

Gender Equality Policy

Trustnexus Limited (the “Company”), with operations in Cyprus and on a European level, is committed to fostering an inclusive and equitable workplace where all employees have equal opportunities. This Gender Equality Policy (“Policy”) affirms our dedication to the principle of equal treatment of all genders, in line with European Union directives and national laws. It is a formal document approved by top management and published on our website, demonstrating leadership’s commitment to gender equality. The Policy is communicated to all personnel and stakeholders, underscoring that gender equality is a core value of the Company’s culture and governance.

The purpose of this Policy is to establish a comprehensive framework for promoting gender equality and preventing discrimination within the Company. It outlines specific goals, measures, and responsibilities to advance gender balance, support work-life balance, ensure fair recruitment and career progression, integrate gender perspectives in our professional activities, and eradicate gender-based violence and harassment. By implementing this Policy, the Company not only complies with applicable EU and national legal requirements but also strives to exceed them, setting a higher standard as a Regulatory Technology Start-up Company set up in Cyprus, to service EU member states.

The Company’s Gender Equality Policy is grounded in international and domestic legal frameworks that mandate non-discrimination and equality. In developing this Policy, the following key laws and standards have been taken into account:

European Union Directives, notably:

Directive 2006/54/EC (Recast) on equal opportunities and equal treatment of men and women in matters of employment and occupation, covering access to jobs, pay, promotions, working conditions, etc. The regulatory definitions of harassment and sexual harassment as forms of discrimination are adopted as outlined in this Directive.

Directive (EU) 2019/1158 on work-life balance for parents and carers, which sets minimum standards for parental leave, paternity leave, carers’ leave, and flexible working arrangements to improve work-life balance.

Directive 2022/2381 (EU “Women on Boards” Directive): on the spirit of improving gender balance in corporate leadership. The Company actively strives towards increased female representation in management roles.

In the spirit of the Cypriot constitution, and the principle of equality before the law, it is our obligation as a Company to ensure the equal rights and obligations of men and women who work or transact with the Company.

This policy has also been drafted in the spirit and with due consideration of Cyprus Law N.205(I)/2002 on the Equal Treatment of Men and Women in Employment and Vocational Training, Cyprus Law N.177(I)/2002 on Equal Pay Between Men and Women for Equal Work or Work of Equal Value, and Cyprus Law N.42(I)/2025 on Preventing and Combating Violence and Harassment in the Workplace.

International standards and best practices have also been closely considered in the drafting of the present policy, including the United Nations Sustainable Development Goal 5 (achieve gender equality and empower all women and girls) and the UN Women's Empowerment Principles. We are also in line with the spirit of the European Institute for Gender Equality (EIGE) and other EU best practices on Gender Equality Plans, which recommend focus areas such as work-life balance, leadership balance, fair recruitment, gender in research, and anti-harassment measures. By aligning with these best practices, the Company ensures its Policy is not only legally compliant but truly effective in driving cultural change.

Part A.

Policy on Equal Treatment, Anti-Discrimination & Anti-Harassment

The Company is committed to ensuring equality, dignity, and respect for all individuals. Discrimination, harassment, or victimisation will not be tolerated.

This Policy applies to all members of the Company, including senior and junior employees in any department, support staff, and management of Trustnexus Limited, as well as anyone working under the Company's supervision (collectively "employees"). It covers all aspects of employment, including recruitment, training, assignments, promotion, remuneration, benefits, and day-to-day workplace conduct. It also extends to interactions with clients, vendors, and third parties insofar as they pertain to a professional and inclusive work environment.

For equal treatment, anti-discrimination and anti-harassment, the Company's approach is founded on the following key principles:

Equal Opportunities and Non-Discrimination: Ensuring that all employment decisions (hiring, assignments, training, promotion, remuneration, termination) are based on merit and free from gender bias. No employee or applicant shall be treated less favorably on the basis of gender, gender identity or expression, or family status. We uphold the principle of equal pay for work of equal value, regularly reviewing pay practices to eliminate any gender wage gap.

Work-Life Balance Support: Foster a work environment that supports employees in balancing work with family or personal responsibilities. We recognize that equitable sharing of caregiving duties is crucial for gender equality. The Company provides family-friendly policies such as paid maternity and paternity leave (as per or beyond statutory requirements), parental leave for childcare, flexible working hours, remote work opportunities, menstrual leave arrangements for female co-workers and compassionate leave for family emergencies. We ensure that taking advantage of these arrangements does not impede career progression.

Gender Balance in Leadership and Decision-Making: Strive for balanced representation of women and men in senior roles, partnerships, and decision-making committees. The Company's aims to increase female presence in leadership roles, in line with emerging European benchmarks for gender diversity in management. Achieving this target will involve proactive measures, such as leadership development programs for under-represented genders, mentorship and sponsorship opportunities, succession planning

that considers diversity, and unbiased criteria for promotions to partner and management roles.

Zero Tolerance of Gender-Based Violence and Harassment: Maintain a safe, respectful workplace free from any form of harassment, sexual harassment, bullying or gender-based violence. Harassment is defined in line with EU and national law as unwelcome conduct related to a person's sex or gender that violates their dignity or creates an intimidating, hostile, degrading or offensive environment. Sexual harassment is any unwelcome conduct of a sexual nature that affects the dignity of a person, particularly when it creates an intimidating or offensive environment. Such behaviors are considered serious misconduct and are strictly prohibited at Trustnexus. This Policy, highlights our commitment to prevention and response, including a clear stance that violence and harassment (including sexist jokes, inappropriate comments, unwanted touching, or any form of sexual advance or assault) will not be tolerated at the Company.

Breaches of this policy are taken seriously and may lead to severe disciplinary measures in line with employment agreements, collaboration agreements or other as is deemed appropriate.

Part B.

Policy on Recruitment, Career Development & Advancement

Recruitment, development, and advancement are based on merit, transparency, and the goal of achieving gender balance at all levels. Hiring is conducted with structured interviews, unbiased criteria, and diverse candidate shortlists. Client matters, projects, and high-profile projects will be distributed fairly across genders. Criteria for advancement and partnership are transparent and communicated to all staff. All employees will have equal access to mentoring programmes, leadership development, and continuous professional development opportunities. The Company supports flexible work arrangements, reintegration after parental leave, and remote working as appropriate. Annual reviews will include analysis of gender pay gaps, promotion and retention statistics, and access to opportunities.

In greater detail, the Company adheres to the principles set out below:

Fair Recruitment & Career Progression: Embed equality in all stages of employment – from recruitment and hiring to training, performance evaluation, and advancement. We use gender-inclusive language in job postings and avoid gender stereotypes. Recruitment panels are, whenever possible, gender-diverse and trained in unbiased selection. We aim for gender-balanced shortlists of candidates. Our evaluation and promotion criteria are transparent and based on objective performance metrics to ensure fairness. The Company also commits to addressing any barriers to women's career advancement, often known as the "glass ceiling." This includes providing equal access to high-value assignments, professional development, networking opportunities, and any necessary accommodations (for example, for returning mothers). Through regular career reviews and employee feedback, we seek to identify and rectify any indirect biases that might affect promotions or retention.

Equal Opportunity in Assignments: After hiring, we ensure that high-value work assignments, client contact opportunities, and professional development prospects are distributed equitably. We guard against any informal biases that might funnel, say, male associates to certain high-profile cases and women to less visible work. Managers will periodically review task allocation with an eye on fairness.

Performance Evaluations: Our performance appraisal system is reviewed to eliminate bias. We use clear, measurable performance metrics. Evaluators receive guidance to focus on outcomes and behaviors without gendered assumptions. For example, leadership style differences are respected (assertiveness in women is not to be judged

negatively by stereotypes). We encourage 360-degree feedback to provide a holistic view of performance.

Promotion Criteria and Process: Criteria for advancement (e.g., to senior associate or partner) are made transparent and communicated in advance. The promotions process includes checks and balances and, where necessary, the outsourcing of HR functions in hiring processes, for a balanced and egalitarian point of view.

Career Development & Training: We offer continuous professional development opportunities equally to all employees. This includes technical legal training, as well as soft skills like business development or public speaking. We also provide specific programs to support career growth of under-represented groups – e.g., a leadership skills workshop for women associates as mentioned in the leadership section. Additionally, networking opportunities (such as attending conferences, bar association events) are evenly encouraged and funded across genders.

Retention Strategies: We actively work to retain talented employees of all genders. This involves seeking feedback through stay interviews or surveys, and addressing any issues that might disproportionately cause women to leave (like lack of work-life balance or exclusion from networks).

Part C.

Policy on Fair Access to Work & Opportunities

All employees must have equal access to meaningful work, including origination, client-facing opportunities, and leadership roles.

The Company will implement a transparent tracking system to monitor allocation of work across staff and partners.

Work allocation will be reviewed annually to identify potential disparities by gender.

If imbalances are found, the Managing Partner will take corrective measures to ensure fairness in the distribution of work.

Reporting Mechanisms: Safe, confidential channels for victims or witnesses to report incidents. The Company has designated complaints procedure whereby employees can report to members of management who have received relevant training in dealing with gender equality abuse situations. Measures are then implemented and followed on a case-by-case basis according to the needs of the victim and always with the aim of maintaining a safe and pleasant working environment for everyone.

Investigation and Response: Every reported incident of harassment or gender-based violence will be investigated promptly and thoroughly. A fair and impartial inquiry will be conducted, respecting the rights of all parties. If an allegation is substantiated, the Company will take immediate corrective action, which may include disciplinary measures up to and including termination of employment for perpetrators. We also commit to protecting complainants from retaliation; any act of reprisal against someone who reports harassment in good faith will result in disciplinary action.

Support for Affected Persons: The Company will support employees who experience harassment or violence. Support measures may include offering paid leave for recovery or legal steps, referrals to counseling services, or adjustments to work arrangements to ensure safety. Managers will take appropriate steps to safeguard individuals from further harm (for example, separating the accused harasser from the complainant during investigation).

Conclusion

Through the implementation of this Gender Equality Policy, Trustnexus Limited commits to being a leader in promoting equal opportunity, fairness, and respect in the legal profession. We recognize that true gender equality requires sustained effort and cultural change – and we are prepared to invest the time, resources, and willpower to achieve it. This Policy not only fulfills our legal obligations under EU, and Cypriot law, but goes further to integrate best practices and set measurable goals for improvement. We believe that these actions will enhance the well-being and productivity of our employees, improve our service to clients (by harnessing diverse talents and perspectives), and contribute to broader societal goals of gender equality. Every member of Trustnexus, from junior staff to senior managers, has a role to play in realizing the vision outlined here. Together, we will foster a workplace where everyone – regardless of gender – can thrive and succeed.

Approved by:

Daniel Sakellariou

CEO, Director and Co-Founder of Trustnexus Limited



Date: 15/09/2025

The above signatures attest that this Gender Equality Policy has been reviewed and approved by the highest management of Trustnexus Limited. The Policy comes into effect as of the date signed and will be published on the Company's external website and internal portal for access by all employees and stakeholders.