Corporate Responsibility

Modern Slavery Statement 2025

ISS STOXX

Contents

Purpose of this Statement

This statement is made for the financial year ended 31 December 2025 in accordance with the requirements of the United Kingdom's Modern Slavery Act 2015 (MSA 2015). The statement is made by ISS STOXX GmbH in respect to the following subsidiaries that are subject to the Act and are required to make a modern slavery statement:

- ISS HoldCo Inc.
- STOXX Ltd (Switzerland)
- Institutional Shareholder Services UK Limited;
- ISS Europe Limited;[1]
- AI Financial Information UK Limited; and
- Pridham & Pridham Ltd.

These entities are part of the ISS STOXX group, and they operate under the same group-wide policies and procedures as our global business.

Introduction

ISS STOXX remains committed to safeguarding human rights and maintaining the highest standards of integrity across all our operations, in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs). Addressing modern slavery risks is integral to our corporate values and our responsibility towards employees, clients, and stakeholders.

Oversight of sustainability-related decision-making is delegated to the CORE (Corporate Responsibility) Council. The CORE Council leads sustainability across the ISS STOXX group and advises on measures to identify and address modern slavery risks in our operations and supply chain.

About ISS STOXX

ISS STOXX, through its group companies, is a leading provider of comprehensive and data-centric research and technology solutions that help capital market participants identify investment opportunities, detect qualitative and quantitative portfolio company risks, and meet evolving regulatory requirements. With roots dating back to 1985, we today deliver world-class benchmark and custom indices across asset classes and geographies and serve as a premier source of independent corporate governance, sustainability, cyber risk, and fund intelligence research, data,

[1] Dormant entity

and related offerings. Our products and services give clients the scale and leverage they need to grow their business more effectively and efficiently.

ISS STOXX, which is majority owned[2] by Deutsche Börse Group, is comprised of approximately 4,000 professionals operating in 20 countries. Its approximately 5,000 clients[3] include many of the world's leading institutional investors who turn to ISS STOXX for its objective and varied offerings, as well as companies focused on ESG, cyber, and governance risk mitigation as a shareholder value enhancing measure. Clients rely on ISS STOXX's expertise to help them make informed decisions to benefit their stakeholders.

Further information about our business can be found on our website.

Operations and Supply Chain

All of ISS STOXX's clients-facing products and services are developed in-house and delivered by full-time employees. Our suppliers support us by supplying IT hardware and software, market and other financial data, office equipment and management, marketing, media, and event services. For additional details about the composition of our supply chain, please see ISS STOXX Sustainability Report 2025.

Our Actions

Risk Assessment and Management

Given the nature of our business, we assess the risk of modern slavery within our direct operations to be very low. Our operational footprint is primarily located in countries that are generally considered to present lower risks of modern slavery. However, we acknowledge the importance of continuous monitoring within our broader supply chain and developing engagement strategies for vendors in high-risk industry. A structured approach to identifying and managing potential risks through our supply chain is discussed in the Supply Chain Due Diligence Procedures section.

Corporate Policies

We are committed to providing safe, healthy, and non-discriminatory workplaces, underpinned by values of integrity, empowerment, collaboration, and flexibility. We recognise that strong labour standards, supported by a culture in which employees feel empowered to raise concerns, are

[2] On March 31, 2026 Deutsche Börse AG ("DB") completed a transaction pursuant to which it acquired all the outstanding equity interests held by private equity firm General Atlantic. DB is now the sole ultimate owner of ISS.

[3] The figures provided are as of December 2025, unless otherwise noted.

essential to preventing and mitigating the risk of exploitative working conditions. We consider that the risk of modern slavery in our operations to be **very low**, given the nature of our work and our robust employee policies and procedures.

General Code of Conduct	Our business practices are guided by our General Code of Conduct to ensure that we comply with the highest standards of integrity, with regards to bribery, corruption, information and data security, workplace safety and whistleblowing procedures.
Vendor Sustainability Policy	Sets out ISS STOXX's expectation that suppliers comply with applicable laws and uphold internationally recognised human rights and labour standards, including the ILO Core Conventions and the Universal Declaration of Human Rights. It prohibits forced labour, human trafficking and illegal child labour, among others.
Freedom of Association Statement	ISS STOXX respects the right of all employees to freely form or join trade unions of their choice and bargain collectively, with non-discrimination protections for union activity and employee representatives in areas such as employment, promotion, transfer or dismissal.
Equal Opportunities Policy	ISS STOXX is an equal opportunity employer. We accept our responsibility to make employment decisions without regard to race, age, sex, sexual orientation, religion, disability, or any other classification protected by applicable laws and ordinances. Our equal opportunities policy applies across the full employee lifecycle (hiring, placement, promotion, transfer, demotion, layoff, termination, recruitment advertising, pay, and other forms of compensation, training, and general treatment during employment).

View our policies at our website dedicated to our reporting efforts.

Training and Awareness

All newly hired employees are required to complete a compliance training on the General Code of Conduct which includes topics on human rights and fair and ethical working conditions. Annually, subsequent training occurs for all employees. In 2025, targeted training was delivered to procurement teams to strengthen awareness of modern slavery risks within supplier relationships.

Supply Chain Due Diligence Procedures

ISS STOXX takes a risk-based approach to supply chain due diligence to help prevent, identify, and address modern slavery and broader human rights risks. We recognise that certain suppliers or regions may present elevated risk, even indirectly. This approach is underpinned by our Vendor Sustainability Policy (see section above) which sets clear expectations for all suppliers.

We assess supplier risk using a consolidated framework drawing in part on ISS STOXX's own tools, including the Modern Slavery Solution, Corporate Rating and norm-based research.

The results of this assessment are integrated into our procurement and supplier management practices, with engagement initiated where supplier performance is identified as insufficient.

We aim to build long-term supplier partnerships and promote responsible business practices, including environmental stewardship, fair labour, human rights, and ethical conduct. We may verify suppliers' compliance and the accuracy of information provided. Where issues are identified, we work with suppliers to agree on corrective actions and monitor progress, and we may escalate concerns or end the relationship if serious issues are not addressed. This approach is reviewed and strengthened regularly.

In 2025, we expanded our supplier risk mapping to cover the consolidated ISS STOXX vendor base (including legacy ISS and STOXX suppliers). We prioritised Tier 1 suppliers with annual spend above €50,000, reflecting higher exposure and leverage. Of approximately 1,726 suppliers globally, we assessed 350 material vendors, representing about 83% of total supplier spend. We also began developing an enhanced engagement and remediation process for higher-risk suppliers, including clearer communication of expectations, corrective action plans, defined monitoring steps, and the use of third-party audits, where appropriate.

Grievance mechanism

ISS STOXX has a Business Integrity Hotline available 24 hours a day, seven days a week, and allows employees to raise concerns anonymously about suspected misconduct involving employees, managers, clients, consultants, agents, suppliers, or other third parties.

All reports of potential misconduct, including concerns that may indicate modern slavery risks, as well as all reports of modern slavery, or potential indicators of modern slavery, submitted through our Business Integrity Hotline are given immediate attention, reviewed, evaluated, and, when and where appropriate, investigated and remediated. In 2025, no material grievances related to modern slavery were reported through the Hotline.

Corporate Collaboration and External Engagement

We have continued to publish bespoke thought-leadership research, collaborate with our clients, academic institutions, and non-governmental organisations, and participate in industry networks to share key findings of our research, understand best practice, and contribute to policy and market developments in responsible investment.

ISS STOXX participates in a range of industry networks globally, including its role as a signatory to the Principles for Responsible Investment (PRI) and the United Nations Global Compact (UNGC), as well as memberships in the Interfaith Center on Corporate Responsibility (ICCR), the UK Sustainable Investment and Finance Association (UKSIF), and the Responsible Investment Association, Australasia (RIAA), amongst others.

Review and approval

We are committed to strengthening our approach to addressing modern slavery risks and, accordingly, the policies and procedures outlined in this statement are reviewed on an annual basis. Measures such as training received, and immediate attention to any grievances reported, are monitored by relevant teams through defined oversight processes with progress and outcomes reported to the CORE Council to support accountability and continuous improvement.

This foregoing statement was reviewed and approved by the ISS STOXX GmbH Management Board on June 15, 2026.

Gary Retelny
CEO & Chair of Management Board
ISS STOXX GmbH

cr@iss-stoxx.com
iss-stoxx.com

ISS STOXX delivers world-class research, data, and technology solutions that empower capital market participants to pursue their visions with confidence. Our expertise spans indices, corporate governance, sustainability, cyber risk, and fund intelligence, giving clients the tools they need to uncover opportunities, manage risks, and navigate evolving regulations. We are made up of 4,000 professionals operating across 20 countries and serving approximately 5,000 clients, including many of the world's leading institutional investors. Our scale and reach give us deep market knowledge, while our innovative methodologies allow us to offer our clients tailored insights that drive impact and success.