



# 2025 Impact Report

Environmental, Social and Governance (ESG)

Interim Update published March 2026

# A message from our CEO

2025 marked a defining period of growth and change for SteelEye, as we strengthened our commitment to building a more responsible, inclusive and sustainable business.



This year, our focus has been on turning intent into action. From taking our first full steps towards understanding and measuring our environmental footprint, to ensuring we give back to our local communities, we have continued to embed responsibility into how we operate and grow.

Our 2025 Impact Report reflects how our thinking has matured, not only in what we do, but in the role we envision SteelEye playing in our industry and beyond.

Environmental responsibility, social impact, and inclusive growth are not parallel initiatives. They are integral parts of how we build trust and strengthen the long-term sustainability of our business.

Our people, clients, partners and investors expect transparency, accountability and progress. This report provides an honest view of where we are today, the areas where we are making a tangible impact, and the work that still lies ahead. It reflects a balance of action, learning and ambition. It is a reminder that sustainable progress is built over time, through thoughtful decisions, long-term commitment and a dedication to do better, year after year.

Publishing this report is part of our commitment to integrity and allows us to measure ourselves openly, learn from our experiences, and hold ourselves to a higher standard as we continue to scale.

**Matt Smith - CEO**

# Who we are

SteelEye is a global compliance technology company helping financial institutions meet their regulatory obligations with clarity, confidence, and purpose. Through a single, integrated platform, we bring together data capture, compliance monitoring, surveillance, and reporting to turn regulatory complexity into clear, actionable insight.



Our team brings together regulators, compliance leaders, engineers, product specialists, and more. We are curious, collaborative, and passionate problem solvers. Together, we build solutions that reflect the realities of financial services and the people working within them.

By capturing and analysing data across communications, trading activity, and voice, SteelEye enables firms to monitor risk holistically, spot issues earlier, act faster, and operate with greater transparency. This strengthens governance, reduces the risk of misconduct, protects reputation, and builds trust with regulators and clients alike.

Today, SteelEye supports firms across global markets, helping them embed compliance into everyday operations while fostering stronger, fairer, and more resilient financial markets in an increasingly complex regulatory landscape.

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# **Our Approach to ESG**

# Our Approach to ESG

Our ESG approach this year focused on putting the right structures in place to ensure lasting impact. Building on the foundations set in 2024, we turned our priorities into clear plans, measurable baselines and stronger oversight. In 2025, this included completing our first comprehensive greenhouse gas assessment, establishing structured community engagement programmes, and strengthening governance to support consistent, responsible decision-making.

These actions mark a shift from planning to action, embedding responsibility into how we work every day. By investing in data and transparency now, we're preparing for measurable progress and helping shape a more sustainable, inclusive future for our people, clients, and communities.



## PASSION

We bring energy and dedication to everything we do, driven by a genuine belief in our mission and the positive impact our work can create. Passion motivates us to push boundaries, stay curious, and continuously seek better ways of serving our clients and supporting one another.



## DELIVERY

We take pride in delivering high-quality work, meeting commitments, and driving meaningful outcomes. This value reflects our focus on reliability, accountability, and maintaining the trust our clients and colleagues place in us.



## TEAM PLAYER

We succeed together. Collaboration, openness, and mutual respect underpin how we work as a global team. By supporting one another, sharing knowledge, and embracing diverse perspectives, we create an environment where everyone can contribute and thrive.



## THOROUGHNESS

We pay attention to the details that matter. A commitment to accuracy, rigour, and thoughtful decision-making ensures that our products, processes, and interactions reflect the highest standards. Thoroughness helps us build confidence, reduce risk, and create lasting value.

"I'm incredibly proud to be part of SteelEye's ESG journey. Serving on the ESG Committee allows me to contribute to work that supports real, lasting impact across our business and wider community, from advancing our environmental responsibility through Greenly, to creating meaningful opportunities for future talent via our Early Careers Programme and T-Level placements. Our progress throughout 2025 demonstrates SteelEye's continued commitment to building a more sustainable and inclusive future"



- Jo Crockford - Global Head of People

### ESG STEERING COMMITTEE



Our cross-functional and regional committee brings together diverse perspectives to guide our ESG priorities, ensuring we stay proactive, accountable, and aligned with stakeholder expectations.

### TWO-WAY INPUT



We encourage colleagues to share ideas and feedback so we can continue strengthening our environmental and social initiatives. This collaborative approach helps us refine our efforts over time.

### DEI INITIATIVES

Through regular pay analysis and targeted action, we work towards fostering pay equity across the company and addressing systemic inequalities that may affect underrepresented groups.



### CARBON ACCOUNTING FOUNDATIONS

We have begun taking our first steps into carbon accounting and Greenhouse gas data collection. Building this baseline will enable us to understand our environmental footprint more clearly and will inform a more targeted reduction strategy in the years ahead.



### MENTAL WELL-BEING INITIATIVES

We offer resources and initiatives that aim to support good mental health and contribute to a positive environment where everyone feels valued.



### RESPONSIBLE CONSUMPTION AND WASTE REDUCTION

We prioritise eco-friendly practices across printing, recycling, and merchandise, with careful attention to waste reduction, ethical sourcing, and responsible consumption.



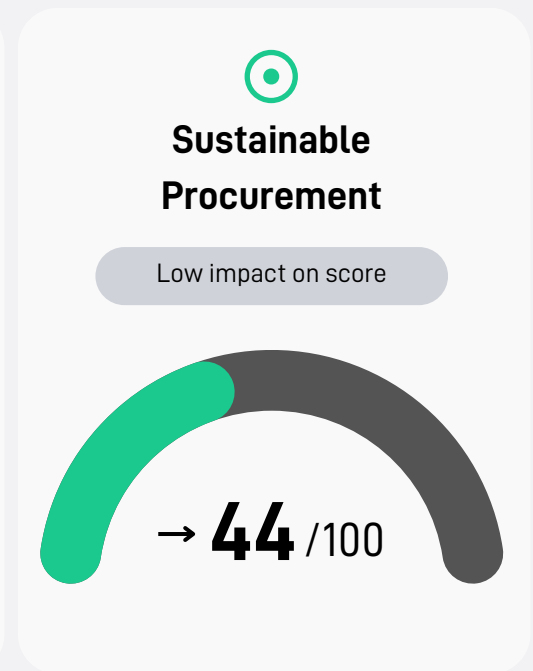
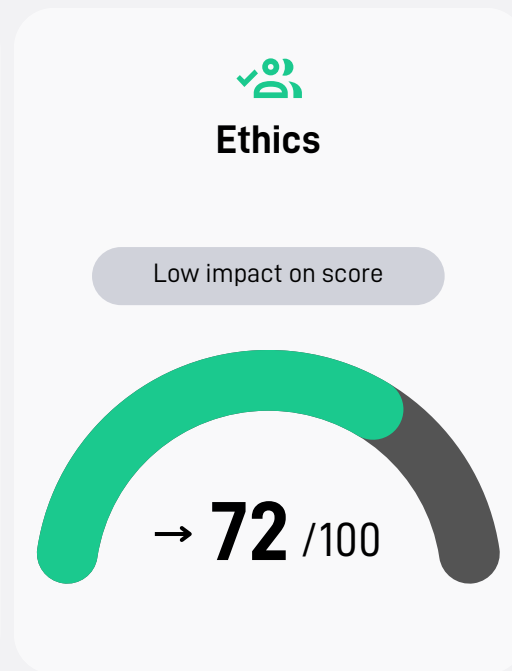
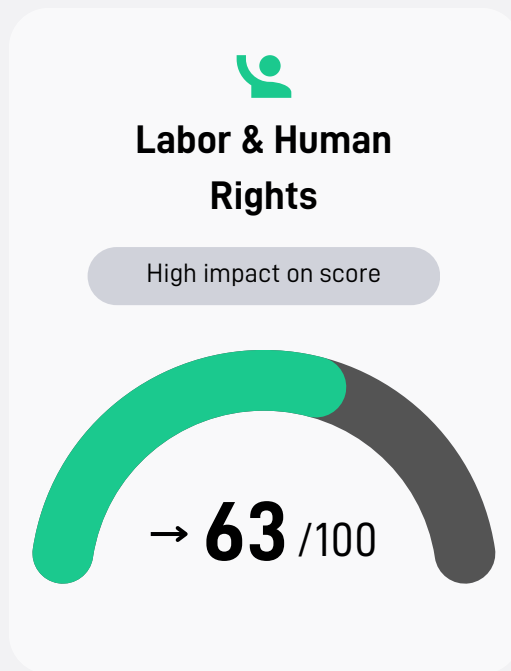
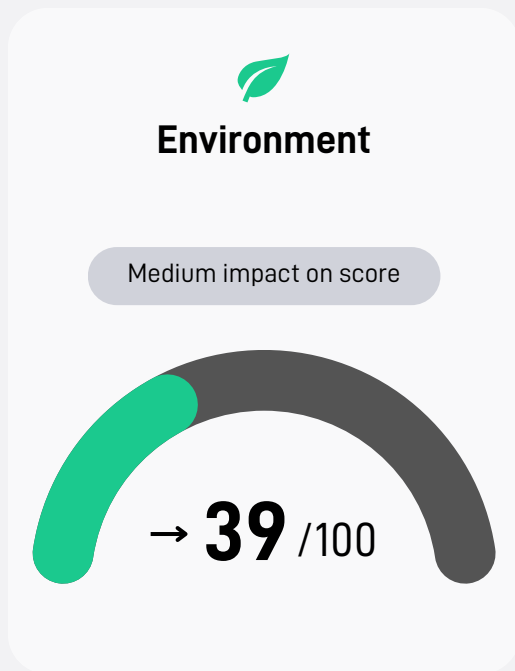
### CHARITY ENGAGEMENT

We partner with local charities through donations, volunteering, and community initiatives, contributing to positive social impact in the regions where we operate.



SteelEye is evaluated and benchmarked by EcoVadis, a globally recognised sustainability assessment platform, to review our practices and drive continuous improvement.

Our EcoVadis scorecard offers a clear snapshot of where we stand today on sustainability and responsible business practices, highlighting both our strengths and the areas where we're sharpening our focus. This year's results reflect the groundwork we've been laying across the business, from environmental tracking to strengthened governance and supplier engagement. While there's always room to push further, the progress we've made shows that our efforts are not only taking shape but starting to deliver measurable impact.

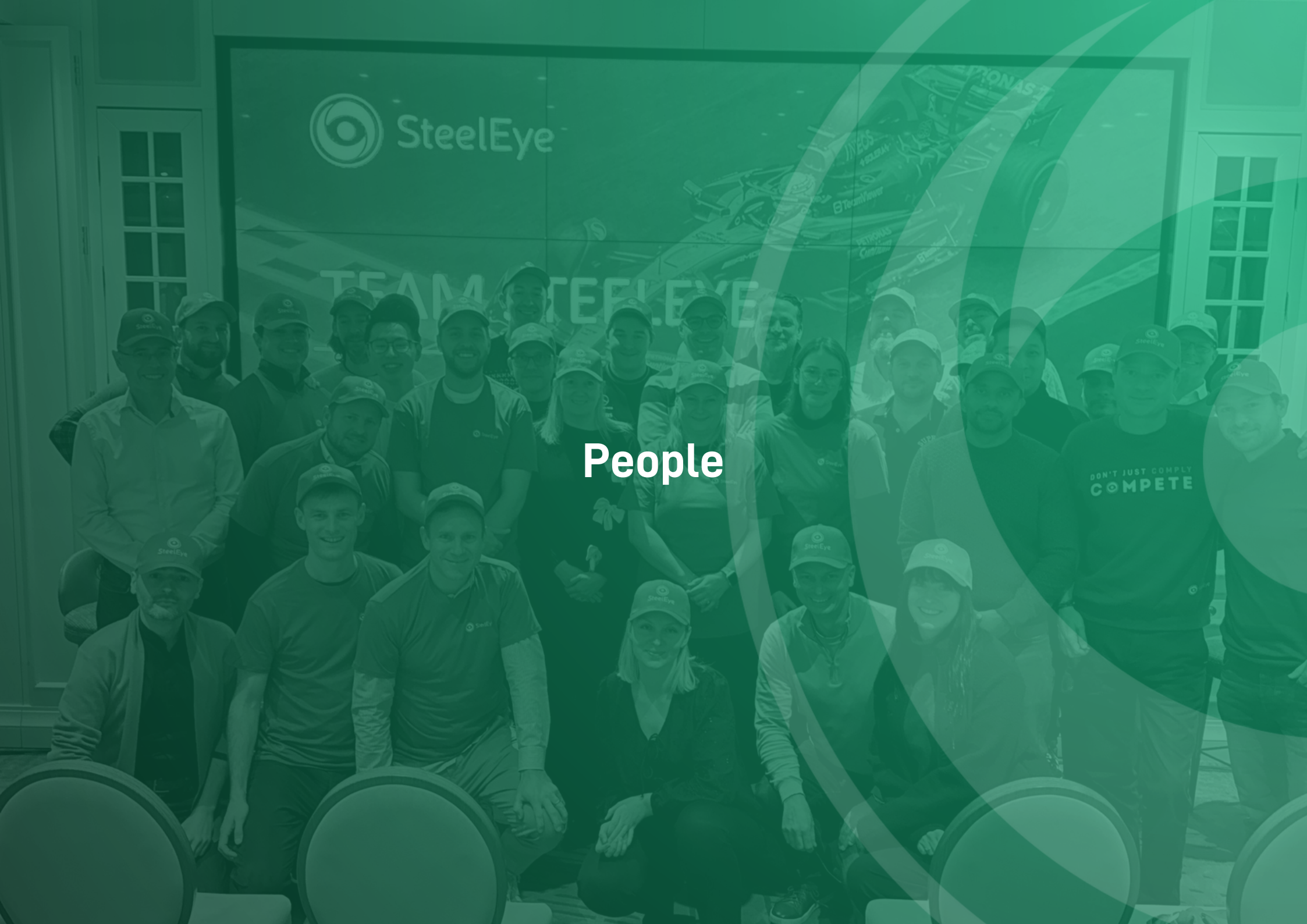




TEAM STEELEYE

# People

DON'T JUST COMPLY  
COMPETE

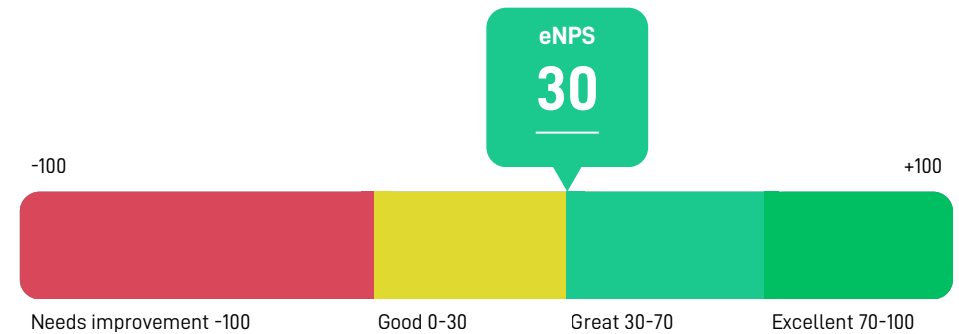


## Measuring What Matters

Our eNPS score of 30 reflects strong levels of satisfaction and engagement across SteelEye, placing us above global benchmarks for companies of our size.



Alongside this, our annual employee survey insights show a growing sense of belonging, with many colleagues highlighting the strength of our culture and community as key contributors. We continue to gather feedback throughout the year so we can enhance the employee experience as we grow.



"I would recommend SteelEye as a great place to work"

8.4 /10

Our People team regularly conducts anonymous surveys to track trends and guide improvements.

## Building a Vibrant Community

At SteelEye, we believe that a strong culture and sense of community are essential to creating a positive, inclusive, and productive work environment. Our approach goes beyond day-to-day office life, focusing on meaningful experiences that strengthen connections, support wellbeing, and celebrate the diverse backgrounds of our global team. Throughout the year, we run initiatives that bring people together, promote belonging, and create opportunities for colleagues to connect in ways that feel authentic and inclusive.

"When I joined SteelEye, I quickly felt how much the company values community. The openness and sense of care shown from the interview stage made me feel welcome before I had even started. There is a real sense of belonging in an environment where people are easy to talk to and encouraged to share ideas. This sense of community goes beyond teams and locations, through working across regions and getting involved in initiatives. SteelEye's values are really reflected in how people show up for one another."

Mary Gupta - Product Support Analyst



# Community Initiatives



## REMOTE WORKING FLEXIBILITY AND INCLUSIVE MEASURES

We recognise that flexibility plays a crucial role in supporting wellbeing, productivity, and inclusion. Our hybrid approach, supported by clear guidelines and accessible tools, helps employees manage their work in a way that suits their personal circumstances while staying connected to their teams. We continue to refine our practices to ensure remote and hybrid colleagues feel equally involved and supported.



## CROSS-OFFICE CONNECTION

As a global organisation, we prioritise building strong connections across regions. We combine virtual engagement, such as shared learning sessions, cross-functional collaboration, and company-wide events, with opportunities for in-person interaction through office visits and team meet-ups.



## BRING YOUR KIDS TO WORK DAYS

These special days invite families into the workplace, helping employees share an important part of their lives and fostering a sense of inclusion and connection across teams.



## FESTIVE AND CULTURAL MEALS

We host shared meals celebrating cultural moments and festivals from around the world, creating opportunities to share traditions and connect with one another throughout the year.



## TEAM SOCIALS

We run a variety of socials throughout the year that help colleagues connect, unwind, and build meaningful relationships beyond day-to-day work. From cooking classes and F1 arcade visits to cricket games and team off-sites, these activities create opportunities for shared experiences, collaboration, and fun. By offering a diverse mix of events, we ensure everyone can take part in ways that feel enjoyable and inclusive.



## Diversity, Equity, Inclusion and Belonging

Our DEIB programme plays a central role in shaping an equitable, inclusive culture across SteelEye. By using our HR Information System to track key metrics responsibly and in full compliance with data protection standards, we can monitor progress and identify where further action is needed.

At SteelEye, inclusion is built into how we operate. We are committed to providing equal opportunity and preventing discrimination across race, gender, pregnancy or maternity, marital or civil partnership status, gender identity, disability, religion or belief, age and sexual orientation.

This commitment shapes how we lead teams, work together and make decisions as the business grows. Equality is not treated as a standalone initiative, but as a shared responsibility that sits at the heart of our culture.

Our approach focuses on:

- Setting consistent standards for respectful conduct and accountability.
- Encouraging open conversations that build understanding across teams and experiences.
- Actively seeking out and uplifting a wide range of perspectives in our work.
- Identifying and addressing inequities with transparency and follow-through.

By taking a deliberate and practical approach, we aim to create a workplace where people feel supported, valued for who they are and able to contribute their best work.

Beyond our internal initiatives, we actively sponsor and participate in DEIB programmes and events throughout the year. These partnerships allow us to contribute to wider industry progress, support underrepresented talent and strengthen our impact beyond our own organisation.

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lligence

FM European  
es Award



# 23%

Percentage of women employed at SteelEye (as at 29th Nov 2025).

## DEIB Initiatives at SteelEye

### INTERNATIONAL WOMEN'S DAY

As part of our commitment to advancing gender equity and elevating underrepresented voices in financial technology, we sponsored Harrington Starr's FinTech Inclusion Includes You: International Women's Day 2025 event.

The event brought together leaders from across the industry to champion inclusion, share lived experiences, and spotlight the ongoing work required to build a more diverse and equitable sector. Our involvement reflects our belief that meaningful progress is accelerated when organisations collaborate to challenge barriers and inspire change beyond their own walls.

### PRIDE

Pride Month is one of the ways we make our support for LGBTQ+ inclusion visible. During this period, we focus on both public advocacy through our social media channels and internal engagement via employee communications. This activity sits alongside our wider, year-round commitment to building an inclusive workplace and community.

### INCLUSIVE HIRING TRAINING

We have developed a new Inclusive Hiring training module. This training equips colleagues with practical tools to reduce bias, create fair and consistent recruitment processes, and improve the overall candidate experience. By embedding inclusive practices at the earliest stage of employment, we strengthen representation, broaden access to opportunities, and support long-term diversity across the company.



## Giving Back

In 2025, we launched our first formal Volunteering Program, giving every SteelEye employee paid time off each year to support causes close to their hearts.

From local community projects to international partnerships, we want to empower our teams to give their time, skills, and energy where they can have the most impact. Across our global offices, SteelEye teams have continued to turn compassion into action:

### **BANGALORE:**

Our India team organised a charity drive for Asha Niketan, an organisation providing lifelong care and support to people with intellectual disabilities. Through donations and volunteering, the team helped fund essential supplies and create moments of joy for residents.

### **BRAGA:**

In Portugal, colleagues joined forces for a beach clean-up at Apúlia, collecting waste and helping protect the local coastline. The initiative brought together employees and their families for a day dedicated to environmental stewardship and community pride.

### **LONDON:**

Our UK team partnered with the Bankside Open Spaces Trust to maintain and improve local green spaces. From planting and pruning to litter collection and landscaping, the work contributed to making the area's shared spaces more accessible and enjoyable for everyone.

### **NEW YORK:**

In the US, our team continued its annual involvement with the West Side Campaign Against Hunger, raising \$2,418 to help the charity provide vital food assistance to thousands of New Yorkers facing insecurity. Colleagues also volunteered in person to distribute meals to families in need during the holiday season.

### **ALTSO:**

Through its long-term partnership with A Leg To Stand On (ALTSO), SteelEye has helped more than 70 CoolKids gain life-changing mobility support since 2017, contributing over \$35,000 towards prosthetic limbs, orthotic braces and properly fitted wheelchairs.

In 2025, SteelEye strengthened its partnership with ALTSO by sponsoring an event and participating in ALTSO's 5th Annual MOVE Fundraiser. Together, these efforts raised awareness and funding to ensure ALTSO can continue delivering its programmes and support to children who need it most.



# CASE STUDY: Volunteering

At SteelEye, we believe volunteering plays an important role in strengthening our connection to the communities around us while supporting colleagues' wellbeing.

In October, teams across our global offices came together to participate in SteelEye's first official volunteering day, giving colleagues the opportunity to step outside their day-to-day roles and actively support the communities they work in.

By getting hands-on in the neighbourhoods around our offices, our teams helped maintain shared outdoor spaces while spending time together and giving something back to their local communities.

Experiences like this highlight the wider personal benefits of volunteering, from feeling connected to the community to boosting wellbeing and creating space to reset. By continuing to support local initiatives, we aim to make a positive impact while giving employees opportunities to contribute, connect, and experience a meaningful sense of purpose beyond their everyday work.

"From time to time, it is important to break the pace of the daily responsibilities, step away for a bit and do something entirely different. The volunteering day was fantastic as we were able to help the local community and revitalise the beach environment. In helping others, we found renewed purpose in ourselves and strengthened the team's chemistry."

Diogo Batista Lima - Staff Data Engineer, Data Integration Lead



"I really enjoyed the morning of volunteering, cleaning up the green area, raking the leaves, and spending some time surrounded by nature and fresh air. It felt like I was making a difference, and it was great to step away from my desk with my colleagues. It was a really rewarding and positive experience"

Lidia Kalinowska



## Wellbeing

Supporting the health and well-being of our people is a responsibility we take seriously.

At SteelEye, we are committed to creating a working environment that supports both physical and mental health, recognising the importance of feeling safe, supported and heard at work.

Our Mental Wellbeing scoring exceeds industry benchmarks, offering reassurance that this focus is having a positive impact. We support mental well-being through a range of initiatives, including annual employee surveys to help us listen to and respond to feedback, ongoing mental health awareness communications that encourage openness and reduce stigma, and participating in World Mental Health Day: Offering all employees access to expert-led talks and resources on Anxiety, Depression, and Self-Care. Looking ahead, we are committed to enhancing our support by investing in dedicated mental health resources, ensuring comprehensive care for our teams globally.

→ **8.81** /10 "I am able to arrange time out from work when I need to"

→ **8.81** /10 "My manager cares about my opinions"

→ **8.81** /10 "My manager genuinely cares about my well-being"

→ **8.68** /10 "I know how my work supports the goals of SteelEye"

→ **8.65** /10 "I feel I am given enough freedom to decide how to do my work"

"Our job as managers is not only to drive results but to support the people behind them. When teams feel well and supported, they think clearly, work better together and perform at their best."

Arjun Shivraj

## Health and Safety

Our commitment to health and safety is fundamental to our business, guiding how we protect and support our employees and partners.

**2** days

Average sickness per employee per year in a rolling 12-month period to November 2025. Substantially below the industry average

We meet applicable legal and policy requirements in every region where we operate and take steps to ensure people understand their responsibilities and how to work safely. Open communication is actively encouraged, with clear expectations that concerns, incidents, near misses and injuries are raised and recorded without delay. This enables us to respond effectively, learn from issues as they arise and uphold the highest safety standards.

## Learning and Development

**£600** budget

Annual personal learning budget is available to each employee for use on professional development.

We invest in the development of our employees by creating access to learning opportunities that support both individual progression and the long-term strength of the business. Through a combination of structured training and day-to-day learning, we aim to support career development at all stages while contributing to a more diverse and inclusive leadership pipeline.

### Formal Training

We deliver management training programmes designed to support employees as they move into leadership roles and to build capability early in their careers. In recognition of ongoing inequalities at management and board levels, we focus this investment on developing diverse talent from the outset.

All employees also receive an individual training budget, enabling them to choose courses and professional development opportunities aligned with their career goals and areas of interest.

### Training Monitoring

We monitor training activity across the company to understand participation levels and ensure learning opportunities are accessible and used effectively. This data helps inform future investment and supports continuous improvement in how we approach development.



## Work Experience

We support early-career development by offering structured opportunities for individuals to gain practical industry experience at SteelEye.

Through our Work Experience Programme, which runs across a number of global offices, we provide internships and university placement roles that introduce young talent to real-world working environments. The programme focuses on building skills, confidence and insight into potential career pathways, while also supporting our long-term aim of strengthening diversity within the industry. By investing at this early stage, we help lay the foundations for a more inclusive future workforce.



**21** interns

hired globally since  
2022

**5** interns

transitioning to  
permanent roles in  
2025

**3** work experience

student hosted in London  
in 2025



"SteelEye is my first full-time internship, and I came in a little unsure of how I'd perform, but that uncertainty didn't last long. From day one, I was trusted with hands-on work, exposed to different parts of the business, and encouraged to experiment. I've learned by building real systems, writing production-grade code, testing ideas, breaking things, and improving them through feedback. I've grown quickly thanks to a supportive team, a brilliant mentor, and a culture that genuinely encourages learning and gives you room to make mistakes. Combined with the warm, friendly atmosphere and the transparency, especially through the monthly town halls, I've truly felt like part of the company, and I'm learning more than I ever expected."

Mohd Ikram - Data Engineer

## CASE STUDY: Martim Miguel

At SteelEye, supporting early-career development is an important part of our commitment to building a diverse and future-ready talent pipeline. Through our partnership with Ada, the National College for Digital Skills, we welcomed Martim, a T-Level student, to our London office for a 20-day work placement in October. His time with us reflects the value of creating opportunities for young people to gain real-world insight into the world of RegTech and cybersecurity.

### INTERNSHIP EXPERIENCE

During his placement, Martim joined SteelEye's Cybersecurity and IT Department, working with mentors across the business to gain hands-on experience of cybersecurity best practices, daily operations, and our technology ecosystem. The role helped him develop key workplace skills, including communication and collaboration, while building a clear understanding of how teams contribute to SteelEye's wider mission.

Martim completed his placement with an impressive research project analysing potential cybersecurity threats to SteelEye and proposing well-considered mitigation strategies. He presented his findings to colleagues across the company, including senior management.

By offering structured placements like Martim's, SteelEye aims to give students meaningful exposure to the workplace and support the next generation of digital and technology professionals. These placements enable us to open doors, nurture emerging talent, and help young people explore opportunities while contributing to a more diverse and inclusive future for the industry.

“The SteelEye placement was a truly insightful experience for me. It taught me a lot about how businesses work and how they utilise technology to provide their services. I really appreciated the opportunity, not only to contribute to SteelEye's ongoing projects, but also to learn about different software and precautions that are taken to keep the company's operations secure. I am thankful to the SteelEye team for their support during my placement”



An aerial photograph of a vast, dense forest of evergreen trees. In the distance, a valley is shrouded in a thick mist or fog, with a winding river visible through the haze. The overall color palette is dominated by various shades of green, from deep forest greens to lighter, hazy greens. On the right side of the image, there is a large, semi-transparent green circular graphic consisting of several concentric, overlapping rings that create a sense of depth and movement.

**Environmental**

We are committed to continuous improvement, and 2025 marks a significant progression in how we understand and manage our environmental responsibilities.

This year, we invested in our first full greenhouse gas assessment, giving us a clear, data-led understanding of our organisational footprint. This provides the foundation we need to plan reduction strategies responsibly and transparently.

Our alignment with recognised frameworks such as EcoVadis helps us benchmark our performance and identify growth opportunities. By pairing this external benchmarking with emissions measurements, we can strengthen accountability and ensure that credible and comparable data guide our decisions.

We will continue to enhance our reporting processes, expand data transparency, and strengthen our monitoring of social and environmental initiatives as part of our ongoing approach.

**greenly**

## Technology for Change

2025 represents a step change in how we measure and manage our emissions. This year's work includes our first full greenhouse gas assessment, included in this report, providing a clear and structured baseline of our total organisational footprint.

These insights will inform a practical, time-bound reduction plan that focuses on the areas of greatest impact and supports the development of our 2026 environmental strategy.

This report will directly inform how we set targets, allocate resources, and design meaningful reduction programmes for 2026, ensuring that our next steps are grounded in evidence rather than assumptions. As our reporting develops, we aim to share clearer metrics, methodologies, and progress updates, helping partners and clients understand both our achievements and the areas where further improvement is needed.

"Protecting the climate is not something we can sit back and think about later. It needs focus, ownership and a willingness to act, even when the right answer is not always obvious. For us, that starts with making careful choices about the tools we invest in, and how we use technology to better understand our impact and improve the way we work. There is no single solution to the challenge, but by supporting innovative tools and approaches, we can make real progress. This is about using technology for impact, not just to grow our business, but to help create a more sustainable environment for the long term."



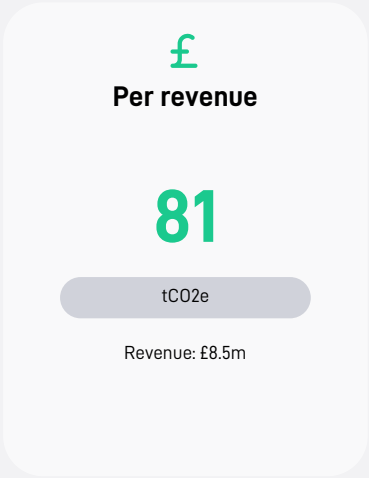
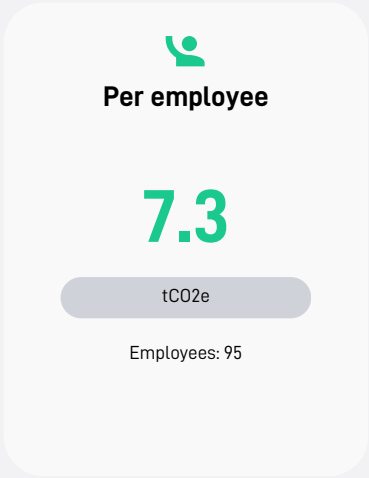
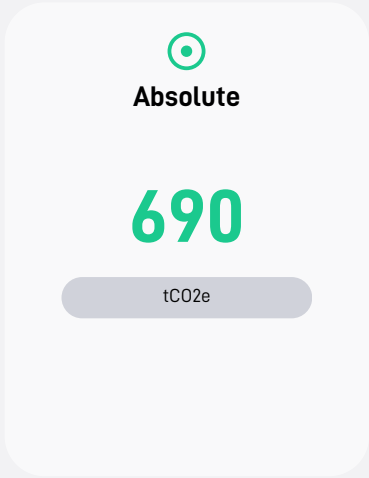
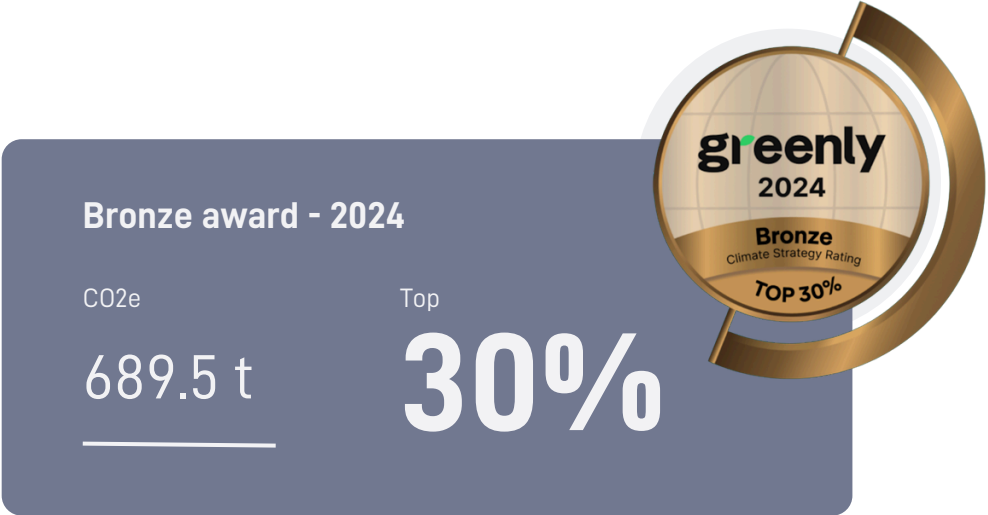
- David Haines, SteelEye CTO



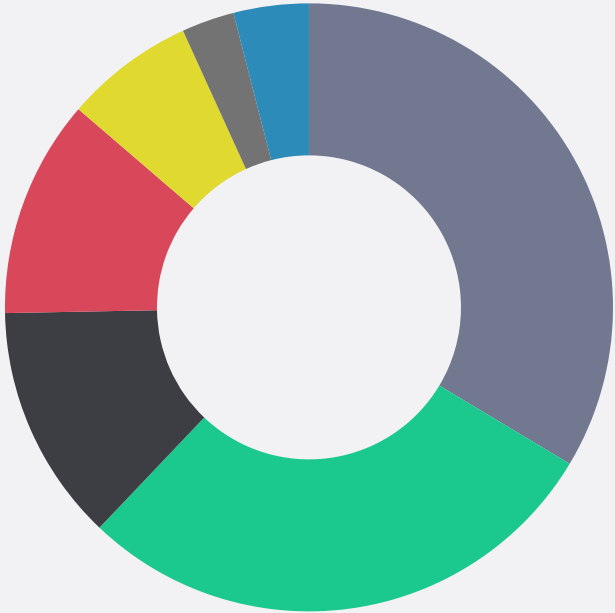
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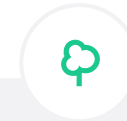
SteelEye is proud to announce that we have been awarded Greenly's Bronze Climate Strategy Rating for 2024, placing us in the top 30% of assessed organisations for our environmental performance.

Sustainability is not simply a corporate responsibility - it is fundamental to how we operate and grow as a business, and this certification marks an important milestone in our journey towards a lower-carbon future.



- 33.6% Travel and Commute
- 28.5% Digital
- 12.6% Services purchases
- 11.6% Energy
- 6.9% Food and drinks
- 2.8% Assets
- 4% Others





Our London based corporate merchandise partner plants 10 trees for every order over £500.

## Sustainable Practices

### Practical printing

We promote a digital-first approach, with printing used only where necessary. Employees are encouraged to consider digital alternatives before printing, helping to reduce waste and conserve resources.

### Reduce, reuse, recycle

We manage resources responsibly by reducing waste, reusing materials where possible and recycling effectively across our offices.

### Responsible merchandising

Our approach to corporate merchandise focuses on quality, reusability and responsible sourcing. We avoid single-use items, work with sustainable and ethical suppliers, and favour local partners where possible.

**SteelEye is Climate Wise**

We offset our carbon footprint with

The trees that we plant include  
**Mangroves, Kelp and Fruit Trees**

**40 TREES PLANTED**  
**WINTER 2024/25**

Each mangrove sequesters 0.31 tCO<sub>2</sub>, each fruit tree sequesters 0.036 tCO<sub>2</sub>, and 10,000 kelp cover 00.25 ha.

Offset your carbon footprint at [climate-wise.com](https://climate-wise.com)  
Visit our website [www.firebrandpromotions.co.uk](https://www.firebrandpromotions.co.uk)



# Governance

## Ethical Conduct and Expectations

Integrity is non-negotiable at SteelEye, and our governance framework continues to evolve as we grow. Our Code of Conduct remains the foundation of how we work, setting clear expectations for professional behaviour, confidentiality, fairness, and respect across every region. In 2025, we reinforced this commitment by ensuring all colleagues completed our annual ethics and compliance training, supporting a consistent understanding of expected conduct and responsibilities.

### Key Elements of Our Ethics and Compliance Framework

- **Whistleblowing and Speaking Up**

We maintain open and confidential channels for raising concerns, including our whistleblowing process, which enables colleagues to report issues safely and without fear of retaliation. All reports are taken seriously, investigated promptly, and addressed with appropriate action, ensuring transparency and protecting those who speak up.

- **Anti-Bribery and Corruption**

We continue to uphold a zero-tolerance approach to bribery and corruption. Our anti-bribery policies are reviewed regularly to reflect evolving regulatory requirements and best practice, safeguarding the integrity of our partnerships and operations. These policies, alongside regular training and communication, help colleagues navigate risk and uphold the standards expected of a regulated technology firm.

- **Oversight and Governance Structures**

During 2025, we strengthened board-level oversight of ethics, compliance, and sustainability, ensuring that governance considerations are embedded within key decision-making processes. Our leadership teams review policy updates, emerging risks, and compliance insights, enabling a coherent approach to ethical conduct across the business.

- **Communication and Transparency**

Open communication plays a key role in maintaining strong governance. Through regular townhalls, CEO updates, and centralised internal communications, we ensure colleagues are kept informed about decisions, priorities, and progress, supporting a culture of transparency and trust.

- **Embedding a Culture of Integrity**

Together, these measures reinforce a governance environment where accountability is shared, policies are well understood, and ethical practice is woven into the day-to-day running of the business.



## Responsible AI

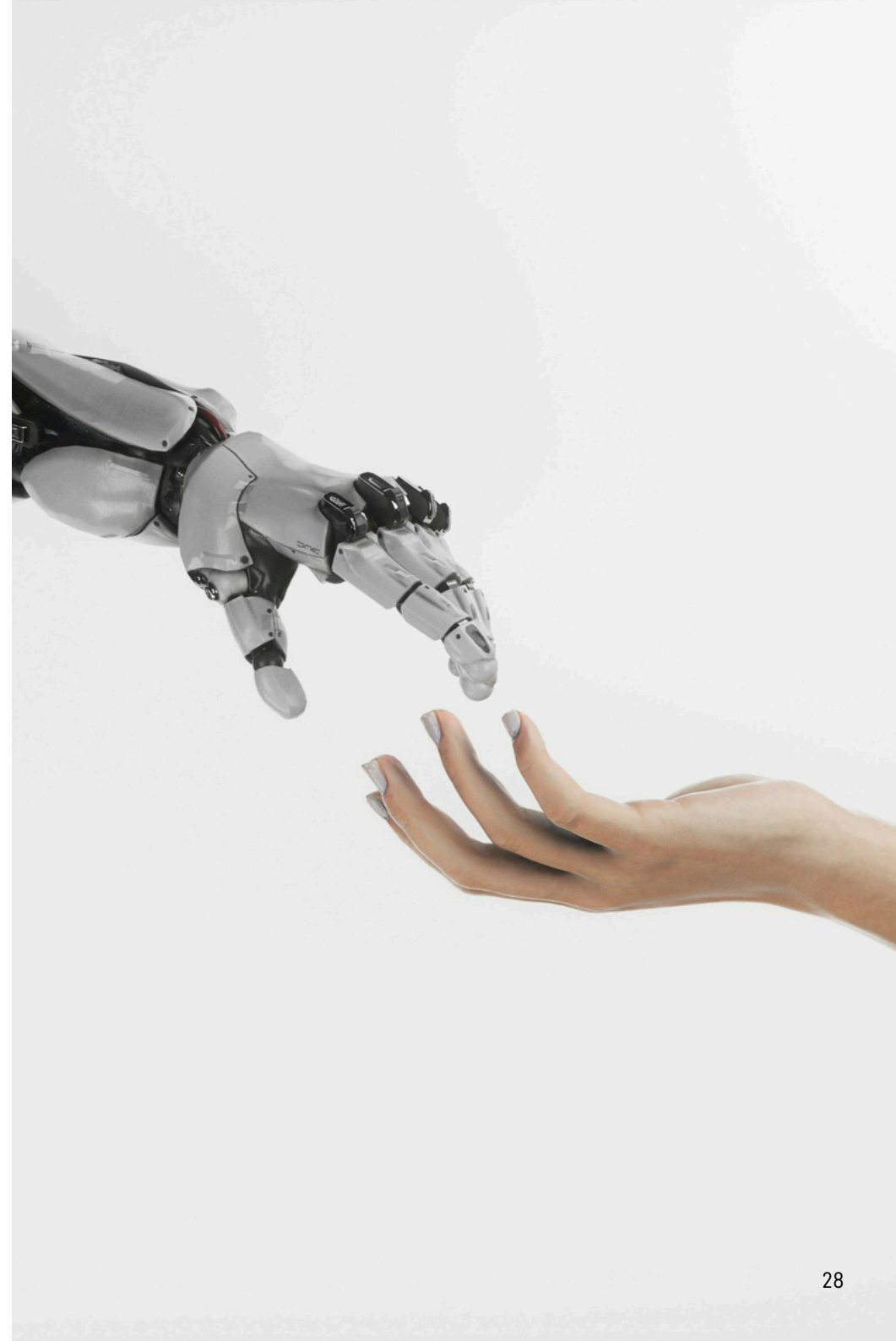
Our technology is built on a foundation of integrity, and we continue to strengthen the ethical standards that guide how we manage data, protect privacy, and secure information. As we expand our use of AI-driven tools, we are formalising a Responsible AI framework that sets clear expectations for how AI is developed, governed, and applied across SteelEye.

All colleagues have now completed AI training, creating a shared understanding of the opportunities AI brings and the responsibilities that come with it. This common baseline supports a consistent, informed approach across regions, functions, and product teams.

The framework focuses on transparency, fairness, and maintaining human oversight in high-impact processes. It details how we assess and manage AI-related risks, test for accuracy and bias, and ensure that outputs remain explainable and accountable to both regulatory and client expectations.

We have established policies that guide the responsible use of AI, helping teams make well-governed decisions in their day-to-day work. Clear guidance, supported by internal controls and ongoing training, ensures that our adoption of AI is safe, compliant, and focused on the right outcomes.

Our ambition is to innovate responsibly, using AI to enhance compliance insight, strengthen operational efficiency, and elevate client trust. By pairing advanced technology with strong governance, we continue to build systems that are secure, reliable, and aligned with the standards our clients expect.



# Risk Management

Our risk management approach is designed to support stable and sustainable operations.

We identify and monitor financial, operational and ESG-related risks, taking steps to reduce potential impacts and support informed decision-making across the business.

## Our Risk Management Framework

### Risk Identification

We take a systematic approach to understanding risk across the business, reviewing financial performance, operational resilience and ESG-related factors to identify areas that could impact stability or long-term performance.

### Managing and mitigating risk

Once risks are identified, proportionate actions are put in place to address them. These include financial oversight and controls, operational protections and ESG-related measures such as meeting regulatory requirements, strengthening inclusive practices and reducing environmental impact.

### Financial resilience

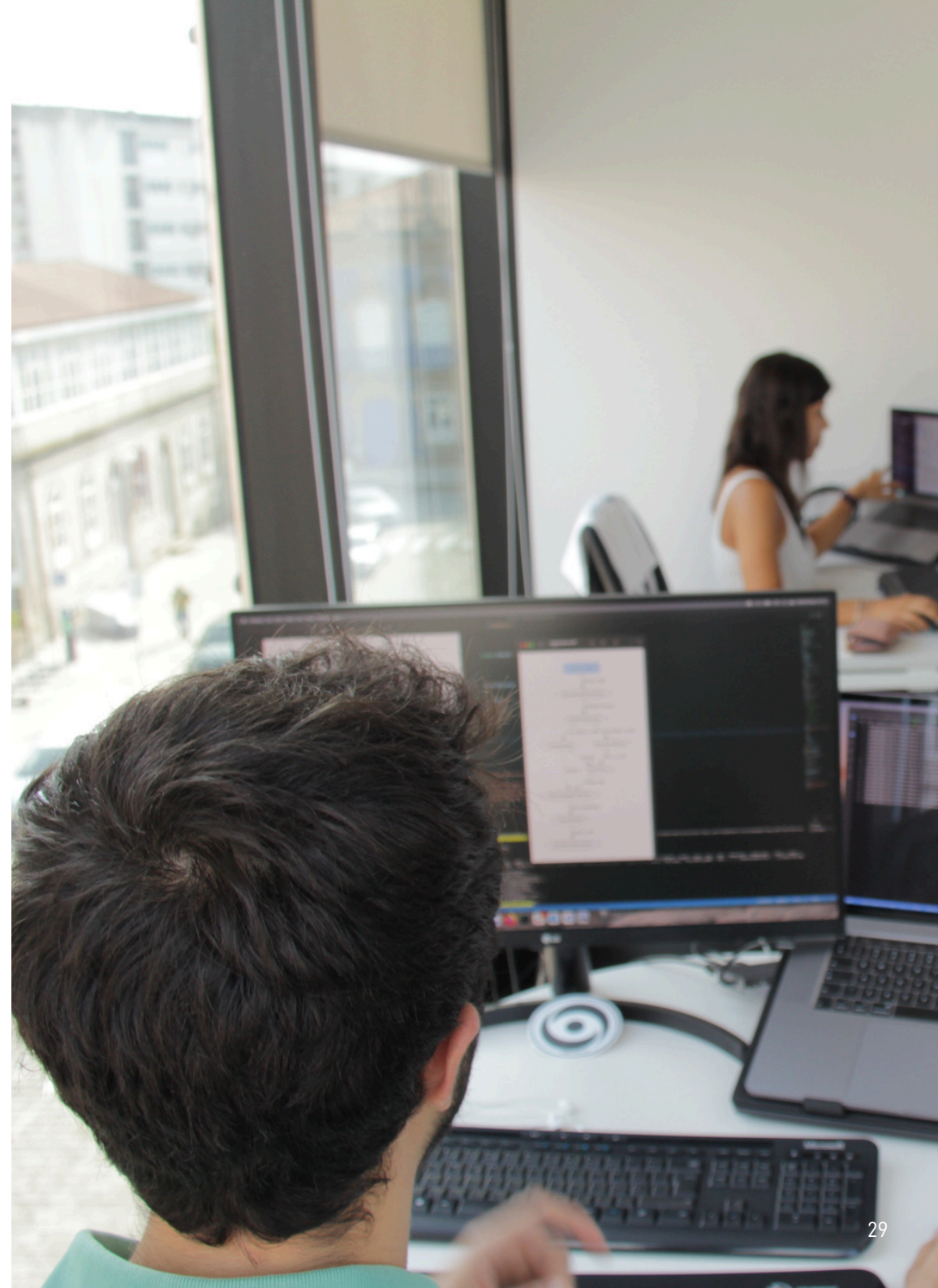
Strong financial governance underpins our approach to risk. Regular reviews and audits support compliance and help maintain the organisation's financial strength.

### Operational continuity

We maintain plans and systems designed to support continuity and security, including business continuity planning, cybersecurity safeguards and infrastructure that can scale with the business.

### Building risk awareness

Risk management is embedded into day-to-day operations rather than managed in isolation. Employees are supported to recognise potential risks and escalate concerns appropriately, reinforcing shared responsibility and accountability across the organisation.



# Data Protection and Security

We maintain a robust security framework to ensure the protection of data, recognising its critical importance in maintaining trust and compliance.

Our comprehensive approach encompasses stringent data protection policies and robust security measures to safeguard sensitive information.

## Data Protection

We maintain high standards of data protection to ensure that the personal data of clients, partners, job applicants and employees is handled in line with applicable data protection laws in each location where we operate. All employees are required to complete mandatory data protection training, including General Data Protection Regulation (GDPR) training. Completion is monitored to support consistent awareness, understanding and compliance with data protection responsibilities.

## Security Measures

SteelEye has established a comprehensive security framework designed to protect data and operations. Key components include:

- **Certifications**  
We maintain ISO 27001 compliance and SOC 2 accreditation, demonstrating alignment with recognised security standards and best practices. These certifications provide assurance that data is managed securely and responsibly.
- **Disaster Recovery and Resilience**  
Our disaster recovery approach includes robust recovery planning and multiple failover mechanisms, supporting operational continuity and service availability in the event of disruption.

- **Penetration Testing and Vulnerability Assessments**  
We carry out regular penetration testing and vulnerability assessments to identify, assess and address potential security weaknesses in a proactive manner.
- **Data Encryption**  
All client data is encrypted both in transit and at rest, ensuring confidentiality and protecting data integrity.
- **Centrally Managed Workstations**  
IT security controls are enforced through centrally managed company workstations, enabling consistent application of security policies across the organisation.

“From a security perspective, the biggest impact comes from culture, not tools. At SteelEye, we work together to make sure we take data protection seriously and that ownership sits across all departments, not just Security. We ensure that staff have every opportunity to not only learn about data protection but also help enforce it”



- Ryan Peters, Senior Security Analyst.

# Future Focus

As we look towards 2026, we remain committed to growing with purpose and shaping a future where responsible innovation supports long-term value for our clients, investors, and communities. Our ambition is to continue embedding sustainability into the way we build our technology, run our business, and contribute to our industry.

## Commitment to our Clients

ESG is strongest when it is shared, and our partnerships reflect this belief. We work closely with clients and investors to provide the clarity, insight, and transparency they need to meet their own ESG ambitions. From timely reporting to open dialogue, we aim to make it easier for stakeholders to track progress and make confident decisions.

### **Accountability and Continuous Improvement**

We have established a robust greenhouse gas baseline as the foundation of our structured climate strategy, and are now progressing towards clearly defined reduction targets. This approach reinforces our commitment to transparency and continuous improvement, while enabling us to support clients in meeting their regulatory, risk management, and sustainability objectives with confidence.

### **Leading with Purpose**

Our ESG Steering Committee plays a key role in guiding this direction. Bringing together voices from across SteelEye, the committee supports informed decision-making and ensures accountability across our ESG priorities. Looking ahead, it will help us identify opportunities for meaningful progress and enable us to turn ambition into measurable impact.

### **Moving Forward Together**

Our journey is ongoing, and the steps we take next will be shaped by the same belief that has guided us so far: progress matters most when it benefits many. We look to the year ahead with optimism, determination, and a shared commitment to building a more resilient and responsible future.



# Environmental, Social and Governance (ESG)

2025 Impact Report

Interim Update published March 2026