

DIVERSITY, EQUITY & INCLUSION POLICY

Approved and adopted on 13 January 2023



Contents

Clause		Page
1	CULTURE AND VALUES AND DIVERSITY, EQUITY & INCLUSION (DE&I).....	3
2	SHARED VALUES.....	3
3	DIVERSITY, EQUITY & INCLUSION AT THE CORE OF OUR BUSINESS	4
4	NURTURING OUR INCLUSIVE AND EQUAL CULTURE.....	4
5	KPIS AND TARGETS TO ENFORCE OUR DE&I MARK.....	5
5.1	Diversity.....	5
5.2	Equity and Inclusion	6

1 Culture and values and diversity, equity & inclusion (DE&I)

- 1.1 Equal opportunity is what we are proud of at Flow Traders Ltd. and its subsidiaries ("Flow Traders"). We constantly endeavour to find the best fit for a role. As a result, we create an environment that brings out the best of our people and offers our employees a unique place to build connections within the workspace and beyond. We are proud of our culture and continue to focus on fostering it as we come across new markets, new products and keep striving to exceed expectations.
- 1.2 We believe that creating a strong and successful business requires a set of shared values that everyone can relate to. Values that help shape how everyone behaves, feels, and develops at work. We live by our values every day: they are at the core of what we do:
- (a) we are open, informal, and diverse;
 - (b) we want colleagues to take ownership, to be entrepreneurial and to act as team players; and
 - (c) we reward responsibility, performance and initiatives that benefit the firm as a whole.
- 1.3 Additionally, we have a number of mission guiding principles:
- (a) we make investing cheaper, fairer, and more efficient for end-investors;
 - (b) we support markets with liquidity provision under all circumstances;
 - (c) we promote fair, transparent, and orderly markets;
 - (d) we promote competition on a level playing field;
 - (e) we comply with all rules and regulations;
 - (f) we subscribe to fair taxation and transparent reporting; and
 - (g) we always give back to society and the communities we live in.
- 1.4 These values and guiding principles reflect the things we believe in and shape our culture. We believe that who you are is more important than what you wear. So, our employees dress comfortably for work – jeans, t-shirts and sneakers are common. We believe that what someone says is more important than who says it. We believe that the contributions of our team members are crucial to the success of Flow Traders. We believe that two people know more than one, and that people can have great ideas even in areas other than their core expertise, which is why we welcome and encourage everyone to share their opinion. Anyone with a good idea, in their own area of expertise or another, is encouraged to share it. This is part of the open, informal, and diverse culture that makes us who we truly are.

“We are the driving force for an investment environment that is more transparent, efficient and lower-cost for end-investors, through the power of trading, acumen, innovation and talent.”

2 Shared values

Flow Traders was founded in 2004. Since then, we have developed an innovative and entrepreneurial spirit that enables us to grow and to explore new markets. We recognize that with this growth come responsibilities that go beyond our core business, and that our activities influence the society in which we live and operate. At the same time, society has a very real impact on our business and operations. The board of Flow Traders Ltd. (the "Board") pays close attention to a wide variety of developments and trends that could pose either a risk to or an opportunity for our business.

3 Diversity, Equity & Inclusion at the core of our business

- 3.1 Companies that are diverse (e.g., in terms of age, gender, race, sexual orientation, physical or mental ability, ethnicity, and perspective) are proven to be more successful in attracting talent. Moreover, companies with a high degree of diversity are also proven to accomplish better performance and growth. A diverse workforce will stimulate greater innovation and creativity, bring forward a larger range of skills, increase productivity through a broad range of backgrounds and experience, and provide more talent to choose from.
- 3.2 Flow Traders embraces this philosophy and sees the added value diversity brings to our business. Our current company demographics are also something to be proud of:
- (a) over 25% of the world's nationalities (of all inhabited continents) are represented in our 630+ employee workforce over 8 offices globally;
 - (b) our people bring in experience from over 50 academic study backgrounds, providing broad perspectives and insights from multiple angles to solve challenges together. Additionally, our employees are able to develop personally by learning from others;
 - (c) we are a relatively young company with an overall average age of 33 years. We see a healthy mix of ages through all ranks with ~40% of our workforce in the age category of 30-40 years old. The average age between our three company divisions (Trading, Tech, and Business Support) is also balanced with a difference in average age of less than 5 years; and
 - (d) gender diversity is on our mind at Flow Traders. Our Business Support division, comprising of ~220 employees, shows a balanced ratio of 47% female employees in line with the sector benchmark of 44%. The Tech and Trading divisions female representation is growing.
- 3.3 However, at Flow Traders we look beyond diversity. We create a workplace where everyone is welcome regardless of e.g., race, ethnicity, age, gender, religion, sexual orientation, gender identity, gender expression, disability, economic status and other diverse backgrounds.
- 3.4 There is so much power and potential in the fantastic mix of people Flow Traders comprises. To unleash this power and potential we need to be genuinely inclusive and aim for full equality. Therefore, maintaining a safe and equal environment is our key objective when looking at DE&I. This is accomplished through genuine commitment from all colleagues. At Flow Traders we do this with each other for each other.

4 Nurturing our inclusive and equal culture

- 4.1 Maintaining, preserving, and nurturing our culture is extremely important to everyone across the organization. This is done by:
- (a) the Board, through the organization of firmwide events and company outings as well as regular all-staff updates. In addition, a bi-yearly engagement survey is offered to ensure open communication and to enable employees to raise their voice;
 - (b) business departments, by providing specific trainings and learning sessions to our people through which we actively stimulate their personal and career development;
 - (c) colleagues themselves, by reinforcing our positive culture through organizing their own events, competitions, and charitable endeavours; and
 - (d) societal commitments and charities, by supporting multiple charities, also through our own Flow Traders

Foundation, not only financially but also by offering access to our knowledge and experience.

- 4.2 To guarantee the safe and inclusive environment Flow Traders values so highly, we have several mechanisms in place to make all employees feel included and safe:
- (a) a group of internal and external 'trusted persons' with whom employees can privately discuss any work-related or non-work-related challenges and/or difficulties in private in case desirable;
 - (b) a proven zero-tolerance policy in case of unacceptable behaviour in any form, as well as a clear follow-up procedure towards all stakeholders;
 - (c) the ability to always work in the office to connect with one another and to thrive together;
 - (d) the ability to work from home at dedicated moments per week to maintain the flexibility to perform in the best way possible if that means working from a remote location;
 - (e) a non-hierarchical working culture in which all employees can easily contact each other without any hierarchical boundaries (e.g., executive directors and senior leadership are always approachable, instilling ownership and accountability);
 - (f) a wide range of global and local company events in which all employees from all backgrounds can participate if they like to; and
 - (g) a focus on healthy lifestyle for employees to participate in voluntarily (e.g., a gym with personal programs, a hairdresser, massages, healthy office meals, etc.).

5 **KPIs and targets to enforce our DE&I mark**

To ensure we keep evolving, enforcing, and nurturing our company culture we want to increase our Diversity, Equity and Inclusion mark. Therefore, for the coming years we have indicated several targets across these three themes. Below is Flow Traders' DE&I strategy for the coming years up to 2025.

5.1 **Diversity**

- 5.1.1 In general, we aim to incorporate diversity aspects such as nationality, age, gender, educational background or professional background into decision making concerning the composition of our workforce. To the extent possible, this also applies to the composition of our Board and executive committee, as well as the corporate bodies of Flow Traders B.V.
- 5.1.2 Regardless of rules and regulations, we see diversity as a means to guarantee a safe and inclusive environment for our employees. We therefore aim for the following goals:
- (a) strive to have more than 20% of world's nationalities working at Flow Traders (currently 25%);
 - (b) strive to have women in Tech at par with the market (benchmark 17%);
 - (c) strive to have at least 1/3 female and 1/3 male non-executive directors;
 - (d) strive to have at least one female and one male executive director; and

- (e) Flow Traders top-50¹ (which includes the members of the executive committee) reflects the total workforce gender distribution.

5.2 Equity and Inclusion

Equity and inclusion are paramount in maintaining and thriving our entrepreneurial culture and mindset. Next to current focus we are always looking to expand and improve. In the coming years we will therefore keep developing and implementing initiatives to further promote Equity and inclusion. In this regard, we have made the following plans:

- (a) to increase our range of (online) trainings on communication and unconscious bias even further;
- (b) to include a D&I module in our leadership training programme to train our managers on inclusive leadership;
- (c) to start with 'high performing team training' and offer team activities around DE&I to ensure more inclusive collaboration and that our employees are inclusive in collaborating with one another, and to create more awareness about how inclusion improves performance / high performing teams;
- (d) to become even more vocal internally and externally about our DE&I initiatives, as well as to partner with other companies in the sector on big DE&I topics;
- (e) to create even more external awareness about Flow Traders, our mission, our people, and our culture through external events; and
- (f) to keep reviewing and updating our existing policies and internal procedures relating to DE&I on a yearly basis and to create new ones where applicable.

¹ Top-50 defined by function title Board Member, (Global) Head, Chief of Staff and Corporate secretary.