



ESG Statement of Commitment

convera
SMART MONEY MOVES

1 Purpose and commitment

Convera is dedicated to transacting funds for and on behalf of our customers globally. We also strive to conduct ourselves in a responsible and socially conscious way, and as such, we are committed to focusing on and managing all relevant environmental, social, and governance ("ESG") factors pertaining to our business. To demonstrate and manage that commitment, Convera has implemented this Global ESG Policy ("policy") as part of its overarching ESG program. This program is designed to help reduce our environmental footprint, ensure our social responsibilities are met, including helping create a safe and healthy environment for our employees, and seek to create value for all our stakeholders.

The accompanying policy details our approach to integrating these ESG considerations and dimensions into our ongoing management of the business and outlines the primary components of the three pillars and how we seek to contribute to each. We also specifically detail our commitment to transparency and disclosure to all our stakeholders and our commitment to consistently progress towards the aims of the United Nations Sustainable Development Goals ("SDGs"). We also reaffirm Convera's commitment to conducting its global business in conformity with all human rights standards, and our adoption of a principles-based approach to doing such business as laid out in the Ten Principles of the United Nations Global Compact.

2 Definitions

2.1 Environmental, social and governance

The standards, definitions, principles, and recommendations supported and adopted by Convera and referred to within this policy are aligned with those set out in the following documents:

- United Nations Sustainable Development Goals
- Paris Agreement 2015
- The International Bill of Rights
- Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights including the Ten Principles of the
- United Nations Global Compact
- International Labor Organization's Declaration on Fundamental Principles and Rights at Work
- Rio Declaration on Environment and Development
- United Nations Convention Against Corruption

3 Roles and responsibilities

3.1 Program governance framework

The Ethics and Anti-Corruption Team ("EACT") is a department of the Ethics and Markets Compliance Team. It oversees and is responsible for the implementation and day-to-day governance of the ESG program and all elements contained therein. Working with the EACT on the program is the global ESG team, and office

managers, whose purpose is to provide knowledge, feedback and critical input from employees regionally as well as any pertinent business data and commentary.

3.2 Global ESG team

The global ESG team consists of interested staff members in various departments and offices and anyone who is keen to be part of this team can become a member. The global ESG team meets on a quarterly basis to discuss the guiding principles of the ESG program included within this principle with the remit of making any changes that positively affect our customer base. The Ethics and Anti-Corruption Team (“EACT”) is overseeing the organization of the global ESG team.

3.3 Chief Compliance Officer and Global Head of Ethics and Markets Compliance

Oversight of the EACT and the overarching ESG program is provided by the Global Head of Ethics and Markets Compliance and Convera’s Chief Compliance Officer (“CCO”). The CCO is a member of the Convera Executive Team who, as well as having oversight, set Convera’s level of commitment, tone, and ethical approach to the program.

4 **Environment**

Convera is cognizant of its environmental footprint and seeks to mitigate any negative environmental impact. To help achieve this goal the following are principal elements of this commitment:

4.1 In-scope emissions

Convera is committed to reducing scope 1 emissions which include those emissions from its owned or controlled sources. These include, but are not limited to, its offices and transport usage where we will look to reduce our carbon footprint whenever feasible. We will also look to work with stakeholders concerning the reduction of any scope 2 emissions generated by the purchase of energy used during our business. We will also actively work on a plan to assess any scope 3 admissions and a framework for addressing them. All targets in relation to reducing emissions will be detailed in end of year reporting.

4.2 Sustainability in business

The overarching aim of Convera's ESG program strategy is to seek to mitigate any environmental impact resulting from its business and manage all aspects of the business sustainably. As part of this approach, Convera looks to align its sustainability strategy with the overall business goals so that all stakeholders understand any potential value creation, as well as examining product innovation designed to meet the sustainability preferences of customers.

4.3 Transportation

Convera will work closely with stakeholders on the use of transport in relation to business use and for private use by employees. We will look to promote the use of environmentally friendly transport and seek to reduce the use of any transportation means that produce harmful emissions.

4.4 Offices, waste generation, and management

Convera will review all elements of its estate with a view to moving, where possible, towards a more sustainable approach to working. Convera will also comply with all relevant regional waste legislation. We recognize the importance of waste management and generation as part of our sustainability approach. As such the business has adopted the approach of reducing, reusing, and recycling waste products wherever possible. In particular,

Convera actively seeks to recycle waste across its offices including looking to eliminate any dependence on single use plastics.

5 Social

At Convera we recognize the importance of and the impact we can have on our relationship with people be they our employees, our stakeholders and partners or the communities we live and work amongst. In this pillar of the program, we cover those interactions and define them against the principles of ethics, human rights, and general wellbeing. To help meet Convera’s social commitment, the following elements are considered and acted upon:

5.1 Diversity, equity, and inclusion

At Convera, we are committed to fostering an inclusive and equitable environment where all individuals feel valued, respected, and empowered. We firmly believe that diversity, equity, and inclusion (DEI) are not just important values, but also critical components for driving innovation, creativity, and sustainable growth. We are in the process of establishing measurable goals and will regularly monitor our progress towards achieving them. We strive to create an inclusive workplace where individuals can bring their whole selves to work, feel a sense of belonging, and contribute to our collective success.

5.2 Employee well-being and labor rights

Convera aims to be a premier employer by retaining and attracting top talent, as well as to uphold values and ethical standards that create working relationships based on trust and respect, within Convera as well as with all stakeholders, including customers and employees.

At Convera, we are committed to creating a healthy working environment and to enhancing the well-being of our employees while complying with all relevant statutory requirements and best practice in respect of recruitment, retention, development, equal opportunity, and diversity. This includes, but is not limited to, minimum-age labor restrictions where applicable, and overall working conditions such as minimum wage pay and working hours.

At Convera, we believe that diversity within our workforce enriches our company, customer interactions and the communities where we operate. We comply with all applicable laws in this respect and provide equal opportunity and advancement opportunities for all individuals. We believe that diversity in individual experiences constitutes a strategic and competitive advantage. We therefore seek to provide a workplace that is inclusive, respectful, and free from discrimination, bullying, harassment, victimization and acts of violence.

5.3 Health and safety

Convera is committed to ensuring the health, safety, and welfare of all employees, contractors, visitors, and anyone else affected by our operations. We recognize that a safe and healthy working environment is vital for the well-being and productivity of our employees and the success of our business. Our current documented Health and Safety Statement sets out our commitment to managing health and safety effectively and complying with all relevant legislation and regulations.

Convera’s objectives are:

- To prevent accidents, injuries, and work-related ill health;

- To provide and maintain safe offices, equipment, and systems of work;
- To ensure that adequate information, instruction, and training are provided to employees;
- To promote a positive safety culture through communication and consultation;
- To comply with all relevant health and safety legislation and regulations; and
- To continually monitor and review our health and safety performance and improve our processes.

5.4 Community outreach and engagement

At Convera, we recognize that our responsibilities extend beyond our business operations. We are committed to making a positive impact on the world around us. Therefore, we have dedicated volunteer days for our employees to actively participate in community service projects. These volunteer days are an opportunity for our team members to give back, support local organizations, and contribute to the betterment of society. We believe that by leveraging our collective skills, resources, and time, we can make a meaningful difference in the communities where we live and work.

5.5 Protecting the customer

Convera utilizes various controls to manage certain consumer protection compliance risks and obligations related to products and services offered in our operating countries and other jurisdictions and complies with legislative requirements both regionally and globally. Further to this, Convera maintains various business continuity plans to protect against any disruption to its operations. It also monitors platform downtimes and strives to keep such periods to a minimum.

6 **Governance**

Across Convera, we seek to implement strong governance and oversight of processes, controls, and adherence to laws and regulations in respect of all elements of our ESG program. This commitment includes the way we conduct ourselves as individuals and as an organization, any ESG related initiatives undertaking, and reporting with associated transparency. To help us achieve this strong governance framework, the following elements are considered:

6.1 Integrity and transparency

Convera is fully aware of the importance of integrity and transparency in respect of its ESG program and any associated communications and disclosures to maintain the trust of our customers and stakeholders alike. We are also aware of the need to set appropriate standards and follow the principles laid down by the United Nations and any regional legislation and charters. We take very seriously any concerns about misleading information, false impressions, or unsubstantiated claims in connection with our program. We strive to always be open and honest, and always looking for room for improvement.

6.2 Corporate governance, policies and disclosures

Convera is committed to complying globally with all relevant environmental legislation, regulations, and directives. We are also committed to monitoring our progress and striving to continuously improve our environmental performance.

Convera will publish annually an ESG report detailing its targets, objectives, achievements, and associated data for the year to date, as well as any future objectives on its sustainability journey. This report will also include our efforts to minimize any environmental impact and our moves towards greater sustainability and a place in

a circular economy. We will be open and transparent in all such reporting. Annual reporting will be made available in Q1 of the following year.

6.3 Training and Communications

Convera recognizes that training and communications are essential elements of a successful ESG program, as ignorance of the subject is a serious barrier to any drive towards sustainability. As the program progresses, we will continue to raise awareness among our employees about environmental issues, sustainability, and ESG in general. This will include, where appropriate, training and communication.

We also recognize the need for our leaders in our ESG program to have the requisite skillsets and have ensured they have received external training and qualifications in business sustainability management.

6.4 Ethics and conduct

Convera's values provide the foundation for how we treat our customers, respect our company, engage with our partners, and work with each other. Our values are core to who we are, and we work to measure ourselves against the highest ethical standards both in practice and in spirit. Our ethical standards include working relationships that are built on trust and respect between Convera, our customers, and each other. We work to create a healthy working environment and a strong culture of compliance in accordance with legal and regulatory obligations.

Our code of conduct is founded on Convera's values and is the compass that guides our behavior as we strive to operate responsibly with the highest level of integrity, transparency, and ethical conduct. The code plays an essential role in building a culture of compliance within Convera and defining the standards to which we hold ourselves, our customers, and our company. The code of conduct also defines employees' responsibility to speak up when they see or suspect a violation of Convera policies and/or a violation of the law.

The primary channel for reporting ethical concerns, including bribery, corruption, modern slavery, and human trafficking, is the Convera ethics hotline. The hotline is a secure and confidential mechanism for receiving and processing whistleblower reports and other ethical concerns. It allows employees and other reporters to raise concerns anonymously, subject to applicable law. Reports can also be made by completing and submitting a form online via a web portal. Convera also offers a mobile-site submission point. All avenues for reporting concerns are available 24 hours a day, 365 days a year. The web-based reporting tool and toll-free phone line support submissions and calls in 21 different languages. An external, independent, third-party vendor administers the Convera ethics hotline. Concerns reported through the Convera ethics hotline are immediately forwarded to the Convera ethics office for review. Convera reviews all submissions and, as appropriate, will investigate and act in accordance with Convera's ethics investigation procedure. Convera's whistleblowing policy and procedure and the reporting channels it provides are fully compliant with local country legislative requirements such as, but not limited to, data protection, scope of reporting, notifications, anonymity, and languages offered.

6.5 Human rights

Convera is committed to conducting its global business in conformity with all human rights standards and has adopted a principles-based approach to doing such business. These are laid out in the Ten Principles of the United Nations Global Compact and expanded upon in the Convera human rights policy.

6.6 Global data privacy and security

At Convera, we take the confidentiality, data integrity, and information security of our data, including that of our customers and systems, extremely seriously. To ensure legal compliance and the integrity and security of our systems and data therein, we have a dedicated privacy team as well as an information security team.

6.7 Compliance

Convera's risk and compliance program helps to mitigate the risk of modern slavery, human trafficking, human rights abuses, and ESG-related concerns, including, but not limited to, fraud and corruption. Convera's risk and compliance program utilizes a risk-based approach that aligns with legal and regulatory requirements. An annual compliance enterprise risk assessment is undertaken to assess current and emerging risks, which includes assessing the effectiveness of controls across business lines, geographies, products, customers, and vendors.

As part of Convera's efforts to combat such issues, Convera established the Compliance and Risk Investigation and Analysis ("CRIA") team. The CRIA team is comprised of over fifty financial crime experts with backgrounds including law enforcement, banking, and legal affairs. CRIA works to identify, prevent, and report any instances of potential financial crime, including modern slavery, human trafficking, and child exploitation. CRIA utilizes several automated tools to monitor and identify indicators of potential financial crime. These tools include transaction screening and monitoring software that utilizes algorithms to identify risk indicators including business nature, geographies, key words, currencies, adverse media, and other behavioral patterns that may indicate a nexus to financial crime. Convera educates its staff and regularly assesses and updates its controls through engagement with regulators, law enforcement, and other industry stakeholders to ensure its efforts are tuned to the ever-evolving world of financial crime.

6.8 Risk management and sourcing

Convera maintains a vendor risk management and oversight program that formalizes the review requirements and process for onboarding potential new vendors, including the requirements for:

- Onboarding new third-party vendors;
- Ongoing monitoring of existing third-party vendors; and
- Exception processes.

We take a risk-based approach to assessing vendors for potential human trafficking or modern slavery within their business. Prior to working with Convera, prospective vendors must successfully complete the risk assessment and due diligence processes. The assessment focuses on a variety of issues, including compliance, anti-bribery, and corruption, which have been associated with modern slavery and human trafficking.

Convera's approach to sustainability is centered around the material issues for the business, its stakeholders, and its customers. To ensure this approach is relevant a materiality assessment has been undertaken and will be frequently reviewed.

Further, as part of the program, Convera is committed to assessing any associated current and future state ESG-related risks. To help mitigate any such issues, Convera is committed to undertaking a yearly global ESG

risk assessment, which includes a client risk analysis and a measurement of any inherent vulnerabilities in the Convera business model.

6.9 Anti-bribery and corruption

Convera is committed to conducting its global business in conformity with ethical business standards and to complying with both the letter and the spirit of all applicable anti-bribery and anti-corruption laws. Convera strictly prohibits bribery or corruption in any form by any employee or third-party regardless of its impact on the bottom line or prevailing norms or practices.

Convera's global footprint leads to being subject to anti-corruption and anti-bribery laws everywhere the Company conducts business, such as the U.S. Foreign Corrupt Practices Act and UK Bribery Act. Violations of these laws can result in severe fines and penalties for Convera, and those individuals involved. Additionally, violations can damage the Company's reputation, brand, and the trust of our shareholders. Even alleged violations of these laws may have a significant negative reputational impact and result in indirect costs for the Company. As a global company, Convera recognizes that the costs of corruption often impact the communities we serve, and, therefore, Convera is committed to being part of the solution to this important global issue.

6.10 Fraud prevention

Convera is committed to protecting its customers from instances of fraud and implements controls to help effectively mitigate the risk. The cornerstones of the anti-fraud program are red flag led and proactive fraud controls, a dedicated customer partnership, a customer fraud education program, Know-Your Customer ("KYC") controls, interdiction, reporting, transaction monitoring, a fraud reporting policy, controls management through appropriate policies and procedures, compulsory fraud training for 1st and 2nd line of defense employees, and the provision of experienced fraud investigators.