TRADING CENTRAL™

EMPLOYEE HANDBOOK

REVISION CONTROL

This document is reviewed and updated annually and at any significant changes by senior management.

Employee Handbook 2025				
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Version: 1.1	**Owner:** Claudia De La Fuente			
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	Internal	X	Confidential	

Date	Version	Author	Reviewer	Approver	Summary of Changes Made
Jul 15, 2025	v1.0	Claudia De La Fuente	Claudia De La Fuente	Claudia De La Fuente	Creation
Jul 24, 2025	v1.1	Claudia De La Fuente	Claudia De La Fuente	Claudia De La Fuente	Added the **Information Security Event Report** section

WELCOME TO THE TEAM!

This Employee Handbook aims to help you understand our work environment, company policies and practices, and your responsibilities as a member of the Trading Central team. As an employee, it is your responsibility to familiarize yourself with the information contained in this document and to agree to follow its guidance.

No manual can anticipate every aspect about policy. As Trading Central continues to grow and evolve, and as legislation is updated, the need may arise to make changes. As such, Trading Central reserves the right to revise, supplement or rescind any policies or portion of this manual as we deem appropriate.

CONTENTS

SUPPORTING INVESTMENT DECISIONS THROUGH INNOVATION SINCE 1999.

We strongly believe our mission is important to the entire economy; We help investors spot the best trading opportunities. We help them convert ideas into investment decisions and we accompany risk takers when it comes down to handling their exposure.

That's our modest contribution to the type of society we want to live in. We are full of esteem for risk-takers and full of joy when smart ideas are financially rewarding. **That's how we are at Trading Central.**

- Alain Pellier

MEET THE LEADERS GUIDING OUR COMPANY'S VISION.

ALAIN PELLIER

CEO & Co-Founder

Alain co-founded Trading Central in 1999 after several years spent in the City of London working for various financial institutions. A leader in the investment space, Alain graduated from ICMA Centre (UK) (MSc) and Paris-based Dauphine University (M.A. and PhD).

JEROME FAVRESSE

Chief Operating Officer

Jerome is a cross-asset strategist with over 15-years of investment banking experience, busy incubating new decision-support algos and AI. He specializes in Research & Strategy, Big Data, News and Sentiment Analytics. Jerome holds a Master of Science (MSc) from Bordeaux Management School in France.

LILIAN APPENHEIMER

Global Director of Customer Success

Lilian has excelled in creating value and meaningful relationships with customers, while managing international, multi-cultured teams in the investment industry for nearly 10 years. Prior to joining the company, she led the customer support teams of two Online Broker houses.

JULIEN HEIDERSCHEID

Director of Global Solutions

Julien has been providing B2B solutions to global institutions for 25 years. In charge of TC business development since 2000, he opened the London, New York and Hong Kong branches to further expand the firm's global network. Julien holds a degree in Management from Rutgers University and speaks 4 languages fluently.

CEDRIC VAIRELLES

Chief Financial Officer

Cédric has been working in the financial environment for more than 18 years. He holds the position of Chief Financial Officer and Chief Compliance officer. Before joining the TC Group, Cédric began his career at Ernst and Young and worked for Generali Finances, BayernLB bank and GFI Group. He holds an Executive Master in Finance from HEC Paris.

CLAUDIA DE LA FUENTE

Human Resources Director

Claudia excels in helping organizations and people grow within rapidly changing global environments. Multicultural and multilingual, she has had the opportunity to work and live within several countries, and collaborate with multinational companies in various industries. She holds a Master's Degree in International Relations & Economics and has over 10 years of HR experience in areas like Compensation and Benefits, and International Mobility.

MEET THE LEADERS GUIDING OUR COMPANY'S VISION.

REMY GAUSSENS

Head of Global Research

Rémy has over 20 years experience in financial markets. Before joining TC in 2003, he worked for the CIC. He is the author of "Optimize your investment strategies", and has been invited as a guest speaker to many well known financial conferences.

FAYEZ ALSEDLAH

Chief Technical Officer

Fayez is highly versatile and results-driven, with an extensive background in development, DevOps, cloud, and AI. He leads and guides diverse teams across the globe to drive innovation and excellence, ensuring that TC›s tech stacks are always ahead of the curve. Fayez holds a master's degree in Systems and Networks Architecture.

KATHRYN ST. JOHN

Director of User Insights & Analytics

Kathryn has in-depth knowledge of software development, quant analytics and trading user experience amassed through startup days with Recognia. Kathryn's team continually transforms TC's products to deliver modern, engaging experiences; and helps brokers envision how to deliver actionable insights to their customers. (Honours Bachelor of Computer Science, CMT I)

KASIA FLOOD

Director of Marketing & Design

Kasia has been scaling marketing functions, building brands and launching products in the tech sector for the past decade. Leading TC's global marketing team, her expertise as a digital marketer, designer and storyteller have helped the company scale into a revered global brand. She has a Global MBA, Bachelor of Literature and a mild obsession with collecting business books.

GARY CHRISTIE

TC Canada General Manager & North American Research Director

Gary has over 15 years in financial markets. Prior to joining TC, he served as an equity & derivatives specialist with TD Bank and Bank of America. Gary is regularly quoted in Bloomberg News, conducts many education and market outlook webinars for investment institutions all over the world and has been a guest speaker at the New York Traders Expo.

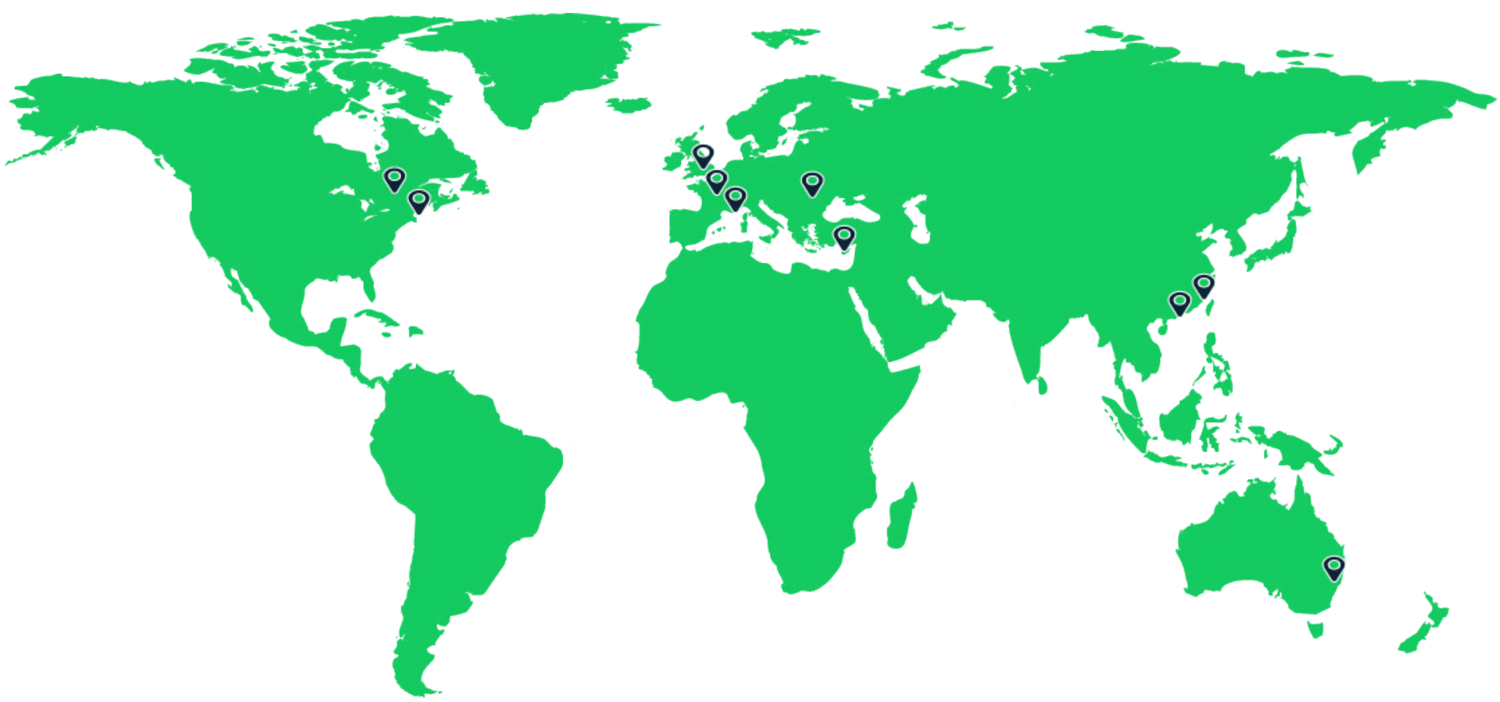
JEFFREY ZHANG

Head of APAC Region

Jeffrey has 15 years experience in financial markets. Before joining TC in 2007, he worked at Agricultural bank of China and FinanceOne Financial consulting Co in Shanghai. He has been invited as a guest speaker to many financial conferences in Asia and is often quoted by Bloomberg News.

WE’RE GLAD YOU’VE JOINED US!

You've joined a truly global and rapidly growing company! Trading Central's continious expansion and loyal customer-base are true measures of our success! Today, our business spans the world, with offices in New York, Ottawa, London, Paris, Nice, Limassol, Bucharest, Shanghai, Sydney and Hong Kong.



OUR JOURNEY

Our journey started in 1999, when our founders Alain Pellier and Romain Gandon identified the unmet need for actionable investment research and left their positions on the floor of the London Stock Exchange to pursue this opportunity. Since then, Trading Central has developed an incredible competency in automating and systematizing investment analytics that are typically perceived as challenging to encode, generating useful Intellectual Property related to our analytical methodologies and algorithms. We have also built out an incredible globally-distributed infrastructure that allows us to deliver our research at scale, covering virtually any publicly traded financial instrument worldwide, even as data changes in real-time.

Throughout the past two decades, we have made a name for ourselves by identifying the aspects of investment research that retail investors typically find cumbersome, and offering solutions that break down these barriers. We deliver these through our brokerage and media customers who benefit from our turnkey solutions that integrate seamlessly into their applications and into their business.

1999
The company is founded in Paris

2006
London office opens

2010
Hong Kong office opens

2015
Recognia in Ottawa joins TC

2016
Cyprus office opens

2017
Shanghai office opens

2018
TC Labs founded in Nice

2019
Bucharest office opens

2022
Lisbon office opens

WHO ARE WE AT TC?

We pride ourselves on being a small firm with big results that are felt by investors across the globe. To accomplish this, we fill our teams with individuals who are hungry, humble and smart. What do these characteristics look like?

HUNGRY

We have the innate drive to bring forth measurable results for the company and continiously innovate to improve.

HUMBLE

We respect our peers, accept feedback, work proactively and put in the grind that's needed to get things done.

SMART

We know our industry and are always learning about new tools, processes and strategies to deliver the best to our customers.

VISION

We're on a mission to de-liver actionable insights at the point of action and to accomplish this, we need fresh, innovative concepts.

TRADING CENTRAL LABS

Our innovation lab operates from the French Rivieras technology park, Sophia Antipolis.

TC Labs mission is to continually rethink wealth management and improve how today's investors consume data, by creating concise analytics that are simple to understand and easy to apply to investment strategies.

Trading Central Labs has played an integral role in the launch of products including TC Market Buzz, TC Crowd Insight & more!

ARTIFICIAL INTELLIGENCE

MACHINE LEARNING

NATURAL LANGUAGE PROCESSING

PREDICTIVE ANALYTICS

WHO DO WE SERVE?

Our dynamic product suite fuses expert analyst research with patented pattern recognition and insightful analytics, to provide actionable support in the moments our customers need it.

Our analytics are trusted by over 20 million provisioned accounts globally!

ONLINE BROKERS

Our insightful analytics are embedded in the world's most admired investing brands through web apps, APIs and more.

INVESTING APPS

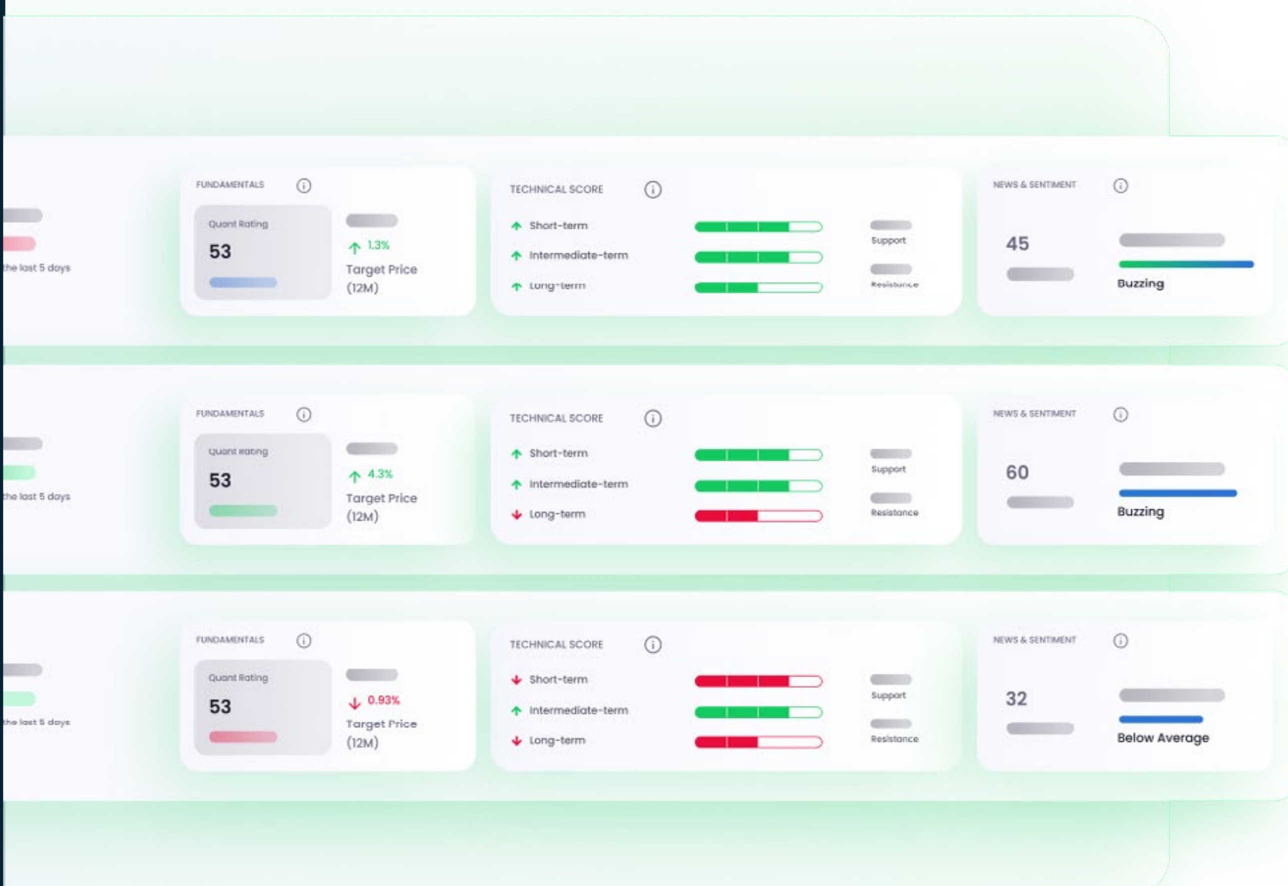
Our compact, layered insights underpin exciting new investing apps.

MARKET PROS

Our transparent, unbiased investment analytics help users optimize their investment strategies and learn more about a range of investing styles.

CAPITAL MARKETS FINTECH

As a dynamic fintech company in the capital markets space, we service some of the most admired investing and trading brands.



COMPANY ETHICS

Trading Central promotes the highest standards of integrity by requiring employees to conduct themselves in an honest and ethical manner. We aim to provide a positive, professional work environment that fosters productivity and personal growth. Maintaining such an environment is the responsibility of every employee, at all levels of the company. Because of their role, managers have the additional responsibility to lead in a manner that fosters an environment of respect for each person.

CODE OF CONDUCT

It is the responsibility of all Trading Central staff to demonstrate dedication for their position and be accountable for producing high quality work. All employees should treat each other with respect and work together to provide satisfaction and confidentiality to our customers.

We're in this together and we consider it every single employee's responsiblility to:

GROW THE COMPANY'S BRAND

Facilitate the continious growth of Trading Central's success by producing high quality work, maintaining confidentiality and ensuring customer satisfaction.

SHOW RESPECT FOR YOUR TEAM

Demonstrate dedication to your position and treat co-workers, customers, and anyone that we work with in a respectful manner. It is everyone's responsibility to ensure a healthy and safe work environment free of any conflicts of interest. Recognize the value of thought diversity and allow people to apply their skills and perspectives to support our business.

BUILD SCALABLE SOLUTIONS

Create an open, collaborative environment that encourages sharing great ideas and celebrates innovation. These opportunities to shine are plentiful with room for everyone to make a difference.

TC EMPLOYMENT STATEMENTS

1. **Trading Central** strictly prohibits the withholding of employees identity or immigration documents. We recognize that retaining such documents can contribute to forced labor or limit a employee’s freedom of movement, and we are committed to respecting the rights and autonomy of all employees. All personal and legal documents remain the property of the individual and must be accessible to them at all times.
2. **Trading Central** strictly prohibits the use of recruiters or labor brokers who do not comply with the local labor laws of the country in which recruiting occurs. This includes a zero-tolerance policy for any involvement in child labor or other unlawful employment practices. We require all recruitment partners to adhere to applicable local labor standards, and we conduct due diligence to ensure compliance.
3. **Trading Central** ensures that all employees including those hired through recruiters, receive detailed and accurate employment agreements or similar documentation prior to relocation. These documents clearly outline the terms and conditions of employment and are provided in a language the employee understands. This practice is part of our commitment to fair labor standards and transparency, especially in cases where relocation is required for the job.
4. **Trading Central** permits all employees, including migrant employees, to cancel their employment contracts at any time without financial penalty, provided they give reasonable notice in accordance with local labor laws or applicable collective agreements. We respect employees’ freedom of employment and are committed to upholding fair and ethical labor practices.

UNACCEPTABLE BEHAVIOUR

It is not possible to list all forms of behaviour that are considered unacceptable in the workplace. The following are just some examples of infractions of rules of conduct that, depending on the seriousness of the offense, may result in disciplinary action ranging from a reprimand up to and including termination for cause.

- **Theft,** attempted theft, destruction, willful damage, defacing or misuse of Trading Central's property or the property of another in the workplace.
- **Dishonesty**, including falsification or unauthorized alteration of any Trading Central document, record or report, such as (but not limited to) timesheets, employment applications, expense reports, or fraud affecting Trading Central or its interests.
- **Disorderly conduct**, including threats, aggressive behaviour or being under the influence of, or impaired from the use of alcohol or drugs while at work.
- **Breach of confidentiality** owed to our clients and partners.
- **Discriminatory** conduct or harassment.
- **Insubordination** or other disrespectful conduct.
- **Violation of safety** or health rules.
- **Excessive or chronic tardiness** or absenteeism subject to applicable human rights legislation.

DISCIPLINARY PROCESS

Any conduct deemed misconduct may, depending on its severity and aligned with local regulations compliance, be subject to one or more of the following sanctions, listed in order of severity.

Considering the facts and circumstances, the sanction will be imposed without necessarily following the order of this classification:

- **Admonishment:** written reprimand for misconduct;
- **Warning:** written observation intended to draw attention;
- **Disciplinary suspension of up to 10 days:** unpaid temporary suspension of contract;
- **Demotion:** assignment to a different and lower-level position or function;
- **Disciplinary dismissal**, with or without notice nor severance payment, depending on the severity of the misconduct.

ANTI-BRIBERY POLICY

Trading Central Group including its subsidiaries, (collectively, the “Company”) values its reputation for ethical behaviour and recognises that trust and confidence in the propriety of its activities is essential to its continuing success. It is important that the Company, its employees, officers, directors and agents (“Representatives”) behave, and are seen to behave, appropriately and honestly at all times.

Please read the company's Anti-Bribery Policy and when complete submit the following form.

INFORMATION SECURITY POLICY & CHARTER

Trading Central is critically dependent on information, it must preserve the security of its information system, protect its data and that of its customers, in compliance with the laws and regulations in force. In fact, the excellent reputation we enjoy is directly linked to the manner we manage such information.

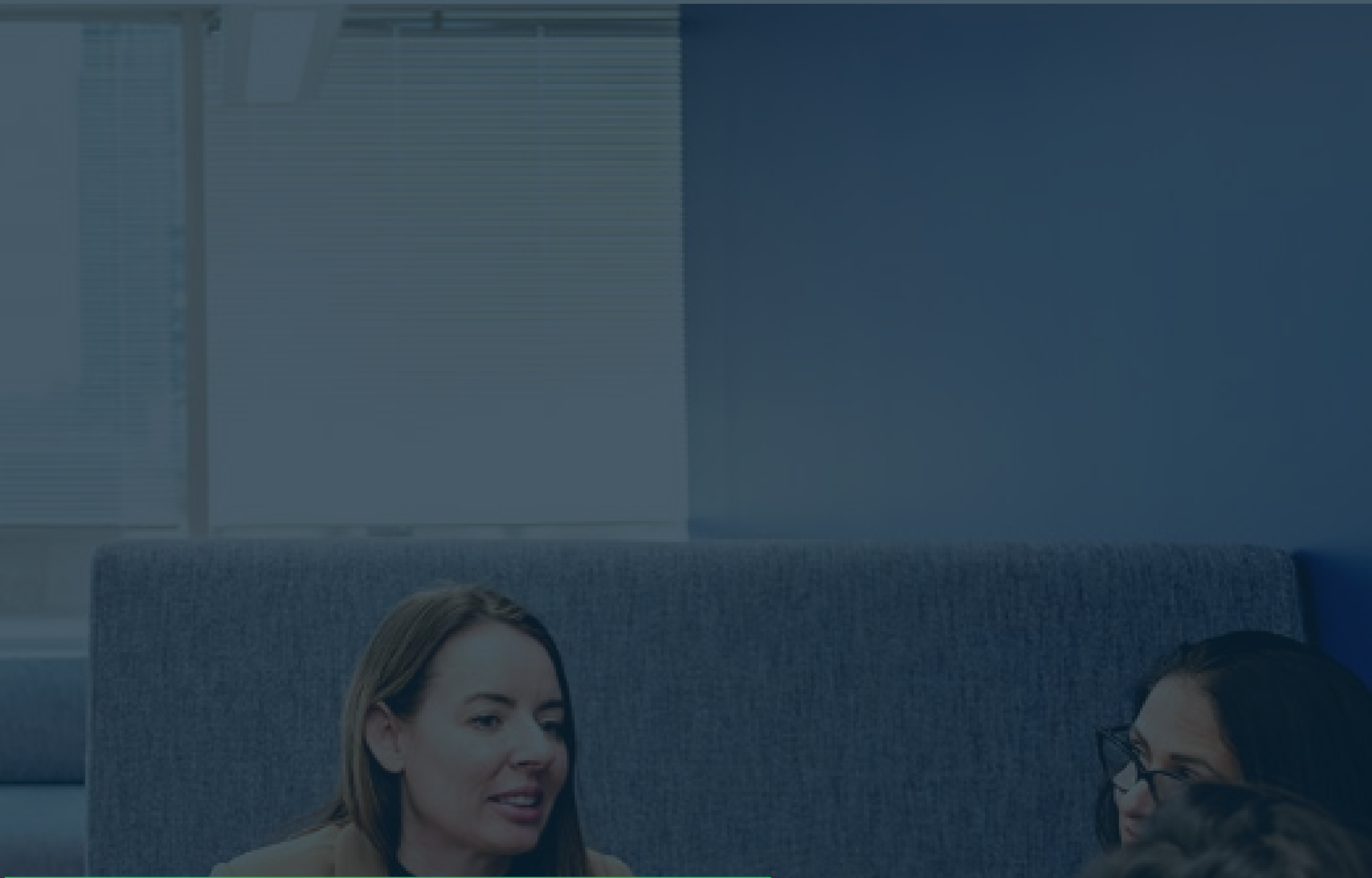
These documents define the rules for using information, IT and telephone resources in compliance with the laws, to protect the interests of the company and is in addition to the provisions set out in the employment contract.

Please refer to the company's Information Security Policy & Charter, read the Information Security Policy & the Information Security Charter and when complete submit the following form.

INFORMATION SECURITY EVENT REPORT

All personnel and users should be made aware of their responsibility to report information security events as quickly as possible.

The procedure to follow is the one described in the Incident Report Plan document. The person will send an email to sysadmin@tradingcentral.com or contact the OPS team via GMeet. They can also create a ticket in Youtrack with the #Incident tag. For more information please refer to the Information Security Charter.



WORK ENVIRONMENT

We are committed to maintaining a work environment that fosters personal and professional growth for all employees. Maintaining such an environment is the responsibility of every employee, at all levels of the company. Because of their role, managers have the additional responsibility to lead in a manner that fosters an environment of respect for each person.

EMPLOYMENT EQUITY

Trading Central is committed to the fundamental principles of employment equity and to supporting diversity in its workforce, and will abide by and respect all applicable human rights legislation. Trading Central is committed to developing practices that remove barriers and discrimination of any kind and further support a culture of diversity in all employment practices.

We are committed to treating people fairly, with respect and dignity, and to offer equal employment opportunities based upon an individual's qualifications and performance, free from discrimination for any protected ground prohibited under human rights legislation. It is our policy and practice to recruit, transfer, assign, retain and compensate employees on the basis of qualifications, merits and competence.

RECRUITMENT & SELECTION

Trading Central is committed to recruiting and selecting individuals who are the most qualified to perform the requirements of each position available. Candidates for job vacancies may be chosen from existing staff or from outside sources. All job postings are to be posted on the TC website career page.

PROBATIONARY PERIOD

Every new employee must complete a probationary period. The length of each employee's probationary period will be outlined in further detail in the employee's employment agreement.

Subject to the terms of the employee's written employment agreement, the probationary period will be for a period of three (3) months. In general terms, the purpose is to enable management to evaluate the employee's performance and fit within the company. The probationary period is also an opportunity for the employee to determine whether the experience of working at TC meets with their expectations.

SICK LEAVE, HOLIDAYS & TRAVEL TRACKING

All employees are responsible for using the TC Planning: Leaves Holidays Trips sheet to keep track of days out-of-the-office due to sickness as well as for holidays and travel. Planned days away should be coordinated with the employee's direct manager to ensure the absence does not interfere with the company's operations or team commitments.

VACATION

Employees are encouraged to use their accrued vacation for rest, relaxation, and personal pursuits on an annual basis. Employees are entitled to paid annual vacation as specified in their employment agreements in alignment with the regional HR policies where they are employed. We believe that taking your vacation jointly improves your well-being and work performance.

STATUTORY LEAVES

It is the employee's responsibility to properly notify Trading Central if the need for time off relates to any kind of statutory leave, and to provide Trading Central with any confirming documentation required under applicable legislation, so that the use of leave time can be properly documented and processed.

PARENTAL LEAVE

Employees shall be entitled to receive maternity, and parental leaves of absence in accordance with the provisions of the applicable labour statutes and regulations.

SICK LEAVE

Employees are entitled to sick leave in accordance with the provisions of the applicable labour statutes and regional HR policies.

UNPAID LEAVE OF ABSENCE

On occasion, Trading Central may grant a leave of absence without pay to an employee for legitimate personal reasons. The requests for such leave must be made in writing to your manager and must be approved by the CEO of Trading Central.

HOURS OF WORK

Employees' hours of work are to be set in accordance with the provisions of the applicable labour statutes and regional HR policies.

PERFORMANCE MANAGEMENT

Trading Central promotes an environment of continuous learning and encourages staff to undertake formal training and development to improve the performance of their existing duties and promote growth for future professional development.

PERFORMANCE REVIEWS

Trading Central believes that an employee should receive frequent and ongoing feedback on performance throughout the year. In order to encourage open and constructive communication between managers and employees, to ensure employees are clear on expectations and required standards, and to encourage growth and development, performance reviews will be conducted regularly on a formal and informal basis.These provide important moments for you to express what can be a barrier or boost to your success so that your manager has the opportunity to consider this information.

Employees will receive a formal documented performance review at least once every year. The review will include discussing overall progress against objectives, specific achievements, strengths, areas for development, and professional development.

PROFESSIONAL DEVELOPMENT

Employees are encouraged to work with their managers to detail individual learning plans. Learning topics can include new tactical skills related to your functional area and new soft skills. You might also include learning more about TC capabilities, products and industry context to inform your work. There are many ways to learn, whether from coursework, practice time, project assignments, conferences or knowledge sharing sessions. Be an active partner in pursuing your own growth and in seeking ways to apply the latest skills to advance Trading Central.

PERFORMANCE IMPROVEMENT

Effective, two-way communication is encouraged at all levels of Trading Central. Employee performance is managed on a day-to-day basis through employee and manager interaction. However, if Trading Central's feedback and development plan and assessments provide evidence that the employee's job performance is not to Trading Central's expectation, the manager may establish a written performance improvement plan that clearly identifies the performance issue, what is required or expected to improve the performance, timeframes and additional coaching or support that may be required. Trading Central will make every effort to assist the employee in closing the performance gap; however, consistent failure to meet performance expectations may result in more serious actions up to and including termination of employment.

CONFLICT RESOLUTION

Trading Central strives to create a work environment governed by respect and regard for the rights and dignity of all persons, where employment related issues can be dealt with in a fair and expedient manner.

In a workplace where we value thought diversity and seek to allow all people to apply their skills and perspectives to help the business succeed, conflict can arise. Employees are encouraged to attempt to resolve any and all employment related differences informally among themselves. Conflict training can be made available upon request.

Where differences cannot be resolved informally, employees are to bring their concerns, in person, to the attention of their immediate manager. The manager, where appropriate, will meet with the employee to attempt to resolve the differences or concerns.

Where an informal resolution cannot be reached, the manager, at their absolute discretion, may authorize the employee(s) to submit their concerns to the CEO. The CEO, in their absolute discretion, may resolve the matter as he or she see fit. Any decision made in this respect is final and binding.

RESIGNATIONS

Employees shall provide Trading Central with adequate notice, as outlined in your employment agreement, in writing of the employee's intent to resign. Trading Central reserves the right to waive the resignation notice period, in whole or in part, by providing the employee with regular pay for the period so waived.

COMPENSATION

Trading Central has developed compensation and benefit programs that are financially responsible, competitive to attract and retain our valued employees, and internally equitable. Trading Central takes a total rewards approach to compensation and benefits designed to support the ongoing growth and success of Trading Central and **reward indi**vidual performance.

PAYMENT OF WAGES

Employees will be paid on a monthly basis (last weekday of each month) by direct deposit into your bank account. Deductions will be made as required by provincial, state or federal laws.

ANNUAL REVIEW

Employees' annual remuneration will be reviewed annually in July. The remuneration is based on the employee's performance, and may or may not increase accordingly. Any changes to the remuneration will be negotiated between the employee and Trading Central.

TRAVEL & EXPENSE POLICY

As a truly global business, travel is necessary to expand our client relationships and our business. Since client visits are often difficult to arrange and a great expense (time and spending), all client visits must be approved by both Sales Management and Customer Success teams. It is important to plan and coordinate all trips to ensure we have a solid plan to achieve the best possible outcome from the meeting, and so that we have the opportunity to arrange additional value-add visits through the same trip where possible.

It is Trading Central's policy to reimburse employees for legitimate, necessary and reasonable travel expenses when directly connected with or pertaining to the transaction of corporate business. Employees are expected to exercise prudent business judgment regarding expenses covered by this policy.

Please read the company's Travel & Expense Policy for more information.

HEALTH & SAFETY

Trading Central is committed to ensuring the health and safety of its employees. Protection of employees from injury or occupational disease is a major continuing objective and the TC team will make every effort to provide a safe, healthy work environment. All supervisors and employees must be dedicated to the ongoing objective of reducing risk of injury.

RESPONSIBILITY

As an employer, Trading Central is ultimately responsible for employee health and safety and takes every reasonable precaution to protect its employees from injury. Where required, employees will receive adequate training in their specific work tasks to protect their health and safety.

Each employee must protect their own health and safety by working in compliance with the law and with safe work practices established by Trading Central. All employees should consider health and safety in every activity.

ALCOHOL & SUBSTANCE ABUSE

Trading Central is committed to providing a safe, healthy and comfortable work environment for all employees. Employees of Trading Central are required to report to work fit for duty at the start of the day and throughout the work day and this includes remaining free from impairment from alcohol and drugs. Being under the influence of drugs or alcohol while on the job poses serious safety and health risks, not only for the user, but to all those who work with or otherwise come in contact with the user.

Employees required to take prescription drugs while at work, which may impede their ability to perform their work safely, must notify their manager.

There may be occasions when alcohol is available at company events or in celebration of an achievement; during these times, each employee is responsible for his or her own consumption of alcohol. Employees are expected to behave professionally and responsibly and respect legal limits and laws. Trading Central reserves the right to limit alcohol consumption at such events and the right to exercise any options necessary to ensure the safety of all employees,

WORKPLACE HARASSMENT

Policy

Trading Central is committed to providing a work environment in which all individuals are treated with respect and dignity.

Workplace harassment will not be tolerated from any person in the workplace. Everyone in the workplace must be dedicated to preventing workplace harassment. Managers and employees are expected to uphold this policy, and will be held accountable by Trading Central.

Workplace harassment means engaging in a course of vexatious comment or conduct against an employee in the workplace, including a comment or conduct that is known or ought reasonably to be known to be unwelcome.

Examples of unacceptable behaviour include but are not limited to:

- Display / circulation of offensive pictures or materials
- Unwelcome, offensive, or intimidating phone calls
- Intimidating or offensive jokes and innuendos
- Unwelcome gifts or attention
- Offensive gestures or leering
- Spreading offensivev rumors
- Sexual harassment
- Unwelcome teasing
- Bullying

Harassment may also relate to a form of discrimination on the basis of:

- Gender
- Race
- Ancestry
- Place of origin
- Colour
- Ethnic origin
- Citizenship
- Age (18 and over)
- Marital status (including same-sex partners)
- Family status
- Record of offences
- Disability
- Creed (religion)

This policy is not intended to limit or constrain the reasonable exercise of management functions in the workplace, including disciplinary measures related to performance or unacceptable workplace behaviours.

Managers will investigate and deal with all concerns, complaints, or incidents of workplace harassment in a fair and timely manner while respecting employees' privacy as much as possible.

Consequences of Harassment

Any employee found to be engaging in harassing behaviour would face disciplinary measures, up to and including termination of employment. Other measures may also include training or customized counseling to deal with the specific incident. A record of the harassment and the resulting consequence will be placed in the employee's employee file.

Any non-employee found to be harassing employees or visitors of Trading Central will be dealt with appropriately to prevent any further acts of harassment.

Procedures

Reporting Incidents of Workplace Harassment

All employees are encouraged to raise any concerns about workplace harassment and to report any workplace harassment experienced or witnessed within the workplace. Any incident of workplace harassment should be reported directly to the employee's manager or to the CEO.

The affected employee(s) will be asked to provide complete details regarding the incident, including events before, during and after the incident, and previous behaviours that demonstrate a pattern of harassment. Employees will be asked to provide these details in writing.

Investigating Incidents and Complaints of Workplace Harassment

The CEO or the Manager (or an appointed external third party) will meet with the alleged harasser and the victim(s) of the harassment to obtain further information and to discuss the details of the reported harassment. Other individuals may be interviewed as part of the investigation as required.

After obtaining the available facts relating to the harassment, the CEO shall consult with the appropriate manager(s) and/or an external third party to discuss the details of the investigation and to determine appropriate actions to eliminate any further harassment and any required disciplinary measures.

Confidentiality and Protection of Workers

Trading Central pledges to investigate all incidents of workplace harassment as quickly as possible. All investigations will respect the confidentiality of individuals involved to the extent that such confidentiality does not further jeopardize or threaten the safety of any employee of Trading Central. This balance of confidentiality and safety will be considered at all points of the investigation and any resulting consequences.

WORKPLACE VIOLENCE

Policy

Trading Central is committed to the prevention of workplace violence and is ultimately responsible for employee health and safety. Trading Central will take whatever steps are reasonable to protect our employees from workplace violence from all sources.

Workplace violence is defined as the exercise of physical force by a person against an employee, in a workplace, that causes or could cause physical injury to the employee. This includes attempts to exercise physical force that could cause physical injury, or statements or behaviour that an employee could interpret as a threat to exercise physical force that could cause physical injury.

Examples of workplace violence include, but are not limited to:

- Kicking an object someone is standing on
- Exerting physical force to gain entry to another employee's workspace
- Attempting to run someone down with a vehicle or equipment
- Verbally threatening to attack an employee
- Leaving threatening notes or e-mails
- Shaking a fist at an employee's face
- Hitting or trying to hit an employee
- Wielding a weapon
- Throwing an object
- Sexual violence

Violent behaviour in the workplace is unacceptable and will not be tolerated regardless of whether the perpetrator is management, an employee, client, visitor, etc. It is incumbent on management, all employees and all those who are associated or work with Trading Central to uphold this policy and to work together to prevent workplace violence.

Trading Central, as thWe employer, will ensure that this policy is implemented and maintained and that all employees and managers have the appropriate information and instruction to protect them from violence in the workplace.

All employees must work in accordance with this policy and are encouraged to raise any concerns about workplace violence and to report any violent incidents or threats.

Trading Central pledges to investigate and deal with all incidents and complaints of workplace violence in a timely and fair manner, respecting the privacy of all concerned to the extent possible.

TC EMAIL GROUPS

- **System Administrators:** sysadmin@tradingcentral.com

- **Global Sales Team:** sales@tradingcentral.com
- **Americas:** americasales@tradingcentral.com
- **APAC:** apacsales@tradingcentral.com
- **China:** chinasales@tradingcentral.com
- **EMEA:** emeasales@tradingcentral.com

- **TC Bucharest:** bucharest@tradingcentral.com
- **TC Hong Kong:** hk@tradingcentral.com
- **TC London:** london@tradingcentral.com
- **TC Ottawa:** ottawa@tradingcentral.com
- **TC Paris:** paris@tradingcentral.com

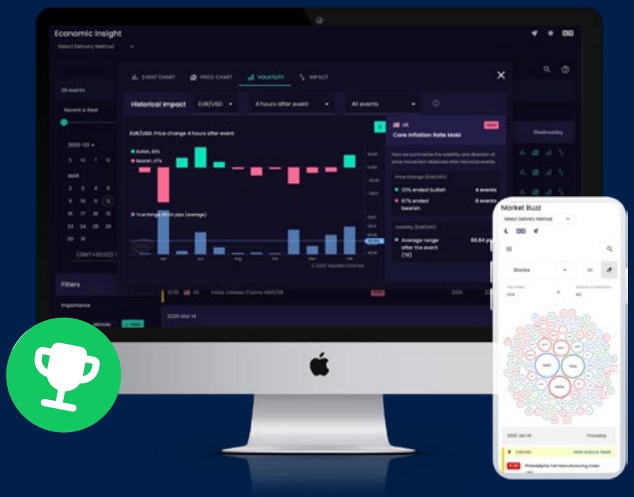
- **Analysts:** analysts@tradingcentral.com
- **Customer Success Team:** clients@tradingcentral.com
- **Developers:** dev@tradingcentral.com
- **Legal Team:** legal@tradingcentral.com
- **Marketing:** marketing@tradingcentral.com
- **Product Management:** pm@tradingcentral.com
- **TC Labs:** tclabs@tradingcentral.com
- **User Experience Team:** ux@tradingcentral.com

- **Customer Support:** support@tradingcentral.com

Our singular mission is to help people make investment decisions through innovation.

Go forth and...

- Use your judgement and creativity to act in the best interest of our customers who pay us, and the end users that make investment decisions using our products.
- Keep your skills and instincts sharp and apply them to solve the problems of the business with efficiency.
- Foster secure and candid relationships with all departments you engage with, because it is this thought diversity and synergy that drives our growth.



TC Wins

Best Investment Research Tech, 2024

Technical Analysis Provider, 2024

Best Market Insights & Analysis, 2024

Best AI/ML Tech, 2024

Automated Chart Patterns Provider, 2024

Last revised on July 24, 2025