Environmental, Social and Governance (ESG) Policy

Version	3.1
Document Status	Published
Classification	Public
Published Date	October 2026
Next Review Date	September 2027
Intended Audience	All Interested Parties
Document Owner	Chief Operating Officer (COO)

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1. Introduction

1.1 Purpose

Our values and standards are expressed and reflected in our actions, performance, guidelines, and policies across all Environmental, Social and Governance (ESG) aspects. The purpose of this policy is to ensure responsible operations and investment is a key priority for Quantexa.

Quantexa believes that a responsible approach towards its operations and global footprint, our employees, suppliers and local communities, the environment and society is an essential part of our success. Quantexa believes that responsible ownership and business success go hand in hand and, as such, Quantexa has embedded the consideration for Environment, Social and Governance (ESG) factors throughout all departments and functions.

We are fundamentally committed to building a long-term, sustainable business, which will grow, provide employment, and generate economic benefit in an environmentally and socially responsible manner. Responsible investment, and subsequently responsible ownership, require proper analysis, judgement, and mitigation of risk. Quantexa aims to invest within the organisation and take a responsible approach towards the environment, society, and corporate governance.

"At Quantexa, we're committed to having a positive impact on the people we serve and the planet we inhabit. We maintain the highest standards of moral and ethical conduct as we work to drive sustainable, long-term value within the organization, and beyond it. The culture we have fostered here at Quantexa will guide us to reach our goals".

Vishal Marria CEO, Quantexa

The policy will be reviewed annually, or within planned and agreed intervals, to determine whether it has achieved its intended outcome(s) over the past year, to review the objectives going forward and to identify opportunities for continual improvement.

2. Definitions

The three main areas of focus for responsible investment relate to the environmental and social impact of any business's activity, and the way a business is managed. Together, these factors are known as Environmental, Social and Corporate Governance ('ESG').

ESG processes and procedures focus on non-financial performance indicators that address Quantexa's approach towards responsible operation, with sustainability, and our impact on society and the environment, as well as other ethical and corporate governance considerations.

2.1 Environmental

The depletion of natural resources and the threat of climate change have raised concerns about the environment and the potential financial impact on businesses and our growth around the globe. Sustainable options are increasingly being considered as part of investment choices that are made within Quantexa.

The issues are diverse, but the main areas are:

- Factors contributing to climate change

- Efficient energy consumption
- Responsible disposal of hazardous waste
- Sustainability of resources
- The impact of climate change on businesses
- Carbon neutral goals

2.2 Social

Inclusion, diversity, and equality are becoming more important considerations in relation to the way in which we operate and generate a competitive advantage. All these areas are attracting increasing scrutiny from a range of clients, investors, and stakeholders. There is increasing commercial benefits for businesses which have inclusive and diverse work ethics and practices, as we look at the impact it has on our employees, local communities, and our society.

The main areas of consideration are:

- Preservation of human rights, and avoidance of any complicity in human rights abuses
- Equality and diversity amongst employees
- Non-discriminatory employment practices
- Health and safety
- Animal welfare
- Charity commitments and corporate donations
- Employee/human welfare
- Information Security and Data Protection (ISO/IEC 27001)

2.3 Corporate Governance

Corporate governance covers the rights and responsibilities of the management of a company, our structures, corporate values and finally our accountability processes.

This relates to the following areas:

- Management structure inclusive of the balance of power between the Executive Management and the Board, appropriate checks, and balances for members of the management team
- Employee relations and workplace grievances
- Executive remuneration
- Transparent governance
- Equality and diversity amongst the board and executive management team

3. Quantexa's Commitment

Quantexa is committed to making the world a safer and more secure place with the use of software that is developed to combat crime, through better KYC, prevention of money laundering and fraud. In the digital era, this commitment applies to our work both on the internet and the physical world alike. Furthermore, to pursue our business objectives, while ensuring the protection of the interests of the parties involved in the growth, merger and acquisition processes undertaken by Quantexa.

As we aspire to achieve a more sustainable future for all, we set out the following practices and guidelines in which our employees and stakeholders are expected to:



- Make a commitment to reducing its emissions to achieve Net Zero emissions by 2050
- Perform an annual review and publish a “Responsibility Report” which will include:
    - Carbon reduction strategy and systemic environmental initiatives
    - Diversity & inclusion metrics with progress
    - Anti-Bribery & Corruption and Corporate Social Responsibility metrics with progress.
- Commit to producing an annual carbon footprint report, for the purposes of internal reporting.
- Commit to investing in the training and awareness of all staff on the management of environmental, social and governance risks.
- Implement and adhere to various policies and procedures to reduce greenhouse gas emissions, energy use, water use, waste generation, consumption of finite natural resources and pollution of land, air, and water.
- Assist, where possible, in the protection and damage limitation to nationally or internationally protected areas including UNESCO World Heritage sites, Ramsar sites, Man & Biosphere sites, and FSC High Conservation Value Forests and furthermore, where possible, include damage to plants and animals listed on the IUCN Red List of critically endangered species.

3.1 Community

We believe in creating a more sustainable future for our clients, partners, and employees both current and in the future and for the developing communities around the world. We are involved in the community, and we already invest greatly in volunteering and donations activities to make the world a better place. Year on year we expect this to increase and encourage and support all our employees to undertake differing levels of charitable work.

3.2 People

The most important asset of our company is our human capital. We promote a safe, healthy, and supportive work environment. Our goal is to create a diverse work environment and additionally we invest greatly in the training and development of our employees.

Quantexa recognises the importance of diversity, equity, and inclusion, and we are committed to providing an environment in which each employee is recognised, valued, able to fulfil their potential and maximise their contribution. We appreciate the value and creative potential that individuals of different backgrounds and abilities bring. We work hard to ensure equitable treatment in all aspects of working life, and an inclusive and supportive culture where differing views and experience are respected. We firmly believe that such a culture significantly enhances our ability to provide a quality service to our clients. Therefore:

- We expect all employees to be thoughtful of the environment and make careful use of resources.
- We address environmental challenges in our workspace through various responsible means.
- We inspire employee conscientiousness in support of the environment.
- We encourage our employees to use green transportation and minimise their energy consumption.
- We support and encourage flexible and hybrid working arrangements.
- We support mentorship programs for developing the career of employees who are members of minority communities.
- We are providing equal opportunities and recognise the importance in gender pay gap equality; and
- We integrate messages of a safe and accepting multicultural work environment in our internal and external publications.

3.3 Ethics

Quantexa promotes core values of honest and ethical conduct, integrity, open communication, equal opportunity, and diversity.

Quantexa requires the highest standards of honesty, loyalty, transparency, and integrity. Quantexa has developed a set of values which are referred to as DATA

- Determination
- Ambition
- Teamwork
- Accountability

The ethical and behavioural standards as well as the professional conduct at Quantexa is considered incredibly important and all employees are expected to conduct their work life and rule their business relationships in a way that respects everyone around them and Quantexa. It recognises the importance of Quantexa's reputation and the responsibility of each employee, to uphold Quantexa's obligations to all our stakeholders, with the intention to avoid any possible acts or modes of behaviour that might be contrary to the expected values at Quantexa.

Quantexa strives to create an inspirational and happy working environment promoting good behaviours in line with our values. As part of this, we expect all its employees, to be trustworthy, respectful, responsible, fair, caring, and good citizens. We seek to embrace diversity in all its forms, as a value that enhances the business, and attempts to follow the environmental principles that underpin our business model.

Artificial Intelligence (AI) is a core part of Quantexa's strategy and continues to evolve. Quantexa has adopted and mandated four key principles we to address ethical risks around AI:

- **Accountable:** AI and ML programs should have a clear owner and a governance process covering all stages in the program lifecycle, i.e., design, build, testing, deployment, and ongoing running. This should ensure all relevant legal, regulatory, and ethical guidelines are demonstrably adhered to, with any ethical risks or issues identified, tracked, and mitigated.
- **Fair and Justifiable:** AI-driven processes should be fair for all individuals and groups impacted by decisions. Model output, decisions, and process outcomes must be fully justifiable for achieving valid (business) objectives.
- **Transparent and Explainable:** AI-driven processes and models should have the appropriate level of transparency, explainability, and interpretability. Programs should be transparent about their use of AI to appropriate stakeholders. Both the data and models, which input into AI-driven decisions, should be explainable and interpretable. The risks associated with critical machine-made decisions are best addressed by transparent models. Individuals assessing output of AI systems must understand the evidence which produced that output.
- **Robust and Secure:** AI systems must provide reliable and stable results. Software and confidential data must be secure.

3.4 Environment

We take an active part in helping to ensure the sustainability of the world's resources and environment undertaking various initiatives around all our locations. We are committed to reducing our carbon footprint by creating reliable software products and services that are mindful of their environmental impact. We strive to reduce energy usage and greenhouse gas (GHG) emissions, where possible.

Transportation is one of the major sources of carbon emissions. Therefore, Quantexa, as one of the industry leaders in the mitigation of financial crime solutions has enabled its workforce to be able work in a hybrid manner



and encouraged them to reduce using transportation and increased its remote work access solution capabilities and remote support and installation.

We support the reduction of physical infrastructure by moving to a virtualised infrastructure and we encourage moving from on-premises where possible to cloud based offerings. We have developed our cloud offerings to enable our customers to continue to use our services reducing their carbon footprint.

3.4.1 Environmental Management System (EMS)

Quantexa is committed to establishing, implementing, maintaining and continually improving an Environmental Management System (EMS) appropriate to the nature, scale and environmental impacts of its activities.

The EMS will provide a structured framework for identifying and managing environmental aspects, risks and opportunities; ensuring compliance with applicable environmental requirements; establishing environmental objectives and targets; monitoring environmental performance; and driving continual improvement.

Quantexa intends to align its EMS with the principles and requirements of ISO 14001, with the objective of developing a systematic and effective approach to managing and improving its environmental performance.

3.5 Supply Chain

Quantexa is a worldwide leader in developing financial crime software solutions to governments and corporate enterprises globally. Quantexa assures the high standards of its supply chain conduct by ensuring that the working conditions in Quantexa's global operations and supply chain are safe and that business operations are conducted ethically. As part of our commitment to our business partners, we demand the suppliers of our products and services ("Suppliers") to comply with our high standards and values, as we consider honesty, integrity, transparency and open communication core values of our business and operations. Therefore:

- We are committed to diversity and equality throughout our supply chain.
- Our suppliers are committed to the environment and are selected carefully, as our environmental expectations are clearly outlined.
- Our suppliers are committed to reduction of use of substances of concern and hazardous waste/emissions.
- Our suppliers are requested to disclose their objectives and their use of emissions and comply with our commitments and goals.
- Our suppliers are requested to comply with the relevant standards to support environmental responsibility.
- We are committed to fair practices of trade and competition.
- We engage with Suppliers that adhere to our business conduct and values and with those who act in an ethical and responsible manner, in accordance with our Supply Chain Code of Conduct.
- We ensure that our Suppliers comply with all applicable laws and regulations and with those relating to human rights and labour, conflict mineral, slavery and human trafficking, environmental sustainability, ant-corruption and bribery.

Quantexa adopts a proportionate and risk-based approach to supply chain monitoring, including ESG considerations. This is built directly into the procurement process, ensuring that supplier ESG evaluation forms part of the onboarding and assessment lifecycle from the outset.

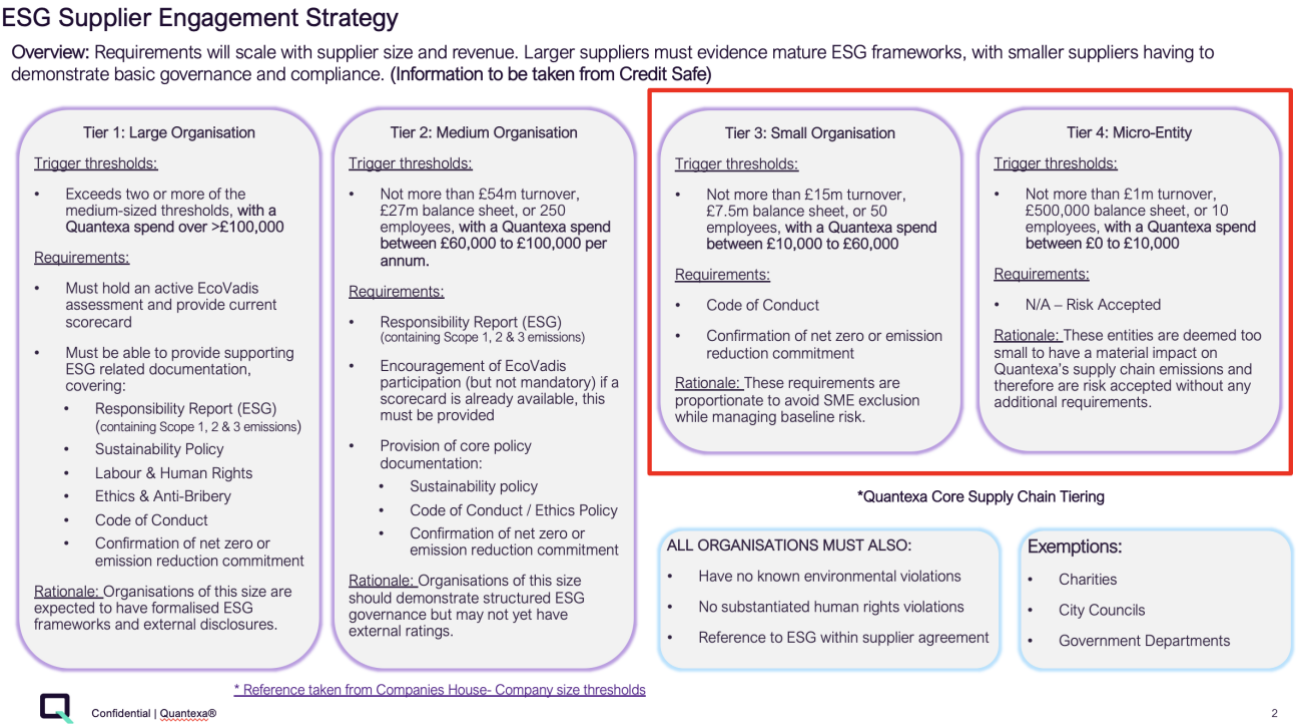
Suppliers are classified in accordance with the UK Companies House size definitions and based on Quantexa spend, which provide a recognised and objective framework based on organisational size and financial thresholds. This ensures that expectations are appropriate, proportionate, and scalable.

Requirements are aligned to the supplier's classification, recognising that larger organisations typically have more mature sustainability programmes and greater resources. Large organisations are expected to demonstrate established ESG frameworks, including formal policies, defined objectives, and evidence of

ongoing scoring, monitoring and improvement. Medium sized organisations are expected to show structured governance and clear ESG commitments, supported by relevant policies and accountability.

Small organisations and micro entities are subject to proportionate requirements, focusing on foundational governance, regulatory compliance, and evidence of responsible business practices. This approach ensures that smaller suppliers are not subject to undue burden while still meeting baseline ESG expectations.

Suppliers are therefore categorised as Large, Medium, Small, or Micro entities as part of the procurement process, with ESG requirements tailored to reflect their size, operational scale, and likely level of ESG maturity. This structured and embedded approach enables Quantexa to maintain effective oversight of its supply chain while promoting responsible, sustainable, and proportionate supplier engagement.



3.6 Corporate Governance

The Board of Directors of Quantexa has adopted the following:

- Corporate Governance Guidelines to assist the Board in carrying out its responsibilities and serving the interests of the Company and its shareholders in a manner that is consistent with the Board's fiduciary duties. We have adopted corporate governance guidelines to assist our Board in carrying out its responsibilities and serving the interests of our company and its shareholders.
- The Board's principal duty is to exercise its powers in accordance with its fiduciary duties to Quantexa and in a manner that it reasonably believes is in Quantexa's best interests. To satisfy this responsibility, the Board expects its members to take a proactive approach to their duties and functions while actively monitoring corporate management. Accordingly, the directors and senior management provide oversight in the formulation of the long-term strategic, financial, and organisational goals of Quantexa and of the plans designed to achieve those goals.
- In relation to conflicts of interest, all directors are expected to avoid any action, position or interest that conflicts with the interests of Quantexa or gives the appearance of a conflict. If an actual or potential conflict of interest develops, the director must report all facts regarding the matter to the Chairman of the board. If a director has a personal interest in a matter before the Board, the director must disclose the interest to the Board and excuse himself or herself from discussion of the matter and abstain from voting on the matter.

4. Quantexa's Commitment to the UN Global Compact Principles

Quantexa is proud to be a signatory to the United Nations Global Compact, reinforcing our formal commitment to corporate sustainability, ethical conduct, and responsible business practices. By joining this global initiative, we publicly affirm our dedication to upholding fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption, and to integrating the Ten Principles of the UN Global Compact into all aspects of our business.

Our commitment is not limited to compliance, it reflects a proactive approach to embedding sustainability and responsibility into our strategic objectives, governance structures, policies, and operational procedures. This includes:

- **Human Rights:** Respecting and promoting the protection of internationally proclaimed human rights, ensuring that our operations do not contribute to human rights abuses.
- **Labour:** Upholding the freedom of association, eliminating forced and child labour, and promoting fair and safe working conditions across all locations.
- **Environment:** Implementing sustainable practices and managing environmental impacts.
- **Anti-Corruption:** Acting with integrity, preventing all forms of bribery and corruption, and fostering transparent and accountable business practices.

We recognise that our responsibility is global and holistic: strong performance in one area cannot compensate for harm in another. By embedding the UN Global Compact Principles into our decision-making, culture, and everyday operations, we aim to enhance transparency and accountability in our business practices.

This formal adoption reinforces Quantexa's values and sets clear expectations for all employees, business partners, and stakeholders, ensuring that responsible business practices are a shared commitment and an integral part of how we operate. As a UNGC signatory, we shall regularly report on our progress, engage in continuous improvement, and contribute to a global movement for a more sustainable and equitable future.

Category	Principle	Description
Human Rights	Principle 1	Support and respect the protection of internationally proclaimed human rights.
Human Rights	Principle 2	Make sure that we are not complicit in human rights abuses.
Labour	Principle 3	Uphold the freedom of association and the effective recognition of the right to collective bargaining.
Labour	Principle 4	Support the elimination of all forms of forced and compulsory labour.
Labour	Principle 5	Support the effective abolition of child labour.
Labour	Principle 6	Support and adopt the elimination of discrimination in respect of employment and occupation.
Environment	Principle 7	Quantexa will support a precautionary approach to environmental challenges.
Environment	Principle 8	Undertake and adopt initiatives to promote greater environmental responsibility.
Environment	Principle 9	Encourage the development and diffusion of environmentally friendly technologies.
Anti-Corruption	Principle 10	Work against corruption in all its forms, including extortion and bribery.

5. ESG Governance Model

Quantexa has put in place a governance structure which ensures sustainability at the various levels of the organisation. The Model provides for the following roles and corporate bodies:

Role	Responsibilities
ESG Management	Responsible for the strategic management of sustainability at Quantexa, directing the activities of the ESG Committee.
Sustainability Consultant (External)	Monitors developments related to the sustainability topics, coordinates the definition of Quantexa's strategy in this area, ensuring that it becomes embedded into everyday operations.
ESG/CSR Committee	Contributes to defining the sustainability strategy and the related communication plan, as well as supervising all the activities in this area.
ESG Ambassador(s)	Identified within the organisation and responsible for the development of specific ESG initiatives, promoting the development of a culture of sustainability both inside and outside the organisation.

6. Reporting Responsibility

We are committed to reporting and publishing our progress in a transparent manner, both in areas we have done well and in those that will improve in 2025 and beyond. Quantexa actively publishes its Responsibility Report on our website https://www.quantexa.com/esg-commitments/.

We have made considerable progress in several key areas and being a scaling and agile company, we pride ourselves on having the ability to move and change direction if needed, including in basic governance.

However, there is always room to improve, particularly in the adoption of carbon reduction strategies and the diversity of senior leadership teams. Initiatives have been put in place to drive improvement in these areas during 2026/7.

7. Violations and Enforcement

We encourage the reporting of non-compliance or policy breaches to ensure transparency and drive improvement in our organisation's practices. Please use the procedures outlined in the Speak Up Policy for reporting. Individuals found in violation of this policy, or other organisational policies may be subject to disciplinary action in line with applicable People Team policies, contractual obligations, and legal or regulatory requirements.

8. Approval Log

8.1 Change History

Version	Date	Name and Role	Revision Notes
3.1	September 2026	Emma Thomspon – Business Operational Resilience Manager	Annual Review with no substantial changes.

8.2 Approval History

Role	Action (i.e., version approval, annual review)	Action Date
Head of Information Security Chief Operating Officer	New Document	01/08/2022
Head of Information Security Chief Operating Officer	Review & Update	10/06/2024
Head of Information Security Chief Operating Officer	Annual Review	08/10/2024
Head of Information Security Chief Operating Officer	Annual Review	October 2025
Head of Information Security Chief Operating Officer	Annual Review	September 2026