



TMF Group Sustainability Statement

March 2026 | Version 1.0



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General Notice

This document falls under TMF Group ESG team. The following applies to this document:

- This document is controlled as part of TMF Group's ESG team governance control.
- No changes to this document are permitted without formal approval from the document owner.
- This document is classified, version controlled and regularly reviewed.
- Any questions regarding this document should be raised to the owner.
- Distribution, modifications and access must be addressed based on TMF Group's information classification.
- The version of this document can be found on the cover page.
- Revision details are described below.
- This document may be available in various languages; however, the version in the English language will prevail.



Classification	
Public	

Stakeholders	
Owner	Juliana Ferreira
Approver	Sustainability Committee
Sponsor	Patrick de Graaf

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Introduction

TMF Group is committed to conducting business responsibly and sustainably.

This Statement sets out how Sustainability principles are embedded in our operations, decision-making, and stakeholder relationships.

Scope

This Statement applies to all TMF Group entities, departments, and employees worldwide, without exception. It also applies to subcontractors, vendors and other 3rd parties where relevant, ensuring sustainability principles are consistently implemented across all our operations.

Our sustainability principles are also reflected across other TMF Group Policies, such as:

- [Code of Conduct](#)
- [Supplier Code of Conduct](#)
- [Privacy Statement](#)
- Human Resources Policy
- Procurement and Real Estate Policy
- Travel Policy
- Anti-Bribery and Corruption Policy
- Business Continuity Management
- Environmental Policy

Purpose

The purpose of this Statement is to convey TMF Group's sustainability strategy with related targets to our stakeholders. It is important to know that our sustainability strategy is aligned with the UN Global Compact (UN 2030 Agenda), the Science Based Targets initiative (SBTi) and Corporate Sustainability Reporting Directive (CSRD), with a purpose of driving measurable progress towards our sustainability targets and providing a clear framework for sustainability integration which will ultimately enhance stakeholders' trust in TMF Group's sustainability efforts.

Roles & Responsibilities

Function	Responsibilities
Sustainability Committee	Assists the Board in setting the Company's actions to run the Company as an environmentally and socially sustainable business, capable of generating long term value for its stakeholders.



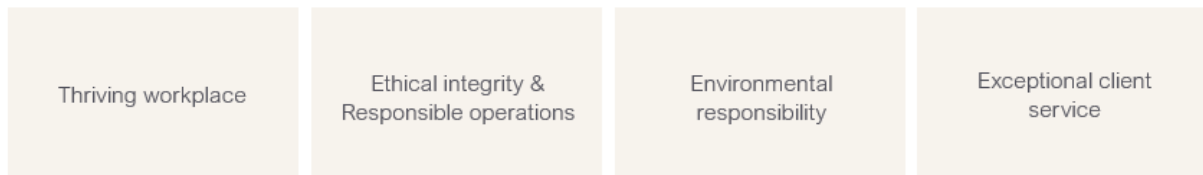
Function	Responsibilities
ESG Team (Statement owner)	Maintains and updates the Statement, coordinates execution of sustainability strategy, collects and monitors sustainability data, manages external disclosures related to sustainability and supports sustainability assurance processes.
Functional and Business Leads	Accountable for embedding sustainability principles within their business areas, aligning functional and business objectives with group targets and escalating sustainability risks or opportunities.
Market Leaders	Ensure that local operations comply with Statement principles, that sustainable office management practices are implemented and are reporting challenges and achievements to the ESG Team.
Employees	Must understand and adhere to this Statement and contribute to continuous improvement through responsible behaviours and feedback.



Sustainability Strategy

We believe that our position as a leading service provider enables us to influence positive change for our colleagues, clients, communities, and the planet. This statement sets out the strategy that guide TMF Group in delivering sustainable value across all markets in which we operate.

TMF Group has developed its sustainability strategy around 4 key pillars according to our business model and operations.



1.1 Thriving workplace

We believe our people are our greatest strength, therefore TMF Group is committed on continuing to provide an inclusive, safe and engaging workplace that enables growth, wellbeing and collaboration; therefore, we have created ambitious targets to keep driving these initiatives.



TMF Group reaffirms its commitment to achieving its strategic targets by upholding principles that are fully aligned with the TMF Group Human Resources Policy and consistently applied by senior leadership. The organisation has embedded diversity and inclusion across all people practices, ensure transparent and equitable pay practices globally, and continue to provide continuous access to learning and development opportunities through the TMF Business Academy, promote the wellbeing of all employees through programmes aligned with global and local frameworks, and encourage active employee participation in corporate social responsibility initiatives.

1.2 Ethical integrity & responsible operations

Considering that the core of our business operations is dealing with confidential client data, working with official state institutions, processing important client transactions etc., we uphold the highest



standards of integrity, transparency, and compliance. This brings trust to our investors and other stakeholders, ensuring our resilience against risks. We have, therefore, established several targets related to this matter.

All employees complete mandatory trainings on ethics and data privacy annually by 2030	Achieve an EcoVadis silver and above rating by 2027	Publish an annual sustainability report by 2027
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TMF Group reaffirms its commitment to achieving its strategic and sustainability objectives through the highest standards of corporate governance, integrity, and transparency. The organization shall maintain a confidential and accessible whistleblower mechanism, enforce a zero-tolerance policy towards bribery and corruption, uphold stringent data privacy and cybersecurity standards, and continuously enhance its business continuity and risk management frameworks to preserve organizational resilience and stakeholder confidence.

1.3 Environmental responsibility

With climate rapidly changing and intensifying, TMF Group recognizes the urgency of addressing climate issues and putting in efforts towards mitigating our environmental impacts reflecting in our recent public commitment to SBTi which will be followed by submission of our targets and their constant tracking. We are committed to reducing our environmental footprint and embedding sustainability principles across all operations through the following targets.

To ensure that all employees actively contribute to the achievement of our sustainability targets, TMF Group has developed comprehensive Environmental policy. This document provides clear guidance for employees across functions on how to integrate environmental measures into daily operations, including energy efficiency, waste reduction, and responsible paper consumption.

Reduce Scope 1 & 2 GHG emissions 63% by 2035 (vs 2022)	Reduce Scope 3 GHG emissions 66.3% per FTE by 2035 (vs 2022)	Reduce office energy consumption per FTE 20% by 2030 (vs 2022)	Reduce paper consumption per FTE 80% by 2035 (vs 2024)
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In addition, we have established an internal Decarbonization Strategy for senior management, outlining the pathway to reduce our carbon footprint in alignment with the Science Based Targets initiative (SBTi). We are working in close collaboration with each department to implement this strategy effectively, ensuring that decarbonization is embedded into our business practices and decision-making processes.



1.4 Exceptional client service

Our clients are at the heart of our business, and their trust is the foundation of TMF Group's success. Delivering exceptional service is therefore central to who we are and what we do. Strengthening client trust remains a daily priority, and integrating sustainability principles into our services is a key part of this commitment. We believe that achieving the targets set for 2030 will meaningfully enhance the overall client experience.

Maintain net promoter score (NPS) > 40%

Keep revenue retention > 90% annually

To reach these objectives, we will continue to implement a structured client feedback mechanism, ensuring insights are used to drive continuous service improvements. We will continue to invest in comprehensive training for employees at all levels, focusing on communication, relationship management, and best practices for client engagement. Finally, we are committed to the ongoing enhancement of our client engagement and account management models, ensuring they remain fit for purpose and aligned with evolving expectations.



Definitions and Abbreviations

Term	Definition
ESG	Environmental, Social and Governance – three main aspects of sustainability.
GHG	Greenhouse gases – emissions of CO ₂ and other malicious gases which contribute to global warming.
SBTi	Science Based Targets initiative – corporate climate action organization that enables companies worldwide to set and track their climate related targets.
UNGC	United Nations Global Compact – initiative that aims to encourage businesses worldwide to adopt sustainable and socially responsible policies.
NPS	Net promoter score.
CSI	Client satisfaction index.
EcoVadis	A company that provides a range of sustainability solutions to help organizations manage, measure and improve their sustainability performance across the entire value chain. They are also a sustainability rating company.
CSR	Corporate social responsibility.
CSRD	Corporate sustainability reporting directive.
FTE	Full time employee.



Reference to Associated Documents

Related Policies	
Code of Conduct	Latest version, available at: https://www.tmf-group.com/globalassets/pdfs/legal/code-of-conduct/tmf-group-code-of-conduct-eng-202409.pdf
Privacy Statement	Latest version, available at: Privacy Statement TMF Group
Supplier Code of Conduct	Latest version, available at: https://www.tmf-group.com/globalassets/pdfs/legal/code-of-conduct/tmf-group-supplier-code-of-conduct-202409.pdf

Related Internal Documents	
Human Resources Policy	Latest version available only on the Intranet
TMF Group Procurement & Real Estate Policy	Latest version available only on the Intranet
TMF Group Travel Policy	Latest version available only on the Intranet
Anti-Bribery and Corruption Policy	Latest version available only on the Intranet
Business Continuity Management	Latest version available only on the Intranet
Environmental Policy	Latest version available only on the Intranet



Revision History and Records

Version	Date	Author	Details
1.0	March 2026	Juliana Ferreira, Milica Bijelic	Establishment of the document.