two planned fire evacuation drills were completed in each of 2023, 2024 and 2025. No RIDDOR-reportable health and safety incidents were recorded during this three-year period.

Charity

TradingHub supports the wider community through partnerships that promote access, inclusion and education. In 2026, we continued our partnership with Inspire for a third year, working with local schools to broaden awareness of future career pathways. This included hosting a Women in Engineering event, providing visible role models and encouraging greater participation in STEM careers.

Through our partnership with Feedr, we also support the Meal for a Meal initiative, which helps fund meals for children facing food insecurity through The Akshaya Patra Foundation. Every workplace meal purchased contributes to the programme and, to date, TradingHub has helped fund nearly 9,000 meals, creating positive social impact beyond the workplace.

100%

Paternity leave taken*

100%

Maternity return rate*

8,900+

Meals donated to children in need, through our partnership with Feedr

* All eligible employees utilised their full maternity or paternity leave entitlement.

Culture

Culture is not a single initiative at TradingHub. It is part of who we are and shapes how we work every day. It starts with our purpose of helping to keep markets safe and is reflected in the way we work together, support our colleagues and serve our customers. The same principles of integrity, accountability and trust that guide individual decisions across the business are also at the heart of the products we provide. Culture is not something separate from our business. It influences how we operate, innovate and deliver for our customers every day.

How our culture scales

From individual integrity to market integrity



Culture

Our product: keeping markets safe

Through our trade surveillance and financial analytics software, and our regulatory insight, we help customers identify risk, detect market abuse, combat financial crime and strengthen governance. Trusted by 48 customers across 45 countries, our platform analyses more than 4 billion trades and orders each day, helping financial institutions navigate increasingly complex regulatory and market environments. By embedding integrity, accountability and trust into our products, we help our customers uphold the highest standards across their organisations

Our people: individual integrity & accountability

Our people play a vital role in maintaining the culture, standards and behaviours that underpin TradingHub. Every colleague is responsible for acting with integrity, making informed decisions and upholding the policies and principles that guide our business. While our people-related initiatives, wellbeing programmes and workforce metrics are covered in the Community section of this report, culture is ultimately brought to life through the actions of individuals every day.

A culture of learning and accountability

Learning plays an important role in maintaining our culture of integrity, accountability and professional excellence. Supported by annual policy and Code of Conduct attestation, and our training programme, employees understand their responsibilities and the standards we uphold. We have maintained 100% completion of mandatory training across 2024 and 2025, reflecting a strong and consistent culture of compliance and accountability. Our mandatory training programme is shown below.

Ethics & financial crime	People & workplace	Security & data	Sustainability
Anti Bribery and Corruption	Bullying & Harassment	Information Security	Sustainability and people
Criminal Finances Act	Equity & Diversity	Physical Security	
Preventing Money Laundering	Health and Safety in the Office	General Data Protection Regulation	
Whistleblowing	Code of Conduct	Using AI Responsibly	
Modern Slavery			
Policy Attestation			
Fraud			

100%

completion of mandatory training in 2024 and 2025

4bn+

Trades and orders analysed every day

45

Countries whose trades we analyse

48

Customers from investment banks, asset managers, hedge funds and sovereign funds

Culture

Our organisation: Governance and speak-up culture

Our Code of Conduct

In 2026, we introduced our first formal Code of Conduct, approved by our Executive Committee and Board and owned by our Chief Administration Officer. It applies to everyone at TradingHub and brings together our commitments. The Code gives our people a single, clear reference point for the standards we expect and the behaviours that define us.

A speak-up culture

We want colleagues to feel confident raising concerns. Alongside our existing internal channels, we introduced an independent, third party whistleblowing service, giving employees a confidential and impartial route to report concerns without fear of retaliation. This strengthens transparency and reinforces a culture where issues can be raised and addressed early.

Information security and operational resilience

Protecting customer and company information is fundamental to maintaining trust in TradingHub and its services. Our control environment is supported by a structured programme of regular testing and monitoring, including business continuity tests, disaster recovery tests, external penetration tests, phishing simulation exercises and incident response exercises, alongside our ISO 27001 certification. This programme is designed to identify and address risks early, strengthen operational resilience and safeguard the confidentiality, integrity and availability of the data we hold. Reflecting the strength of these controls, we recorded no data breaches and no reportable information security incidents in 2023, 2024 or 2025. Full details of our testing activity are set out in the key performance indicator summary at the back of this report.

Governance and Oversight

Strong governance underpins our culture. Our Board provides oversight of ethics, risk and compliance, supported by our Executive team. During 2023, 2024 and 2025, we recorded zero reportable incidents relating to whistleblowing, corruption or supplier-related human rights violations, reflecting the strength of our governance framework and speak-up culture.

Over the past 3 years

0 Whistleblowing incidents

0 Corruption incidents

0 Information security reportable incidents

0 RIDDOR reportable H&S incidents

Culture

Our ecosystem: Suppliers

Strengthening our approach to supplier ESG

In 2026, TradingHub is reviewing its supplier ESG programme to create a more consistent and risk-based approach to supplier oversight. As our approach matures, we are working towards a single supplier framework that aligns ESG, procurement and financial risk management activities.

This framework will establish a common method for identifying and categorising suppliers based on business risk, ensuring a consistent approach across the organisation. ESG due diligence will continue to form part of our supplier governance process, supported by a proportionate assessment framework aligned to supplier risk, size and relevance.

Diverse supply chain

We value a diverse supply chain and the role businesses of all sizes play in supporting innovation and thriving communities. We were proud to receive the Fair Payment Code Gold Award, recognising our commitment to paying suppliers promptly and consistently, helping to support smaller businesses. Through our CSR programme, we also seek opportunities to work with local and diverse suppliers, including businesses owned by women, LGBTQ and ethnic minority entrepreneurs, helping to create positive impact beyond TradingHub.

Our supplier ESG journey

1. **Assess**
   Supplier ESG foundation set

2. **Align**
   ESG, Procurement and Finance aligned to one approach.

3. **Govern**
   Risk based oversight and supplier engagement.

Gold

Fair Payment Awards for prompt reliable payment of suppliers

0

Supplier related human rights violations have been identified or reported during the past three years.

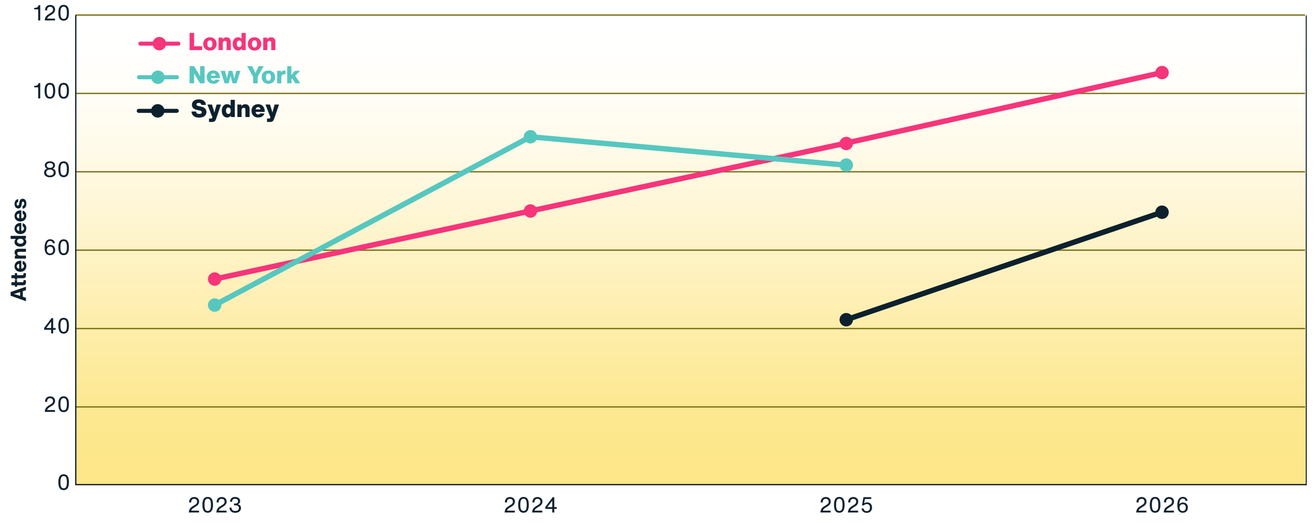
Culture

Our ecosystem: Customers

Supporting our customers

We believe the strongest customer relationships are built on partnership, not just technology. Through our RegHub events, roundtables, podcasts and industry forums, we create opportunities for customers, regulators and industry leaders to share knowledge, discuss emerging challenges and exchange best practice.

Growing attendance across our global events programme reflects the increasing engagement and value of these conversations. By bringing together diverse perspectives and fostering open dialogue, we help customers strengthen governance, respond to change and learn from one another.



RegHub
LONDON 2026
SUMMIT

86
External attendees

Regulators, customers and industry experts represented

43
Organisations represented

84%
Audience participation in live Q&A

50
Audience questions submitted

90%
Rated the event 8/10 or higher

Culture

The Markets

Why market integrity matters to us

Market integrity is the reason TradingHub exists. We help our customers identify and manage risks that could undermine trust in financial markets.

Maintaining that trust requires ongoing collaboration across the industry. We regularly engage with customers, regulators, suppliers and industry peers through events, roundtables, podcasts and forums, sharing insights and learning from others.

These relationships help us improve our products, support our customers and contribute to stronger, more transparent markets.

External validation

Independent assessment reinforces the strength of our culture and governance. Over the past three years, our EcoVadis score improved from 53/100 in 2023 to 67/100 in 2025 and 74/100 in 2026, placing us in the 89th percentile with a Silver rating. We also hold the Fair Payment Code Gold Award and maintain key certifications and commitments including ISO standards, SOC 2, CDP and SBTi approved targets.

External recognition

TradingHub's contribution to fair and transparent markets was further recognised externally when the company was named Tech Growth Business of the Year at the 2025 UK Tech Awards, reflecting the impact and continued growth of our surveillance and financial analytics solutions.



GRI Content Index

GRI Standard / Disclosure	Disclosure area	Location in this report	Notes
GRI 2: General Disclosures 2021	Organisation, activities and reporting context	Pages 2, 4, 17, 20, 21	TradingHub business, purpose, products, customers, markets served and external recognition.
GRI 2-6	Activities, value chain and business relationships	Pages 2, 4, 17, 19, 20	Software business model, customers, suppliers and market integrity role.
GRI 2-9	Governance structure and composition	Page 18	Board composition, Board tenure and Board gender disclosed.
GRI 2-22	Statement on sustainable development strategy	Page 2	Opening statement from the Chief Administration Officer.
GRI 2-23 / 2-24	Policy commitments and embedding policy commitments	Pages 17, 18, 19	Code of Conduct, mandatory training, whistleblowing, supplier governance and policy attestation.
GRI 2-26	Mechanisms for seeking advice and raising concerns	Page 18	Independent whistleblowing service and speak-up culture.
GRI 2-29	Approach to stakeholder engagement	Pages 5, 13	Stakeholders considered in the Double Materiality Assessment and employee engagement channels.
GRI 3-1	Process to determine material topics	Page 5	First Double Materiality Assessment, supported by an independent third party.
GRI 3-2	List of material topics	Page 5	Fourteen material topics disclosed under Climate, Community and Culture.
GRI 3-3	Management of material topics	Pages 6 to 21	Management approach shown through ESG priorities, roadmap, climate, community and culture sections.
GRI 203: Indirect Economic Impacts 2016	Market integrity and customer impact	Pages 17, 20, 21	TradingHub role in supporting fair and transparent markets, customer engagement and RegHub activity.
GRI 205: Anti-corruption 2016	Business ethics, anti-bribery and corruption	Pages 17, 18	Mandatory training, Code of Conduct and zero corruption incidents.
GRI 302: Energy 2016	Energy consumption	Page 12	Electricity consumption and methodology note.
GRI 303: Water and Effluents 2018	Water withdrawal	Page 11	Water withdrawal by office and water intensity.
GRI 305: Emissions 2016	Scope 1, Scope 2 and Scope 3 emissions	Page 9	Market-based emissions, Scope 3 categories and methodology note.
GRI 306: Waste 2020	Waste generated, diverted and directed to disposal	Page 10	Waste generated, waste diverted from disposal and waste directed to disposal.
GRI 401: Employment 2016	Employment, retention and parental leave	Pages 14, 15	Employee retention, maternity return rate and paternity leave uptake.
GRI 401-1	New employee hires and employee turnover	Page 14	Employee retention rate disclosed. New hire data is not separately disclosed in this report.
GRI 401-3	Parental leave	Page 15	Maternity return rate and paternity leave uptake.
GRI 403: Occupational Health and Safety 2018	Workplace health, safety and wellbeing	Pages 15, 18	Wellbeing support, trained First Aiders, Mental Health First Aiders and zero RIDDOR-reportable health and safety incidents confirmed for 2023, 2024 and 2025.
GRI 404: Training and Education 2016	Learning and development	Pages 6, 17	Mandatory training completion and role-relevant artificial intelligence skills target.
GRI 405: Diversity and Equal Opportunity 2016	Diversity, equity and inclusion	Pages 13, 14	Female representation, ethnicity reporting and employee-led networks.
GRI 308: Supplier Environmental Assessment 2016	Supplier environmental assessment	Pages 7, 19	Supplier ESG and procurement approach.
GRI 414: Supplier Social Assessment 2016	Supplier social assessment	Pages 7, 19	Supplier ESG due diligence and responsible procurement approach.
GRI 418: Customer Privacy 2016	Data privacy and information security	Pages 17, 18	Cybersecurity, data privacy, information security training and zero information security reportable incidents.

Key Performance Indicators

The following table summarises our key non-financial performance indicators across governance, security, health and safety, people and board composition, covering 2023 to 2025 where data is available. Each indicator is mapped to the relevant disclosure in the GRI Content Index.

Category	KPI	2023	2024	2025	GRI Content Index
Ethics & Governance	Whistleblowing incidents	0	0	0	GRI 2-26
	Corruption incidents	0	0	0	GRI 205-3
	Supplier human rights violations reported	0	0	0	GRI 414: Supplier Social Assessment
	Mandatory training completion	100%	100%	100%	GRI 205-2; GRI 404
Information Security & Operational Resilience	Business continuity tests completed	1	1	1	GRI 418: Customer Privacy
	Disaster recovery tests completed	2	2	2	GRI 418: Customer Privacy
	Data breaches	0	0	0	GRI 418-1
	Information security reportable incidents	0	0	0	GRI 418-1
	External penetration tests completed	2	2	2	GRI 418: Customer Privacy
	Incident response exercises completed	1	1	1	GRI 418: Customer Privacy
	Phishing simulation exercises completed	1	2	2	GRI 418: Customer Privacy
Health & Safety	Planned Head Office fire drills completed	2	2	2	GRI 403-1
	RIDDOR reportable incidents	0	0	0	GRI 403-9
People & Culture	Headcount as at 31 Dec **	137	127	142	
	FTE as at 31 Dec**	135.6	126.0	140.6	
	Female representation	27.1%	28.5%	32.4%	GRI 405-1
	VP+ roles held by women	24.1%	23.4%	26.3%	GRI 405-1
	Employee retention rate	71.1%	77.9%	82.3%	GRI 401-1
	Highest eNPS score achieved	7	23	27	GRI 2-29
	Employee survey participation	53%	66%	66%	GRI 2-29
	CSR survey participation	-	67%	80%	GRI 2-29
	Maternity return rate	-	-	100%	GRI 401-3
	Paternity leave utilisation	-	-	100%	GRI 401-3
	Average learning hours per employee	31.0	25.7	32.8	GRI 404-1
	Employees covered by collective bargaining agreements*	0	0	0	GRI 2-30
	Employees covered by employee representatives*	0	0	0	GRI 2-30
	Employees entitled to private healthcare	-	-	100%	GRI 401-2
	Employees taking up private healthcare	-	-	85% London 100% other	GRI 401-2
	Employees covered by life assurance	-	-	100%	GRI 401-2
	Employees covered by group income protection	-	-	100%	GRI 401-2
Board Composition	Non-Executive and Executive Directors	-	Non-Exec 1 Exec 3	Non-Exec 0 Exec 3	GRI 2-9
	Board gender	-	1 F, 3 M	1 F, 2 M	GRI 2-9; GRI 405-1
	Tenure of Directors	-	0-2 yrs: 2 3-6 yrs: 1 7+ yrs: 1	3-6 yrs: 2 7+ yrs: 1	GRI 2-9

Note: Unless otherwise stated, metrics cover TradingHub's global operations for the relevant calendar year. Some metrics have a narrower scope, including Head Office fire evacuation drills and location-specific benefit take-up. A dash indicates that comparable data was not collected or is not available for that year.

* TradingHub does not currently recognise collective bargaining or formal employee representative bodies. Employee voice is maintained through structured alternative channels, described on page 13.

** Permanent and FTC employees