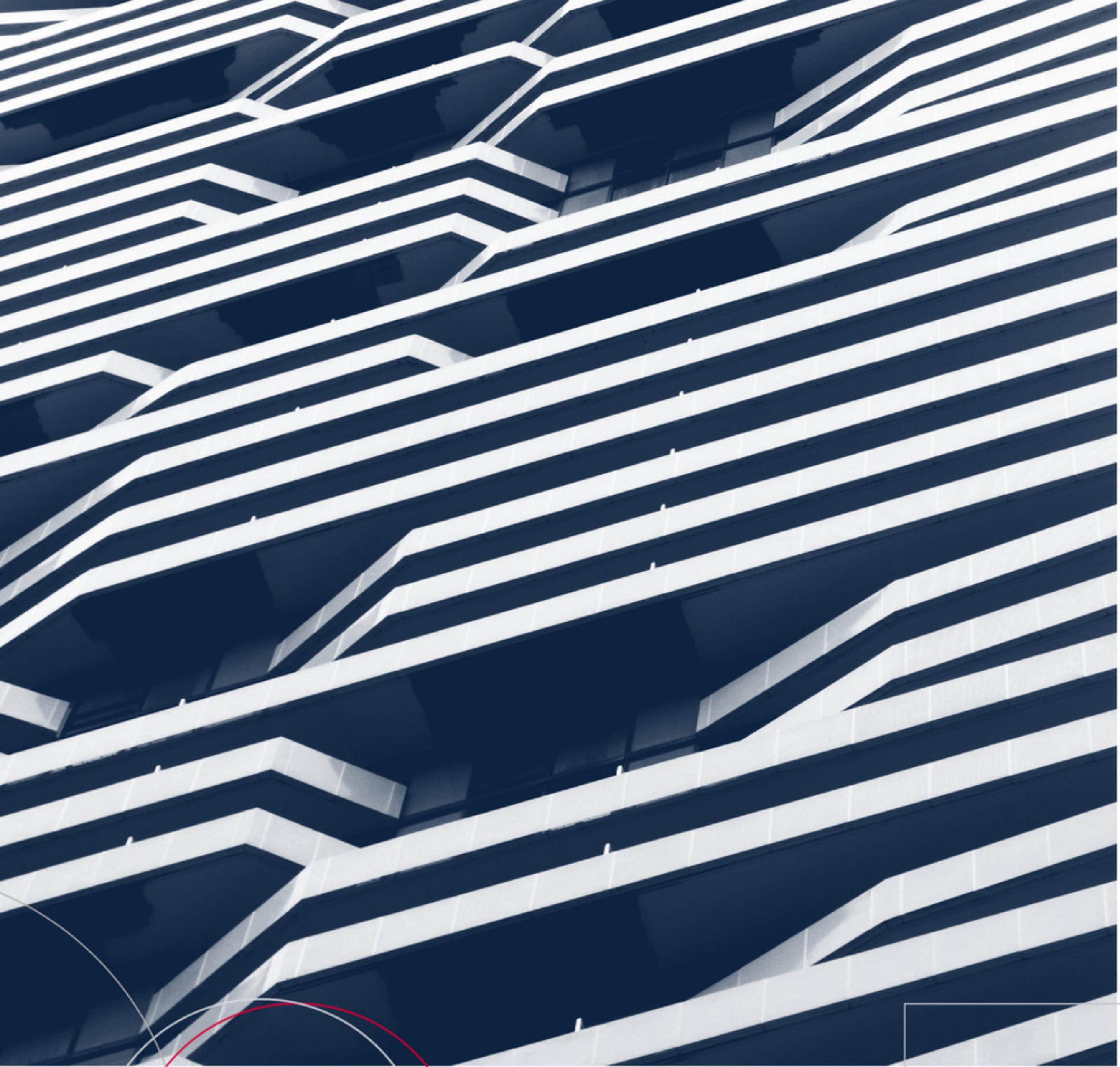


Powering connections

allfunds

2024 Annual Report

Contents

Our Annual Report for 2024

This report combines all aspects of Allfunds Group’s performance and reflects how we are addressing areas which we believe have the potential to have a material impact on the delivery of our strategic objectives.

Our approach to sustainability

Allfunds seeks to integrate ESG standards into our day-to-day operations and business development, while collaborating and working closely with our stakeholders’ groups. For that purpose, we launched our ESG Strategic Plan 2026 last year and we continue to make progress. To achieve its aims, Allfunds is an active participant in several leading industry initiatives and memberships including:

Signatory of:

WE SUPPORT

See pages 40 to 60 for more information or visit our Sustainability Report 2024:

www.allfunds.com/en/esg/reports/

Visit **allfunds.com** for more information

- **This symbol indicates more information is available within other sections of this report**
- **This symbol indicates more information is available on our website at www.allfunds.com**

Driving connections to meet evolving needs

Established in 2020

Allfunds 1.0 – European platform

Allfunds 2.0 – One-stop-shop

Driven by our purpose to transform the WealthTech industry

Leading B2B Platform

Allfunds platform is resilient, scalable, and adapts to market trends, ensuring robust performance and growth. It effectively meets client needs and fosters long-term partnerships. Our platform streamlines operations and enhances connectivity for Distributors and Asset Managers, providing unparalleled access to a vast network of funds and Distributors.

▷ *More information on pages 4-7*

Subscription-based business

A comprehensive set of intuitive, user-friendly services and solutions designed to help our clients grow their business, strengthen client relationships, and simplify their operations. As a one-stop shop, we offer everything needed to support and enhance our clients' business in one place.

▷ *More information on page 8*

Allfunds Alternatives Solutions

AAS enhances distribution capabilities, providing wealth managers with seamless access to a diverse range of alternative investments. By fostering strong connections and streamlining operations, we empower wealth managers to offer sophisticated investment opportunities, ensuring growth and diversification.

▷ *More information on page 16*

Allfunds 3.0 –

Our vision for the future as a fully digital client service provider

▷ *More information on page 20*

At Allfunds, 'powering connections' is at the heart of our mission.

We strive to be the most comprehensive one-stop shop for all our partners, offering an unparalleled suite of functionalities, dealing services, technology solutions and digital tools - all within one ecosystem.

Leveraging our robust business model, we effectively apply different strategies to overcome challenges, grow our business, improve our competitive position, and transform the WealthTech industry.

By fostering strong connections with our clients, we empower them to navigate the complexities of the financial landscape with confidence and agility. They in turn can capitalise on our positive momentum and robust growth.

FY 2024

Key financial highlights

AuA

€1.56tn

(13% up in 2024)

Adjusted EBITDA margin

67%

(1 p.p. up in 2024)

Net revenues

€632m

(16% up in 2024)

Normalised free cash flow

€238m

(17% up in 2024)

Adjusted profit after tax

€253m

(16% up in 2024)

▷ *Read more on page 210 on Reconciliation from IFRS to non-IFRS*

"Our robust business model and strategic investments have positioned us to capitalise on growth opportunities and deliver exceptional value to our clients. We remain committed to driving innovation and excellence in the WealthTech industry."

Juan Alcaraz
Founder and CEO

Our purpose

Our purpose is to transform the WealthTech industry.

Allfunds wants to achieve this through a deep commitment to quality. At the heart of this commitment are our people, who strive to provide only the best service for our clients and create value for all our stakeholders.

Our values

ALL for Excellence

ALL for Accountability

ALL for Empowerment

ALL for Inspiration

▷ ***Read more about our culture on page 68***

Our people

1,074

employees from 61 nationalities

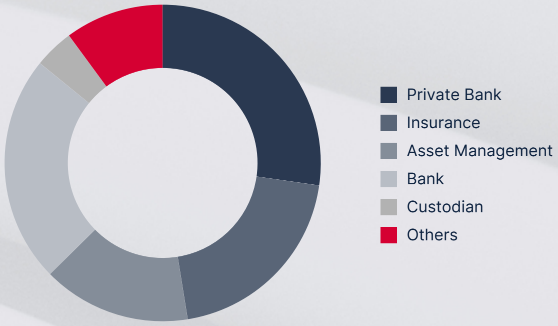
Sustainability

We are committed to become carbon neutral by

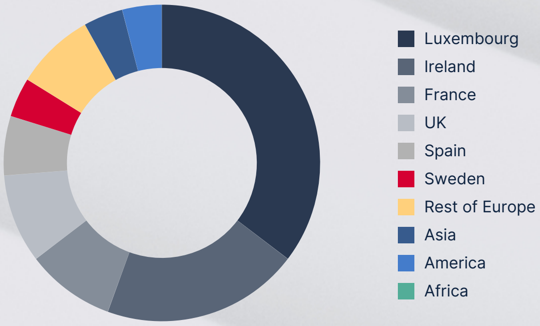
2030

Our clients

>930 Distributors[1]



1,404 Fund Houses[2]

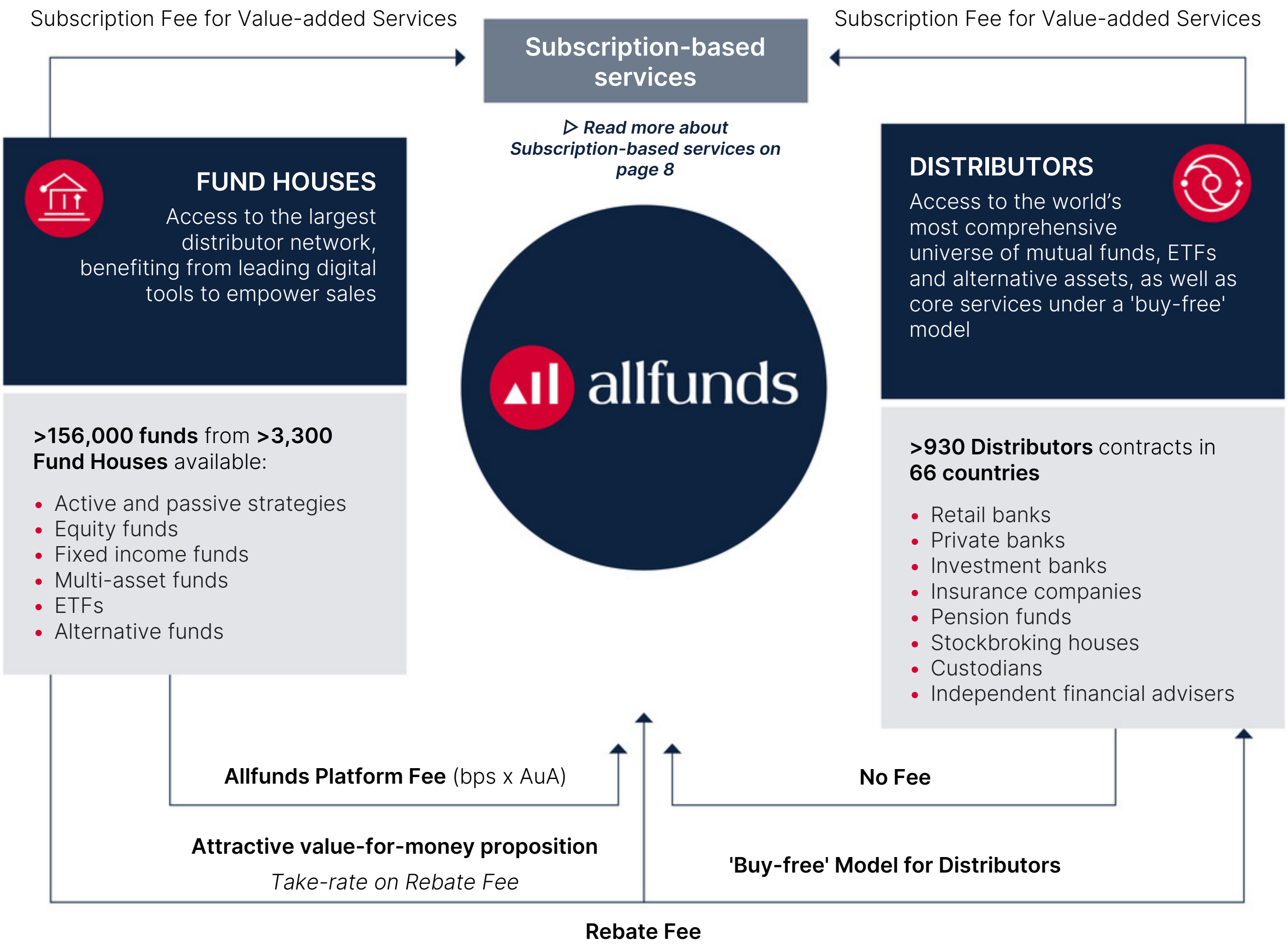


1. Number of Distributor contracts as of 31 December 2024
2. Number of Fund Houses that have Global Distribution Agreements (GDAs) in place as of 31 December 2024

Who we are

Allfunds is one of the world's leading B2B WealthTech companies. We connect Fund Houses and Distributors to match supply and demand for asset management products, offering one of the largest varieties of funds globally. Across active and passive strategies, these include equity funds, fixed-income funds, multi-asset funds, alternative funds and ETFs.

Distributors gain access to services under a 'buy-free' model which favours strong loyalty and has resulted in negligible client churn in recent years



An integrated fully digital offering

Created in 2000, Allfunds offers what we believe is the largest fund distribution network globally, as well as access to the world's largest universe of mutual funds as well as Exchange Traded Funds (ETFs).

We are uniquely positioned to continue expanding within a large and growing addressable market.

A simple and attractive revenue model

Distributors gain access to services under a 'buy-free' model which has resulted in strong loyalty and negligible client churn in recent years.

The majority of Allfunds' net revenue comes from fees. These are calculated daily as a margin on the Assets under Administration (AuA) on the Allfunds platform. Due to low churn rates, recurring revenue streams made up approximately 99% of the total net revenue for the year ending 31 December 2024 (vs. 99% in 2023).

This includes 100% of platform revenues and 87% of subscription and other revenues.

What makes us unique

Committed to client experience, innovation and digital solutions

We create innovative investment solutions by unlocking data and generating actionable insights. Our expertise in the financial sector, coupled with our dedication to exceptional customer service and the cultivation of long-term client relationships, distinguishes our firm.

Building on our strong organic growth

Allfunds excels in a high-growth market, benefiting from structural growth trends, and gaining market share through our industry leadership based on exceptional service quality and innovation solutions that are fueled by delivering unmatched value.

Uncovering opportunities for clients through technology advancements

Allfunds thrives in adapting and innovating within a rapidly changing market, ensuring we deliver exceptional value to our clients. Our investments in technology also enhance our operational efficiency.

Capitalising on our strong cash generation

Allfunds' strong cash generation enables continuous investment in growth and innovation. Allfunds has an active capital management policy and is committed in delivering value and returns to our shareholders.

Global scale coupled with local knowledge

Approximately
156,000
funds from over

3,358
Fund Houses available for distribution and trading on the Allfunds Platform with access to

>930
Distributors in

66
countries

Our global locations

- Madrid
- Valencia
- Milan
- London
- Paris
- Luxembourg
- Stockholm
- Zurich
- Warsaw

- Miami

- Bogotá
- São Paulo
- Santiago de Chile

- Hong Kong
- Shanghai

- Singapore

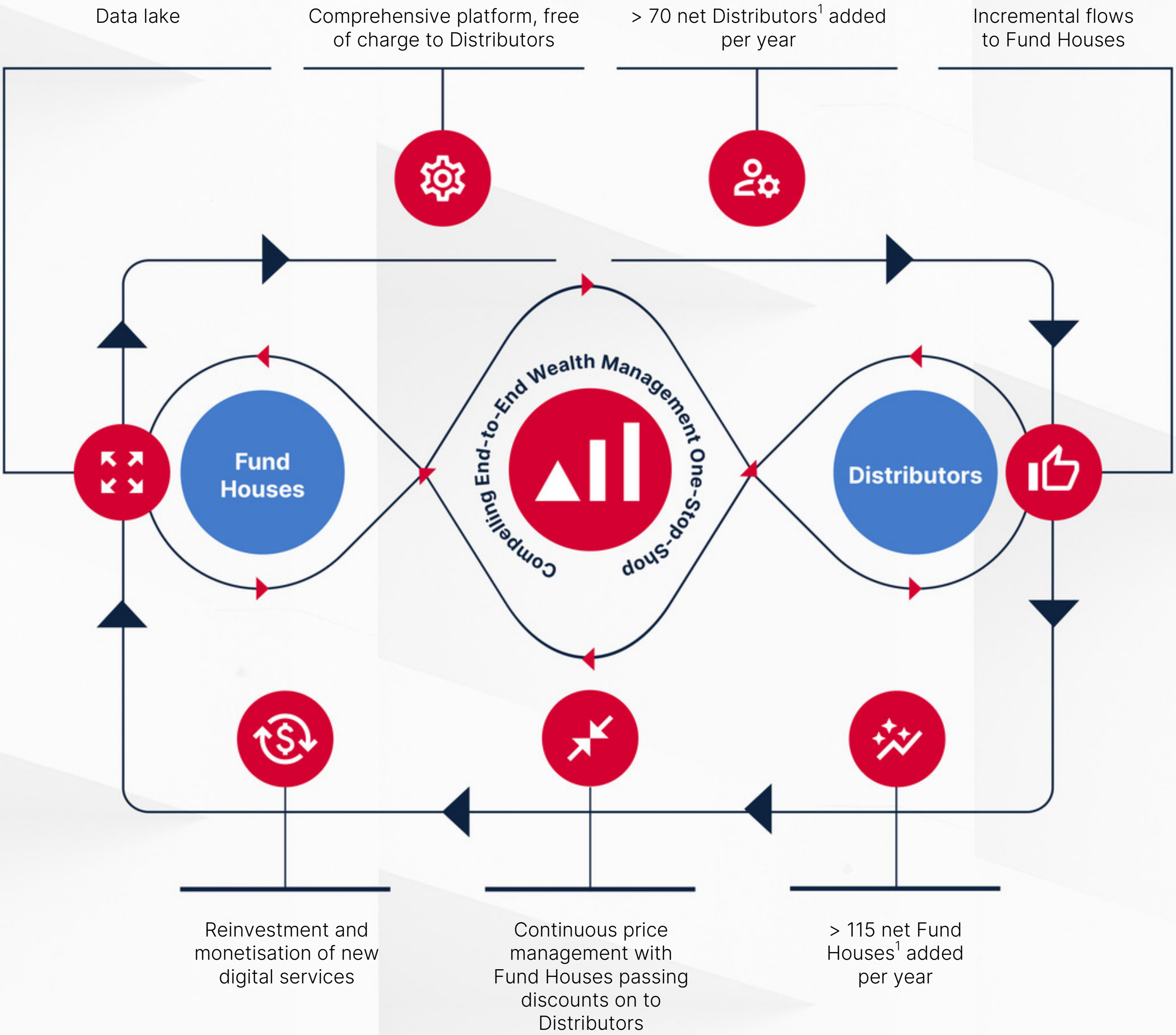
- Dubai

The flywheel effect

The Allfunds Platform creates powerful network effects that benefit both Fund Houses and Distributors. We call this the flywheel effect.

Our comprehensive suite of services, plus our ability to achieve better terms in our distribution agreements with Fund Houses, are what attracts new Distributors to join the Allfunds Platform. This provides incremental flows to Fund Houses, which in turn incentivises more Fund Houses to join us to capture increased sales from a growing base of Distributors.

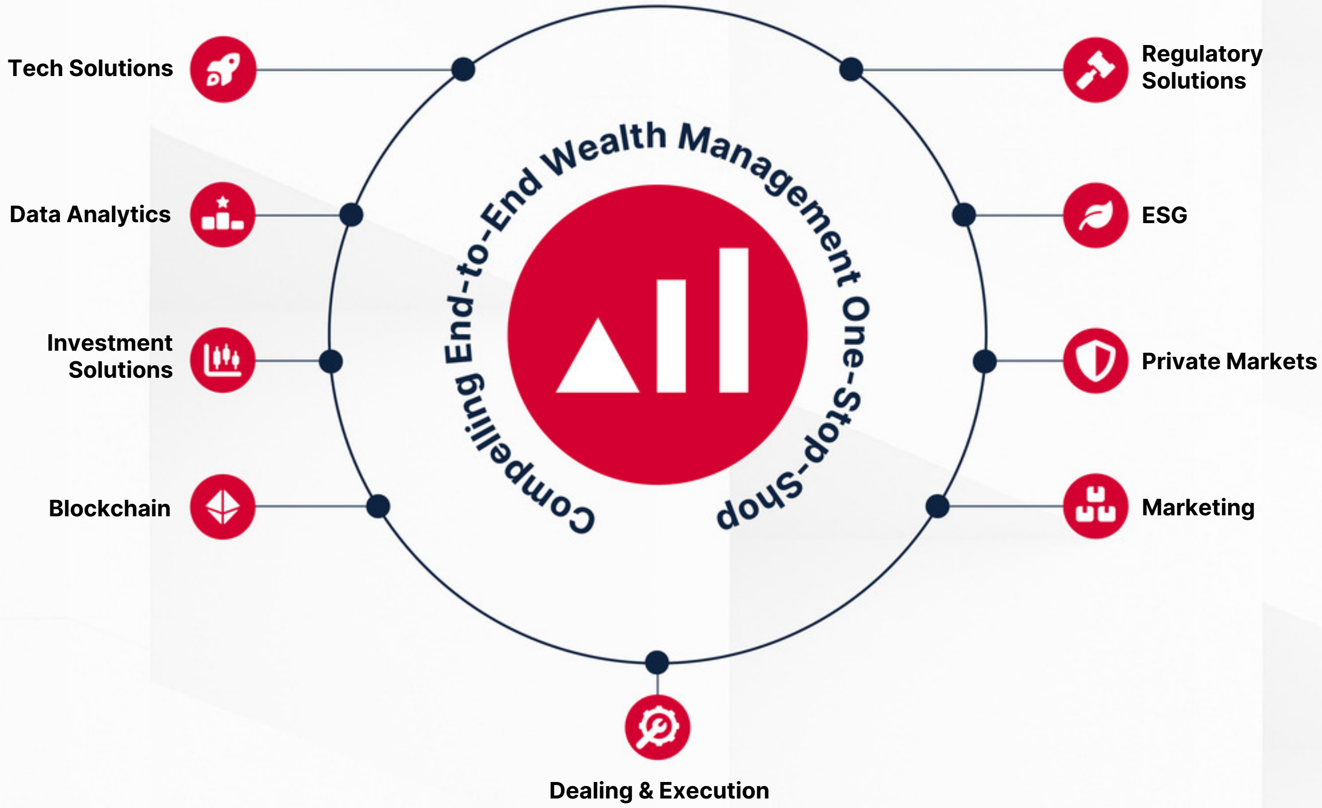
Leveraging this network effect provides us with a clear competitive advantage. As Fund Houses and Distributors join the Allfunds Platform and make increasing use of our digital services, more data is available to us, and this enables us to continue to improve our service offerings.



1. Number of Distributors and Fund Houses are the average of the last 4 years.

A unique enhanced value proposition

Our evolving ecosystem covers the entire fund distribution value chain and investment cycle, making us the only fully integrated one-stop shop in the industry.



Our one-stop shop solution: revolutionising fund distribution with a comprehensive, secure, and integrated platform

Allfunds enables clients to trade a diverse range of mutual funds, alternative funds, and ETFs through a centralized, integrated platform that ensures secure transactions and minimizes operational risks. Our advanced tools support clients in fund selection and distribution strategies, offering features such as fund screening, integrated dashboards, monitoring, compliance support, regulatory documentation, and reporting.

We seamlessly connect financial institutions, providing cutting-edge digital solutions across the entire fund distribution value chain. This includes asset managers, banks, insurance companies, pension companies, and other entities involved in fund distribution.

Launched in March 2023, our new platform for private markets aims to replicate and enhance our successful 'buy-free' model and one-stop shop approach for private capital markets. Allfunds’ leading full-service offering on its traditional platform can be scaled across the Alternatives platform. Managed by a dedicated team of around 60 professionals, Allfunds Alternatives Solutions has been fully operational since March 2023.

Our mission is to be the ultimate one-stop shop, delivering an unparalleled suite of functionalities, dealing services, technology solutions, and digital tools within a single ecosystem that encompasses mutual funds, alternatives, and ETFs.

Our subscription services

Allfunds subscription services complete Allfunds value proposition for Asset Managers and Wealth Managers, supporting them end-to-end across their value chains.

	Offering	Brief Description
WealthTech Solutions *42%	• Connect - Professional workstation • Portfolio management system • End-investor platform	Services and tools designed to offer Software as a Service (SaaS) and On-Premise solutions. They cater for the wealth management needs of Asset Managers, banks, Wealth Managers, and Insurance companies
Connect Allfunds Professional workstation *34%		Licenses to access our digital ecosystem of powerful tools and services to help our clients increase sales, enhance efficiency and deliver exceptional client service
ESG solutions *10%	• ESG Data • Sustainability navigator (build customised portfolios) • ESG Advisory	One stop solution for ESG. Includes analysis, data and ESG reporting required to support clients to comply with ESG regulations in multiple jurisdictions - and to market their funds
Regulatory Solutions *6%	• Fund registration • Fund representation • Share Class Tool • Coporate Actions Pro	Helps clients to meet regulatory requirements to register funds in a new country. Allfunds' platform simplifies regulatory documentation reporting for Asset Managers
Investment solutions and white label fund services *3%[1]	• UCITs fund engineering & setup • Day to day business support • Distribution support	Offers Management Company (ManCo) services to our clients, assisting them in the creation and distribution of their own UCITS funds in Luxembourg and Ireland
Data Analytics *3%	• Advanced reporting with comprehensive data • Allfunds Navigator	Unique data for advanced reporting, with comprehensive data on assets and flows. Allfunds' market intelligence services provide access and insights to its deep and mostly real-time transactional market data pool
Allfunds Blockchain *1%	• Proprietary blockchain technology • Solutions for the entire funds industry	Proprietary software and network for increased operational efficiency and transparency. An opportunity to deliver savings in a blockchain ecosystem

1. ManCo revenues refer only to the non-asset driven portion of Investment solutions.

WealthTech Solutions

Allfunds WealthTech solutions combine a suite of services and tools designed to drive end-to-end wealth management. We offer software as a service (SaaS) and on-premise solutions to cater the wealth management needs of asset management companies, banks & wealth Managers, and Insurance Companies.

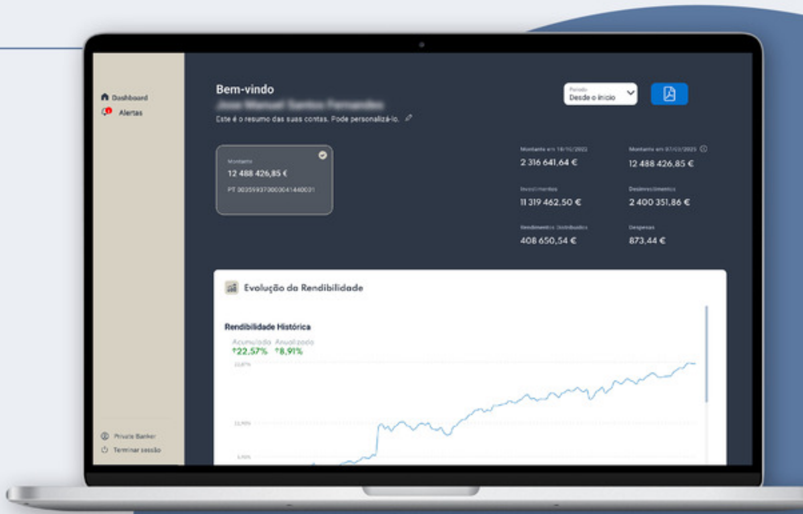
Benefits to Distributors	Benefits to Fund Houses
End-to-end solutions to enhance your value proposition • Builds for all client segments and sizes • Multi-asset capabilities • Self-trading	End-to-end solutions for those wishing to unlock new distribution channels and streamline their reporting • Open B2C channels to connect with retail clients • Fund Insights: marketing tool to promote their funds, events and content to reach new distribution partners

+200 entities
using Allfunds wealth solutions worldwide

+20,000 users
accessing to Allfunds workstation

Present in
+20 countries

Nextportfolio - Portfolio Management System



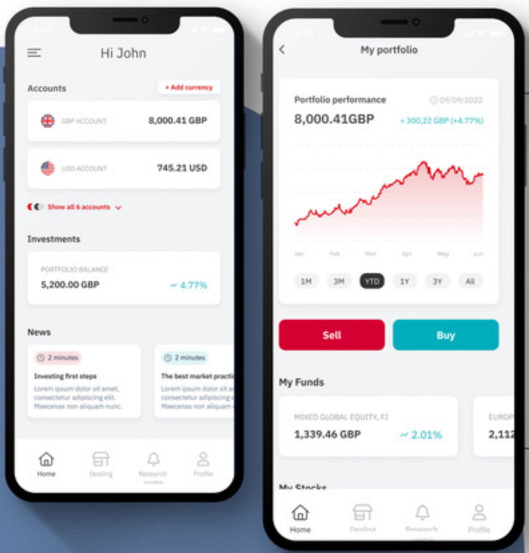
Client need

The largest retail bank in Portugal wants to offer services to HNW clients by providing a high added-value service.

The need to consolidate a comprehensive 360º view of client wealth and to develop the advisory service, aiming for the industrialisation of MiFID-compliant processes, was paramount.

Our solution

Nextportfolio is our modular tool to deliver an exceptional service managing portfolios & clients' wealth holistically.



End investor Portal

Client need

API-enabled mobile experience for end-users to analyse key portfolio indicators and invest in multiple funds.

Our solution

Live data feed via API enabling fund analysis, client portfolio reporting and execution over a mobile device.

Connect Allfunds Professional Workstation

▷ *More information on page 10*

Connect
Allfunds Professional Workstation

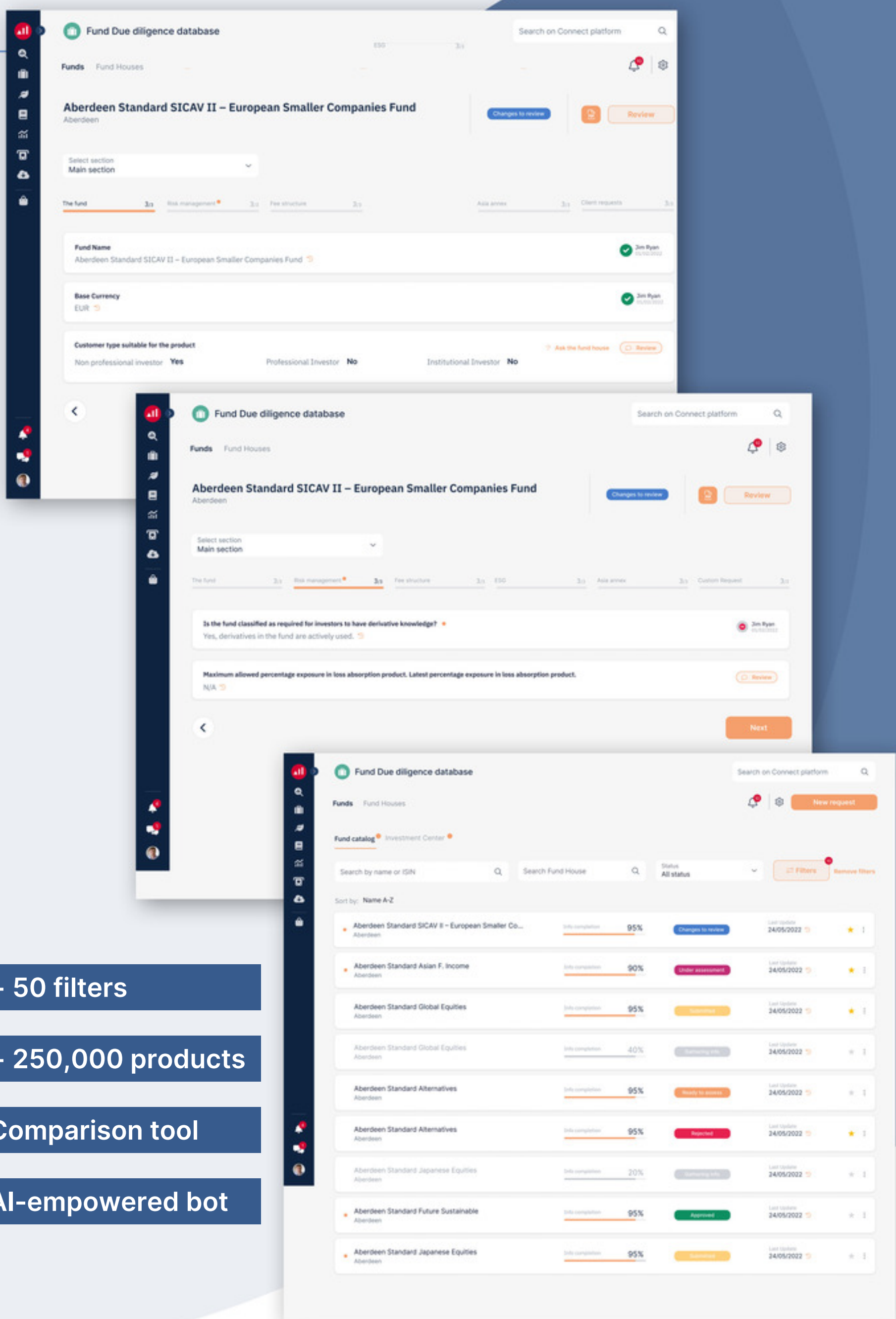
Licences to access our digital ecosystem of powerful tools and services to help our clients increase sales, enhance efficiency and deliver exceptional client service.

Benefits to Distributors and Fund Houses

Our digital ecosystem enhances client service by streamlining operations, improving communication, and providing real-time data and insights, ensuring personalized and responsive support.

+ 22,000 professional users

accessing Allfunds Connect



Research centre + analytics + due diligence

Interactive screening to search, analyse and compare different products from scratch. Or copy your selected funds directly in the search engine for a deeper analysis.
Export in an Excel file and share within your organisation.

Client need

A global Benelux entity was seeking a platform for their fund selectors to search, analyse and access professional due diligences at both the company and fund levels for all the funds within their scope. This due diligence also includes compliance with local regulatory requirements.

Our solution

- Access to over 250,000 Funds, ETFs and alternative products
- Homogenous information across all different houses, including client specific requirements
- The client can assess and add their own analysis into the information to create customise reports

+ 50 filters

+ 250,000 products

Comparison tool

AI-empowered bot

ESG solutions

Allfunds helps its clients comply with ESG regulations in multiple jurisdictions, offering a one-stop solution for ESG that includes the analysis, data and ESG reporting required to market their funds. Allfunds' ESG tools address and support the growing demand for sustainable investing strategies providing a one-stop shop to meet sustainability requirements at portfolio level.

Benefits to Distributors

An advanced suite of solutions to tackle the ESG challenge and meet the full cycle of financial institutions' business needs.

- ESG scoring
- ESG reporting
- ESG portfolio advisory
- ESG audit and certification
- EET analyser

Benefits to Fund Houses

An advanced suite of solutions to tackle the ESG challenge and satisfy the full cycle of financial institutions' business needs.

- ESG Analysis
- ESG Portfolio Construction
- Client ESG Profiling
- ESG Investment Proposal Generator
- ESG Reporting Generator
- ESG Monitoring

ESG Anaytics platform

+400 Fund Houses

+4,800 Green bonds

+8,800 Strategies

+60,000 Funds & ETFs

+8,700 Issuers

ESG solutions

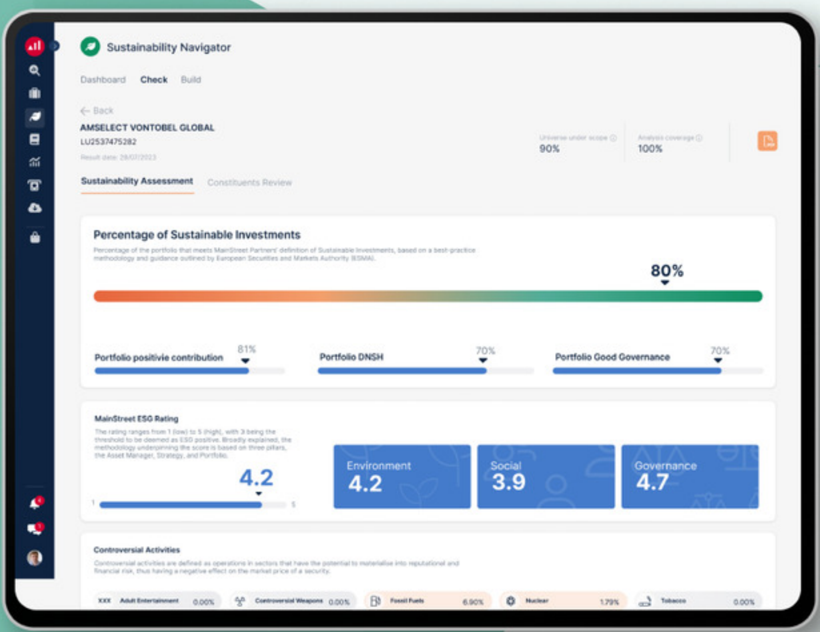
Designed to meet the full business cycle of financial entities

MAINSTREET PARTNERS

Portfolio and Advisory

- Model portfolio advisory
- Bespoke reporting
- Private assets
- Audit and certification
- Fund selection
- Regulatory implementation

ESG rating | SDG's & exclusions | Impact results | Sustainable definition | SFDR & SDR



Sustainability navigator

Tool for constructing sustainable investment portfolios in line with SFDR regulation.

Regulatory solutions

Allfunds helps clients be compliant across multiple jurisdictions so they can meet regulatory requirements when registering funds in a new country. Furthermore, Allfunds' platform simplifies regulatory reporting for Asset Managers.

Benefits to Distributors	Benefits to Fund Houses
• Share class selection tool • Corporate actions • Fund documentation • Regulatory reporting	• Connect Integrated Dashboard – CID with AML/KYC library • Fund registration and representation services • Regulatory reporting

>70 countries

registration coverage

MiFID, PRIIPS, SFDR and ESG

mandatory reporting

Our Regulatory Reporting Corner was created to help our clients comply with regulation - easily

Fund Registration

- Regulatory requirements to register your funds in a new country
- Advice related to new requirements or impacts of regulatory

Regulatory Reporting

- Allfunds' platform simplifies regulatory documentation for Asset Managers

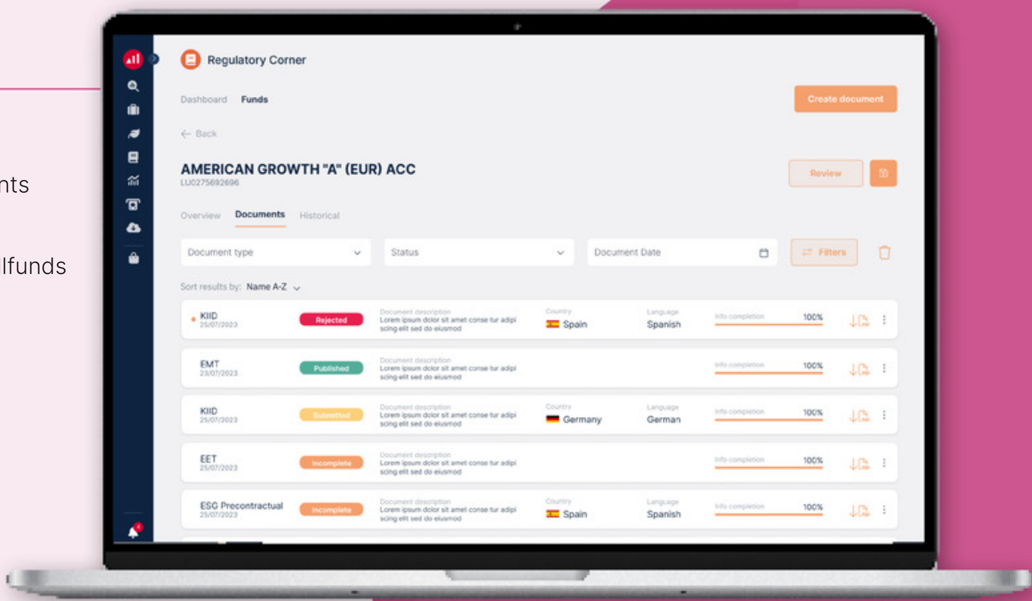
Distribution

- Allfunds puts in contact Fund Houses and Distributors to facilitate the dissemination process and later updates

Regulatory Reporting Corner

Allfunds has crafted a specialised platform to generate Fund Regulatory Reporting.

- Simplifies the annual process
- Centralise your reporting to clients
- Minimises the exchange of data and interfaces
- Everything under control with Allfunds
- Direct communication with your Distributors



Investment solutions and white label fund services

Allfunds offers a wide range of investment solutions for Distributors and Fund Houses including Management Company (ManCo) white label services in connection with the creation and distribution of UCITs funds in Luxembourg and Ireland.

Our differentiation lies in our global UCITS Distribution capabilities.

A dedicated investment team

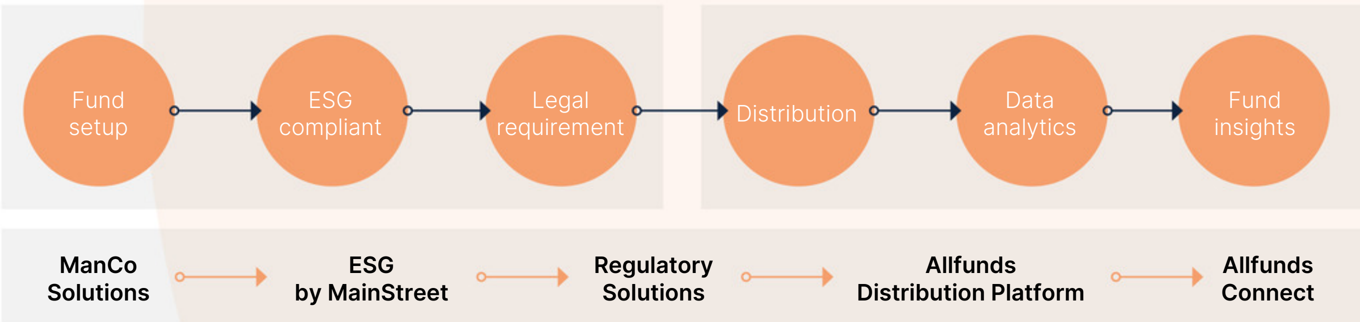
16 members	**>200 years**	**Luxembourg Madrid Milan Zurich**	**>930**	**66**	**15 Countries**
focusing solely on mutual funds	of combined investment experience		Distributors	Countries	TPM's selection

Benefits to Distributors	Benefits to Fund Houses
• Due diligence and fund monitoring • Model portfolio solutions • B2B Sub-Advisory platform with multi-boutiques offered • Fund wrapping capabilities (DPM wrappers, FoF etc.)	• Product development and registration • Risk management and reporting • Distribution services • Market Intelligence (ESG, Strategy design, fee setting, benchmarking, etc.)

A competitive fund structuring setup. . .

. . . already connected to the largest distribution platform. . .

. . . to quickly unlock sales through data and visibility



White Label Fund Hosting Platform

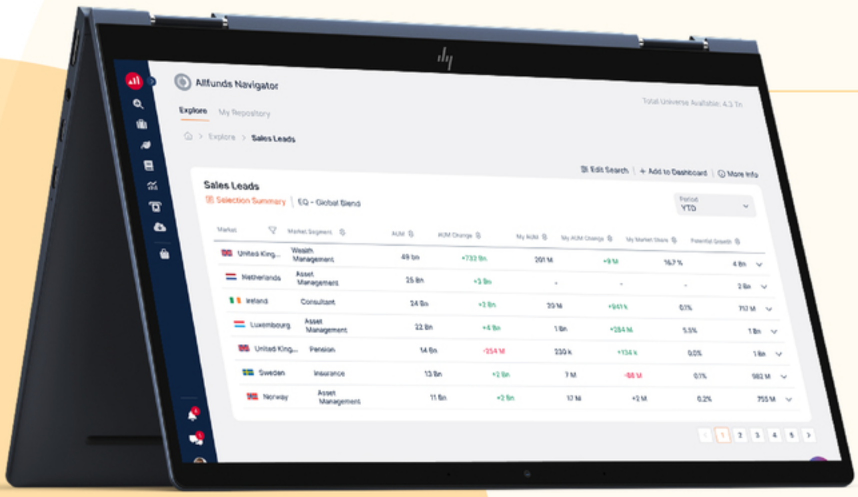
Supports mutual funds and ETFs in Luxembourg and Ireland, connecting fund managers with Allfunds' distribution network.

Data Analytics

Allfunds provides unique platform to develop highly actionable distribution insights for the fund industry worldwide.

Benefits to Fund Houses

- **Access unique real time transaction data**
  Access over €4.5 trillion in assets comprising fund-infund and sub-advised fund data universes as well as realtime analytics of daily transaction data from Allfunds distribution platform
- **Identify smarter actionable distribution insights**
  Identify growth opportunities, refine your product, monitor buyers and peers faster, based on real-time trends
- **User-friendly AI powered platform ready to use**
  No implementation. Simple, easy to use platform, powered by an AI chatbot agent. Access actionable insights through a few clicks

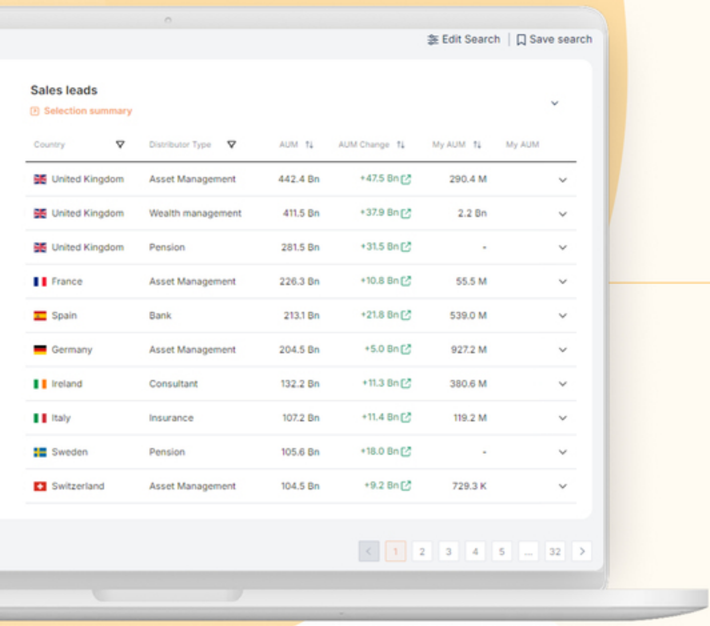


Allfunds Navigator

Combines AI and machine learning with Allfunds' digital ecosystem to provide market insights and identify opportunities.

Key benefits of Allfunds Navigator

- Grow Assets: identify and convert actionable opportunities via buyer behaviour insights
- Competitive advantage: stay ahead of your peers with real-time insights and trends
- Optimise your product: make informed decisions with granular data on buyers' and peers' behaviour
- Boost efficiency: Reduce manual work, leveraging the AI chatbox and Proactive Notifications



Competitive Edge

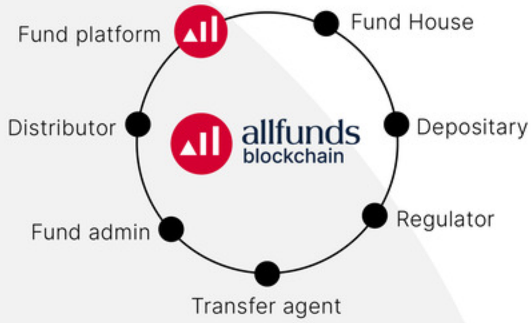
Analyse real-time flow trends and emerging opportunities as they unfold using daily data on over €1.4 trillion as a forward-looking indicator. Granularly at fund category level.

Save Time

Attested by executives, distribution professionals and analysts, with Allfunds Navigator and the chatbot users can obtain the insights they actually need in seconds versus deriving at the results after hours of data extractions and manipulation. Sales people can find specific information about prospects and peers immediately, on the fly and wherever they are.

Allfunds Blockchain

Allfunds Blockchain is a dedicated software company focused on developing solutions for the entire fund industry. The team has built a blockchain market infrastructure to transform the fund industry and its network operator.



Benefits to Distributors

- **Reduce cost** of the existing distribution model, digitalising existing manual processes
- **Relieving current pain points:** account opening, transfers, etc
- **Real-time concept:** data access, clients look-through, reconciliation, extended cut-off etc

Benefits to Fund Houses

- **Automation and efficiency** for transfers to reduce time and cost and allow fast dealing
- **Tokenisation and distribution:** discovering new markets and new segments of clients
- Combination of traditional distribution channels with new alternatives to be **attractive for next-gen of investors**

R&D

A blockchain technology to support our business

Build a unique technology, with blockchain capacities not available in any other blockchain platform.

2018 – 2019 – 2020 – 2021 – 2022 – 2023 – 2024

First ever Allfunds' software patent requested.

Allfunds Blockchain as a subsidiary company.

Build, test and learn

Ideation together with business participants

Ideate business solutions in collaboration with other participants in the fund industry value chain.

Seed our value proposition.

Evangelisation & early adopters

Capturing early adopters in the industry

Evangelise the blockchain capabilities into the main industry players.

Real collaboration with early adopters.

Rock & roll

Real accounting

Ready-to-use blockchain solutions (i.e. FAST) to drive real adoptions, efficiencies, strategic collaborations and revenues.

Automation & Efficiency

Many organisations manage their operational flows through blockchain technology, guaranteeing a more efficient and secure model that opens the door to new possibilities.

The Allfunds Blockchain Dealing solution allows organisations to connect in a completely secure and efficient way through the use of the blockchain network.

Tokenisation

Allfunds Blockchain is the leading entity for combining tokenisation and distribution services in the fund industry.

As an E2E solution, and together with its clients, it has not only been a pioneer in the tokenisation of investment funds in different jurisdictions but has also enabled the tokenisation of different types of funds, both UCITS and alternative funds.

Key highlights

>€6 billion
Managed through blockchain

9
Transfer agents with signed agreements with Allfunds Blockchain

21
Entities connected to the Allfunds Blockchain network

3
Jurisdictions where we have launched tokenised funds

11
Tokenised funds through Allfunds Blockchain

5
Different tokenised structures: UCITS, AIF, RAIF, Evergreen, ELTIF

Allfunds Alternative Solutions

Allfunds' leading full service offering on its traditional platform has been extended at scale across the Alternatives platform, replicating and reinforcing our successful 'buy-free' and one-stop shop model for Alternatives. We are ideally positioned to lead the private markets opportunity for the Wealth segment.

Distribution

- **One single global distribution agreement to reach >**930 distributors from 63 countries
- **Instant go-to-market**

Technology

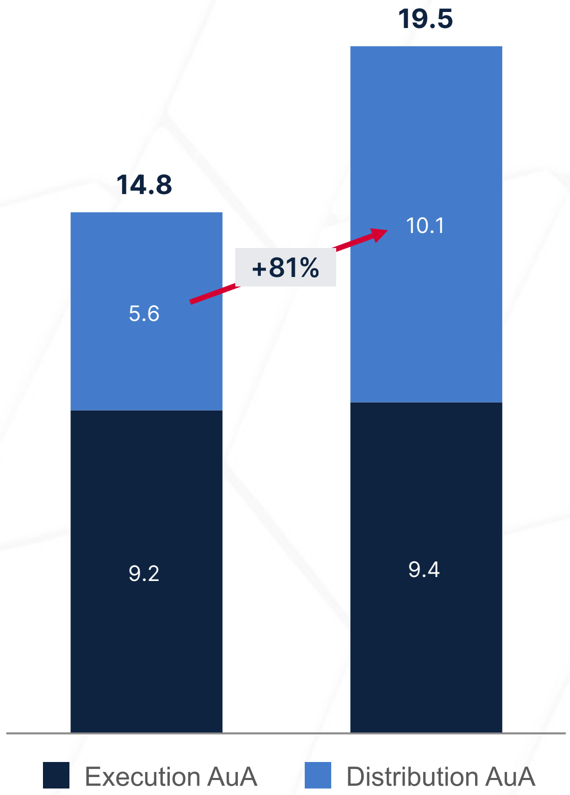
- Single point of entry for f**ully integrated platform: UCITs and Alternatives**
- **Fully digitalised** and automated trading process
- **Full range of services:** pre-trade / trade / post-trade

Fund House / GDAs

- Complementary to existing product
- Single point of entry for any fund simplifies operational burden for FHs
- Broad coverage of funds **enables full outsourcing to a single platform**

Alts business is growing exponentially

Figures in €bn



Allfunds Private Partners program (APP)

A unique initiative with top tier institutions to bridge the gap in the Wealth segment.

Selected alternative Asset Managers that have demonstrated their capabilities to create adapted products to the wealth management segment

We have signed Global Distribution Agreements with these entities to distribute their products in our platform:

Blackstone, J.P.Morgan Asset Management, Apollo, Morgan Stanley, BlackRock, Carlyle, Ares, KKR, Franklin Templeton Investments

Benefits for Distributors

Contract and fund offering

- **One single agreement** to get access to +1,500 funds from 140 Alternative Asset Managers
- **Buy Free Model,** our key to success
- Instant access to global fund universe

Operations

- **Single Operational Set up:** Trading, settlement & core services
- Connectivity via **SWIFT, FTP, API,** Web (Connect) for both traditional and alternative funds
- Fully **Digitised** and Automated Trading Process

Data and Tech Solutions

- Transparency & Regulatory Reporting
- Data & digital solutions: Access to Data and Fund Documentation, Corporate Actions, Historical NAVs

Benefits for Asset Managers

Biggest network of distributors worldwide

- Access to more than 930 Distributors and €1.56tn of assets, of which 60% comes from the wealth segment
- 66 Countries

Covering both execution and distribution

- Allfunds enables execution in a fully automated and digitised way (SWIFT, FTP, API, Connect)
- Allfunds covers the broadest universe of alternative funds through GDAs (+140 FH, +1,500 funds)

Specialised Team

- Team of 60+ professionals dedicated exclusively to alternative funds
- Specialised IT team working on new features to enhance our capabilities

CASE STUDY

Swiss Private Banks

Many Swiss Private Banks are looking for efficient ways to access alternatives funds

Swiss Private Banks Challenges	AAS offers the solution
Manual Operations	• Fully automated and digitalised operations • Connectivity via SWIFT, API, FTP and Connect
Administrative Burden	• No application or subscription forms to fill in, Allfunds is doing it on behalf of the distributor
Individual distribution agreements to set up	• Distributors only need to sign one distribution agreement to access to >1,500 funds from >140 Asset Managers
Management of trailer and placement fees	• Allfunds is in charge of placement fees management (calculation and payment) through the distribution agreement

Our value creation model

Our business model has proven to be successful and resilient, largely due to its highly diversified nature. This diversification is evident in our extensive global reach, with clients spread across 66 countries and offices in 17 locations worldwide.

Thanks to our client base spanning so many cultures and markets, we have gained a thorough understanding of numerous financial landscapes. This geographical diversity enhances our global insights and reduces our dependence on any single market, so mitigating regional economic risks.

Furthermore, this global presence puts us in a strong position to capitalise on emerging opportunities in different markets, further strengthening our resilience and capacity for growth. It's a proven model that supports our current operations while providing a solid foundation for our future expansion.

Our resources and relationships

Financial

Adj. EBITDA

Free cash flow

Our business activities require financial capital and cash flow to support our strategic growth.

Clients

>930 Distributors

Collaboration with clients

1,404 Fund Houses with global distribution agreements (GDAs) in place

Fostering responsible investment

Human capital

1,074 employees

- Full-time employees ranging from digital specialists to platform back-end specialists and independent data scientists
- Dedicated client service managers, servicing clients in 66 countries
- Employees in our global sales and marketing team, with 10 languages spoken
- Diverse and talented people

Technology and innovation

Innovative technical assets

- Wide range of digital products with wide market reach
- Tailor-made platforms in Channels, Processing and Data
- Proprietary IP on blockchain technology

Data-centric platform

- Unique cloud-based platform
- Core operational processes being shifted to Data Lake
- Data as a source of value for clients and internal process optimisation

Our strategy

Continued market share gain

Perpetuating the flywheel effect

Further expansion and monetisation of digital value-added proposition

Margin resilience

Realisation of operating efficiencies through scale effects

Pursue strategic, value-accretive acquisitions

▷ *Read more on page 28*

How we do it

A one-stop shop

We offer a comprehensive suite of best-in-class solutions powered by smart data through our ecosystem, Connect. Launched in 2018 to digitise our relationship with both Fund Houses and Distributors, Connect has enabled us to bundle our digital offerings in one place.

▷ *Read more on page 7*

Benefits of scale

Our strategic focus has been on growing globally through international expansion. We have also grown through transformational M&A, acquiring and integrating different businesses. This has led us to operate what we believe is the largest open architecture, integrated ecosystem in the market with €1.56 trillion AuA across more than 66 countries.

▷ *Read more on pages 5 and 6*

An attractive and simple revenue model

Distributors benefit from a 'buy-free' model of core services related to trading, dealing, settlement and administration, and pay a subscription fee for value-added services. Fund Houses benefit from an attractive value-for-money proposition in which they pay basis points fee on intermediated AuA, in addition to a subscription fee for value-added services.

▷ *Read more on page 8*

Keeping close to our clients globally

Through our local presence, we have been able to maintain long-term relationships with Distributors and Fund Houses. Thanks to this, we can offer global access to our distribution network.

▷ *Read more on page 4*

Operational excellence

We have built a proprietary and independent European fund distribution platform for our clients, with best-in-class capabilities in core business that is robust, simple to use and efficient.

▷ *Read more on pages 4 and 7*

Innovating through new initiatives

Allfunds has been unique in anticipating client needs and adapting its offering to market trends. Clear examples of innovation have been the launch in 2023 of Allfunds Alternative Solutions, our private markets solution or the upcoming Exchanged-Traded-Products (ETP) platform to be launched in 2025.At the same time, we continue to invest in blockchain and digital subscription services.

▷ *Read more on page 7*

Value created in 2024

For our employees

Our priority is to keep our colleagues motivated so they can work efficiently and effectively. We offer a training development programme, plus an attractive compensation package based on experience. Balance remains important, so we have introduced new policies to further improve flexibility on maternity and parental leave. We have also introduced new DEI training sessions.

For our clients

We provide our clients with a better understanding of common client's distribution activities. More broadly, we are committed to transforming the WealthTech world by empowering our clients with a unique combination of scale, experience and digital mindset. We also understand the security threats they face, so we provide all our clients with an Information Security System to protect the continuity of their activities.

For our investor community

We aim to reward our investors with a progressive dividend policy and provide them with long-term, sustainable returns through attractive Adj. EBITDA margin and share price appreciation. Capital return is also an important pillar, and this year took the form of the €100m share buyback programme which was launched in July 2023 and completed by September 2024.

For our regulators

We are committed to fostering strong compliance culture. To this end in 2024 a new Code of Conduct has been approved, reinforcing the principles, values, and conducts that shall govern our daily life in Allfunds as well as the responsibility to create long-term sustainable value. Likewise, the maintenance of compliance with AENOR on our Compliance Management Systems, confirms the alignment to best practices and international standards. Our goal is to comply with both the law and with regulators' expectations, with strong professional behaviour, being transparent with our stakeholders and the market.

For our business partners

Our partnerships aim to transform the WealthTech industry and enhance the distribution chain. We have managed to develop this community through excellence and accountability, by following our Code of Conduct, and by promoting human and labour rights.

For our society

Our community plays a key role in our daily business so we are committed to contributing in as many ways as we can. We do this through multiple awareness campaigns, crowdfunding, charitable donations and hosting of events throughout all our offices.

▷ *Read more on Stakeholder engagement and S172 see page 48*

Delivering long-term growth

Our resilient business model, global scale and cutting-edge platform mean we are confident we can continue to create long-term sustainable value for all our stakeholders.

For our **clients**. We want to thrive as the fund industry's first and most trusted partner in the WealthTech space. We will continue to enrich our service offering by developing leading digital tools within a seamless, secure user experience throughout the Allfunds ecosystem.

▷ *Read more about our clients on page 62*

For our **shareholders**. We are committed to quality growth and delivery of sustainable returns always by means of responsible business practice. We want to have an active role in fostering an ethical, accountable and competitive environment for the financial services industry.

▷ *Read more about our shareholders on page 63*

For our **employees**. We believe that people's talent is key in delivering our world-class service. We encourage our workforce to grow at a professional and personal level stretching their capabilities to achieve the right career progression based on meritocracy. Allfunds employees live our core values, are high performers engaged in teamwork, gain the advantage of a stimulating culture, and attain superior goals.

▷ *Read more about our employees on page 62*

We stand for supporting **Environmental, Social, and Governance principles** which we apply to our day-to-day operations and business development. In order to effectively progress and champion these policies, we seek to integrate the maximum external standards level applicable to our business and take into account our stakeholders demands.

▷ *Read more about our commitment to ESG on pages 40*

Allfunds 3.0

Our strategy will help us deliver -Allfunds 3.0- This year we have made a significant progress in our mission to make Allfunds a 100% digital client service company. We have onboarded new clients, both Fund Houses and Distributors. We are committed to advancing our digital capabilities through various initiatives.

In 2024, we have enhanced fund sales efficiency with data, applied AI technology and integrated new ESG information for investment decision-making. We also consolidated our Alternatives Solutions platform, further enhancing our distribution capabilities and providing wealth managers with seamless access to a diverse range of alternative investments.

Our goal is to leverage Allfunds' competitive strengths to remain at the forefront of innovation. We are well-positioned to enhance our business and scale up in the coming years. Our opportunities are anchored in strategic pillars that support the Allfunds 3.0 vision of becoming a fully digital client service provider:

- Fully digital interaction with clients: One of the main objectives of Allfunds 3.0 is to become a fully digital platform where clients, both Fund Houses and Distributors, directly interact digitally through the Connect Integrated Dashboard.

- Global footprint: As a global player, we will continue to analyse our expansion by entering new markets and confirming our commitment to key regions such as the UK, Nordics, Latin America and Asia.

- Big data science on customer behaviour: The Group combines the large quantity of data on trading and execution (which it has been collecting for the last 20 years and continues to collect) with the data available on Allfunds Connect. This generates real-time insights on behaviours, investors and client appetite. We have developed a new tool, Allfunds Navigator, which leverages AI and machine learning within Allfunds' digital ecosystem. This innovative tool enhances our ability to deliver sophisticated, data-driven solutions to our clients.

- B2B marketplace: Allfunds Connect comprises services owned by Allfunds. These form part of a marketplace offering that combines in-house proprietary applications and best-of-breed tools.

- Full blockchain implementation: The Group has long recognized the potential of blockchain innovations to disrupt the global asset management value chain. Since 2018, we have been developing an Allfunds Blockchain offering, which, as of December 2022, has resulted in real solutions. These include FAST, an initiative to reduce the time in investment fund stock transfers in Spain and Italy, and our participation in launching tokenized funds. This marks our commitment to the future of the industry.

A strong investment case

A leading global-scaled WealthTech

- Global reach and local presence
- Ideally positioned to keep capturing market share (x2 gain in 5 years)
- Large & high-growth market underpinned by open-architecture penetration and outsourcing

A one-stop shop

- Compelling value proposition
- Sticky value proposition for blue-chip clients (~99% distributor retention)
- Game-changing digital tools and proprietary technology
- Continued focus on operating efficiencies
- Private markets platform

Superior financial profile

- Best-in-class growth (+14% CAGR 20-24 in net revenues)
- High margin and strong cash flow generation (Adj. EBITDA 67% and average €220m in L3Y)
- Proven M&A track record, successfully closing and integrating 6 acquisitions in 4 years

Unique and attractive revenue model

- "Buy-free" model for Distributors
- Paired with powerful flywheel effect
- Continuous innovation

Committed to delivering value to our stakeholders

At Allfunds, we believe that creating long-term shareholder value requires taking into account the interests of all our stakeholders. Our strong cash generation capabilities enable us to support an increased dividend payout ratio and initiate a new share buyback program, demonstrating our dedication to shareholder returns. We have successfully released an additional €130 million of CET1 capital by reducing Credit Risk Risk Weighted Assets, further strengthening our financial position.

We continue to invest in the future of the company while simultaneously seeking the best risk-adjusted returns for our shareholders to deploy the excess cash generated. At the upcoming Annual General Meeting (AGM), we will seek approval to distribute an €80 million dividend, which will increase the payout ratio to 32%, reflecting a 40% growth in Dividend Per Share (DPS).

Furthermore, the Board is proposing a new €250 million share buyback program, subject to approval at the upcoming Shareholder Meeting on May 7, 2025. We anticipate the share buyback to be executed within 24 months.

We firmly believe that this buyback will create significant value for our shareholders and is the most attractive option for deploying excess cash.

Generating shareholder value

We have a clear and differentiated strategy to grow our business, organically and inorganically...

Large addressable market

€14-€15 trillion of AuM in the B2B Fund platform segment

Read more about our Total Addressable Market on page 26

Organic growth

Continued market share gain

- Flywheel effect
- Expansion to new markets

Strategic growth initiatives

- Allfunds Alternatives Solutions
- Digital subscription services
- Blockchain

Inorganic growth

Platform M&A

- In 2024, acquisition of Fideuram Local Paying Agent business
- In 2023, acquisition of Iccrea Local Paying business

Product M&A

- In 2023, acquisition of ESG advisory boutique MainStreet Partners
- In 2022, acquisition of WebFG and Instihub Analytics

We have a highly professional team, leading market positions and benefit from secular market growth trends. This, combined with our long-term strategy to drive sustainable growth, means we're confident we can deliver value for our stakeholders.

. . . to deliver on our financial performance . . .

. . . which underpins our sustainable capital allocation.

Recurring and diversified revenue

High operating leverage

Adj. EBITDA margin 65%+

Strong cash generation

Average €220m in last 3 years

Talented and dedicated team

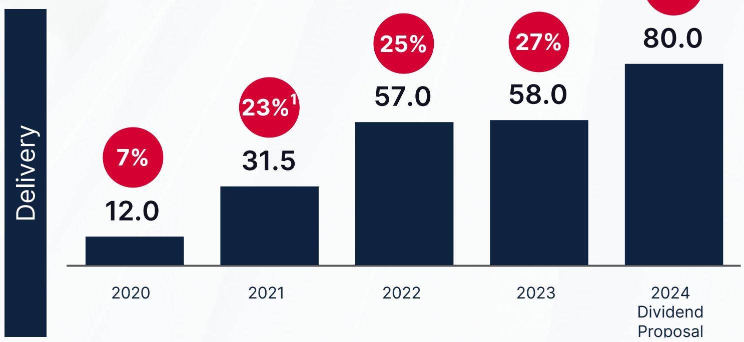
Progressing in sustainability

ESG Strategic Plan 2026 in place

Carbon Neutral by 2030

Ordinary dividend policy

Pay-out ratio on Adj. PAT (€m)



1. Based on 2021 Adjusted profit after tax accounted since the IPO (April 2021)

Strategic M&A

Track Record of Acquisitions	
2018	Finametrix
2019/2020	Credit Suisse InvestLab; Nasdaq Nordic Fund Market; BNP Paribas Banca Correspondente
2022	instiHub by allfunds; WebFG
2023	Mainstreet Partners; BCC Banca ICCREA
2024	Fideuram Intesa Sanpaolo Private Banking Asset Management

Shareholder distributions

Share buyback programmes (€m)

Powering Connections, Driving Record Growth

In 2024, Allfunds achieved a remarkable year with record-high €1.56 trillion in AuA, capturing a 28% market share in the European cross-border UCITS segment. Leveraging this increased open architecture penetration and strategic diversification, Allfunds plans to capitalise on growth opportunities in private markets, in fixed-income products and in sustainable investments. Our strong cash flow generation and excess capital highlights our capacity to invest in future growth potential and assess the best returns for our shareholders.

"Powering connections" is the driving force behind our success. By fostering strong relationships with our partners and clients, we have delivered another year of record financial performance. These connections have enabled us to accelerate growth in assets, revenue, and profitability, demonstrating the tangible impact of our collaborative efforts and strategic investments. Through these powerful connections, we continue to build a thriving ecosystem that supports sustained growth and innovation.

Juan Alcaraz
Founder and CEO

Market environment

The global economy has demonstrated resilience, with inflation steadily moving towards central bank targets and growth maintaining a stable trajectory. While challenges remain, there are numerous opportunities for progress. Geopolitical tensions and high public debt ratios are being managed, and there is a strong focus on enhancing medium-term growth prospects. To ensure macroeconomic stability, policy actions are being thoughtfully calibrated. This includes easing monetary policy to sustainably contain inflationary pressures, and implementing fiscal policies that create room for future investments. Resolving conflicts in the Middle East could stabilise energy markets and bolster confidence and growth. Indeed early resolutions to all major geopolitical conflicts could improve sentiment and lower energy prices. Easing trade tensions may further support trade growth, while positive surprises in growth prospects or disinflation paths could enhance financial market stability. Additionally, improvements in consumer confidence, driven by a quicker-than-expected recovery in purchasing power, could lead to increased spending or further investment.

The European fund industry experienced positive momentum in 2024. The European UCITS (undertakings for collective investment in transferable securities) industry saw a 15% increase, reflecting improved investor sentiment. Mutual funds and ETFs enjoyed net inflows, with mutual funds seeing €356 billion and ETFs €261 billion in net inflows over the year, according to EFAMA. Bond products led the inflows, while equity products also performed well.

These trends highlight the resilience and adaptability of the fund industry in navigating a complex macroeconomic landscape.

The fund industry is brimming with positive opportunities. The demand for fixed-income products has surged as investors seek stability amid economic uncertainty, further boosted by an easing interest rate environment. These trends underscore the potential for fund managers to capitalise on shifting investor preferences and market conditions.

Technological advancements also present significant opportunities for the fund industry. Continued investment in technology and digital platforms can enhance efficiency, improve client experiences and enable innovative product offerings. Moreover, the growing interest in sustainable and ESG-compliant investments provides fund managers with the chance to develop and market new products that align with these criteria. Market diversification across regions, asset classes and types of Distributors helps mitigate risks - and capture growth opportunities in different segments. These factors highlight the potential for growth and innovation in the fund industry, even in a challenging macroeconomic environment.

Business review

Allfunds capitalised on this environment, growing its assets under administration (AuA) by 13% to reach a record high of €1.56 trillion. Market share reached 28% of the open architecture segment of the European fund industry and 12.2% of the total European fund industry.

We continue to excel in the markets, thanks to our strategic diversification across regions, asset classes and distributor types.

The increase in open architecture penetration in Europe, driven by positive market sentiment and the trend towards outsourcing, has further strengthened our position.

It is important to reflect on the remarkable journey shared throughout 2024. It was an extraordinary year for Allfunds, filled with achievements, growth and pivotal milestones. This also gives us an opportunity to express deep gratitude for the unwavering support and trust of our shareholders.

This year, a historic milestone was reached by achieving a record high in assets under administration, reaching €1.56 trillion. This achievement is a testament to the trust clients place in Allfunds and the commitment of the team. The results demonstrate not just the strength of the core business but also the innovation and resilience that drive the Company forward.

Our client wins continue to solidify our position as a market leader in Europe and globally. This year, we successfully onboarded 74 new Distributors, 40% more clients than in 2023 and welcomed 98 new Fund Houses. We have also benefited from maintaining long-standing, deeply embedded relationships, resulting in very high retention rates of 99% for Distributors.

Despite recent changes due to the merger of Credit Suisse with UBS, which led to UBS replacing Allfunds as the fund distribution platform partner for the former Credit Suisse business ('Discontinued Operations'), and hence cancelling our exclusivity agreement in place, our performance remains strong. Our flywheel effect has propelled Allfunds to achieve a 28% share of the European cross-border UCITS segment,(27% when excluding Discontinued Operations), showcasing our ability to capture market share from legacy infrastructure providers.

The Allfunds business, excluding Discontinued Operations, has shown significantly better underlying revenue growth and AuA net flow characteristics since 2021. Specifically, annual revenue growth has been 2 percentage points higher than on a reported basis (16% vs. 18% in 2024). Net platform flows from existing and new clients, excluding CS/UBS, were €29 billion in 2024 compared to €(23)billion on a reported basis in that same period.

In 2024, we also made strides in achieving our vision. Building upon the foundations laid in previous years, Allfunds solidified its position as the industry’s leading fund distribution platform. We are in the process of innovating and becoming a 'three-in-one' platform covering long-only alternatives and, very soon, Exchange-Traded-products (ETPs). Alongside steady growth in long-only AuA, alternatives grew to a solid €19.4 billion in AuA, establishing Allfunds as the preferred platform in Europe for streamlining investor access to private markets funds. While ETPs are set to launch officially in late 2025, this year has ensured readiness in bringing this exciting new offering to life.

Equally transformative has been the implementation of a new business strategy, with a greater focus on our all-in-one service. This initiative embodies a commitment to a holistic approach to sales, where every team member contributes to cross-selling and upselling the entire suite of tools. Together, the Company is shaping a future where the platform is the ultimate destination and one-stop shop for fund distribution.

“This remarkable growth underscores our innovation, resilience, and the trust placed in us by clients and shareholders."

We continue leading innovation, promoting the further adoption of our Allfunds Blockchain technology by the industry. We announced a partnership between Allfunds Blockchain, Hamilton Lane and Apex Group, aimed at enhancing access to private markets through tokenisation. This collaboration is set to transform the landscape of fund operations, making them more streamlined and efficient, while significantly enhancing investor access to high-performance opportunities.

Selected Major Product and Service Launches in 2024

Allfunds Navigator:

This tool provides clients and partners with a new resource to complement the one-stop shop, and combines advanced AI and machine learning with Allfunds' extensive digital ecosystem. By leveraging this and the universe of over €4.5 trillion AUM, it will offer users a wealth of information, enabling them to identify market opportunities, locate the most promising Distributors, and uncover new opportunities.

▷ ***Read more on on page 14***

ANA (AI-empowered bot):

An intelligent assistant designed to help users efficiently navigate an extensive fund universe. ANA was launched in Q3 and its capabilities will continuously evolve. It will serve as an ideal co-pilot for delivering all of the Allfunds digital ecosystem features.

▷ ***Read more on on page 10***

New white label fund hosting platform:

this is a major step forward in empowering fund managers, and expands our service offering. This innovative platform will support traditional mutual funds and ETFs in Luxembourg and Ireland, with Allfunds Investment Solutions acting as the management company. This integrated solution is designed to support fund managers in launching new funds, leveraging Allfunds' existing one-stop-shop platform. It connects fund managers' ideas with Allfunds' unparalleled distribution capabilities, providing a seamless and efficient route to market. This unique offering sets Allfunds apart from other players in the industry by combining best-in-class technology with unmatched access to a vast global distribution network.

▷ ***Read more on on page 13***

Additionally, the €100 million share buyback programme to repurchase ordinary shares was completed last September. This investment in the Company's own shares demonstrates a commitment to delivering exceptional value to shareholders and aligns with the capital allocation framework established during the IPO. While the share price has decreased by 19.3% this year, ending at €5.04, it presents a unique opportunity for investors to capitalise on Allfunds' strong fundamentals and future growth potential. This temporary dip in share price does not reflect the underlying strength and resilience of our business. Instead, it underscores the market's cyclical nature and provides a compelling entry point for those looking to invest in a company with a proven track record of innovation, robust cash flow generation and strategic growth initiatives. As we continue to execute our business strategy and expand our offerings, we are confident that the market will recognise the true value of Allfunds, leading to significant potential gains for our shareholders.

Financial review and key highlights

The financial results reflect our strong strategic performance. In 2024, we delivered record-breaking financial performance with continued revenue diversification.

We are delivering on our growth strategy with exceptional asset growth, as AuA (excluding Discontinued Operations) soared to €1,503 billion, up 17%, with Platform Service surging 22% vs 2023. Our robust net flows, excluding Discontinued Operations, reached €29 billion (3.2%) year-to-date, primarily driven by fixed income and showcasing our strong core business.

Additionally, migrations from new clients have continued to be strong, underpinning the strength of our franchise. We continue to make new client wins all around the world, while capturing significant share from competitors, helping us to diversify our distributor base. We achieved record migrations of €73 billion (8.3%) year-to-date, with significant migrations in the UK, Italy and Asia. When excluding the acquisition made from Intesa, migrations also exceeded expectations at €61 billion. Our market performance has been positive, with an increase of €93 billion (10.5%).

Our digital ecosystem is supported by best-in-class proprietary technology. Our subscription-based revenues represent 11% of total revenues by the end of 2024. We have been focusing heavily on expanding our subscription revenue-based pool, implementing a double strategy of organic growth and selective M&A. This underlines the increasing importance the subscription-based business represents for the future of Allfunds.

We have seen solid subscription-based growth, with a 13% increase compared to 2023.

Allfunds Alternatives Solutions, our proprietary platform to access private markets, has grown its AuA to €19.4 billion, with €10.1 billion in distribution growing at an impressive 81%.

Finally, our strong cash generation enabled us to continue to make significant but targeted investments. During the year, we have also strengthened our partnerships with Santander and Intesa, successfully extending them for over 5 years. As part of that stronger partnership with Intesa, we acquired the local paying agent business of Fideuram in Italy, which consolidates our leading position in Banca Corrispondente. With Santander, our relationship has been strengthened through a collaboration framework under which they have agreed to partner across different areas, including: Santander will remain as a strategic platform service client of Allfunds; Allfunds will use the SWIFT bureau services of PagoNxt; and Allfunds and Santander Wealth Management & Insurance Division will explore different opportunities with regards to digital tools and technologies.

Our financial performance has been record-breaking, with net revenues hitting a record €632 million, up 16% year-on-year, thanks to higher AuA and margin stability, and subscription revenues. Comparing FY24 to FY23, revenues increased by €86.6 million, driven by higher AuA, transactional activity and liquidity remaining significantly above 2023. The platform margin increased to 3.9bps in 2024.

In addition to new clients and acquisitions, we continue to exercise discipline on costs while investing in the future growth and revenue diversification of the Company. I would like to reaffirm our commitment to investing in our people, who form the core of our business.

Costs increased by €23.5 million in the year, mainly due to higher variable costs from increased transactional activity in Banca Corrispondente and higher FTEs due to business growth.

Our adjusted EBITDA margin reached a record €422 million, up 18% year-over-year, thanks to strong revenue performance and cost stability, reaching a 67% adjusted EBITDA margin (1 p.p.), in line with the guidance provided during the year. The reported EBITDA increased by 26% year-over-year to €401 million.[1]

Net profit results show a negative figure due to the impairment of the Discontinued Operations. However, our adjusted net profit has increased by 16% year-on-year to €253 million.

Technology and Operations

We invested a total of €55 million mainly to fund growth initiatives while maintaining best-in-class platform services. In the medium to long term, these investments will deliver a more scalable and efficient business and enhance our customer offering.

- We transformed our infrastructure by shutting down the mainframe after 24 years and adopting open technologies. These new systems improve quality, time-to-market and efficiency, enabling better service and cloud-based solutions for our core systems. This project highlights the value of Allfunds' IT services and our commitment to innovation and continuous improvement.
- Our Operations and Technology teams now report to our Chief Operating Officer, enhancing synergies and fostering collaboration. New roles and market leaders have been introduced to refine our operating model. As a result, Operations will shift from a Dual Hub model to Operational Hubs, with leaders in Madrid and Warsaw, and other international leads reporting accordingly. These changes aim to enhance operational performance and accelerate our transformation.
- We also welcomed our new Chief Data Officer, Miguel Angel Treceño, to the Allfunds team. In his new role, he has established a transformative data strategy that underscores the critical role of data in our organisation. By optimising data management and enhancing data quality, we can leverage advanced analytics to drive informed decision-making and foster innovation. This strategic focus on data is essential for maintaining our competitive edge and ensuring we deliver superior services to our clients.

Sustainability and People

Our dedicated team and their commitment to sustainable growth are the driving force behind our success. We build long-term, close relationships to deliver lasting value for shareholders, clients and employees.

Three senior advisors have strengthened our team. Two will expand our presence in key markets, crucial to our growth strategy in Germany, France, and Benelux. The third advisor will identify business opportunities and partnerships to ensure the success of our ETP platform, launching in 2025. Their strategic vision and leadership are invaluable as we continue to innovate and expand.

Our people are the cornerstone of our achievements and future ambitions, and investing in them is an ongoing priority. We have welcomed and integrated colleagues from recent acquisitions, invested in new talent and developed our employees' skills. The number of Group permanent employees grew by 4% in 2023 to 1,074. In 2024, we will continue to invest in our people, particularly in growing our Alternatives and Subscription-based teams.

Reflecting on 2024, we recognise this year as a pivotal moment in our sustainability journey, marked by significant progress in Environmental, Social and Governance (ESG) management. With a strategic focus on strengthening our commitments and aligning with global sustainability standards, we have taken decisive steps to integrate ESG principles across our operations.

A key milestone has been the continued implementation of our ESG Strategic Plan 2026, reaffirming our long-term commitment to environmental and social responsibility.

In response to evolving climate-related financial disclosures, we published our first report aligned with the Task Force on Climate-related Financial Disclosures (TCFD), ensuring greater transparency in how we manage climate risks and opportunities. We also made significant progress in preparing for compliance with the Corporate Sustainability Reporting Directive (CSRD). This included conducting our first Double Materiality Assessment and carrying out a gap analysis on European Sustainability Reporting Standards (ESRS), both of which are reflected in this publication.

We have also doubled our Charity Fund initiatives, amplifying our social contribution during the 10th Anniversary year of the Allfunds Charity Fund.

We look forward to achieving further progress on these important matters.

Looking ahead

None of these achievements would have been possible without the collective effort of every individual in the organisation. Looking ahead, 2025 promises to be even more exciting. With the official launch of the ETP platform and the addition of top-tier talent to the team, the business is poised to reach new heights. However, it is important to remain vigilant given the market volatility, recent turmoil and increased geopolitical uncertainty. These are ambitious times for Allfunds, and there is confidence that together, the goals will be achieved and new benchmarks for quality will continue to be set.

Thank you once again for the commitment and hard work. We are proud of what we have accomplished together and are excited about the future. Let's keep up this momentum into the new year with the same passion and determination that have brought us where we are.

Juan Alcaraz
Founder and CEO

1. Refer to reconciliation in financial statements on page 2024.

Our strategy and growth plans

We have six strategic pillars, which enable us to focus on priorities and react quickly to changes in our operating environment.

Our strategic priorities

Continued market share gain	Perpetuating the flywheel effect	Further expansion and monetisation of digital value-added subscription-based proposition
Allfunds has a solid track record in developing business activities both in its existing markets and outside its core markets. This has fuelled the successful growth of its international market share.	The Allfunds flywheel is at the core of the Company's strategy: as the number of Fund Houses increases, so does the value of the Allfunds platform proposition to Distributors, and vice versa. Allfunds is focused on supporting and perpetuating the flywheel effect through several strategies.	Allfunds' digital value-added proposition is a key pillar of its strategy to build a fully integrated, one-stop shop, B2B wealth management marketplace.
Progress in 2024 Our superior offering has enabled us to maintain our share of the existing addressable market, despite challenging market conditions. In 2024 we achieved continuous onboarding of Distributors and Fund Houses.	**Progress in 2024** We have captured new flows and new clients as a result of secular market growth. We maintain strong client relationships, and develop and expand product offerings to current clients.	**Progress in 2024** We have increased the penetration of our digital services: • In our existing client base • By intensifying our cross-selling efforts via selling Allfunds Connect to our existing Distributors and Fund Houses
How we measure it • Total market share • Market appreciation in 2024 • AuA growth in 2024	**How we measure it** • New flows • Number of new clients added – both Fund Houses and Distributors • Client retention rate for Distributors and Fund Houses	**How we measure it** • Net revenue share of digital proposition represents 11% of total revenues in 2024
Future priorities • Continue gaining market share, especially in new markets we have just entered • Expansion to new markets	**Future priorities** • Continue adding Fund Houses to the platform • Onboarding of key specific large Distributors when possible	**Future priorities** • Grow the subscription-based business and, eventually, strengthen it with acquisitions. Net revenue share of digital proposition to represent 30% of total revenues in the mid-term

Our strategic priorities *continued*

Margin resilience

Allfunds believes that it is naturally well positioned to compensate margin fee pressure given its global scale and reach, the strength of its relationships with both Distributors and Fund Houses, its ability to negotiate prices with them, and its independence.

Progress in 2024

We have increased our revenue margin thanks to active margin management and the natural hedge of net treasury income.

We also launched Allfunds Alternative Solutions and Allfunds Private Partners for our proprietary private capital markets platform.

Our platform leads in breadth and width of services and continues to be the gold standard.

How we measure it

- Evolution of net platform revenue margin

Future priorities

- Continue with the Fund Harmonisation initiative
- Consolidate the growth from the alternative investments offering
- Launch of the ETP platform

Realisation of operating efficiencies through scale effects

Allfunds' focus on operating efficiency and associated cost optimisation will remain an integral part of its strategy.

Progress in 2024

Thanks to its scalable platform, and continued investments to improve it, Allfunds can onboard new Distributors at very low marginal costs.

How we measure it

- Cost per transaction (€)
- Adjusted EBITDA margin (%)
- IT Capex over total Capex (%)

Future priorities

- To maintain its operational efficiency and high-quality service, Allfunds will continue to invest in its platform to maintain best-in-class capabilities and standards

Pursue strategic, value-accretive acquisitions

Allfunds has proven M&A capabilities with a demonstrable track record of successful acquisitions that have helped accelerate its growth and enhance its platform.

We expect that there will be further consolidation in the wealth management market, and we intend to continue to focus on selected M&A opportunities that will strengthen our value proposition to clients.

Progress in 2024

Allfunds' M&A strategy has been focused on enhancing scale, expanding and consolidating its geographical footprint and accessing technologies, products and expertise that enhance its solutions.

Allfunds is highly disciplined and has a well-defined set of evaluation criteria that it follows to maximise value from any acquisition.

This year, we completed and integrated two acquisitions. One of these acquisitions has resulted in a fully integrated product suite. Through the integration we have achieved meaningful accretion for our shareholders.

How we measure it

- Subject to the type of M&A pursued: product vs scale/consolidation

Future priorities

- Allfunds will evaluate opportunities to expand its global footprint and gain access to new markets
- Allfunds' M&A strategy will complement its organic growth ambitions
- Finalise the integration of the recently acquired business

Measuring our progress

To ensure continuous improvement in our performance, as well as responsible business practices, we have defined key performance indicators. These measure our progress in our strategic goals, servicing our clients, retaining talent and ensuring the successful scalability of our platform.

Financial measures

AuA (bn)

€1,558bn

Description

Assets under administration through our platform

Definition

AuA is the total market value of the volume of units or shares of UCIs (undertakings for collective investment) which are managed by Fund Houses

Link to strategy

Link to remuneration

Total AuA is not a direct target within any remuneration package

Adjusted EBITDA margin

66.8%

Description

Adj. EBITDA margin is a measure of our profitability and the efficiency of our operation

Definition

Adj. EBITDA margin refers to adjustments to the EBITDA figure that relate to costs and income that the Allfunds Group believes are not reflective of the ongoing performance of the business and are thus added back

Link to strategy

Link to remuneration

Adj. EBITDA is included as a metric within the Group bonus scheme. Total EBITDA growth is also a performance element within the Group's LTIP schemes

Net revenue (m)

€632m

Description

Revenues from sales

Definition

Net revenue represents the Allfunds Group's fee, commission and service revenues less fee, commission and service expenses, plus the net interest income from treasury activities. Net revenues comprised of net platform revenue, net subscription revenues and other revenues

Link to strategy

Link to remuneration

Total revenue is not a direct target within any remuneration package. However, revenue growth is a performance element within the Group bonus scheme

Financial measures *continued*

Normalised Free Cash Flow (FCF)

€238m

Description

FCF is a measure of operating performance and underlying cash generation

Definition

Profit/(loss) for the year after tax, excluding net interest expense, tax credit/(expense) and depreciation and amortisation. Adjusted to exclude: separately disclosed items; impairment losses; losses on disposal; and amortisation of intangible assets acquired as a result of business combinations, net of underlying capital expenditures, rental expenses, net interest expense and effective tax rate of the year

Link to strategy

EBITDA margin

63.5%

Description

EBITDA margin is a measure of our profitability and the efficiency of our operation

Definition

EBITDA margin refers to EBITDA figure calculated under IFRS approach over total revenues of the year

Link to strategy

Non-financial measures *continued*

FH – Client retention rate

96.7%

2022	98.2%
2023	97.4%
2024	96.7%

Description

High retention rate signifies client satisfaction and recurring business

Definition

Calculated as 1 minus churn rate. Churn figures based on Fund Houses with GDAsin place that have cancelled their agreements during the year, excluding M&A

Link to strategy

Link to remuneration

Retention rate of Fund Houses is included as a metric within the Group bonus scheme

D – Client retention rate

99.8%

2022	99.5%
2023	99.8%
2024	99.8%

Description

High retention rate signifies client satisfaction and recurring business

Definition

Calculated as 1 minus churn rate. Churn figures based on total AuA lost in a given year due to Distributors leaving the platform, excluding M&A

Link to strategy

Link to remuneration

Retention rate of Distributors is included as a metric within the Group bonus scheme

Operational measures

Employee retention rate

93.5%

2022	87.2%
2023	91.7%
2024	93.5%

Description

Employee retention rate is a metric that measures the capacity of the Group to retain employees over the year

Definition

Calculated as 1 minus turnover rate. Turnover rate based on number of voluntary leavers over total number of direct employees during the year

Link to remuneration

Employee engagement is a performance element within the Group bonus scheme. Employee retention rate is a KPI linked to employee experience

Trades placed successfully (million)

44.85m

2022	34.3
2023	33.4
2024	44.9

Description

Number of trades correctly placed (not rejected) by our clients

Definition

Calculated as the number of orders, coming from Distributors, that pass all validations and are registered within the system for further delivery to fund managers

Link to strategy

Link to remuneration

Operational excellence is a performance element within the Group bonus scheme

Operational measures *continued*

STP orders

98.0%

2022	96.7%
2023	95.7%
2024	98.0%

Description

% of Straight-through Processing (STP) trades placed by our Distributors

Definition

Calculated as the % of orders reaching Allfunds platform through an STP process (SWIFT, FIX and files)

Link to strategy

Link to remuneration

STP orders is not a direct target within any remuneration package. However, operational excellence is a performance element within the Group bonus scheme

New funds set up

15,221

2022	17,100
2023	14,350
2024	15,221

Description

Number of new funds set up annually within the system by Fund Houses

Definition

Calculated as number of ISINs set up within the system with the relevant operational information

Link to strategy

IT CAPEX over total CAPEX

80.1%

2022	72.9%
2023	76.4%
2024	80.1%

Description

Investment in IT as a measure of the importance given to the maintenance and improvement of our platform

Definition

Investment made in IT, digital and blockchain developments (excluding IFRS 16 Leases spend) during the year over total Company capital expenditures (CAPEX)

Link to strategy

Security rating

800

2022	800
2023	800
2024	800

Description

Security rating provided by a third party (BitSight)

Definition

Cybersecurity rating serves as a measure of the risk. Security rating is calculated daily using a proprietary algorithm from BitSight that examines two classes of externally observable data – configuration and security events. Configuration information represents how diligent a company is in implementing best practice to mitigate risk. Security events represent evidence of successful cyber attacks.

Link to strategy

Our addressable market

We operate in a large and high-growth market underpinned by open architecture penetration and outsourcing.

Addressable market

According to Allfunds' estimates, using underlying data from independent third parties, the total fund platform distribution market was estimated to be €14.9 trillion at the end of 2019, based on AuA. Of this €14.9 trillion, €8.5 trillion refers to the captive fund platform market, €6.0 trillion to B2B open architecture platforms, and the remaining c.0.4 trillion refers to D2C platforms. The figures for Allfunds' total addressable market are limited to the captive and B2B business, along with the geographies in which it currently has Distributors. These include Europe, Asia, the Middle East, the United States offshore market and Latin America.

This results in a total addressable market of €14.5 trillion AuA for the B2B platform market. Allfunds believes that growth in the core B2B outsourced open architecture platform market, in which we operate, is driven by predictable and sustainable secular trends. These include household wealth, penetration of financial assets, open architecture and outsourcing. Annual AuA growth of this Total Addressable Market ('TAM'), based on management sizing of the market using third-party data, is expected to be c.9% from 2019 to 2024. For 23 years, Allfunds has set out to fundamentally change the industry by building a single fully integrated global platform, providing Fund Houses with a single point of access to the largest global distribution network.

Household wealth

We are still going through a sequence of global shocks that are disrupting economies around the world. Over the past three years, we have seen a pandemic, severe supply chain disruptions, the Russia-Ukraine war, an energy crisis, tensions in banking markets and now additional geopolitical shocks such as the armed conflict between Israel and Hamas. The resulting swings in activity and prices have caused significant challenges to the economy and financial sector as a whole.

Authorities, policymakers and central banks have taken strong action to contain the turbulence in the US, in Europe and globally through a tightened monetary policy. According to the International Monetary Fund in its 2024 World Economic Outlook, the baseline forecast is for global growth to reach 3.3% in 2025, broadly unchanged from 2023, and 3.3% in 2026. As a result, wealth growth as one of our secular market growth trends has remained robust, driven by steady global economic expansion and declining inflation, despite the presence of policy uncertainties and regional economic disparities.

With disinflation and steady growth, the likelihood of a hard landing has receded, and risks to global growth are broadly balanced. On the upside, faster disinflation could lead to further easing of financial conditions. Looser fiscal policy than necessary, and than assumed in the projections, could imply temporarily higher growth, but at the risk of a more costly adjustment later on. Stronger structural reform momentum could bolster productivity with positive cross-border spillovers. On the downside, new commodity price spikes from geopolitical shocks – such as the attacks in the Red Sea – and consequent supply disruptions could prolong tight monetary conditions. These conditions could also be prolonged by more persistent underlying inflation. Meanwhile, deepening property sector woes in China or elsewhere, disruptive tax hikes and spending cuts could also cause growth disappointments. If those persist, this might have a material impact on investors' willingness to invest in capital markets, as happened in 2022.

Financial assets penetration

Over the years, and boosted by a favourable regulatory framework, there were significant trends in the European financial industry. These trends highlighted the role of Asset Managers in serving investors, funding European companies and aiding the transition to a greener economy. Financial assets outpaced non-financial wealth during the 2020–2021 pandemic period, but non-financial assets narrowed the gap in 2022 when household financial assets declined in value. According to market data, forecasts suggest that financial and non-financial wealth will continue to rise in tandem over the next five years.

Open architecture penetration

Over the past two decades, there has been remarkable growth in the distribution of third-party funds by financial institutions, private banks, insurers, Wealth Managers and other Distributors. Investors now expect access to a diverse array of funds from international Fund Houses, and their discernment has increased as their investment profiles evolve. In response, Distributors have adapted their strategies. The European fund industry is becoming more international, with growing importance for cross-border funds. Consequently, the proportion of cross-border Assets under Management (AuM) funds within the total AuM held in Europe, considered a reliable gauge of open architecture adoption has steadily risen over the years. As indicated by market data[1], the share of cross-border funds domiciled in the European Union increased from 51% in 2014 to 58% in 2024.

1. Source: EFAMA

Outsourcing

Our clients, including Fund Houses and Distributors, are proactively adopting cost-efficient operating models. They achieve this by strategically outsourcing various functions – such as back-office operations, portfolio tools and analytics, regulatory compliance and legal services – to fund platforms. This shift toward outsourcing, combined with a greater reliance on open architecture models, empowers our clients. Not only do they effectively navigate mounting regulatory pressures, but they also meet the rising investor demand for enhanced performance and diversified investment options. According to market data, the share of assets outsourced to European B2B fund platforms continued to increase in 2023 to 32% compared to only 19% in 2017[2].

Allfunds market share

Allfunds has grown its AuA at a 26% CAGR over the last decade. As of 31 December 2024, our global market share is 10.4% (or 10.1% excluding Discontinued Operations) of the AuM in regulated open-ended funds, based on market data, considering just the countries in which we operate[3]. In the European UCITS market, Allfunds holds a 12.2% (or 11.8% excluding Discontinued Operations) market share at the end of 2024, and a 28% market share in the European cross-border UCITS based on Morningstar data (or 27% excluding Discontinued Operations). Our diversified AuA profile and strong commercial activity helped us maintain our market share during 2024, adding to a decade of uninterrupted market share growth (excluding Discontinued Operations).
At a local level, Allfunds has Distributor clients in more than 66 countries and has built a strong market presence in some key markets for third-party fund distribution. Our top three markets at the end of 2024 were Italy, Spain and Central and Northern Europe, where we hold a significant market share of their respective fund markets – including local and cross-border funds based on market data.

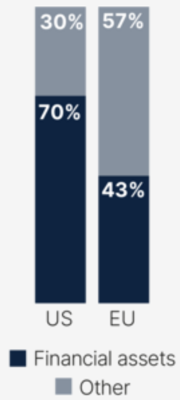
2. Latest publicly available data. Source: Platforum
3. Regions included in the data are Europe, Bahrain, Brazil, Chile, Colombia, Hong Kong, Kuwait, Malaysia, Mexico, Oman, Philippines, Qatar, Saudi Arabia, Singapore, South Africa, Taiwan, Thailand and United Arab Emirates. Source: Morningstar and management analysis

Penetration-led market growth drivers

Household wealth
20-24E % CAGR

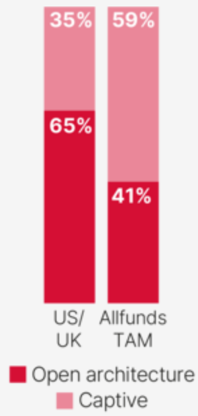
- Accelerating economic growth
- Expansionary monetary and fiscal policies
- Change in demographics and population growth

Financial assets penetration



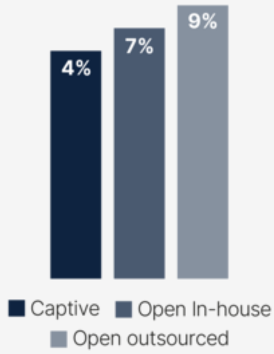
- Wealth effect
- Attractiveness of financial assets vs real estate
- Shift to pensions/savings

Open architecture penetration[1]



- Third-party funds offer outperformance and broader diversification
- Regulatory pressure for increased transparency (for example, MiFID II)
- Distributors expanding offering

Outsourcing penetration
19-24E AuA TAM CAGR

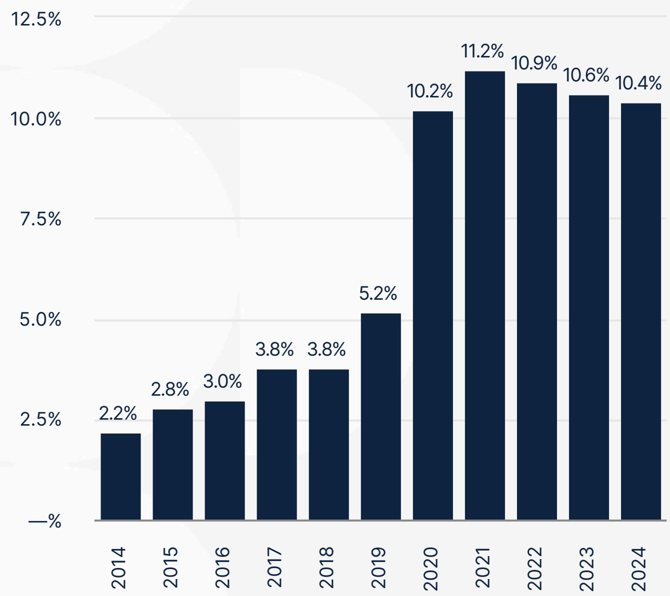


- Cost pressure
- Strength of third-party platform value proposition
- Increasing administrative, compliance and data requirements

1. Excludes D2C business

Source: Management sizing of the market based on third-party market data

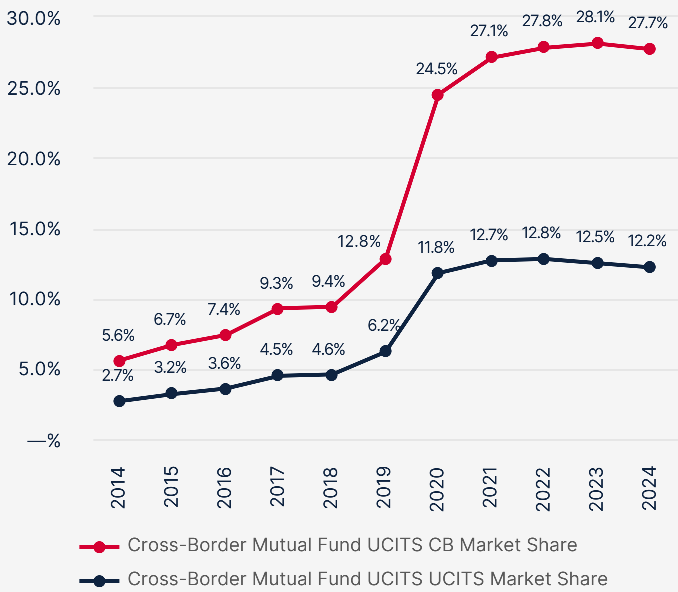
Allfunds market share of worldwide open-ended funds (%)



Note: Market share calculated as Allfunds' total AuA over worldwide investment funds. Investment funds including Money Market and ETFs but excluding Fund-of-Funds in countries in which we operate

Source: Morningstar and management analysis

Allfunds market share in European UCITS and cross-border mutual funds (%)



Market share calculated as Allfunds' total AuA over European UCITS. UCITS including Money Market and ETFs but excluding Fund-of-Funds Source: Morningstar and management analysis

Market trends

Capitalising on favourable industry trends is what keeps us at the forefront of innovation.

Increasing wealth and savings

During 2024, most Central Banks around the world changed the direction of monetary policy with interest rate cuts as inflation levels started to moderate globally after two years of high inflation. Both the FED and the ECB cut interest rates by 100 bps each during the year, entering a new monetary policy cycle which is expected to be a lot more supportive for global financial markets and the wealth management industry

Over the past two decades, personal financial wealth across the globe has nearly tripled. Despite crises, economic shifts and uncertainties, wealth continues to grow. This trajectory is expected to persist, fostering financial wellbeing for individuals worldwide.

According to market data, global financial wealth rose by around 4% in 2023 and is expected to rise by 6% over the next 5 years, reaching USD 628 trillion by 2028.

The European Union is supporting several initiatives to encourage more retail savings to go into investment products, ultimately aiming to mobilise more private capital towards the EU economy.

At the end of 2023, deposits accounted for over 42% of the total financial assets owned by EU households, according to EFAMA and ECB data. This significant share, which has increased from the previous year, highlights an excess in savings among EU households. In comparison, the proportion of deposits in the US is considerably lower, underscoring the disparity in savings behaviour between the two regions.

Allfunds is well positioned to capture flows if EU households shift some of their financial assets from deposits into investment products over the coming years.

Outsourcing and preference for open architecture

Our clients, which include Fund Houses and Distributors, are progressively embracing more cost-effective operating models. This shift involves outsourcing a variety of activities to fund platforms and includes areas such as back-office operations, portfolio tools, analytics, regulatory and legal services.

By leaning more heavily on open architecture levels, our clients are better equipped to navigate the increasing pressures of regulation. This approach also enables them to meet the rising expectations of investors for performance and diversification. The reliance on open architecture is not merely a trend, but a strategic move that allows our clients to stay agile and responsive in a dynamic market environment.

Furthermore, end investors are expressing a growing demand for more access to open architecture fund products. These products offer a wide range of options, allowing investors to choose the ones that best align with their financial goals and risk tolerance. The demand for high performance at the lowest possible cost is a driving force behind this change, with regulation also playing a significant role.

The adoption of lower-cost operating models and the shift towards open architecture are transforming the way our clients operate. This transformation is enhancing their operational efficiency and enabling them to deliver greater value to end investors. As we move forward, we expect these trends to continue shaping the future of the fund platform industry.

We continue to benefit from these outsourcing and open architecture trends. During 2024, we onboarded 74 new Distributors and 98 new Fund Houses onto our platform. Of the new Distributors onboarded, 30% were new to the open architecture model while a further 27% shifted from the in-house to outsourced platform model.

Fund houses' outsourcing of fund hosting activities to third-party Management Companies represents another key outsourcing trend in the industry.

Allfunds is well positioned to capitalise on this trend through a new white-label platform to service traditional mutual funds and ETFs in Luxembourg and Ireland, with Allfunds Investment Solutions acting as the management company.

Access to private markets

Private markets (private equity, real estate, infrastructure, private debt and hedge funds) are becoming increasingly more attractive to companies because of the benefits they provide in terms of flexibility, access to patient capital and reduced short-term pressures. This transition has resulted in a dramatic growth in private markets activity and its share of business and asset finance. According to market data from asset management research and consulting firm Novantigo, the private wealth opportunity in Europe alone is projected to grow at double digits annually to reach over €2 trillion AuM by 2032.

In particular, there is growing demand for broader access for retail investors to achieve better portfolio diversification. The emergence of European-domiciled structures like the ELTIF and other evergreen funds is playing a critical role in facilitating retail access to private markets

Assets invested in private markets funds for the wealth management segment – including ELTIFs and other evergreen funds – are projected to grow by 24% annually over the next three to five years, as per data from by Novantigo.

Allfunds Alternative Solutions, is making alternative funds more accessible to Distributors by simplifying the operational aspects of private asset investments, making them as easy as conventional funds. In addition, our Allfunds Private Partners programme has been established to help our clients access best-in-class solutions and content from top global Alternative Fund Houses.

Our efforts to facilitate the distribution of Private Markets is already being recognised by the industry. Distributors and Fund Houses cite Allfunds as their preferred platform for accessing and distributing these products respectively, according to a market survey published by Novantigo in June 2024.

Growing popularity of passive funds and ETFs

Over the past year, the industry has observed a shift in consumer preferences towards passive funds and exchange-traded funds (ETFs). This trend has exerted some pressure on fund management fees. Passive funds, including mutual funds and ETFs, are characterised by portfolios that mirror the components of a specified index, or a similar pool of assets, without active management by a Fund House.

The proportion of assets under administration (AuA) on the Group's platform attributable to passive asset classes and ETFs is growing but remains relatively small. As of 31 December 2024, it accounted for approximately 8.8% of the total AuA on the Group's platform (8.6%, when excluding Discontinued Operations). This is primarily because the majority of our clients are private banks, which tend to favour active fund management.

In response to growing investor interest in ETPs (which include ETFs, ETCs and ETNs), we are launching a new end-to-end ETP platform to support Distributors and Fund Houses with the distribution of these products.

The new ETP platform will allow us to:

- Expand our one-stop-shop, by distributing ETPs alongside mutual funds and Private Market funds
- Penetrate a new open architecture segment, by targeting a market that had surpassed €2 trillion in AuM by the end of 2024.
- Leverage existing distributor channels, by growing our share of wallet with Distributors increasing their usage of ETPs
- Unlock new opportunities by targeting distributor and Fund House relationships not yet part of the Allfunds distribution network.

Technology trends

Technology is transforming the wealth industry, mainly in how services and products are combined and delivered. The value chain used to have distinct functions, but new technology and data – such as blockchain – have changed that. This has created more competition across all services and products.

However, Allfunds sees disruption as an opportunity rather than a threat. This is because we cover the entire value chain and continue to enhance our offering – including, artificial intelligence and blockchain technology. The Allfunds strategy is to lead the industry's evolution. Allfunds has the advantage of being able to foresee clients' changing needs and adapt to new technological trends.

As a leading B2B WealthTech platform, our ambition is to support Distributors and Fund Houses worldwide through technology - solutions and products. Based on market data, our wealth and data analytics solutions address a market estimated to generate over €9bn in annual revenue across the markets where Allfunds operates.

Testament to our commitment of being at the forefront of technological trends, we announced a partnership with Google Cloud in 2024. The partnership aims to deliver transformational solutions for Allfunds' extensive network of Distributors and Fund Houses, providing enhanced capabilities, strengthened security and cutting-edge tools to address the complex challenges of fund distribution. The launch of Allfunds Navigation Assistant (ANA) – an AI-powered assistant to drive better investment decision-making – is an example of how we are leveraging our partnership with Google Cloud.

ESG focus

ESG (Environmental, Social, and Governance) factors are becoming more important for investors when they allocate capital. Companies that have a strong ESG policy are more likely to attract investments because they show transparency and accountability. This fast-paced growth also brings regulations such as the Sustainable Finance Disclosure Regulation (SFDR), which has led to a high demand for funds that comply with its Article 9 and Article 8.

Allfunds offers more than 70,000 products that are categorised as Article 8 and Article 9, which account for around 59% of AuA as at 31 December 2024. Investors are putting more pressure on Fund Houses to include more ESG criteria in their investments.

In particular, Fund Houses are facing higher regulatory scrutiny when claiming certain ESG credentials for the products. According to our subsidiary MainStreet Partners, nearly a quarter of all European-domiciled funds classified under Article 8 of the EU's Sustainable Finance Disclosure Regulation remain at risk of greenwashing.

In addition, local ESG regulation – such as the UK's Sustainable Disclosure Regime (SDR) – is also emerging in key fund markets, forcing Fund Houses to review their investment processes in order to claim certain ESG labels on their investment products.

Through MainStreet Partners and its extensive ESG research and data services, Allfunds is well positioned to continue to help Distributors and Fund Houses meet their ESG regulatory needs.

Increased regulation

Over recent years, tremendous efforts have been made by policymakers, regulators and industry to improve the current framework governing retail investing – and to enhance the offer to end investors, especially in the European Union.

This means that our clients are facing continued regulatory pressure to increase transparency, particularly concerning fees charged to investors and/or received from third parties. These fees can affect the performance and returns of the investments, so investors need to be aware of them.

The increased costs of regulatory compliance are putting pressure on the cost-income ratios of banks, which measure how efficiently they use their resources. In addition, greater transparency regarding fees is driving investor demand away from higher-cost captive, or closed-architecture funds, towards lower-cost open-architecture funds. Captive funds are those that are managed by the same entity that sells them, while open-architecture funds are those that are selected from a range of different providers. This also places pressure on Distributors' profits as they retain lower margins on open-architecture funds.

Lower profit margins and investor demand are leading Distributors to increase levels of outsourcing to lower-cost third-party providers, such as fund platforms, that can offer them more services and products.

In this context, the European Commission published the Retail Investment Strategy (RIS) in May 2023. Is a comprehensive package that seeks to better equip European citizens with the safeguards and confidence needed to become capital markets investors. A key element of the RIS is to strengthen product governance rules and regulate the pricing process to improve value for money for investors.

Due in large part to regulatory changes driving increased transparency to end investors, the asset management industry continues to shift away from higher-margin fees based on negotiated rebates, and certain jurisdictions are moving away from these fees. Negotiated rebates are fees that are paid by fund managers to Distributors for selling their funds. Although they previously created conflicts of interest, they are essential for remunerating the distribution effort.

Some jurisdictions, such as the United Kingdom, the Netherlands and Switzerland, have imposed bans or caps on these negotiated rebates, following the principles of investor protection and fair competition.

Due to the implementation of MiFID II in the European Economic Area, the majority of Allfunds' business has already shifted away from fees based on negotiated rebates. Allfunds was already ahead of the curve because since 2017, due to anticipated changes to regulation, we have been actively reducing the rebate-earning AuA (from 29% of AuA to only 11% as of December 2024). Allfunds continues to shift its business mix and apply its new pricing model, reducing the exposure to rebate-earning AuA.

Consolidation in the sector

Over the past few years, the fund platform industry in Europe has experienced an obvious metamorphosis. A smaller number of players have managed to consolidate their positions, thereby amplifying their market share.

This trend of mergers and consolidations is not just a passing phase but a likely indicator of the future landscape of the European fund platform services industry. As the industry gears up for more competition and strives for increased efficiency, we can expect to see a continuation of this consolidation trend.

In the face of these industry dynamics, our strategic vision is clear and focused. We aim to identify and seize selected opportunities that align with our goals and values. These opportunities enhance our competitive edge and also foster growth and diversification in our range of products and services.

In addition, we are a seeing significant level of market consolidation amongst wealth and asset management firms. Recent high-profile deals highlight the industry need for scale.

Allfunds' has always been committed to support the industry in their search for scale, which ultimately can also be passed onto investors through more cost effective products and services.

The transformation of the fund platform industry in Europe is a testament to the dynamic and evolving nature of the financial markets. As we navigate through these changes, our strategic vision guides us towards growth, diversification and global expansion. We remain committed to delivering value to our clients and staying at the forefront of industry innovation.

Blockchain

Blockchain innovations have the potential to disrupt the global asset management value chain by reducing risks and streamlining and speeding up processes – as well as simplifying the supply chain. Allfunds recognised this some time ago and has been developing blockchain-based solutions in collaboration with Distributors, Fund Houses and regulators to bring more efficiency and transparency to the fund distribution space.

Allfunds' Blockchain division has not only emerged as a crucial participant in pilot programmes but also as a dependable collaborator for regulatory bodies. This is a testament to our deep-rooted expertise and innovative approach to blockchain technology. We have successfully cultivated strong partnerships in France, Italy and Spain, further solidifying our presence in the market. Our relentless pursuit of advancement is evident in our FAST solution, Digital Assets-Tokenisation, and active market collaborations. These solutions are meticulously designed to offer an elevated level of security, unparalleled adaptability and superior convenience to all entities involved in the fund distribution value chain. This commitment to enhancing stakeholder experience underscores our dedication to revolutionising the industry.

Our response to market trends

As a pioneering force in the B2B WealthTech sector, Allfunds is agile in responding to market trends. Meanwhile, our strength is rooted in our capacity to access a broad and swiftly growing market, fortified by open architecture, extensive market penetration and strategic outsourcing. Our demonstrated success proves our adaptability in navigating changes in demand or regulatory environments, all while preserving a resilient business model. Moreover, our dedication to innovation means we can identify the essence of client demand trends, potentially initiating significant shifts to business contributions.

Sustainability approach

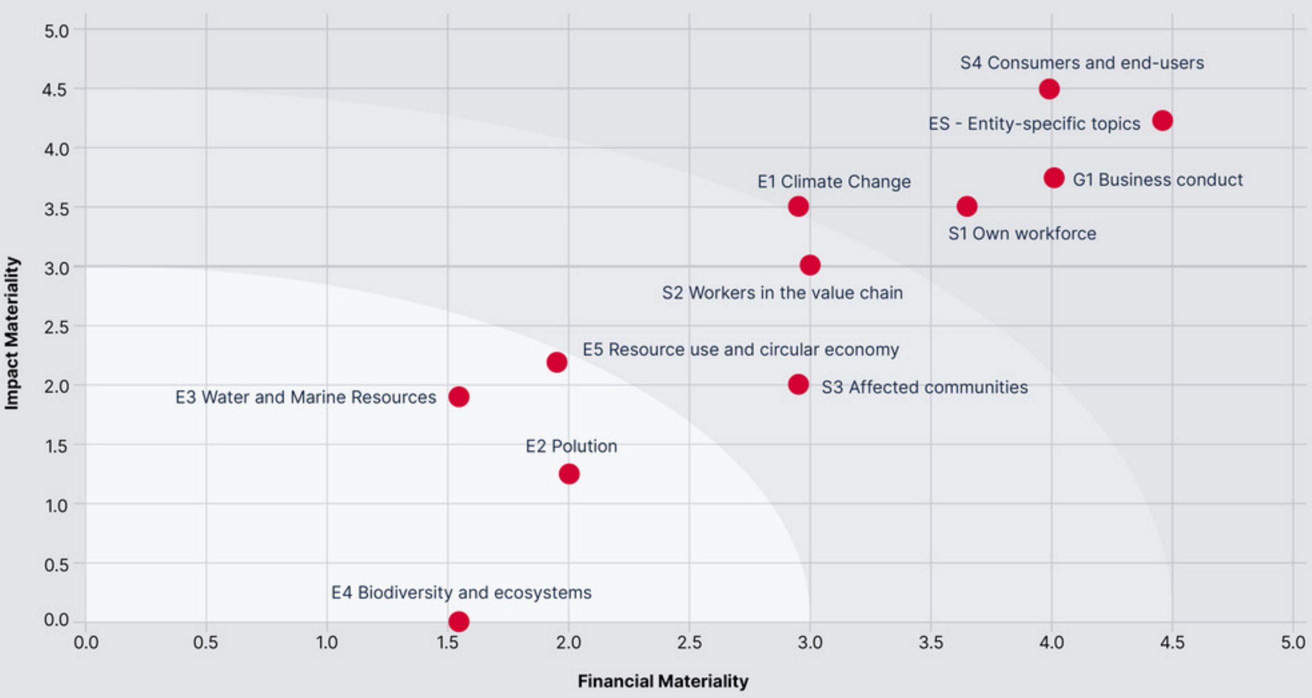
Our sustainability is built on six key pillars:

1. **Ethics and governance**
2. **Talent management**
3. **Digitisation and innovation**
4. **Responsible investment**
5. **Social commitment**
6. **Environmental protection**

As we look back on 2024, we recognise this year as a turning point in our sustainability journey. With a strategic focus on strengthening our commitments and aligning with global sustainability standards, we have taken decisive steps to integrate ESG principles across our operations.

We made significant progress in preparing for compliance with the Corporate Sustainability Reporting Directive (CSRD) including conducting a Double Materiality Assessment (DMA). As a result, we have identified our impacts on the environment and society (impact materiality assessment) as well as the sustainability-related risks and opportunities that we are exposed to (financial materiality assessment). The outcome is aggregated per ESRS topic. It shows that Climate Change- E1, Own Workforce-S1, Consumers and end-users-S4 and Governance-G1 and other Entity Specific topics (Innovative Digital Solutions, IT Security, Sustainable Investment) are our most material sustainability issues. See the outcomes in the matrix below:

Double Materiality Assessment



▷ *More information on Sustainability Report 2024 - Double Materiality Assessment*

Materiality analysis

Material topics (threshold 3+)

ES Entity- Specific Topic*

S4. Consumers and end-users

G1. Business conduct

S1. Own workforce

E1. Climate change

Not material/not applicable topics

S2. Workers in the value chain

S3. Affected communities

E5. Resource use and circular economy

E2. Pollution

E4. Biodiversity and ecosystems

E3. Water and marine resources

Thresholds:	
Major	5
Significant	4
Medium	3
Low	2
Minimal	1

Sustainability Topic	Impact materiality	Financial Materiality		Double materiality (final output)
	Impact	Risk	Opportunity	
ESRS E1: Climate Change	3.5	3.0	2.5	
ESRS E2: Pollution	1.2	2.0	0	
ESRS E3: Water and marine resources	1.9	1.6	0	
ESRS E4: Biodiversity and ecosystems	0	1.6	0	
ESRS E5: Resource use & circular economy	2.1	1.6	2	
ESRS S1: Own workforce	3.5	3.4	3.6	
ESRS S2: Workers in the value chain	3.0	3.0	1	
ESRS S3: Affected Communities	2	1.4	3.0	
ESRS S4: Consumers and end-users	4.5	4.0	1	
ESRS G1: Business conduct	3.7	3.9	4.0	
Entity-specific[1]	4.2	3.7	4.5	

1. Entity Specific topics (Innovative Digital Solutions, IT Security, Sustainable Investment)

Sustainability priorities

Overview of our sustainability priorities

The DMA, in which various stakeholders have participated, was verified by an external third party. It enables us to reconfirm that our pillars collectively address our material sustainability impacts, risks, and opportunities. They reinforce our commitment to achieving rapid, large-scale development that benefits people and the planet while ensuring the long-term resilience of our business.

For more information please see the Allfunds' Sustainability Report (SR) which includes a limited assurance opinion by an independent third party and which can be found at https://allfunds.com/en/esg/reports/

Allfunds Sustainability Pillar	SDGs priority	Material topic ESRS	▷ More information on
1 **Ethics and governance**	16	ESRS G1 Business conduct	▷ More information on page 45 (AR) ▷ More information on page 49 (SR)
2 **Talent management**	8	ESRS S1 Own workforce	▷ More information on page 46 (AR) ▷ More information on page 99 (SR)
3 **Digitisation and innovation**	9	ESRS Entity-specific topic	▷ More information on page 47 (AR) ▷ More information on page 137 (SR)
4 **Responsible investment**	12	ESRS Entity-specific topic	▷ More information on page 48 (AR) ▷ More information on page 157 (SR)
5 **Social commitment**	1, 3, 4, 10, 17	S4: Consumers and end-users	▷ More information on page 49 (AR) ▷ More information on page 168 (SR)
6 **Environmental protection**	13	ESRS E1 Climate change	▷ More information on page 50 (AR) ▷ More information on page 196 (SR) ▷ More information on page 51 (AR-Climate Related Disclosures) ▷ More information on page 222 (SR- EU Taxonomny)

ESG Strategic Plan 2026

Environmental dimension: Achieved several key milestones on our journey towards becoming a carbon-neutral company.

Topic		Target	2024 Achievements
Environmental management	1.	Global ISO 14001 Environmental Management System certification	Revalidate ISO Certifications
	2.	100% Allfunds' offices with external audit	60% external environment audit in offices (covering 87% employees) according to ISO 14001
	3.	100% employees trained on environmental management by 2025	Prepare an in-depth environment training course for all employees to be displayed 1Q2025
Suppliers' environmental management	4.	100% of crucial suppliers with environmental impact reviewed	100% new suppliers were reviewed according to Allfunds environmental requirements
Climate change strategy	5.	Compliance with Paris Agreement to keep warming to 1ºC, according to SBTi by 2024	Allfunds´ carbon footprint is aligned with the Paris Agreement
	6.	100% renewable energy consumption by 2026	92% of **electricity consumption** from renewable resources (+17p.p up in 2024)
	7.	Zero emissions scope 1&2 by 2028	
	8.	Carbon neutral by 2030	
Climate-related risk and opportunities	9.	Publication of TCFD in 2024	Voluntary **1st TCFD Report** on climate-related risks and opportunities based on 2023 data

Social dimension: Continued to invest in growing employees' skills, promoting diversity and supporting non-profit activities.

Topic		Target	2024 Achievements
Human Resources			
Human capital management	1.	Succession Plans for 1st and 2nd level	Concluded
	2.	25 hours (average) training per year per employee	19 hours (average) training per year (7 more hours vs 2023)
	3.	30% internal promotion vs external hires	36% of internal promotion vs external
Diversity, equity and inclusion (DEI)	4.	25% women in Executive Committee	12.5% women in Executive Committee
	5.	40% senior managers women	28.2% women senior managers
	6.	All managers attend annually DEI training sessions	Achieved
	7.	Gender Pay Gap < 5%	Study to adjust job level classifications within the workforce to ensure the accuracy of the Gender pay gap calculation
Health, safety and wellbeing	8.	Towards safe working environments with zero accidents	Zero work-related fatalities, and only one commuting accident
	9.	ISO 45001 Health and Safety certification globally by 2025	Health & Safety ISO 45001 certification postponed to 2026, due to the complexity. Hiring of an expert pending
Human rights	10.	Maintain zero human rights breaches	Zero breaches in human rights
Social Commitment			
Corporate philanthropy	11.	Increase by 10% the number of employees in volunteer activities	1,580 hours dedicated to volunteer activities (vs 502 hours in 2023) Almost 60% more social contribution (vs 2023)

Governance dimension: Anticipated regulatory compliance, strengthened control systems and improved transparency.

Topic		Target	2024 Achievements
Corporate governance	1.	40% women directors	30.7% women directors
	2.	Higher % independence in Board Committees	Ongoing
	3.	Ongoing ESG training for Board members	Training on ESG and Compliance
	4.	Bonus linked to E&S	20% Bonus linked to Sustainability
Ethics and integrity	5.	Reinforce the ESG-related policies to the new commitments and legislation	Concluded end of 2023
	6.	100% employees trained on Ethical issues	96.27% employees trained on Ethical issues (Code of Conduct)
Risk monitoring and compliance	7.	Adapt our non-financial reporting internal controls to the CSRD	1st **Internal audit completed** by an external to validate that Allfunds was complying with all regulatory sustainability reporting requirements
	8.	At minimum, an annual review of the ESG risk controls	Achieved
Corporate transparency	9.	ESG Report according to CSRD by 2025	See Sustainability Report 2024
Stakeholders' management	10.	Monitoring procedure of Stakeholders' Dialogue	See Stakeholder Engagement section
	11.	Double materiality analysis according to CSRD by 2024	See double materiality analysis according to CSRD and ESRS

1 Ethics and governance

"Act with integrity and transparency, complying with the highest standards and applicable regulations at all levels of the organisation."

Policies and procedures

- Code of Conduct
- Reporting channel
- Criminal Risk Prevention and Compliance Policy
- Compliance Monitoring Programme
- Anti-Corruption and Gifts and Entertainment Policy
- Manual for the Prevention of Money Laundering and Terrorism Financing
- Privacy Policy
- Conflict of Interest Management Policy
- Related Party Transactions Monitoring Procedure
- Insider Trading Policy
- Tax Strategy
- Board Diversity Policy
- Non-Executive Directors' Profile
- ESG Policy
- Human Rights Statements
- Stakeholders Dialogue Policy

Milestones

- Strengthen Allfunds' governance of sustainablity-related matters:
  - Allotted specific duties to the Board of Directors and each of the Board Committees with regard to sustainability and ESG topics
  - Reviewed the progress of ESG Strategic Plan target for 2026
  - Reviewed a number of existing ESG-related corporate policies such as Supplier Code of Conduct, Charity Fund Policy.
  - Directors received an intensive, customised ESG training programme
- Re-evaluation of our ESG risks and in particular environmental and climate-related risks in accordance with Task Force on Climate-related Financial Disclosures (TCFD).
- Re-validation of Compliance Management Certification based on the international standard ISO 37301:2021.
- Reinforcement of the content of the Code of Conduct.
- Updating the procedure and giving greater visibility to the Reporting Channel to report any irregularities, especially those that might constitute improper practices, law breaches or allegedly illegal acts.
- Monthly review of new ESG regulatory obligations coming into force in 2023/2024 through the Compliance Monitoring Programme.

KPI 2024

96.6%

Compliance with the applicable Best Practice Provisions of the Dutch Corporate Governance Code

97.8%

Employees trained about AML and CFT

0

Complaints received through the Reporting channel

0

Incidents of corruption

SDG commitment

As part of its activities and organisation, Allfunds has solid policies and procedures in place to prevent corruption and bribery.

16 PEACE, JUSTICE AND STRONG INSTITUTIONS

CSRD

ESRS G1 Business conduct

▷ ***More information in Sustainability Report - Ethics and Governance section***

2 Talent management

"Seek the personal and professional development of our employees in a diverse and safe working environment."

Policies and procedures

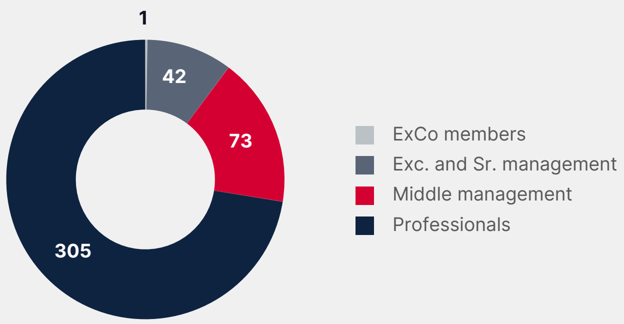
- Remuneration Policy
- Flexible Work Policy
- Learning and Development Policy
- Professional Career Plan
- Gender Equality Plan, Diversity and Inclusion Policy and a Protocol for Prevention and Action Against Harassment
- Global Health, Safety and Wellbeing Policy and Workplace Accident Procedure
- Recruitment Policy

Milestones

- Continued to progress on the Human Capital Management Strategic Road Map.
- Awarded the Top Employer certification in Spain, which recognises excellence in human resources management. It emphasises employee satisfaction, engagement and growth opportunities.
- Enhanced Workforce Diversity: We have broadened our employee base, increasing the number of represented nationalities by 30% -from 47 in 2023 to 61 in 2024. Additionally, we have significantly improved gender diversity in leadership, raising the ratio of women in Executive and Senior Management positions from 19.4% in 2023 to 28.2% in 2024.
- Advancing Workplace Equity : Negotiations with the Working Council in Spain have progressed on the Equity Plan, which includes an updated protocol for addressing sexual harassment and gender-based harassment.
- Investment in Talent Development: Expanding our training course offerings has led to a substantial 58% increase in average training hours per employee, rising from 12 hours to 19 hours per employee.
- Employee Well-being Initiatives: In our continued commitment to employee wellbeing, we have introduced a series of workshops focused on emotional health and physical wellness.
- Higher Employee Engagement: Our average engagement rate has improved to 75 out of 100, up from the previous score of 72 out of 100, reflecting a more engaged and motivated workforce.

KPI 2024

Women by professional category



1,074
Total employees (4% increase)

> 19,520
Hours of training (in 2023 12,510)

96%
Employees with permanent contract

36%
People with internal development opportunities

421
Women (39.2 % total employees)

10.12%
Turnover rate (13% in 2023)

61
Nationalities

690
Employees between 30 and 50 years old

SDG commitment

Allfunds enhances employee value through technical excellence, continuous learning, and equal opportunities. It fosters a fair, inclusive workplace, recognising and rewarding merit. This commitment strengthens employability and long-term career growth..

CSRD

ESRS S1 Own workforce

▷ ***More information in Sustainability Report - Talent management section***

3 Digitisation and innovation

"Pursue innovative digital technologies to offer our clients products and services that are more agile, efficient and secure."

Policies and procedures

- Information Security System
- A Crisis Management Plan
- Business Continuity Plan
- Cybersecurity Insurance

Milestones

Innovation

- Allfunds drives AI innovation and infrastructure optimisation with Google Cloud.
- Developed a new range of advanced widgets integrating user browsing data from 800+ financial institutions with AI algorithms. These tools offer deep insights into market trends and investor behaviour, enabling asset managers to make more informed decisions in the WealthTech sector.
- Launched a new Alternatives microsite within Allfunds Connect. It provides a centralised resource dedicated to empowering partners in their distribution endeavours, especially in exploring new markets and segments.
- Creation of two new services: Fund Registration and Regulatory Reporting - to meet the evolving needs of Asset Managers, offering comprehensive solutions for expanding market access and regulatory compliance.

Allfunds Blockchain

- Expanded the capabilities of its FAST solution to digitise the process of switching mutual fund portfolios between financial providers. FAST has been growing in Spain, expanding its functionality after a new ideation process with 18 local and international financial institutions. There is further geographical potential in the Italian market, after an ideation process with a number of key financial institutions and international players.
- Tokenisation of a Luxembourgish ELTIF and a BBVA Asset Management investment fund.

IT Security:

- Adopted the new NIST CSF 2.0 framework. This adds a new function, Governance, which reinforces the importance of aligning senior management and its business strategy with information security.
- IT Security Director Plan has been extended to 2025 including DORA, Zero Trust and Cloud strategy.
- Renewed our certification of our financial and technology processes through the ISAE 3402 (SOC 1 Type 2) certification to ensure the quality of outsourced managed hosting solutions.
- Compliance with technical exercises for financial institutions in compliance with TIBER-EU.

KPI 2024

4h

Recovery Time Objective (RTO)

BitSight rating

800

we are part of the top peer group of a total of 26,798 financial institutions analysed.

0 phishing incidents

for 2024

Endpoint Detection and Response (EDR)

SDG commitment

Allfunds contributes to transforming the investment industry with digital solutions such as Blockchain.

CSRD

ESRS Entity-specific topic

▷ ***More information in Sustainability Report - Digitalisation and innovation section***

4 Responsible investment

"Promote and integrate ESG criteria into investment services to encourage more sustainable capital markets."

Policies and procedures

- Responsible Investment Policy

Milestones

- Renewed our commitment to the Principles of Responsible Investment of the United Nations.
- Launched Sustainability Navigator: a cutting-edge automated tool designed to efficiently build and audit Article 8 and 9 portfolios in line with the current EU regulatory framework.
- Reinforced our ESG proposal, expanded our capabilities through different tools and services, responding to the new regulation and giving a 360º ESG solution to Fund Houses and Distributors thanks to the integration of MainStreet Partners (MSP).
- Fund tools: providing advanced ESG search criteria and comparison tools
  - Unique ESG Funds Ratings: going above and beyond your typical fund rating, offering a trusted solution for ESG due diligence and regulatory compliance - powered by MSP.
  - Portfolio Solutions: increasing capabilities to make ESG-related investment advice with the use of efficient and compliant tools.
  - Reporting: providing a set of reporting possibilities at fund and portfolio level, now with an in-depth financial and ESG analysis in clients' look and feel.
  - Direct access to ESG Everything Platform (Main Street Partner's proprietary database), with the same access credentials, to facilitate the use and analysis of information.
  - Green, Social, Sustainability (GSS) Bonds Database: providing ratings of green, social and sustainability bonds in the market based on MSP´s unique rating model. The rating relies on the ESG score of the issuer and on issuance-specific information gathered by analysts on the sustainability of the bond framework and on the additional proceeds financed.

KPI 2024

Over 150,000

EETs are available in Allfunds database, positioning Allfunds as one of the largest providers in the market.

59%

AuA of Allfunds' platform related to ESG (article 8 and 9 SFDR) (+2 pp vs 2023)

46.2%

Allfunds´revenues are linked to ESG products and services

SDG commitment

Allfunds provides comprehensive data to its clients, facilitating investment decisions based on ESG criteria.

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

CSRD

ESRS Entity-specific topic

▷ ***More information in Sustainability Report - Responsible investment section***

5 Social commitment

"Contribute to positive change in the communities where we operate."

Policies and procedures

- Allfunds Charity Funds Policy
- Crowdfunding platform
- Supplier Selection Procedure
- Supplier Code of Conduct
- Modern Slavery Act applied to supplier

Milestones

- Enhanced our ESG criteria for suppliers by: introducing a new supplier matrix that assesses their impact; increasing requirements for crucial suppliers to ensure stronger compliance with sustainability standards; and by updating our Supplier Code of Conduct to reinforce our commitment to responsible and ethical business practices.
- Duplicate social contribution to non-profit activities vs 2023 (crowdfunding initiatives, new charity sport events, charity market sales, new volunteering activities) while celebrating our 10th Anniversary of the foundation of Allfunds Charity Fund.
- Increased volunteering hours of our employees by 214% vs 2023.
- Sponsored different activities.

KPI 2024

€426,177
Investment in the community

55
Supported foundations/non-profit associations

Supplier expenses:
€91.4m
(84% invested in local suppliers)

1,580
Nr. hours of employees involved in volunteering activities

1,082
Suppliers

29.9
Average days payable supplier ratio

SDG commitment

Allfunds engages its stakeholders in different charity activities to increase our social footprint.

1 NO POVERTY
3 GOOD HEALTH AND WELL-BEING
4 QUALITY EDUCATION
10 REDUCED INEQUALITIES
17 PARTNERSHIPS FOR THE GOALS

CSRD

ESRS S4 Consumers and end-users

▷ ***More information in Sustainability Report - Social commitment section***

6 Environmental protection

"Work to operate more efficiently and respectfully towards the environment"

Policies and procedures

- Environmental and Climate Change Management Policy
- Environmental Management System Manual
- Certificate Environmental Management System Manual
- ISO 14001 Certification (Global)
- ISO 14064 Certification (Global)
- Allfunds Environmental Programme
- LEED Certification (HQ)

Milestones

- Published our first TCFD Report, providing a comprehensive analysis of climate-related risks and opportunities based on our 2023 data.
- Achieved alignment with the Paris Agreement, ensuring that our activities do not contribute to a global temperature increase beyond 1.5°C.
- Expanded our use of renewable energy across more offices, increasing its share of our electricity consumption to 92% - up from 75% in 2023.
- Revalidated carbon footprint ISO 14064 and Environmental Management System ISO 14001 certifications.
- Completed 60% external environment audit in offices (covering 87% employees) according to ISO 14001.
- Completed a new employee survey to calculate CO^2 emissions of employee commuting.

KPI 2024

11.28

CO_2eq Tn emissions of **Scope 1** (0 in UK)

8.66

CO_2eq Tn emissions of **Scope 2** (0 in UK)

1,241.76

CO_2eq Tn emissions of **Scope 3** (0 in UK)

1,445 MWh

Electricity consumption

92%

Energy consumption coming from renewal sources

SDG commitment

In addition to environmental policies and procedures, Allfunds implements internal engaging awareness campaigns to address key environmental issues.

13 CLIMATE ACTION

CSRD

ESRS E1 Climate Change

▷ ***More information in Sustainability Report - Environmental protection section***

Climate related disclosures

Our climate-related disclosures as at the end of 31 December 2024 are in accordance with sections 414CA and 414CB of the Companies Act 2006 which outline requirements for non-financial reporting.

Introduction

Our climate change commitments and approach

Allfunds prioritises environmental protection, aligning its activities with key international initiatives such as the ISO 14001 Environmental Standard, the UN Global Compact, the UN Sustainable Development Goals, and the Paris Agreement, which provide a vital framework for its operations. This has been reflected in our Climate Change Management and Climate Change Policy as well as in the ESG Strategic Plan 2026.

The Group's approach is summarised in its Environmental Management System, which comprises the following four aspects:

- Environmental protection measures
- Environment criteria in the supply chain
- Reporting and transparency
- Environmental culture

All of which are targets subject to periodic review and aligned with ISO 14001.

The Climate Change Management and Environment Policy seeks to define the principles that guide Allfunds and its group companies, at a global and local level, to support and improve its environmental performance. It develops Allfunds' commitments in the environmental dimension outlined in its ESG Policy.

In addition to the importance of compliance with relevant environmental legislation, this Policy provides guidance for all staff, management, suppliers, business partners and stakeholders on all actions and measures taken to improve our environmental protection.

Governance

The Board's oversight of climate and nature-related risks and opportunities

Climate-related financial disclosures: CFD-a. TCFD: G-a

The **Board of Directors** is responsible for developing the Group's views on sustainable long-term value creation, and for formulating and overseeing a strategy consistent with those views, which includes a climate-related strategy. The Board is also responsible for approving all non-financial reporting, including reporting on climate-related issues, and for regularly monitoring climate risk management and the effectiveness of corresponding control systems. The Board also approves the Group's annual budget, Including estimated expenses or investments relating to climate action. In performing its duties, the Board considers, among other things, the impact of the Group's operations on the environment.

Within the Board, the CEO is responsible for the executive leadership of the Group in accordance with the Board-approved strategic objectives. He is entrusted with the day-to-day management of the Group, including, among other things, matters and climate action. The ESG Department reports directly to the CEO and the CEO belongs to the ESG Internal Committee of Allfunds.

The **Risk and Audit Committee** is responsible for overseeing the non-financial reporting process and assists the Board in supervising the integrity and quality of non-financial information, including climate-related information. It also supervises the choice of external standards against which the Group wishes to report and the identification, management and reporting of material topics. This Committee also monitors the relationship with third parties involved in the auditing or verification of non-financial information.

The **Remuneration and Appointments Committee** assists the Board in defining compensation structures, setting E&S performance metrics (some of them climate-related) for variable compensation and monitoring their progress. This Committee also assists the Board in reviewing its collective skills and identifying potential gaps or development needs, including with regard to climate.

In 2023, the Board of Directors approved a ESG Strategic Plan 2026, which includes targets to become carbon neutral by 2030.

The Board of Directors also decided that the 2023 annual bonus of the global population of Allfunds should be linked to E&S metrics with the aim of promoting the development of a leadership model and culture focused on sustainability. These metrics include climate-related goals. Target measures and performance levels are disclosed in the 2024 Sustainability Report.

Management's role in assessing and managing climate and nature-related risks and opportunities

Climate-related financial disclosures: BEIS (a). TCFD: G-b

Climate-related responsibilities have been assigned to the Sustainability department and the Sustainability Internal Committee.

Sustainability Internal Committee

- Developing and Implementing Allfunds' general strategy with respect to ESG matters that includes the TCFD

Sustainability department

- Monitoring ESG performance of the Group
- Reporting data on ESG to third parties
- Communicating and positioning Allfunds on ESG issues
- Coordinating all ESG governing bodies

Other organisational areas: Manage and control key topics for which they are responsible

- Compliance: Policies and Legal Risks derived from climate-related issue
- **Risk Management:**
  - **IT and IT Security:** Technology Risks derived from climate-related issues
  - **Strategy and Product development:** Market Risks derived from climate-related issues
  - **Global Facilities:** Physical Risks derived from climate-related issues affecting offices where Allfunds operates

Strategy

Climate-related financial disclosures: BEIS (d1) (d2). TCFD: S-a

Allfunds' climate strategy covers the entire value chain, as the Company believes that taking a leadership role can build a more sustainable future for business, stakeholders, and the planet.

Following increasing climate-related regulation worldwide and considering how ESG factors have become more important for investors as they allocate capital, Allfunds has integrated environmental criteria into its corporate purpose, using a comprehensive and integrated approach.

Climate change management

Allfunds' environmental commitments are set out in the Climate Change Management and Environment Policy and involve the following specific actions:

- **Preventive approach**
  Taking a preventive approach that favours the environment whenever Allfunds participates in projects where there may be a threat of serious or irreversible damage to the environment or human health.
- **Risk management**
  Opting for a sustainability approach based on the management of environmental risks and conducting activities to identify, measure, assess, mitigate, control and monitor risks and any direct and indirect impact caused by our operations. This approach involves correctly assessing the impact that climate and environmental risks may have on the environment where the Group operates.

  To this end, Allfunds' will integrate environmental criteria into its processes and will review existing controls or define new ones where appropriate. As a second line of defence, Allfunds includes environmental matters in its compliance monitoring programme, and integrates environmental risks in its risk management processes.

  To complete this approach, the Group has taken the steps recommended by the TCFD to identify and assess the potential materiality of risks and opportunities to increase our positive effects and mitigate negative impacts on our business.
- **Climate change mitigation**
  Moving towards becoming a carbon-neutral company by 2030, reducing greenhouse gas emissions and offsetting emissions that cannot be avoided, and working to mitigate and adapt to climate change through activities that contribute to the transition towards a decarbonised society.
- Actions to achieve this commitment include:
  - Definition of GHG emission reduction plans, for Scope 1, 2 and 3.
  - External verification of our carbon footprint on an annual basis.
  - Transition to use of 100% renewable electricity.
  - Reduction in the use of fossil fuels.
  - Introduction of energy efficiency measures.
- **Environmental protection measures**
  Collaborating in the protection of the environment and the prevention of pollution by:
  - Making energy savings wherever possible throughout the organisation.
  - Preventing and reducing waste generation and managing it appropriately, fostering the circular economy.
  - Reducing the consumption of electricity, water, and materials, and encouraging sustainable consumption.
  - Reducing hazardous waste and pollutants and ensuring the proper handling of these materials.
  - Assessing the environmental impact of our business activities and working to conserve biodiversity.
  - Promoting environmental best practices throughout the Group.
  - Driving the digitalisation of processes and the use of environment friendly technology and services.
- **Environmental criteria in the supply chain**
  Establishing environmental criteria when selecting suppliers and when making procurement and hiring decisions. Integrating environmental variables into the business strategy and the design of new financial services and products. In particular, highlighting environmental-related information in the investment funds distributed on Allfunds' platform.
- **Environmental culture**
  Assigning roles and responsibilities and allotting appropriate resources to implement the commitments set out in this Policy. Providing training and skills-building programmes and launching awareness and educational campaigns among all in-house and subcontractor personnel as regards environmental best practices and climate change. Seeking to positively influence the environmental conduct of our stakeholders. Encouraging active participation, communication, and establishing an open and transparent dialogue regarding environmental management with a view to motivating and involving all stakeholders.
- **Reporting and transparency**
  Measuring, recording, and reporting on the main environmental indicators with transparency, and openly communicating environmental matters or issues to relevant stakeholders. To this end, the annual ESG Report and other related documents are available on the Allfunds website, which contains important data on environmental matters.

Suppliers and clients share our approach

ESG criteria (including environmental topics) have been established in the selection of suppliers, the onboarding of New Fund Houses and the procedure for approving new services.

Allfunds carries out a due diligence process with new suppliers and when renewing current suppliers, taking environment issues into consideration. The company prioritises the environmental responsibility of suppliers that share its values and show their commitment to sustainability and environmental performance. During 2024, the company has strengthened supplier requirements based on their environmental impact and conducts more thorough compliance reviews, as reflected in the updated Supplier Code of Conduct and Selection Procedure.

Allfunds takes commitment to sustainable development very seriously, addressing and solving climate-related challenges. At the same time, the Company provides the relevant data, expertise, and connected technology to all stakeholders, so that they can make well-informed decisions.

Thus, Allfunds promotes ESG investment, establishing internal mechanisms to consider ESG criteria applied to products and services, offering more than 60,000 products that are categorised as Article 8 and Article 9, thereby showing the Company's ability to respond to clients' needs.

Decarbonisation Plan

Allfunds' Decarbonisation Plan approved by the Board of Directors was developed and produced with the goal of becoming a carbon neutral company by 2030, which included near-term targets. This plan is an important part of the ESG Strategic Plan and contains specific emission reduction targets along different time horizons:

- 2023: Compliance with Paris agreement to limit warming to 1ºC according to SBTi
- 2026: 100% electricity consumption from renewal energy sources
- 2028: Net zero in absolute scope 1 and 2 GHG emissions
- 2030: To achieve carbon neutrality: offsetting on absorption or mitigation projects.

The approach towards these targets is aligned with the latest climate science aimed at limiting global warming to 1.5°C and adopts best practices of avoiding and lowering greenhouse gas (GHG) emissions by carefully tracking and disclosing our performance, implementing energy reduction initiatives and transitioning to low-carbon energy sources.

As such, early in 2025, a GHG Inventory of the Allfunds Group was prepared, including all direct and indirect emissions of the 17 Allfunds offices around the globe, and compared to the year 2022.

The result of the GHG inventory allowed the Company to calculate and certify its carbon footprint according to ISO 14064, as well as to set 2022 as the baseline year for Decarbonisation Plan targets.

Achievements

The Group has progressed in its transition plan with the following achievements over the course of 2024:

- Published 1st TCFD Report on climate related risks and opportunities with 2023 data.
- 60% external environment audit in offices (covering 87% employees) according to ISO 14001.
- Achieved Carbon Footprint aligned with the Paris Agreement.
- 92% of electricity consumption from renewable resources (+20%).
- New employee commuting survey for the carbon footprint calculation.
- Prepare an in-depth mandatory environment training course to all employes to be displayed 1Q2025.

Risks and opportunities derived from climate change

Climate-related financial disclosures: BEIS (d1) (d2). TCFD: S-a

Climate-related Risks

Transition Risks

Risk category	Time horizon	Mitigation strategy
Current legislation The risk of non-compliance with applicable regulations on climate adaptation. ●	Short Term < 1 year	All climate-related regulations are analyzed together with other applicable legislation through the Allfunds Compliance Monitoring Programme, as established in the Compliance Risk Management Manual. This comprehensive approach ensures that all relevant laws and regulations are considered in our compliance efforts. Following our regulatory monitoring and Risk Appetite Statement (RAS), we have determined that there is no substantial risk at present. However, we include climate-related regulations in our risk assessments due to the potential reputational risk or financial loss that could arise from non-compliance with current climate-related laws and legislations. The risk of non-compliance with applicable regulations is managed internally by several dedicated teams, including Compliance, Risk, Legal, and ESG. These teams collaborate closely, holding monthly meetings to analyze the business implications of regulations and assess how to maintain ongoing compliance. The outcomes of these meetings are regularly submitted to the Board's Risk and Audit Committee for review. The primary regulations affecting the company pertain to the disclosure of information on climate-related issues. Key regulations include: • EU Directive 2014/95/EU on the disclosure of non-financial and diversity information (NFR Directive) • ECB Guide on Climate-Related and Environmental Risks for Banks • Bank of Spain (BoS) Guidelines • EU Environment Taxonomy Regulation (Although this regulation does not apply to Allfunds, we voluntarily report in the ESG Report) By adhering to these regulations and maintaining a robust compliance framework, we aim to mitigate any potential risks associated with climate adaptation and ensure transparency and accountability in our environmental impact reporting.
Emerging legislation The emerging climate legislation risk refers to the potential challenges and uncertainties that the business faces due to new and evolving laws and regulations aimed at addressing climate change. ●	Medium Term 1-5 years	One of the objetives of the Allfunds Compliance Monitoring Program is to detect Emerging Regulation risks related to climate change that may have an impact on the company. Where appropriate, we usually involve other stakeholders to help us provide input on such emerging regulations. For example, during 2023 we reviewed: 1. Corporate Sustainability Reporting Directive (CSRD), that will required to disclosure of compliance with the transition to a sustainable economy including limiting global warming to 1.5°C and climate neutrality by 2050. The CSRD standards will be applicable for fiscal years 2024 onwards, to be reported from 1 January 2025. 2. SFDR - regulatory technical standards (It defines pre-contractual and periodic reports: (i) the templates for the sustainability-related disclosures applicable to financial products that promote environmental or social characteristics and with environmental objectives, and (ii) the statements on principal adverse impacts on sustainability factors that will be provided by financial market participants since 1 January 2023. 3. Capital Requirements Directive- CRD VI proposals, that are aimed at further strengthening the EU prudential framework, tackling emerging risks to banks (especially those stemming from the climate crisis). 4. Spanish Environmental change and Energy transition Law 7/2021-requests additional disclosures among the report with prudential relevance, through an annual report assessing the financial impact on the company of the risks associated with climate change, including the risks of the transition to a sustainable economy and the measures adopted to address those risks. (Not yet applicable, subject to further development)

Risk exposure

● LOW ● MEDIUM ● HIGH

Risk category	Time horizon	Mitigation strategy
Technological Risk Technological risk refers to the potential challenges and uncertainties associated with the development, deployment, and reliance on technologies aimed at mitigating or adapting to climate change. ● (Low)	Short Term < 1 year	Technological risk is a crucial component of the Allfunds Risk Management System. It encompasses risks associated with insufficient or faulty hardware and software within technical infrastructures, which may compromise the availability, integrity, accessibility, and security (including cybersecurity) of said infrastructures and data, as defined by the European Banking Authority. Such risks can lead to reduced operational efficiency, increased costs, and data vulnerabilities, among other issues. In addition, we monitor technology risk in alignment with the TCFD framework. This includes risks related to replacing existing products and services with lower-emission alternatives, unsuccessful investments in new technologies, and the costs associated with transitioning to lower-emission technologies. In our annual review, Allfunds determined that the climate risks associated with technology are low. To mitigate these risks, we have implemented several preventive measures aimed at reducing energy consumption and carbon emissions from our technological infrastructure and equipment: • **Energy efficiency:** We maximise the energy efficiency of our technological equipment by selecting products with energy efficiency labels, implementing automatic shutdowns when equipment is not in use, shutting down some test environments during nights and weekends, and regulating ambient temperature. • **Renewable energy sources:** We use renewable energy sources to power the technological infrastructure and equipment in most of our offices, particularly our Data Centre located in Spain. • **Virtualisation:** We use virtual servers and other technological equipment to reduce our energy consumption and carbon emissions by allowing multiple systems to share the resources of a single server. • **Cloud strategy:** Over the next three years, we plan to transition our current infrastructure to cloud service providers with a positive carbon footprint, such as AWS and GCP. • **Recycling and reusing:** We practice recycling and reusing to minimise the need for new products, thereby reducing carbon emissions associated with manufacturing. This includes internal reuse and donations to NGOs through the Allfunds Charity Fund.
Market Risk Market risk refers to the potential financial losses and business impacts that arise from changes in market dynamics due to climate change. ● (Low)	Short Term < 1 year	The market risk of not taking into account customer or market trends related to climate change could impact our ability to attract and retain clients, as well as our market share. That is why, at Allfunds, we constantly analyse the demands of our clients and the dynamics of the market to adapt our services and/or create new solutions. Allfunds has a strategy to provide value-added services to its clients, filling a growing gap in specialised ESG-related services where climate related matters are included: • **For distributors:** providing a full set of ESG tools to help them create an ESG-focused offering, properly assess the ESG profile of funds and portfolios, and report extra-financial performance in a transparent and user-friendly way. By helping distributors with their ESG requirements, Allfunds is supporting a wider adoption of ESG investment funds and portfolios by investors. • **For fund managers:** helping them to analyse the compliance of their funds with relevant ESG regulations, assess the sustainability profile of holdings and produce advanced impact reports. By helping fund managers with their ESG requirements, Allfunds is supporting the creation of more ESG investment products while helping to reduce greenwashing risks.
Reputational Risk Reputational risk refers to the potential damage to the company's reputation due to its perceived or actual response to climate change ● (Medium)	Short Term < 1 year	Allfunds has identified climate change as a potential source of reputational risk tied to changing client or investor perceptions of the organisation's contribution to or detraction from the transition to a lower-carbon economy. • **From the client perspective:** Allfunds core business is to provide investment and ancillary services related to investment funds, as well as other digital and technological services linked to the distribution of investment funds. The only way Allfunds can contribute is by providing access to information in a simple and effective way on investment funds that include ESG criteria, including those related to climate change. In this sense, Allfunds has been offering its clients various ESG-related services since 2020, which in the last year has increased thanks to the acquisition of Mainstreet Capital Partners. • **From the investor perspective:** Allfunds believes that consistency and transparency in the information provided on the company's climate change strategy, impact and risks is crucial. Thus, it avoids having a bad rating/ranking in Environmental, Social and Governance (ESG) matters that could affect the reputation of the company, its ability to attract new investors, and its share price.

Risk exposure

● LOW ● MEDIUM ● HIGH

Physical Risks

Risk category	Time horizon	Mitigation strategy
Acute Risk Acute risk refers to the potential immediate and severe impacts of climate-related events on the company's operations, financial performance, and overall resilience.	Medium Term 1-5 years	As part of the Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP), Allfunds has incorporated adverse weather events among other potential scenarios. Consequently, a comprehensive contingency plan is in place to address these risks should they materialise.
Chronic Risk Chronic risk refers to the long-term, persistent impacts of climate change on a company's operations, financial performance, and overall resilience.	Long Term > 5 years	Allfunds offices with more than 20 employees, located in cities such as Madrid, Warsaw, Milan, Valencia, London, Luxembourg, and Zurich, are exposed to chronic climate change risks, including floods, forest fires, extreme heatwaves, and unusual weather patterns. The severity of these risks varies based on the specific location and characteristics of each city. Recognising that no city is entirely immune to the impacts of climate change, it is crucial to implement measures to mitigate and adapt to these risks as they arise. This includes: 1. Activating the Allfunds Continuity Plan and Disaster Recovery Plan. 2. Regularly adapting and updating these plans to address evolving climate risks. *Note: An office with more than 20 employees is to be considered as having a significant impact for the Group.

Risk exposure

LOW MEDIUM HIGH

Climate-related Opportunities

Opportunity category	Description	Time horizon: Short Term < 1 year	Medium Term 1-5 years	Long Term > 5 years	Potencial positive impacts
Resource Efficiency	Use of more efficient modes of transport	●	●	●	The company is seizing the opportunity to positively impact the climate by promoting more efficient modes of transport. Initiatives include offering special loans to employees to purchase hybrid or electric vehicles, implementing a travel policy that prioritises essential trips only when telecommunication is not feasible, providing electric car charging stations at the central office in Madrid, and encouraging the use of public transport.
	Use of more efficient production and distribution processes	●	●	●	By digitising the fund distribution process, Allfunds significantly reduces the need for physical paperwork and in-person meetings, thereby lowering the carbon footprint associated with traditional financial transactions, specially through its Blockchain solutions. This contributes to a more sustainable and efficient financial ecosystem.
	Use of recycling	●	●	●	Allfunds has implemented different waste management methods, including recycling of various materials and the donation or resale of office equipment. By recycling materials such as paper, cardboard, plastic, organic waste, batteries, fluorescent bulbs, and toners, the company significantly reduces the amount of waste sent to landfills. This helps decrease greenhouse gas emissions associated with waste decomposition. By donating furniture, computers, and mobile phones to non-profit organisations or reselling them to employees with proceeds going to charities, Allfunds not only benefits the community but also promotes a culture of sustainability and social responsibility. This can enhance the company's reputation and strengthen stakeholder relationships.
	Move to more efficient buildings	●	●	●	Allfunds prioritises the sustainable and flexible nature of renting office spaces, allowing the company to choose locations that align with its commitment to environmental responsibility. By prioritising buildings with environmental certifications, efficient waste and water management, and renewable energy sources, Allfunds ensures that its operations are eco-friendly. The main office in Madrid, which accommodates half of the group's employees, exemplifies this commitment with its LEED Gold certification and solar panels that generate electricity and heat water for self-consumption. This approach not only supports the environment but also enhances the company's reputation as a leader in sustainable business practices.
	Reduced water usage and consumption	●	●	●	

Opportunity category	Description	Time horizon Short Term < 1 year	Medium Term 1-5 years	Long Term > 5 years	Potencial positive impacts
Energy Source	Use of lower-emission sources of energy	●	●	●	Support use of renewable energy, purchase renewable energy, switch to energy-efficient lights and water-saving devices. Create a low-carbon workplace and reduce resource consumption by implementing energy-saving actions and paper reduction measures.
	Use of supportive policy incentives				Not applicable
	Use of new technologies	●	●	●	
	Participation in the carbon market				Not applicable
Products/ Services	Development and/or expansion of low emission goods and services	●	●	●	By offering a comprehensive platform for fund distribution, Allfunds facilitates and promotes investments in sustainable and green funds. This encourages financial institutions and investors to support environmentally responsible projects and companies, driving capital towards initiatives that have a positive environmental impact.
	Development of climate adaptation and insurance risk solutions	●	●	●	Allfunds' platform offers tools and services that help financial institutions assess and manage climate-related risks. This includes integrating climate risk assessments into investment strategies, which can lead to more resilient and sustainable financial portfolios.
	Development of new products or services through R&D and innovation	●	●	●	As a one-stop shop for financial solutions, Allfunds fosters innovation in green finance by providing the necessary infrastructure and support for developing new financial products and services that address climate change. This includes green bonds, climate-focused mutual funds, and other innovative financial instruments.
	Ability to diversify business activities	●	●	●	Allfunds' ecosystem serves as a hub for collaboration and knowledge sharing among financial institutions, fund houses, and other stakeholders. This can accelerate the adoption of best practices in sustainable finance and drive collective action towards addressing climate change.
	Shift in consumer preferences	●	●	●	The company’s digital solutions include advanced tools for ESG (Environmental, Social, and Governance) reporting and analytics. This helps fund houses and distributors provide transparent information about the environmental impact of their investments, enabling investors to make informed decisions that align with their sustainability goals. Additonally, by leveraging its position as a comprehensive digital solutions provider, Allfunds can play a pivotal role in advancing sustainable finance and contributing to global efforts to combat climate change.

Opportunity category	Description	Time horizon Short Term < 1 year	Medium Term 1-5 years	Long Term > 5 years	Potencial positive impacts
Markets	Access to new markets		•	•	By offering and promoting sustainable investment products, such as green bonds, ESG funds, and climate-focused mutual funds, Allfunds can attract a new segment of environmentally conscious investors. This opens up new markets focused on sustainability and responsible investing.
	Use of public-sector incentives				Not applicable
	Access to new assets and locations needing insurance coverage				Not applicable
Resilience	Participation in renewable energy programs and adoption of energy efficiency measures				Not applicable
	Resource substitutes/ diversification				Not applicable

Metrics and targets

Climate-related financial disclosures: BEIS (g). TCFD: M-a

Calculation of the Group's carbon footprint considered the following aspects:

a. Scope 1 GHG emissions corresponding to direct emissions coming from:
   - Fuel consumption in buildings from natural gas or oil-fired boiler activity. No fuel of this nature is consumed directly at any of our sites.
   - Emissions due to refrigerant gas leaks in refrigeration and air conditioning equipment. Our refrigeration and air conditioning equipment had no gas leaks during the entire year of 2024, thanks to our Environmental Management System, which ensures that regular maintenance is carried out.
   - Vehicle fuel consumption. Vehicles owned by Allfunds are leased and are a company benefit available to employees. The vehicles are for private use and therefore not taken into account in the carbon footprint calculation.

b. Scope 2 GHG emissions, considering indirect emissions due to electricity consumption in buildings. The calculation is both location-based and market-based. We source our electricity from the general grid. For locations with individual meters, we calculate consumption directly. However, for sites where electricity is included in rental fees and actual usage cannot be determined, we estimate based on average employee presence or square footage, along with the cost of electronic devices used during working hours. It should be noted that the electricity supplied to our offices located in London, Luxembourg, Madrid, Milan,Paris, Valencia, Warsaw and Zurich, comes from 100% renewable sources.

c. Scope 3 includes other indirect emissions like:
   - Emissions due to the energy consumption of the servers and data processing centres used by the organisation to offer its main service.
   - Production of material purchased during the year: devices (computers, monitors, mobile phones) and toner.
   - Business travel: employee commuting, trips by plane, train, taxi and vehicles with a driver.

Emissions caused by Allfunds staff due to employee commuting accounted for 55% of total emissions during 2023, followed by emissions due to business flights, which accounted for 33% of the total.

Employee commuting emissions have been calculated based on the results of the mobility survey carried out in 2024, which considered both the movements of people, and the different means of transport used to come to the office.

Every year, Allfunds is audited by external third parties to ensure that the Company is aligned with its environmental commitments and/or transition plan:

1. Our Environmental Management System is certified according to ISO 14001
2. Our carbon footprint and Transition plan is certified according to ISO 14064

Both certifications are available at Allfunds' website: https://allfunds.com/en/esg/policies-statements/

GHG footprint evolution

GHG emissions (tCO2eq)	2023	2024
Scope 1	—	**11.3**
Scope 2 (market based)	147.0	**8.7**
Scope 3	1,214.9	**1,241.8**
Employee commuting	669.0	**667.9**
Business travel	432.3	**521.2**
Material and Services purchased	113.6	**52.7**
Total	1,362	**1,262**

The methodology used for the calculation of the carbon footprint has been developed in accordance with ISO 14064

CO2 emissions (scope 1 + scope 2) intensity

GHG emission intensity (tCO2eq)	2023	2024
CO2 emissions (scope 1 + scope 2)/ employee	0.14	**0.02**
CO2 emissions (scope 1 + scope 2)/net revenue M€	0.27	**0.03**

Energy consumption

Energy consumption (MWh)	2023	2024
Total energy	1,610	**1,445**
Non-renewable energy	394	**119**
Renewable energy	1216	**1,326**
% of renewable energy	75	**92**

These figures are the result of a series of measures that have been put in place in order to improve energy efficiency such as:

- Twelve solar panels are in place for the production of hot water and renewable electricity in the Madrid office. From January to December 2023, the solar panels produced 18.73 MWh of electricity.
- All lighting has a DALI (Digital Addressable Lighting Interface) dimming system that allows individual lights or fixtures to be controlled digitally. The lights are dimmable via FUDOMO's BMS building management software.
- The owners of the building in Madrid and London achieved the LEED GOLD (Leadership in Energy and Environmental Design) Certification during 2022 (the certification is awarded every three years). This is a green and sustainable building program that requires objective evidence that specific requirements have been met with regard to sustainability, efficiency in the use of water, energy, atmosphere, materials and resources, indoor environmental quality, locations and linkages, environmental awareness and education, and design innovation.
- Printers have been replaced with more efficient models with lower energy consumption.

EU Taxonomy

The EU taxonomy regulation does not apply directly to our business model and is therefore not suitable as a reference framework for classifying our products and services in terms of sustainability. For 2024, we have not identified any economic activity covered by the respective delegated act. Furthermore, we did not identify any material investment or operating expenses that fall within the scope of the delegated act in the 2024 financial year.

The following table shows the proportion of aligned and non-aligned turnover, capital, and operating expenditure:

Category	Aligned	Non-aligned
Net revenue	0.00 %	100 %
Operating expenditures	0.00 %	100 %
Capital expenditures	0.00 %	100 %

Our stakeholders

Allfunds' long-term success is linked to its ability to generate value for a diverse range of stakeholders. To achieve this, we incorporate stakeholder perspectives on sustainability into our strategy and business model, ensuring alignment with our priorities.

Dialogue with Stakeholders' Policy, endorsed by the Board of Directors, establishes a framework for structured and inclusive engagement with key stakeholders. It provides guidance for employees and representatives while maintaining transparency and fostering constructive relationships. The aim: informed decisions based on diverse perspectives.

We have identified six types of key stakeholders and divided them into primary and secondary groups. Primary stakeholders are those who have a direct interest in the organisation, whereas secondary stakeholders have an indirect association or benefit. Both types of stakeholder are equally important for the company.

Primary Stakeholders

Employees

Direct employees
(full time and part time)

External employees
(trainees, interns, subcontractors, temporary agencies)

Clients

Fund Houses

Distributors

Investor community

Shareholders[1]

Investors

Rating agencies

Analysts

Proxy advisors

Secondary stakeholders

Regulators[2]

Public authorities and supervisors

Policymakers and legislators

Industry forums and working groups

Business partners

Strategic business & technological partners

General suppliers

Advisors & consultants

Society

Non-govermental organisations (NGOs)

Media

Opinon leaders

Civil society

Environment

1. See our Policy on Bilateral Contacts with Shareholders and our Related Party Transactions Monitoring Procedure here
2. This stakeholder's classification is irrespective of the fact that Allfunds' business is primarily driven by its regulatory framework and of Allfunds' firm commitment to legal and regulatory compliance.

Employees

Direct employees (full time and part time), external employees (trainees, interns, subcontractors, temporary agencies)

Value creation

- **Attractive compensation package** that protects against discrimination and recognises experience and level of responsibility.
- **Training and Development** to upskill employees and foster individual growth, creating opportunities within the organisation.
- **Performance management process** and feedback culture to encourage development.
- **Talent and talent identification process** defined for the Company.
- **Diversity and inclusion** ensures equal treatment, respect and dignity for all employees.
- **Work/life balance** supported by flexible working hours and digital disconnection measures.
- **Global health, safety, and wellbeing policy** ensures employee health, safety and training resources according to local laws.
- **Engagement and communication** for example the intranet, which keeps employees informed and engaged.

Engagement actions 2024

- **Onboarding sessions** for 146 new employees, helping them transition smoothly into their roles and understand the Company's mission.
- **Knowledge exchange programme**
- **Intranet updates** with more than 176 posts, including bi-weekly CEO Corner (58 posts in 2024) and a wellness centre with resources for employee wellbeing.
- **Volunteer activities** with 320 employees participating, for example the Christmas Campaign, which raised €14,035.
- **End of the year dinner** for all offices to strengthen relationships and celebrate success.
- **Annual offsite for Global Sales team** to foster creativity, collaboration and idea sharing across locations.
- **Employee engagement survey** with an average score of 3/4 for employee satisfaction.
- **Internal offsites** for various departments, to enhance collaboration and teamwork.
- **Carbon footprint survey** focused on employees' commuting practices to reduce environmental impact.

Clients

Fund Houses, Distributors

Value Creation

- **Better understanding** of clients' distribution activities, to provide Fund Houses with valuable insights.
- **Connecting businesses** to international markets via digital solutions, offering greater control and reducing risks.
- **Innovative digital solutions** developed to meet clients' specific needs and enhance their services.
- **Democratising investment opportunities** by giving a wider range of clients access to premium products.
- **Information security system** that mitigates risks and ensures continuity of services, focusing on confidentiality, integrity and resilience.
- **Empowering clients in the WealthTech space** with a unique combination of scale, experience and digital expertise.
- **Comprehensive due diligence services** covering credentials, services, risk management, IT security, data protection and ESG factors.
- **Commitment to ESG** with initiatives on environmental policy, diversity, carbon emissions and equal opportunities.

Engagement actions 2024

- **Client care channel: 15 claims** and **29 complaints** received; six claims and seven complaints dismissed.
- **180 due diligence questionnaires** received from clients, focusing on credentials, ESG and IT security.
- **4 'All Connected' events** in Cartagena, Milan, Madrid and London, focusing on innovation and connectivity.
- **2 ManCo events** in Madrid and Milan, with tier Distributors and clients participating.
- **25+ sponsorships** for brand awareness, positioning, and product promotion.
- **4 Allfunds Private Partners Programme workshops** in Milan, Spain, Chile and UAE.
- **2 ESG-related events:** Fund sustainability due diligence in London and Finanza Sostenibile in Evoluzione in Milan.
- **Commercial events:** Annual golf and football tournaments, fostering networking with prominent financial sector clients.

Investor community

Shareholders, investors, rating agencies, analysts, proxy advisors

Value creation

- **Long-term sustainable returns** through attractive adjusted EBITDA margin and share price appreciation.
- **Progressive dividend policy**.
- **Share buyback programme or special dividends.**
- **Active engagement with investors** through an investor relations programme, including meetings, shareholder roadshows and conferences.
- **Regular reporting** on financial performance to the market.
- **Feedback sharing** from investors to inform decision-making at the Board level.
- **Refined governance and policies** as a result of shareholder feedback.
- **Increased transparency** and visibility in the research analyst community.

Engagement actions 2024

- **Share buyback programme:** In 2024, Allfunds finalised the execution of the buyback programme that was launched in July 2023, with **€100 million** allocated, completing the second **tranche** of **€50 million** by **September 2024**.
- **Analyst coverage: 17 analysts** by the end of 2024.
- **Annual General Meeting (AGM):** hosted at Allfunds' London office on 7 **May 2024.** Shareholders voted on resolutions via a poll.
- **Investor Relations Activities:** active Investor Relations programme, engaging with shareholders, investors, analysts and rating agencies throughout the year using a variety of channels. Our main engagement is via the communication of our performance and prospects, which is achieved through regular reporting to the market. During 2024, we held more than 400 one-on-one and group meetings, three shareholder roadshows following results and site visits to our London and Madrid offices. We also attended more than 10 investor conferences, where we had two-way dialogue with shareholders, analysts and investors interested in the long-term prospects of the Group
- **Investor section on Allfunds' website:** share price evolution, financial reports and financial calendar regularly updated.
- **Results presentations:** Disclosed **preliminary FY 2023 results (February), Q1 trading up-date (April), 1H 2024 interim results (July), and Q3 trading update (October).**

Regulators

Public authorities and supervisors, policymakers and legislators, industry forums and working groups

Value creation

- **Allfunds' governance framework** reflects applicable regulations and best standards to ensure excellence, robustness and prudence in business management.
- **Governing bodies** at Allfunds foster strong regulatory relationships across all levels of the organisation.
- **Regulatory compliance monitoring system** ensures compliance with regulations and internal policies.
- **Internal audit function** provides independent assessments of controls to mitigate significant risks.
- **Risk management system** identifies, measures, controls and mitigates financial and non-financial risks, including legal and regulatory risks.
- **Tax strategy** promotes integrity, transparency and collaboration with tax authorities.

Engagement actions 2024

- **Close interaction** with supervisors and **agile response** to inspections by regulatory authorities.
- **Adapting governance arrangements** to the revised Dutch Corporate Governance Code.
- **Enhanced transparency** through the publication of the **Annual Report** for 2024, highlighting key regulatory actions and business management strategies.
- **Independent assessments** and regular reports to the Board on the effectiveness of the risk management system.
- **Regular regulatory monitoring** and **mitigation measures** to ensure ongoing compliance with both legal and regulatory frameworks.
- **Commitment to transparency** and professional relationships continues in alignment with tax regulations.

Business partners

Strategic business & technological partners, general suppliers, advisors & consultants

Value creation

- **The Group's core values** of excellence, accountability, empowerment and inspiration drive all relationships with partners.
- **Allfunds' partnerships** aim to transform the WealthTech industry and enhance the distribution chain for the benefit of all parties.
- **Public recognition** from Allfunds to partners for their contributions.
- **Respect and protection of human and labour rights** are fundamental in Allfunds' partnerships.
- **Allfunds' Code of Conduct** ensures suppliers are chosen with transparency and equal treatment based on ethical criteria.

Engagement actions 2024

- **Revised Outsourcing Policy** and **supplier management** to ensure transparency and alignment with Allfunds' values.
- **Supplier payment terms:** Average payment term to suppliers was **29.9** days in 2024, which helped ensure positive business/partner relationships.
- **Promoting respect** and protection of human and labour rights through supplier engagement and monitoring practices.
- **Ongoing compliance** with ethical and transparent selection criteria for suppliers, aligned with the Group's Code of Conduct.
- **Supplier engagement** with Allfunds' principles, focusing on fostering positive and responsible relationships in line with business ethics.

Society

Non-governmental organisations (NGOs), media, opinion leaders, civil society, environment

Value creation

- **Charity fund policy,** supervised by the Charity Fund Committee, focuses on ensuring objectivity and maximising the impact of investments.
- **Crowdfunding platform** to raise awareness among employees and stakeholders about social responsibility.
- **Focus on providing equal access** to the charity fund for Allfunds employees and other stakeholders.
- **Transparency in reporting** on the results and positive societal impacts of the charity fund.
- **Employee opportunities** to propose social projects that benefit the community.
- **Clarity and consistency** in corporate communication, adhering to the communication protocol.

Engagement actions 2024

- **Social contribution of €426,177 to 55 charities, foundations and initiatives.**
- **Collaboration with travel agencies** to track and **reduce carbon footprint** from business travel.
- **Social media engagement rate of 14.27%** on LinkedIn, which is significantly higher than the industry rate of **3%**.
- **56% increase in Tier 1 media mentions** across Europe, especially in **Spain, the UK and France.**
- **Adaptation to the Environmental Management System,** achieving certification at a Group level under **ISO 14001 and ISO 14064**
- **Ongoing efforts to reduce environmental impact** in line with the **Climate Change and Environmental Management Policy.**

Board Section 172(1) statement

Directors have acted in the way that they considered, in good faith, would be most likely to promote the success of the Company for the benefit of its members as a whole. This section forms the Board's Section 172(1) statement. It describes how, in discharging their duties, directors considered the matters set out in Section 172(1)(a) to (f) of the UK Companies Act 2006:

a. The likely consequences of any decision in the long term
b. The interests of the Company's employees
c. The need to foster the Company's business relationships with suppliers, customers and others
d. The impact of the Company's operations on the community and the environment
e. The desirability of the Company maintaining a reputation for high standards of business conduct and
f. The need to act fairly as between members of the Company

The likely consequences of any decision in the long term

The Board is committed to delivering Allfunds' purpose and acknowledges that the long-term success of the business depends on creating a positive impression on a wide variety of stakeholders. Accordingly, Directors have set a long-term strategy and have taken decisions they believe best support its delivery. The Strategic Report contains a description of Allfunds' strategy and business model and how they contribute to long-term value creation for our stakeholders.

The subsection 'Key focus areas in 2024' in the report section 'Corporate Governance – Board of Directors' further describes the main activities of the Board carried out during the year and is incorporated by reference into this Section 172(1) statement. It reflects the long-term considerations that drive all Board decisions, such as the 2024-2028 Business Plan, the 2024-2026 ESG Strategic Plan, the Human Capital Strategic Roadmap and the Long-Term Incentive Plan and the combined incentive plan.

The interests of the Company's employees

The Board considers Allfunds' employees to be its most important asset and vital to the delivery of the Group's purpose. In supervising the general state of corporate affairs, directors pay special attention to people and seek to ensure that Allfunds remains a responsible employer where employees can reach their full potential and, in turn, ensure the long-term success of the Group.

The Chief People Officer is a member of the Executive Committee and regularly reports to the Remuneration, Appointments and Governance Committee, with onward escalation to the Board where appropriate to ensure its adequate supervision of people matters.

The section 'Stakeholder engagement' above describes the engagement actions with employees conducted in 2024. The subsection 'Key focus areas in 2024' in section 'Corporate Governance – Board of Directors' further describes the main activities of the Board carried out during the year with regard to Allfunds' people. These include continuously monitoring the Human Capital Strategic Roadmap with a focus on talent management, receiving regular updates on people headcount and turnover, and reviewing the Group-wide remuneration policy and the total rewards scheme for identified staff.

The need to foster the Company's business relationships with suppliers, customers and others

The Board is aware that Allfunds' business cannot succeed without robust relationships with Fund Houses and Distributors, who are at the heart of its strategy, as well as with suppliers and other strategic partners. In particular, the consideration of Fund Houses and Distributors current and future needs drives the Group's action. Allfunds' teams have developed direct, long-term relationships with these stakeholders and there is ongoing engagement. Section 'Stakeholder engagement' above describes the engagement actions in 2024, with Fund Houses and Distributors on one hand, and suppliers and other business partners on the other hand. Directors receive periodic updates on the evolution of these relationships and so supervise our engagement with them. Moreover, the Code of Conduct sets out the principles that should govern each of such relationships, which are based on Allfunds acting with professionalism, honesty, integrity and independence.

The impact of the Company's operations on the community and the environment

The Board seeks to ensure that environmental and social issues are integrated in the corporate strategy and business model. Creating a positive impact on wider society is inherent to our purpose of transforming the WealthTech world, and the Board monitors this in the day-to-day management of the business. The Strategic Report describes our approach to ESG matters and our engagements during the year with society, as influenced by Board discussion and decision-making.

During the period under review, the Board monitored progress against the 2024-2026 ESG Strategic Plan. See subsection 'Key focus areas in 2024' in the section 'Corporate Governance – Board of Directors'.

The desirability of the Company maintaining a reputation for high standards of business conduct

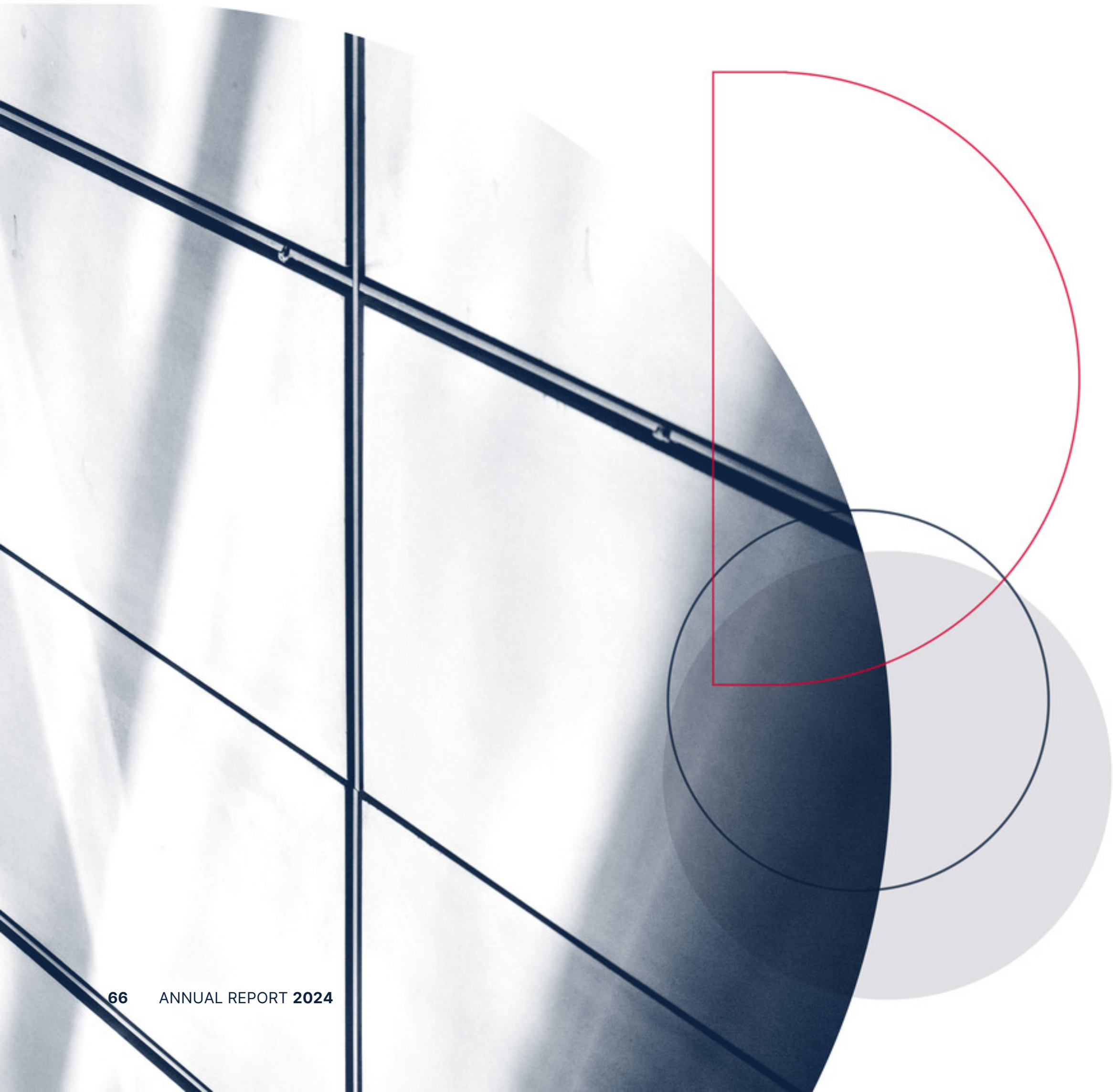
The Board promotes robust culture and values encouraging that all actions, attitudes and behaviours at Allfunds meet the highest standards of business conduct. Our corporate governance framework is periodically reviewed by directors to ensure that legal and ethical standards are achieved, and that Allfunds' reputation reflects this. The Board is provided with regular information on investors' and analysts' feedback to keep up to date on third parties' impressions and perception of our business. Directors also receive periodic updates from internal control functions, which include feedback on the use of our whistleblowing channels, so they are informed of material business misconduct on a regular basis. Specific decisions made by the Board during the past year in this area are further described in subsection 'Key focus areas in 2024' in section 'Corporate Governance – Board of Directors'.

The need to act fairly as between members of the Company

Finally, the Board acknowledges that all members shall be treated fairly. Directors seek to ensure that this principle underpins Allfunds' engagement with shareholders and the investor community, as reflected in the contents of some internal regulations approved by the Board in 2021, namely the Dividend Policy, the Policy on Bilateral Contacts with Shareholders and the Communications Policy. Further information on how we engage with this group can be found in the Strategic Report.

In discharging its Section 172(1) duties, directors recognise that having a good understanding of the views and interests of the Group's key stakeholders will help them to deliver the Group's strategy in line with its purpose and to operate the business in a sustainable way. To that end the Board has identified six groups of key stakeholders: employees, clients, the investor community, regulators, business partners and wider society. The importance of each stakeholder group may differ in each decision to be made by the Board. Directors acknowledge the importance of considering the impact on each of those stakeholders, in order to balance their interests while promoting the success of the Group's business.

Stakeholder engagement is therefore embedded in all aspects of the Board's discussions and decision-making. The Board adopts a variety of methods for engagement with different stakeholder groups. The Board will sometimes engage directly with stakeholders on certain issues, but stakeholder engagement is continual and often takes place at an operational level. The broader business engages with stakeholders regularly throughout the year, and in the build-up to or during many projects or activities. The Board regularly receives reports and considers and discusses information from across the organisation to understand the impact of the Group's operations on, and the interests and views of, the Group's key stakeholders. As a result of these activities and the information it receives, the Board has an overview of engagement with stakeholders, and other relevant factors, which enables directors to comply with their duty under Section 172(1) of the UK Companies Act 2006.



Our people, our strength

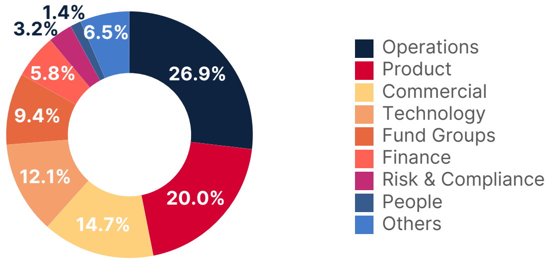
"At Allfunds, our people are crucial in transforming the sector and reaching our objectives. We aim to be the preferred WealthTech company for top talent, leveraging their exceptional skills to achieve Allfunds' strategic goals."

Jorge Calviño Pérez
Chief People Officer

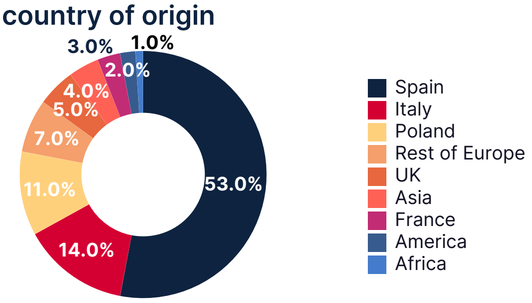
Employee overview

Our diverse team operates globally and looks as follows:

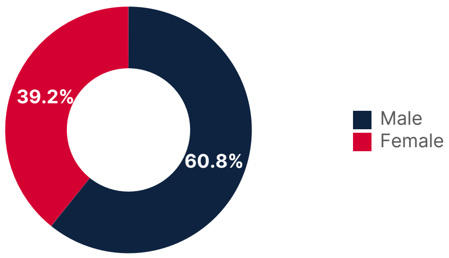
By department



By country of origin



By gender



1. Others include Legal, Strategic projects, Investment, Transformation office, Blockchain, Corporate communications and ESG, Internal audit, Strategy, Investor relations and CEO office

Our ESG Strategic Plan 2026 underscores this commitment by prioritising investment in human capital, focusing on leadership, development, and diversity. This strategic investment reflects Allfunds' dedication to fostering a high-performance culture that supports continuous improvement and exceptional customer service.

Talent management - Technological Excellence and Innovation

At Allfunds, technology is deeply embedded in our organizational fabric, positioning us as a leading WealthTech company. We proudly feature a wide range of STEM profiles across various functions, including operations, product development, fund management, and, naturally, technology. Our commitment to innovation and excellence is reflected in our advanced technological solutions, which empower us to deliver unparalleled services and drive the future of wealth management.

Cultivating Allfunds' culture

Allfunds recognises that a strong culture, rooted in values and ethical behaviour, is essential for sustainable success. We continuously evaluate and adapt our practices to enhance long-term value creation.

Growing the 'S' in ESG

Sustainability is our moral compass. We aim to achieve social impact. From fostering our employees' wellbeing to empowering underserved communities, we nurture the 'S' in ESG.

Allfunds' culture

Culture within Allfunds: Allfunds prides itself on being a highly valued international provider in the WealthTech industry. We are committed to a purpose-driven, values-based culture, to enhancing employee satisfaction and attracting top talent. These commitments are key to our sustained success.

Sustainable long-term value creation:

Our People strategy is deeply integrated with our dedication to sustainable, long-term value creation. This alignment is essential, as our people represent our most invaluable asset. We are committed to nurturing an environment that promotes growth, innovation, and mutual respect. We craft our People strategic initiatives with the intent to attract, develop, and retain top-tier talent.

1. **Underlying values:** Our culture emphasises excellence and we strive for quality in everything we do. We empower our people and encourage their growth, autonomy, creativity, accountability and innovation, all of which propel us forward.
2. **Conduct and behaviour:** Our conduct is guided by ethical principles. By adhering to these principles, we contribute to sustainable value creation.
3. **Initiatives for value enhancement:**
   a. **Continuous learning:** We invest in our employees' development to ensure they stay abreast of industry trends. Well-informed employees contribute significantly to Allfunds' long-term success.
   b. **Innovation:** We encourage a culture of innovation. By fostering creativity and exploring new solutions, we enhance our value proposition.
   c. **Client-centric approach:** Our ongoing focus on client needs drives product enhancements and service improvements.
   d. **Diversity and inclusion:** We celebrate diversity and promote an inclusive workplace. Diverse teams bring fresh perspectives and lead to better outcomes.

Uniting through purpose, values and integrity:

We unite our diverse workforce under a common purpose, fostering a sense of belonging and shared vision. Our organisational values are embedded in every People policy and practice, guiding our actions and decisions. We prioritise integrity, to ensure respect in all our interactions. By aligning individual goals with our business objectives, we make sure that every team member contributes to our success. This holistic approach to HR not only drives our business forward but also strengthens our reputation as an employer of choice.

1. **Alignment with purpose:** Our commitment to purpose-driven work resonates throughout the organisation. By fostering a sense of shared purpose, we empower employees to contribute meaningfully to our mission.
2. **Values-driven culture:** Upholding our core values – Excellence, Accountability, Empowerment and Inspiration – ensures ethical conduct and trust. These values guide decision-making and lead to sustainable outcomes.
3. **Employee engagement:** The focus on team cohesion and values enhances employee engagement. Our team comprises dedicated professionals whose unwavering commitment forms the cornerstone of our success.
4. **Employee listening:** Our commitment to listening to employee feedback fosters a culture of openness. By actively addressing concerns and implementing improvements, we create a positive work environment.
5. **Rewards and recognition:** Recognising employee contributions reinforces their sense of value. Whether through awards or bonuses, we motivate high performance and loyalty.
6. **Offboarding:** We take pride in the fact that many of our voluntary leavers choose to return to us after a period of time. This speaks volumes about the positive impact of our company culture and the value we place on our people. Their decision to come back underscores the supportive environment, growth opportunities, and mutual respect that define our organization. By ensuring a smooth transition process for departing employees, we preserve our reputation and encourage positive referrals.

Our values

ALL for Excellence

We channel our experience, expertise, and passion into delivering unparalleled services, cutting-edge technology, and professional support to our clients, employees, and partners who rely on us.

ALL for Accountability

We strive to balance the interests of our clients, employees, and shareholders, while making a meaningful impact through our transparent and responsible approach to people and society at large.

ALL for Empowerment

We continuously enhance our tools and services, empowering our clients to make informed decisions and choices about their needs and preferences, precisely when and how they require them. Simultaneously, we empower our people to be agile in finding solutions, boosting productivity, and driving innovation.

ALL for Inspiration

All for Inspiration embodies our commitment to fostering a learning mindset, self-belief, inspirational leadership, empathy, and creativity among our employees. It is about inspiring ourselves and others to achieve our goals and make a positive impact.

Integrated risk strategy

Risk management

The Board of Directors, supported by the Risk and Audit Committee, is responsible for defining the risk strategy, risk appetite and risk policy – as well as any material changes to these. For more details, see the Risk and Audit Committee Report included in this Annual Report.

The CEO and the senior management team are responsible for implementing the Board's guidelines. They achieve this through a clear and segregated organisational model, qualitative principles, indicators and thresholds, and limits on risks established by the Board of Directors.

Risk management approach

Risk management consists in identifying and measuring direct and indirect risks, as well as potential and emerging risks. This determines the Group's appetite for the identified risks – and whether to accept, avoid, mitigate or transfer them. Risk management further entails the ability to gain resilience, gain competitive advantage and identify new business opportunities.

Allfunds has a general risk management and control model adapted to its business model, its organisation, the countries where it operates and its corporate governance system. This model allows the Group to implement the risk management and control strategy, as well as the policies defined by the Board, and to adapt itself to a changing economic and regulatory environment. The model is updated at least annually and is fully applied across the Group. It comprises the following elements: risk management framework, risk management strategy and objective, risk appetite framework and risk reporting.

We promote the development of a risk culture that ensures a consistent application of this model across the Group. This ensures the Risk Management function is understood and internalised at all levels of the organisation.

Risk management framework

The Group's risk management framework is based on three lines of defence: the business, risk management and internal audit. This framework is designed to ensure effective and independent oversight of the Group's activities in line with the overall risk strategy, which is established by the Board of Directors of Allfunds Bank and updated at least annually.

1

First line of defence

- Business and support functions (other than control functions)

Provides day-to-day risk management and control for the Group

Implements and manages the risk indicators or first level controls to identify potential risks and ensure an effective answer to mitigate them

2

Second line of defence

- Compliance, Anti-Money Laundering (AML) and Risk management teams
- Act autonomously and independently of each other and with respect to the first line of defence

Provides independent oversight of and challenges the risk management of the business

Supports the first line of defence by defining and monitoring compliance with rules and limits needed for the business to stay within the overall Risk Appetite defined by the Allfunds Board of Directors

3

Third line of defence

- Internal audit function
- Has the maximum level of independence and objectivity within the Group

Ensures the effectiveness of the Group's control systems

Carries out independent reviews of the first two lines of defence to verify compliance with the Group's risk management framework and provides assurance to the Risk and Audit Committee of Allfunds and Allfunds Bank on the effectiveness of the Group's risk management

Risk management strategy and objective

Prudence applied by the Group in risk management is a basic pillar in our activities and services. In turn, the Group's organisational structure represents a system of clearly defined delegations for such risk management. The general principles that guide the definition, monitoring and management of risks are as follows:

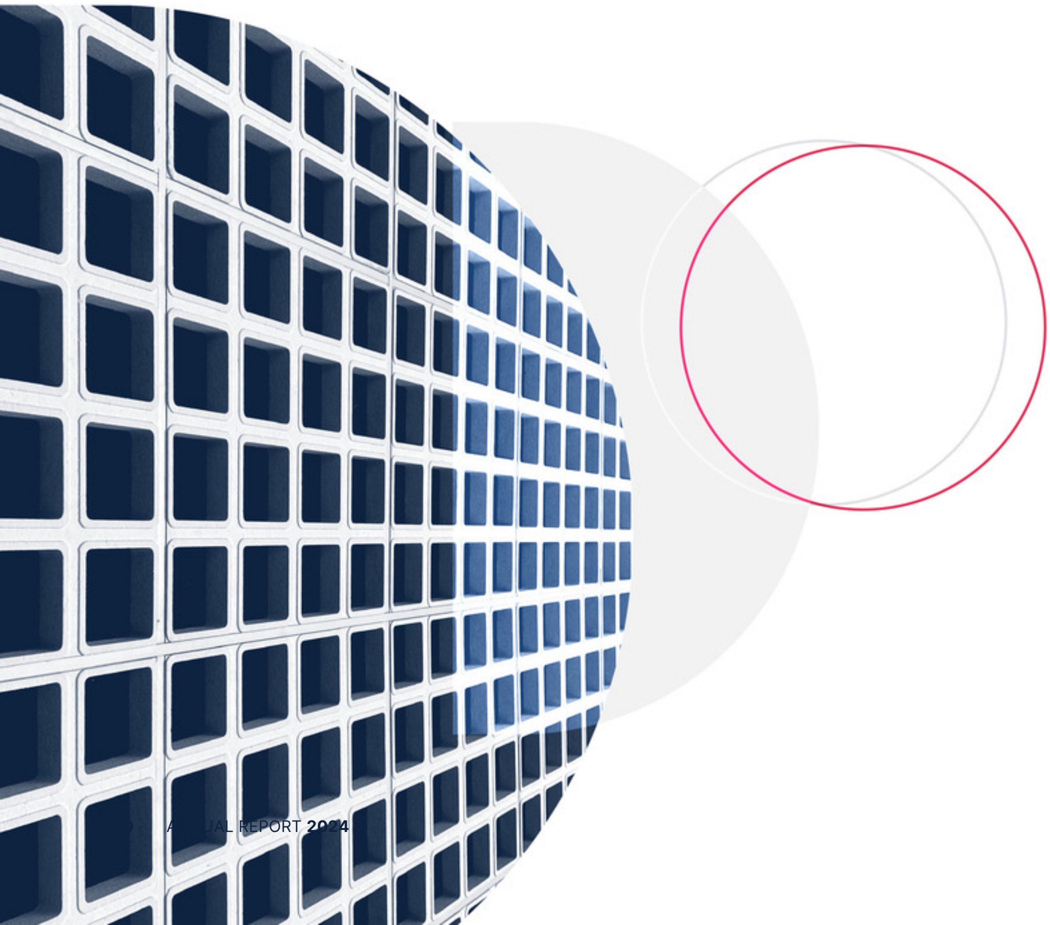
a. The risks assumed must be compatible with the assets of the Group and in accordance with the target solvency level
b. Willingness to maintain a 'low risk' profile through:
    i. Sticking to the distribution activity, avoiding incorporating proprietary positions onto the balance sheet that generate risks that the Group does not wish to assume
    ii. The search for a high degree of diversification of structural risks, establishing limits to concentrations by customers, sectors, markets and/or geographies that may pose a threat to the solvency objectives, liquidity and consistency of results
    iii. Continuous attention to the tasks of identification and monitoring of risks, so that all areas are provided with adequate and dynamic systems that result in optimal management and control of the risks assumed
c. Existence of control and monitoring procedures for all the risks incurred by the Group in the performance of its activity
d. Existence of solid management mechanisms and mitigation of operational and reputational risks

Risk appetite framework

The Risk Appetite Framework (RAF) is a Group-wide corporate management framework to determine risk appetite (the type and amount of risk to be willingly taken to achieve the business strategy) within the Group's risk capacity. This is supported by management strategies formulated by the senior management team based on the Group's management principles – together with the internal control system underpinning that process.

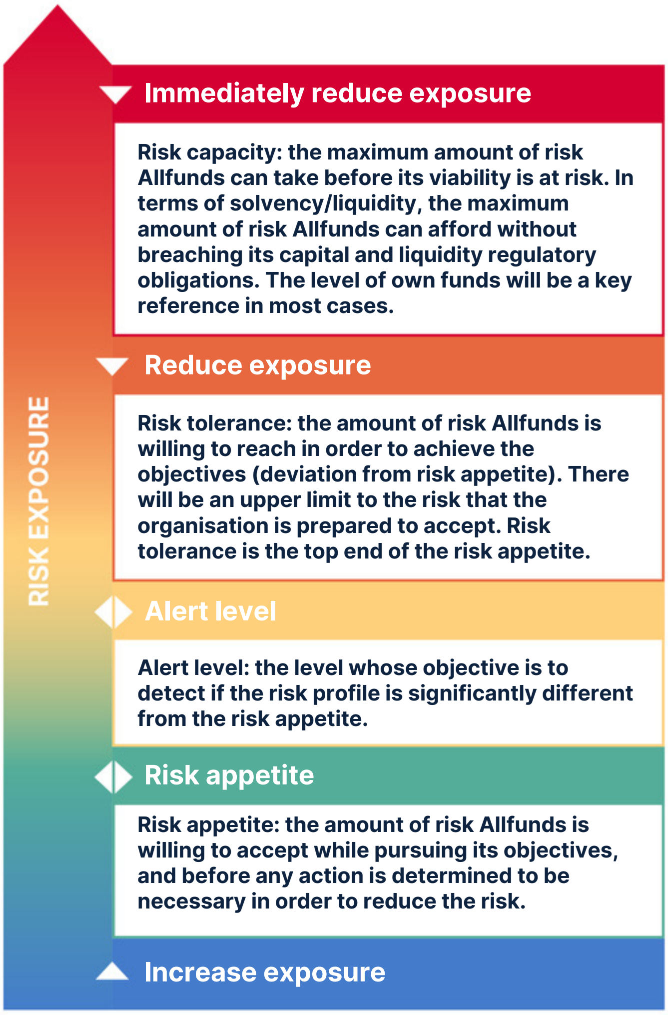
The RAF aims primarily to strengthen profitability, enhance risk management and promote transparency in the overall risk-taking policy for capital allocation and profit maximisation. This is supported through the setting, communication and oversight of risk appetite, as well as the optimisation and speed-up of allocation of management resources. Overall, the RAF reinforces the risk monitoring system.

The Board of Directors annually approves the risk strategy and in particular the RAF to promote good internal governance, the establishment of limits and objectives and the implementation of monitoring and surveillance mechanisms for the different types of risk. The last major update was performed in October 2024 and a minor review in February 2025 and the Board has established that the Group's risk appetite is maintained at low levels. This risk appetite level provides the foundation for the development of calculation and control methodologies for the risks incurred by the Group, which are implemented through its risk unit.
The Allfunds Bank Board reviews and discusses potential corrective measures should any of the risk tolerance levels be exceeded. The Group has identified and implemented a set of key risk indicators to monitor its performance relative to its risk appetite. The key risk indicators report, across all risk areas, is provided to the Board of Directors of the Group on a quarterly basis. This states where there are deviations and potential breaches of the set risk tolerance levels and discusses, if required, mitigating actions.



Risk exposure

Risk profile: assessment of the risk exposure to each relevant risk at a specific moment, depending on the current situation and future forecasts reflected in the dynamic and potential metrics. It must remain within the limits established (risk appetite) and must not exceed the risk capacity.



Risk reporting

Risk control and monitoring reports assist in the efficient and ongoing monitoring of the risks the Group incurs in its daily activities. The information included in these reports supports the Group's control of the operating limits defined for each counterparty, and its control of other operating aspects related to intermediation activity.

The main reports necessary for the risk unit to fulfil its duties include: progress reports regarding execution settlement risk exposure limits; progress reports for overdraft limits; progress reports about liquidity and market risk; statistical reports and stress test results

Principal risks and uncertainties

The Group's financial risks are credit risk risk, market risk, interest rate risk, exchange rate risk, settlement risk, liquidity risk, counterparty risk and concentration risk. Non-financial risks relate to operational risk, information and communication technology ICT risk (including cybersecurity risk), third-party risk and compliance risks, that involve regulatory risks, conduct risks, reputational risks, legal risks and money laundering and financing of terrorism risks. Allfunds also incorporates environmental, social and governance (ESG) aspects into its risk management framework.

Regarding climate and environmental risks, Allfunds' objective is to reduce the direct or indirect impact of its business and thus limit its exposure to these risks. It is noteworthy that the Group does not develop lending activities, issue financial instruments or provide portfolio management. For this reason, its exposure to these risks according to the Task Force on Climate-related Financial Disclosures (TCFD) is considered limited, but the Group is working to increase measures to control and monitor them within its scope of influence.

The Group also a monitors the appearance of emerging risks, whose materiality or significance is increasing and could eventually lead to their inclusion in the RAF if their relevance has increased or they might have a significant impact in the medium term.

Risk and potential impact	Mitigation	Comments for 2024
Operational risk Risk of losses resulting from deficiencies or failures of internal processes, human resources or systems, or derived from external circumstances, which can lead to increased operational losses. Operational risk is inherent to all activities, processes and systems, and can be generated by all business and support areas	• The Board of Directors annually approves Operational risk limits to monitor losses • Risk and Control Self Assessments (RCSAs) to identify relevant exposures to Operational risk • Identification, reporting and tracking of operational risk events • Dedicated resources for the integration of new businesses acquired in the previous year • Existence of insurance policies against fraud and cybersecurity • Annual Operational Risk training	• The Board has reviewed and approved the Group's operational risk limits as well as its operational risk policy • The Group has continued to expand the scope and maturity of the RCSAs, including new businesses acquired in previous years • Enhanced systems for operational risk management with a new GRC solution • The BCM programme has seen significant improvements and robustness
Information and Communication Technology (ICT) risk ICT risk is defined as any reasonably identifiable circumstance related to the use of the network and information systems that, if materialized, could compromise the security of the network and information systems, any technology-dependent tool or process, operations and processes, or the provision of services, producing adverse effects in the digital or physical environment	• Existence of a Group IT Security and Cybersecurity framework • Internal and external assessments of the ICT risk framework • Existence of a Global Business Continuity Plan (BCP) and a Disaster Recovery Plan (DRP) that are tested annually • Definition and Operation of the Resilience Strategy • Identification, reporting and tracking of technological risk events (TKIs) • 1LoD & 2LoD Red team exercises • Event monitoring and response (SOC) and Cyber Intelligence services • 2LoD ICT threats oversee • Annual training on ICT Risk	• Increased testing on ICT contingency scenarios and operating resilience • Satisfactory testing of the BCP and DRP • Renewal of Security Director Plan with DORA, Zero Trust and Security Cloud Strategy • The risk control framework has been updated to support the increasing adoption of cloud computing services, IA, and to comply with the mandates of the DORA regulation regarding digital operational resilience • Corporate cybersecurity framework maturity level above the average benchmark for financial institutions
Credit and counterparty risk (including execution and overdraft settlement risk) Credit risk quantifies the losses derived from the potential failure of customers or counterparties to meet their financial obligations, which could impact our ability to settle trades with Fund Houses and Distributors	• Ex-ante and ex-post controls to monitor trades and settlements • Ongoing monitoring of large exposures limits • Approval of credit risk limits for each counterparty and use of alarms to prevent risk limit breaches	• The Board has reviewed and approved the Group's credit risk limits as well as its credit and counterparty risk policies • No defaults from our counterparties in the history of Allfunds • Risk profile remains comfortably below risk appetite thresholds.
Liquidity risk Liquidity risk is the possibility of incurring losses when there are not sufficient cash or liquid resources to comply with the obligations assumed	• Daily monitoring of short-term liquidity to ensure that all trades can be funded • Ongoing analysis of net cash flows • Regular liquidity stress testing to simulate potential defaults by Distributors or Fund Houses • Additional controls have been implemented during the year to monitor daily inflows-outflows as well as concentration risk • Existence of a liquidity risk management procedure aimed at ensuring compliance with the liquidity risk limits approved by senior management • Strict compliance with regulatory obligations in terms of liquidity management (LCR, NSFR, ALMM) under the close supervision of Bank of Spain	• Allfunds has continued to have strong liquidity levels throughout 2024. The Group's LCR and the NSFR stood comfortable above regulatory levels at 31 December 2024 • Stress test shows strong buffer to cope with severe scenarios • The Board has reviewed and approved the Group's liquidity risk policy

Risk and potential impact	Mitigation	Comments for 2024
Compliance risks Compliance risks are defined as the risks of regulatory breaches of the obligations defined by the applicable regulatory framework and the risks of breaches of ethical codes, codes of conduct and internal policies and procedures, which may result in sanctions, material or financial losses or damage to the Group's reputation	• Existence of a comprehensive, risk- based Compliance Monitoring Programme to assess the effectiveness of the controls implemented to mitigate regulatory, conduct and reputational risks as well as the risk of criminal liability, and to promote the necessary improvement actions. The results of the Compliance Monitoring Programme are reported to the management body • Advise senior management on the • measures to be taken to ensure compliance with applicable laws, rules, regulations and standards • Implementation of an Anti-Money Laundering (AML) and Counter- Terrorism Financing (CTF) framework	• Over 2024, the programme has been updated and reinforced with: • In terms of regulation: the inclusion of controls related with the Corporate Sustainability Reporting Directive (CSRD), the gender balance among directors disclosures, as well as specific local applicable regulation for the Allfunds branches, mainly the UK's Sustainability Disclosure Requirements (SDR), ICT-related incident reporting in Luxembourg and the Swiss circular about operational risks and resilience. Likewise, we have reviewed that the existing controls cover the updates in the Italian criminal code and the UK Economic Crime and Corporate Transparency Act crimes.In terms of organisational changes: with the inclusion of MainStreet Partners and Allfunds I&T Services (Shanghai) Co., Ltd in the group monitoring programme. • Allfunds Compliance model has the international standard ISO 37301:2021 awarded by AENOR in 2022 and maintained in 2024. This ISO establishes the requirements of a compliance management system to identify the main obligations affecting organisations and perform a risk assessment exercise for non-compliance.
Climate-related and environmental risk Allfunds identifies the environmental aspects and impacts associated with the services provided in accordance with the organisation's environmental management system	• The Group has an environmental precautionary approach articulated through the Environmental Management System, Environmental and Climate Change Management Policy, ESG Policy and the commitment to the environment in the General Code of Conduct • ESG criteria (including environmental topics) have been established in the selection of suppliers, the onboarding of new Fund Houses and the procedure of approval of new services • Regular environmental training and awareness campaigns are conducted throughout the organisation	• Obtained Carbon footprint ISO14064 certification • Obtained Environmental Management System ISO 14001 certification at a Group level • Board approval of a revised Climate Change Management and Environment Policy, including the commitment to become Carbon Neutral in 2030, and of a Decarbonisation Plan as part of the ESG Strategic Plan that includes specific emission reduction targets • 92% of total electricity as of 31 December, 2024 came from renewable sources

Directors' statement

In accordance with Best Practice Provision 1.4.3 of the Dutch Code, directors are of the opinion that:

I. This report provides sufficient insights into the risks and into any failings in the effectiveness of the internal risk management and control systems with regards to strategic, operational, compliance and reporting risks
II. Systems provide reasonable assurance that the financial reporting does not contain any material inaccuracies
III. Based on the current state of affairs, it is justified that the financial reporting is prepared on a going concern basis
IV. This report states the material strategic, operational, compliance and reporting risks and the uncertainties to the extent they are relevant to the expectation of the Company's continuity for the period of twelve months after the preparation.

Strategic report sign-off

This Strategic Report has been prepared in accordance with the UK Companies Act 2006. It was approved by the Board of Directors and signed on its behalf.

On behalf of the Board of Directors

Marta Oñoro
General Counsel and Company Secretary

28 March 2025