

JSTTRA

The home of TriOptima

Sustainability Report TriOptima

April 2026

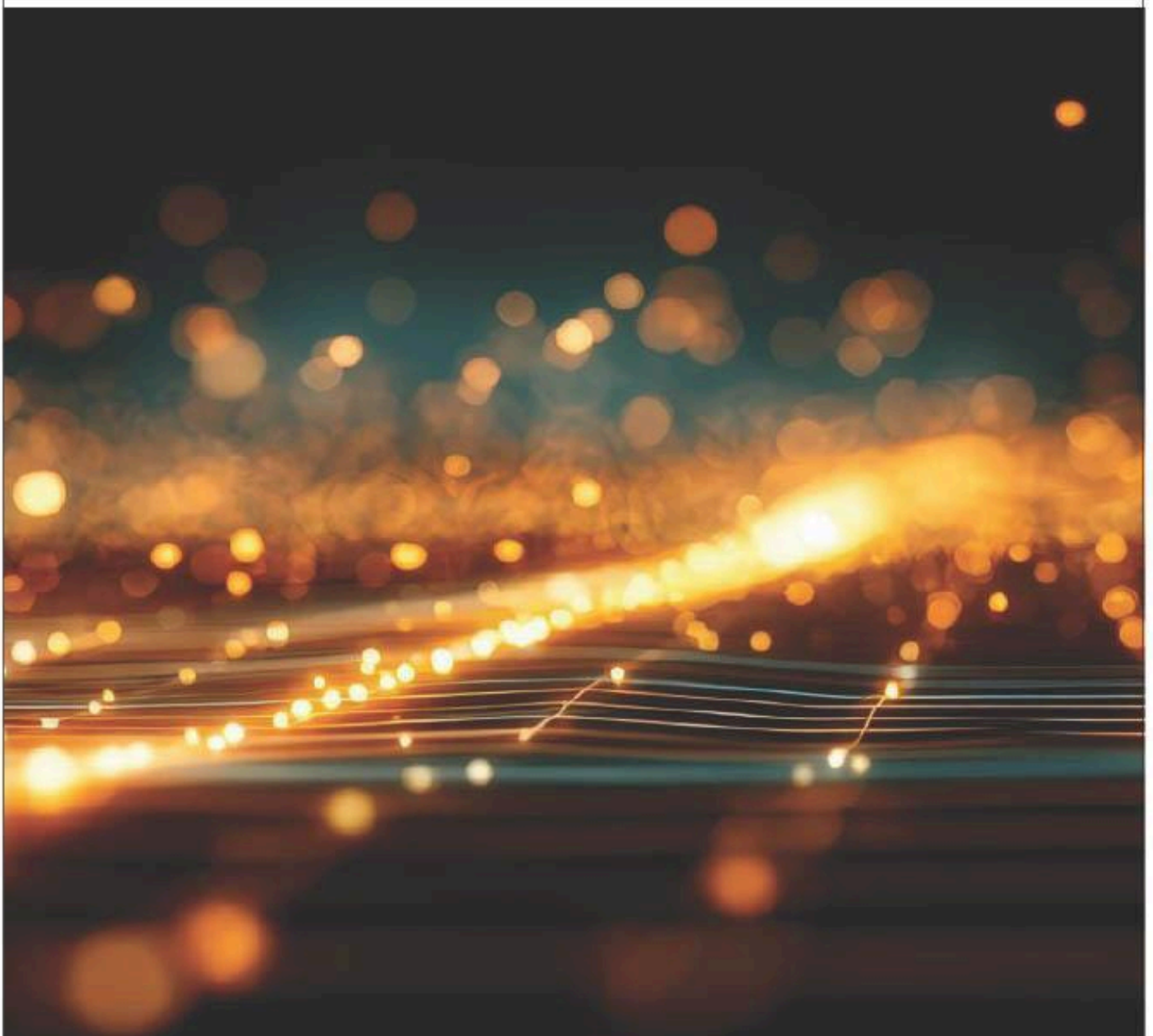


Table of contents

About this Report	1
A Message from Guy Rowcliffe, CEO, TriOptima AB	1
TriOptima Highlights	4
Key Facts about TriOptima	4
Our Control and Governance Framework	5
Board Structure	5
Board of Directors	5
Management Structure	6
Risk Committees	6
The Executive Management Committee	6
Our Commitment to the Environment	7
Our Carbon footprint	7
Our Commitment to our Employees	10
Code of Conduct	10
Gender Breakdown	10
Recruitment	11
Learning & Development	12
The OSTTRA Voice: Listening to Our Own	13
Employee Experience	14
OSTTRA Cares: Empowering Impact in Our Communities	14
Diversity, Equity and Inclusion (DEI)	16
CommUNITY Groups	16
Our Commitment to Governance	17
Respect for human rights	17
Slavery and human trafficking	17
Work against corruption	18
Anti-financial crime programme	19
Gifts and entertainment policy	19
Conflicts of interest	19
Risks within sustainability	20
ISO 27001 information security certification	20
Internal audit	20

About this Report

Welcome to TriOptima's 2025 sustainability report.

During the reporting period, TriOptima was part of the OSTTRA Group ('OSTTRA'). Previously a joint venture between S&P Global (S&P) and CME Group (CME), OSTTRA was acquired by KKR, a leading global investment firm, in October 2025.

This document serves as the statutory sustainability report for TriOptima AB . 556584-9758 (TriOptima'). The data and disclosures herein cover the fiscal year from January 1, 2025, to December 31, 2025

A Message from Guy Rowcliffe, CEO, TriOptima AB

2025 has been a defining chapter in the OSTTRA story - a year of transformation, resilience, and a strategic shift toward full independence. This journey culminated in our acquisition by KKR in October, marking the beginning of a new era. Throughout this transition, we successfully began the mission-critical migration of our infrastructure and core business systems—away from our legacy parent companies, S&P and CME. This move was about more than just technology; it was about building a foundation for an autonomous, agile independent future.

Stability Amidst Volatility

In a year shaped by significant geopolitical shifts and heightened market volatility, OSTTRA remained a pillar of reliability. We processed record trade volumes across our platforms, ensuring the stability our customers depend on.

To help our clients navigate these turbulent times, OSTTRA triBalance launched a new Energy MTM Service, specifically designed to mitigate counterparty credit risk in the volatile commodities space. Our commitment to this level of operational excellence was recognised by the industry, with triReduce & triBalance securing the GlobalCapital award for Americas Optimisation Service of the Year.

Doing More with Less: Innovating for Efficiency

Sustainability in post-trade is defined by our ability to drive systemic efficiency. This year, we launched Multi-Currency Compression at London Clearing House (LCH). By compressing multiple interest rate swap currencies simultaneously, we have significantly increased the frequency of compression runs, driving massive operational savings and reducing the capital footprint for our clients.

Further strengthening our ecosystem, we achieved several key milestones:

- **Record-Breaking Impact:** We compressed a staggering \$401 trillion in gross notional through triReduce, a testament to our role in optimising market efficiency.
- **Data Integrity at Scale:** In Q2 alone, triResolve reconciled 76 million trades, ensuring unparalleled accuracy across the network.
- **Strategic Expansion:** We acquired OSTTRA SEF (formerly NEX SEF) from CME. This integration bridges the gap between execution and optimisation, providing TriOptima clients with a more seamless, streamlined trade lifecycle.
- **Market Agility:** We launched the Index CCP Switch Service, granting clients the flexibility to move positions efficiently between clearinghouses to optimise collateral.
- **Advanced Risk Management:** We introduced triBalance FX for LCR (Liquidity Cover Ratio) optimisation and expanded our Reset Non-Linear service in FX Options to include NZDUSD, USDBRL, and USDSGD.

Client Empowerment & Strategic Partnerships

At OSTTRA, we don't just serve a market; we collaborate with a community. In 2025, we shifted from transactional engagement to deep-rooted strategic alignment.

The Client Advisory Group: This forum brings together the technology leaders of our major clients to co-create our future roadmap. This ensures that as we build our independent infrastructure, it remains interoperable and purpose-built for the industry's needs.

Buy-Side Executive Dinners: We hosted a series of exclusive sessions for the buy-side community to facilitate high-level dialogue on market resilience. For our TriOptima clients, these forums proved invaluable for discussing how to navigate margin volatility and capital optimisation in an evolving regulatory landscape.

Our Commitment to Sustainability

At OSTTRA, we believe that sustainable business practices are the bedrock of long-term value creation and responsible corporate citizenship. Our approach is uniquely tailored to our role as an important market infrastructure provider. This includes full compliance with the Swedish Accounting Act (Årsredovisningslagen 1995:1554), ensuring rigorous reporting across environmental, social, human rights, and anti-corruption matters.

Our strategy is further strengthened by our alignment with KKR's ESG principles. As a KKR portfolio company, we treat sustainability not as a peripheral activity, but as an integral component of operational excellence. By integrating these responsible investment practices into our core DNA, we ensure that our growth remains ethical, resilient, and focused on the long-term health of the global financial

ecosystem.

Our People and Global Footprint

2025 was a milestone year for the "OSTTRA way" of working. As we moved toward independence, we matured our physical and cultural environment to reflect our new identity.

- **Spaces Designed for Collaboration:** Our teams in India and Singapore transitioned into bespoke, independent office spaces, successfully migrating away from legacy S&P and CME premises. These new hubs are more than just offices; they are designed to foster the agility and collaborative spirit that define our independent future.
- **OSTTRA Cares: Impact Beyond the Markets:** In December, we proudly launched OSTTRA Cares, our Corporate Social Responsibility (CSR) platform dedicated to volunteering and charitable matching. We kicked off the program with a global Volunteer Week, where our teams stepped away from their screens to support a diverse range of community initiatives.

We are inspired by the passion our employees show for the causes they care about. To amplify this impact, we have committed to the OSTTRA Matching Donation Program, ensuring that when our people give back, the firm stands right there with them.

At OSTTRA, we don't just process trades; we invest in the communities where we live and work.

Sincerely,

Guy Rowcliffe
CEO, TriOptima AB



TriOptima Highlights

Key Facts about TriOptima

Based in Stockholm, TriOptima builds and manages the post trade workflow, which financial institutions rely on to process and reconcile their trades, manage exceptions and enable timely settlement for all OTC and exchange-traded derivative markets.

TriOptima has subsidiaries in Tokyo, Singapore, London and New York.



* Please note: These figures show revenue generated purely from core business operations.

Our Control and Governance Framework

Board Structure

	TriOptima Board of Directors	TriOptima Board Risk Committee	TriOptima Board Remuneration Committee
Purpose	Strategic direction and business performance	Advisor to the Board of Directors of TriOptima AB on its current and future risk appetite and risk strategy	Advisor to the Board of Directors of TriOptima AB on remuneration matters
Members	Board Directors (4)	Board Directors (2)	Board Directors (2)
Attendees	TriOptima CEO Other attendees as required by the Board	Risk function Other attendees as required by the Board	HR Other attendees as required by the Board
Chair	Chairman of the Board	Chairman of the Board	Chairman of the Board
Frequency	At least four times each year	At least four times each year	At least four times each year
Documentation	Agenda, minutes, papers	Agenda, minutes, papers	Agenda, minutes, papers

Board of Directors

The Board provides strategic and commercial direction for TriOptima’s businesses, operating within the framework of Group policies and strategy. It oversees TriOptima’s performance, is responsible for strategic oversight, and ensures the necessary resources are available to achieve our strategic and tactical objectives.

The Board comprises representatives from across OSTTRA.

Management Structure

	TriOptima Management Risk Committee	OSTTRA Executive Management Committee (EMC)
Purpose	Independent controls review and integrated assurance	Discuss any issues and/or concerns that require escalation to the Board of OSTTRA Group Ltd
Attendees	TriOptima CEO Business owners CISO TriOptima FLOD (First Line of Defence) Risk & Compliance	TriOptima & OSTTRA Co-CEOs CTO, CRO, CFO, Head of HR, Head of Sales, Head Client Services, Head of Trade Processing, Head of Trade Lifecycle, Head of Optimisation, Head of Compliance, Legal Counsel
Chair	Head of Risk	Co-CEOs
Frequency	Bi-monthly	Quarterly
Documentation	Agenda, minutes, papers	Standing Agenda (covering each area of EMC and separate legal, risk and compliance updates), minute

Risk Committees

The TriOptima Board risk committee meets quarterly. The TriOptima Management Risk Committee meets bi-monthly. The Risk Committees are responsible for the oversight of TriOptima’s risk management framework, risk appetite, risk strategy, controls, systems and policies, as appropriate to the activities of TriOptima.

The Management Risk Committee includes representatives from the business units and the control functions.

The Board Risk Committee includes board members, representatives from the Risk function, and other attendees as required.

The Executive Management Committee

The Executive Management Committee meets quarterly and oversees matters relating to OSTTRA’s operations (including TriOptima).

Our Commitment to the Environment

TriOptima is committed to a more environmentally sustainable future. We are currently executing a strategic separation from the S&P legacy shared services, to establish our own dedicated infrastructure. As such we anticipate material changes to our operational footprint

Our commitment to the environment follows our attestation of the OSTTRA Group code of conduct, which states:

'Our strong commitment to driving progress begins with our own operations and value chain. We fulfil our environmental, social, and corporate governance (ESG) responsibilities as a company by creating a diverse and inclusive workplace, reducing our environmental footprint, upholding the highest standards of corporate governance, and actively engaging our suppliers to embrace our sustainability ambitions.'

Our Carbon footprint

Our commitment to a more environmentally sustainable future helps us to strive to reduce our carbon footprint. We do this by sourcing renewable electricity and by maintaining a rigorous waste management process including the recycling of glass, paper, plastics, metals and electronics.

Our operational model prioritises efficiency. Our largest office and primary external data centers are strategically located in Sweden, leveraging the region's low-carbon energy grid. Our global presence is further supported by:

- London: Sub-leased premises
- Singapore: Recently transitioned to dedicated leased premises to better manage our local impact
- Tokyo: Managed office space optimised for flexible resource use

Both our London and Stockholm offices, along with all three Stockholm-based datacenters, have achieved Green Certification, validating our commitment to high-efficiency workplace standards.

2025 Carbon footprint & Methodology

We have calculated our emissions in strict accordance with the Greenhouse Gas (GHG) Protocol Corporate Standard. To ensure the highest level of accuracy, we have utilised the latest emission factors, including DEFRA 2025, IEA 2025, EPA GHG Emission Factors Hub 2025 and the USEEIO 2024 (inflation-adjusted to 2025 values).

An operational reporting boundary has been adopted. TriOptima continues to refine its carbon accounting methodology to ensure alignment with best practices and stakeholder expectations. For the 2025 reporting period, our total emissions were as follows:

- Location-based: 1,598.07 tCO₂e
- Market-based: 1,583.57 tCO₂e

		2025		2024	
Greenhouse gas emissions (tCO ₂ e)					
		Location-based	Market-based	Location-based	Market-based
Scope 1	Direct emissions (natural gas)	3.92	3.92	4.9	4.9
Scope 2	Emissions from Purchased Electricity	17.47	2.96	80.81	63.06
Scope 3	Cat 1: Emissions from purchased goods	882.29	882.29		
	Cat 2: Emissions from Capital goods	68.58	68.58	27.92	27.92
	Cat 3: Fuel and Energy related activities	6.20	6.20		
	Cat 5 Waste	11.01	11.01		
	Cat 6: Business Travel	480.75	480.75	241.57	241.57
	Cat 7: Employee Commuting	104.04	104.04		
	Cat 8: Upstream Leased Assets	23.82	23.82	6.4	6.4
Total GHG emissions		1,598.07	1,583.57	361.60	343.85

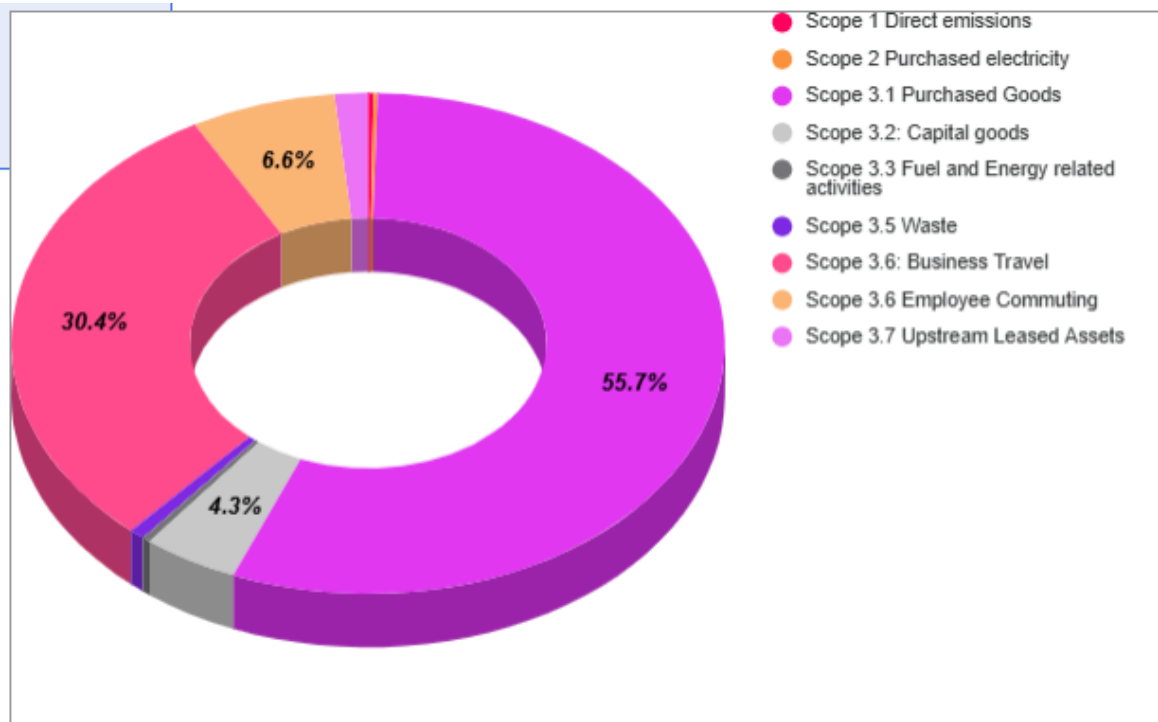
In 2025, TriOptima significantly matured its carbon accounting methodology.

The year-on-year increase in reported emissions is a direct result of our broadened reporting boundary, specifically the inclusion of several new Scope 3 categories. This expanded disclosure provides a more comprehensive and transparent reflection of our total impact across the value chain.

The 2025 footprint includes the additional Scope 3 categories:

- **Category 3.1 Emissions from Purchased Goods and Services**
Accounts for the largest portion of our footprint. By applying the spend-based method and USEEIO 2024, we can better identify carbon-intensive points in our supply chain.
- **Category 3.2 Emissions from Capital Goods**
Calculated using the spend-based method and USEEIO 2024 emission factors. The variance from 2024 could be attributable to change in calculation methodology and the reclassification of these assets which were previously classified as hardware purchases.

- Category 3.3 Fuel and energy related activities (not included in Scope 1 & 2)**
 Activity-based calculation using estimated consumption data provided by landlords. This scope accounts for upstream emissions related to the extraction, production, and transportation of fuels and electricity.
- Category 3.5 Waste generated at the various offices**
 Calculated using a hybrid approach. For the Sweden and Tokyo offices, calculations were based on data from facilities management. For London and Singapore, waste volumes were estimated using secondary research and proxy data from Eurostat and the IPCC.
- Category 3.6 Employee Commuting**
 Estimated based on FTE headcount and assumptions regarding commuting distances and modes of transport derived from desk research.
- Category 3.8 Upstream leased assets**
 Reflects our partnerships with Equinix and AtlasEdge, both of whom utilise renewable energy to power the digital infrastructure TriOptima relies on. The category also now includes serviced offices, previously reported under Scope 2.



Our Commitment to our Employees

We believe that TriOptima’s success will depend on the people we bring into our firm - from our developers who build our industry-leading products, to our Client Services team who ensure our customers have the best experience.

To achieve this, we foster a culture that is collaborative, respectful and inclusive. We strive to ensure our colleagues connect to strengthen our specialisms and champion our uniqueness, so everyone feels confident, comfortable and proud to join in and stand out.

Code of Conduct

At TriOptima all colleagues should feel safe, respected and treated fairly.

We attest and comply with our OSTTRA Group Code of Conduct which ensures a culture of integrity across the firm. The Code of Conduct includes several tools and policies that support our employees in a fair and ethical way. One key tool is our process whereby employees can escalate and report issues or wrongdoing either in their name or anonymously for themselves or others. We also have zero tolerance for retaliation. Anyone who seeks advice, raises a concern, reports suspected misconduct or participates in an investigation in “good faith” is doing the right thing. This promotes a safe environment for our colleagues and the culture of the firm.

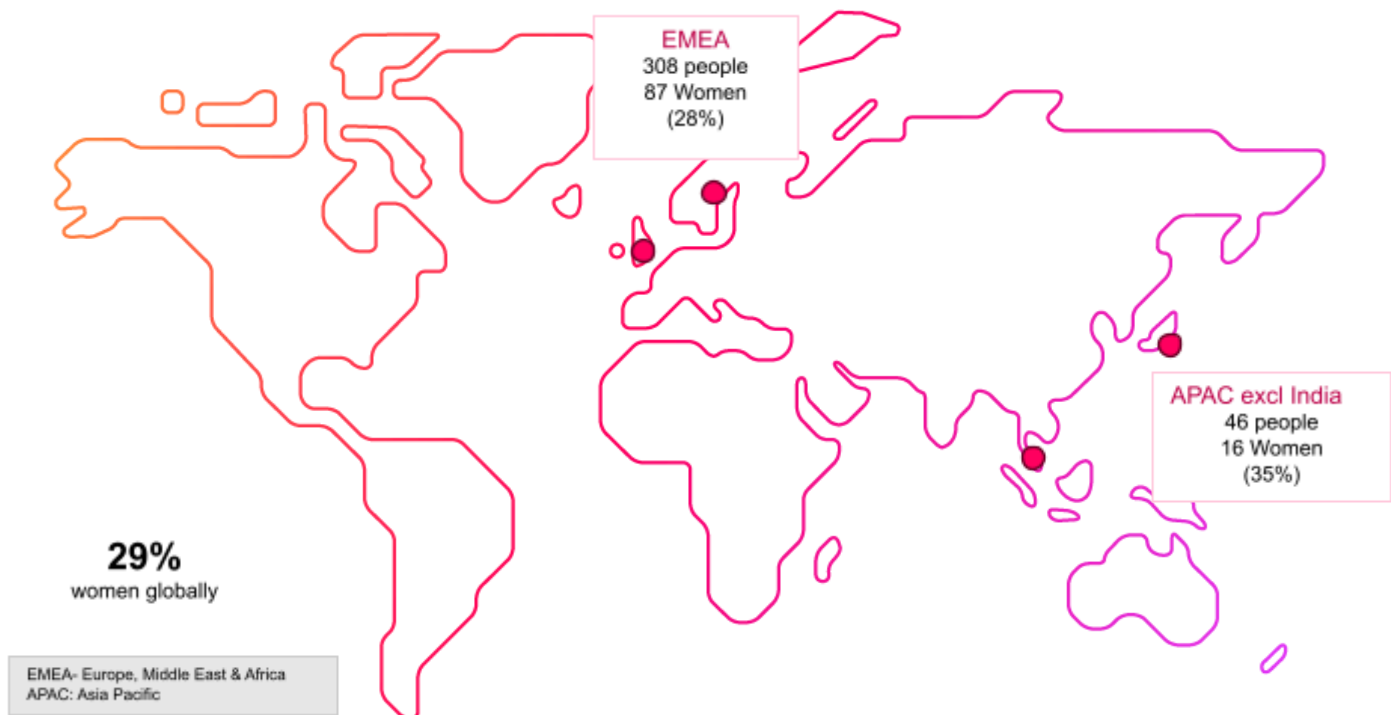
During 2025, all TriOptima colleagues were required to read and attest to understanding the OSTTRA Group Code of Conduct, including the principles of anti-corruption.

Gender Breakdown

In 2025, we continued to monitor our demographics data to ensure transparency in our journey towards a more balanced workforce.

Category	Statistic
Total Employees	354
Female Representation	29%
Promotions (Total: 53)	36% Female
New Hires (Total: 54)	24% Female
Board Diversity	50% Men / 50% Women

Note: During the reporting period, 30 employees left the firm; turnover was higher among male employees than female employees



Recruitment

At OSTTRA we are focussed on building a skilled and diverse workforce. This involves understanding the future needs of the business, creating a strong employer brand, and engaging with potential candidates who offer the right mix of skills, cultural fit, and growth potential. Our aim is also to provide a great experience to internal stakeholders as well, including employees & hiring managers.

We are an equal opportunity employer. Our processes ensure equal employment opportunities without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, pregnancy, veteran status, genetic information, or citizenship status. This commitment to equity applies to all employment practices, including recruitment, compensation, promotions, and professional development.

Diversity is reflected in our commitment to an inclusive workspace that values each individual and their unique contributions.

Our people are our most valuable asset. Their diverse characteristics, perspective, ideas and backgrounds give us a vital competitive edge.

Learning & Development

We recognise that our long-term sustainability is intrinsically linked to the continuous development and well-being of our people. In 2025, we significantly expanded our learning and development ecosystem to cultivate a high-performance culture rooted in knowledge-sharing and inclusive leadership.

- **ASPIRE:** Our flagship leadership program designed to identify and empower high-potential colleagues, providing them with the strategic tools necessary to become the next generation of OSTTRA leaders.
- **EVOLVE:** A nine-month structured mentorship program pairing emerging talent with seasoned internal professionals to facilitate the seamless transfer of institutional knowledge.
- **The Academy:** Our centralised online campus featuring peer-generated content. Curriculum highlights include GDPR compliance, US Treasury insights, Artificial Intelligence (AI) innovation, and Financial Markets Workshops.
- **Global Access:** Through our partnership with Coursera, employees have access to over 5,200 courses to master job-relevant skills at their own pace.
- **Relationship Effectiveness:** We introduced the Strength Deployment Inventory (SDI) tool, a validated assessment based on Relationship Awareness Theory, to help global teams increase self-awareness and reduce workplace conflict.

Early Careers Network (ECN)

Over the course of the last three years, we have successfully developed our OSTTRA Early Careers Network (ECN). Our objectives are clear as we seek to provide those who have recently started their career journey and have joined OSTTRA with the opportunity to kick-start their learning. Our mission is to cultivate and shape the experience of those who are starting their careers through the development of soft skills and through establishing meaningful connections within OSTTRA.

It was created to accelerate the learning and development of our most recent early career hires, who are colleagues with mixed levels of experience, some are graduates straight from university, others may have a couple of years relevant work experience and others may have made a complete career switch in their decision to join OSTTRA. The programme is 12 months long - a learning journey designed to advance their professional acumen, essential to development and success.

The ECN event hosted at our India location in October was attended by 72 members.



The OSTTRA Voice: Listening to Our Own

To ensure our culture remains vibrant during our transition to independence, we launched the OSTTRA Voice Survey. We chose this name because we believe every individual at OSTTRA should have a seat at the table. It is crucial that our people feel empowered to speak up, share bold ideas, and challenge the status quo.

The inaugural results for TriOptima Sweden highlighted **Inclusion** as a core institutional strength. While our foundational culture is strong, the survey identified clear opportunities to enhance Leadership Communication. Specifically, we are prioritising:

- Refining how leadership communicates a motivating and cohesive long-term vision.
- Ensuring transparent updates on the tangible actions taken in response to employee feedback.

We remain committed to using these insights to foster an environment where our people can thrive alongside the growth of our business

Employee Experience

OSTTRA has a number of community groups, including a Diversity, Equity and inclusion (DEI) council, as well as teams which focus on Charity and sustainability led activities.

OSTTRA Cares: Empowering Impact in Our Communities

Our corporate philanthropy policy is designed to empower our people to be a force for good. At OSTTRA, we believe that our responsibility extends beyond the financial markets and into the communities where we live and work. By focusing on Education, Environmental Sustainability, Health, and Humanitarian Causes, we align our global resources with the issues that matter most to our teams.

We don't just offer financial support; we offer our time. Through our "Give Back Days" initiative, every eligible employee receives 40 hours (5 days) of paid volunteer time annually. This commitment ensures that our expertise and energy are put into action where they are needed most.

2025: A Year of Active Giving

2025 was a transition year for our philanthropic efforts. We successfully leveraged the legacy S&P Impact program while building the foundation for our independent platform, OSTTRA Cares, which officially launched in December.

We ignited this new chapter with a global Volunteering Week, hosting a diverse range of activities that reflected the unique spirit of our regional offices. From high-energy team challenges to quiet acts of service, our employees proved that an independent OSTTRA is a socially conscious OSTTRA.

- \$250,000 Total Charitable Contributions: OSTTRA donated a quarter of a million dollars to non-profit organisations globally.
- 1,439 Volunteer Hours: Our global workforce dedicated significant time to community projects, demonstrating our "one-team" commitment to social responsibility.
- \$22,000 in Matched Donations: We amplified the generosity of our people through our corporate matching program, doubling the impact of individual contributions.

Spotlight: Local Leadership in Sweden

We believe that giving is most effective when it is driven locally. Our regional charity teams lead the selection process, ensuring our support reaches legitimate, ethically sound organisations that resonate with our local communities.

In Sweden, our TriOptima colleagues exemplified this grassroots engagement, contributing 293 volunteer hours. Highlights from the Stockholm team included:

- **Community Connection:** Meaningful outreach such as singing for residents at local elderly care homes and participating in the annual "Santa Run."
- **Creative Fundraising:** Hosting office-wide bake sales and flea markets to drive local engagement.

Targeted Support: Of the \$35,000 donated to Swedish charities, a significant portion was directed to the Swedish Childhood Cancer Foundation (Barncancerfonden), a cause chosen by our employees for its vital impact on families across the region.



By empowering our local teams to decide where the majority of our donations are directed, we ensure that OSTTRA's philanthropy remains relevant, transparent, and deeply personal. Whether through financial contributions or "in-kind" volunteering, we are building a legacy of giving that scales alongside our business.

Diversity, Equity and Inclusion (DEI)

The OSTTRA DEI Council, sponsored by the Executive Management Committee (EMC), works to remove obstacles to belonging and celebrates diversity. The Council's primary objectives are to:

- Create a workplace where every individual feels respected, valued, and understood
- Identify and remove obstacles that hinder colleagues from experiencing a sense of belonging
- Promote and celebrate diversity and equity within the organisation
- Increase colleagues' understanding and awareness of critical DEI issues
- Advocate for policies and practices that support a more inclusive and equitable work environment

CommUNITY Groups

In 2025 our CommUNITY groups actively engaged with employees with a diverse range of initiatives:

RISE

- Promotes holistic wellness by supporting the physical, mental and emotional health of colleagues
- Hosted several wellbeing activities, including talks on health & nutrition, fitness and exercise, mental health and menopause

Parents

- Provides a platform for honest discussions and support for working parents

triVersity

- Stockholm based group focusing on DEI awareness through "Lunch & Learn" sessions during PRIDE and International Men's day.

Social

- Local office committees that organise quiz nights, end-of-year parties, and team-building events to maintain a connected workforce

Our Commitment to Governance

A cornerstone of our culture is acting with integrity and to build trust between our customers, vendors and with our colleagues. We adhere to this through our policies and the OSTTRA Group Code of Conduct.

We act lawfully, honestly and ethically, prioritising the best interests of the company and our customers while maintaining an environment of respect and inclusion. This involves conducting our business fairly, with the highest professional standards and in strict adherence to local legal and regulatory obligations in all the countries where we operate.

Respect for human rights

OSTTRA respects fundamental human rights and ensures its employees work in a safe, healthy work environment free from discrimination and harassment, threats or acts of violence or intimidation. We are committed to comply with ethical standards and mandates as well as the laws and regulations in the jurisdictions where we operate and respect the human rights of others.

Given the nature of our business, we believe there is minimal risk of practices that support, facilitate or are complicit with modern slavery, within either OSTTRA or our supply chain.

Generally, we procure computer equipment as well as office supplies, equipment and services for the daily running of our businesses. In addition, from time to time, we use third party vendors and contractors for technology support and development, and for various advisory services. TriOptima does not manufacture or sell any physical goods and, therefore, we have no supply chain relating to such activities.

Nevertheless, we require that all vendors with whom we have a Master Services Agreement (MSA), agree to perform at the highest level of business and professional ethics, Vendors must ensure that they and their subcontractors comply with all applicable anti-slavery and human trafficking laws, including but not limited to the UK Modern Slavery Act. These expectations are embedded in our purchase order forms and new vendor onboarding forms as well as our Third-Party Risk Management (TPRM) frameworks.

Slavery and human trafficking

OSTTRA maintains a zero-tolerance approach to modern slavery and human trafficking, which is confirmed in many of the corporate policies and procedures, including third party and vendor policies, and human rights and labour practices policy. They include our approach and commitment to respecting and promoting fundamental human rights, which we view as a key component of responsible corporate citizenship. In addition to supporting the fundamental principles contained

in the United Nations Universal Declaration of Human Rights, we are committed to working with suppliers to help uphold ethical human rights standards.

We have determined that the majority of our suppliers operate in areas considered to be at a low risk of supporting or being complicit in forced labour or human trafficking. We have implemented procedures to assess the risk of new vendors at onboarding and we require suppliers to affirm their commitment to eradicating modern slavery and human trafficking. We plan to continue to monitor our business for potential risks related to slavery and human trafficking and other best practices adopted in our industry.

The OSTTRA modern slavery and human trafficking statement for October 2025 can be found [here](#).

Work against corruption

The services offered by TriOptima are not considered high risk for bribery or corruption. TriOptima services offer clients the ability to reduce their risks or improve their operational efficiency. They do not construct anything or take large sums of money up front. Fees are paid for the services used – either pay as you go, or regular invoicing. Cash is not used, and TriOptima does not hold or control client money. Interaction with government bodies is mainly financial regulators, central banks, and occasional government owned financial entities.

Despite the low-risk nature of the bribery and corruption risks, TriOptima has systems and controls in place to manage any potential risks. This includes financial crime, gifts and entertainment, conflicts of interest and personal account dealing controls and monitoring. These are designed to promote an ethical business culture that drives company results and mitigates risks of misconduct and legal violations.

2025 Compliance Training

During 2025, all colleagues completed mandatory training and attested to have read and understood all the Compliance policies:

- **Anti-money laundering (AML):** Risks related to money laundering and terrorist financing.
- **Information Security:** Cybersecurity, phishing risks
- **Operational Resilience:** Business continuity management and physical security programmes
- **Regulatory Standards:** Senior Managers & Certifications Regime (SMCR) Conduct Rule Training and certifications for relevant staff
- **Ethics:** Anti-Bribery and Corruption training was provided to select staff based on their role, S&P Global's Code of Business Ethics Training 2025, OSTTRA Code of Conduct
- **Onboarding:** Mandatory training for all new starters covering Market Abuse, "AML, speak up and escalation, gifts and entertainment, personal account dealing, complaints and conflicts of interest

Anti-financial crime programme

OSTTRA has a fully built anti-financial crime programme, including a written anti-financial crime policy which is complemented by a comprehensive set of anti-financial crime systems and controls in OSTTRA. During 2025 all TriOptima staff received training on risks related to money laundering and terrorist financing.

We take all reasonable and appropriate steps to prevent persons engaged in money laundering, fraud, or other financial crime, including the financing of terrorists or terrorist operations, from utilising TriOptima products and services. We have established risk-based processes and procedures designed to ensure that the company does not transact or facilitate prohibited business, with individuals or entities who are the target of applicable sanctions. The programme includes a risk-based process to conduct client due diligence based upon the nature of the business relationship and the background of the client.

We generate our business based on merit and have controls in place to prevent us from providing or receiving improper or corrupt payments. It is our intention to comply with applicable anticorruption laws without exception, regardless of local business culture or practice. We also aim to compete fairly and in accordance with all applicable antitrust and competition laws. In dealing with our clients, vendors, public officials, business partners and others, we will not seek to influence them, either directly or indirectly, by providing something of value to improperly influence their decision making.

Gifts and entertainment policy

In accordance with current policies on gifts and entertainment, TriOptima employees must report and seek pre-approval from their manager when established thresholds are exceeded.

We are pleased to share that no significant issues were identified in 2025. To the extent there are failures to follow the policy, as identified by Compliance, there are a range of sanctions that OSTTRA can take starting with reminding staff of their obligations, re-training, warnings, and finally, in exceptional circumstances, termination.

Conflicts of interest

OSTTRA has a conflicts of interest policy, which sets forth the process for identifying, monitoring and managing actual and potential conflicts of interest.

TriOptima seeks to ensure that a conflict of interest does not adversely affect the interests of its organisation, its clients, its shareholders or other stakeholders. We are required to disclose potential conflicts of interest, including but not limited to, those relating to personal relationships, outside business activities, financial interests and opportunities.

Employee disclosures are reviewed by an individual's manager followed by a review by compliance. Additional controls will be implemented to address the actual, potential or perceived conflict, if required, based on the nature of the disclosure, such as those involving a personal relationship with a colleague, a vendor or customer.

No significant conflicts of interest issues were identified during 2025.

Risks within sustainability

TriOptima maintains a thorough risk framework where all aspects including sustainability are reviewed and assessed annually. These include.

- Ergonomic support and manager training
- Training managers to support staff
- Annual reviews and follow up
- Employee training and development such as diversity training
- Compensation and benefits schemes
- Benchmarking surveys in regard of compensation and benefits
- Selection of sustainable office spaces and data centres

We have not identified any material environmental risks in regard to the services we provide to our customers.

We continue to work with our HR team to deliver on our DEI agenda and we comply with all laws and regulations. We have processes in place to address any discrimination. We have processes to report harassment in the workplace and if anyone feels they are harassed they can speak up to report in a fair and ethical way.

ISO 27001 information security certification

OSTTRA's information security management system is certified to ISO 27001:2022. This is an international standard for managing information security. It outlines a systematic approach to identifying, assessing, and managing risks to information assets. Key elements include risk assessment, policies, management commitment, continuous improvement, and compliance.

The certification demonstrates an organisation's commitment to protecting information assets.

Internal audit

In 2025 TriOptima received internal audit provision via S&P Global. Internal Audit carries out annual audits on anti-money laundering, sanctions, and remuneration to ensure compliance with regulations that TriOptima is subject to. Internal Audit conducts audits of other elements of the business including the compliance programme as needed and provides an annual audit plan setting out its focus for the coming 12 months.

