InteractiveBrokers

2024

SUSTAINABILITY REPORT

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Letter from Sustainability

Sustainability is a key consideration in our office strategies. In 2024, we continued our efforts to reduce our carbon footprint by expanding our use of renewable energy and identifying opportunities for further efficiencies. Additionally, we have enhanced our understanding of our carbon impact and have established comprehensive tracking for material Scope 3 emissions categories.

Our business operations require the use of data centers, where we prioritize renewable energy where possible. As we expand our data center footprint, we have concentrated on prioritizing data integrity and renewable energy implementation. We have also significantly improved the detail and accuracy of our Greenhouse Gas emissions reporting.

In 2024, we welcomed Tim Cramp as our Global Sustainability Lead. Tim is responsible for advancing our objectives to meet or exceed regulatory requirements, with specific focus on enhancing our decarbonization and wider sustainability measures.

My thanks to Tim, and all IB employees, for their continued efforts to make Interactive Brokers a more sustainable company.

Pam Berry
Global Head of Real Estate

I am pleased to present our 2024 Sustainability Report.

2024 was a busy period, as we focused on how IBKR can efficiently progress our objectives in alignment with our wider operations amid regulatory, climate and geopolitical changes.

Building on our success in 2023, we enhanced our Greenhouse Gas capture to include Scope 3 emissions Categories 5 and 8, and developed an Environmental Framework for sustainable office development.

2024 GHG emissions were low, and we focused on reducing waste and water use through responsible sourcing priorities. We emphasized recycling and continued to reduce, recycle and to move away from landfill where possible.

We are also proud to showcase the ways we give back to our communities, in collaboration with our staff. Our philanthropic support increased over 2024 as our staff continued to volunteer and donate to charitable causes.

2024 saw significant developments in global regulations, including the finalization of EU's Corporate Sustainability Reporting Directive (CRSD), the EU Taxonomy and the California Senate Bill SB253 & SB261. My team worked hard to ensure alignment and delivery under our obligations, aligning to TCFD (Task Force on Climate-related Financial Disclosures) and performing a double materiality assessment for our EU entities.

IBKR values integrity and is committed to sustainability. Our goals are continuous allowing us to enhance our sustainability program in a structure that ensures we can achieve our objectives year-on-year. We have already made progress toward delivering on our 2025 commitments.

Tim Cramp
Global Sustainability Lead

Introduction

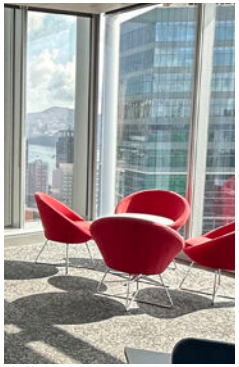
At Interactive Brokers[1], we understand how important sustainable and responsible business practices are to our success.

Since our inception in 1977, we have held firm to four core values: innovation, integrity, operational efficiency, and resilience. Our expertise lies in building innovative technology and tools to help our clients efficiently achieve their financial goals. Our Mission is "to compete on price, speed, size, diversity of global products, and advanced trading tools."

In 2024, we enhanced our sustainability strategy to align with our priorities. Our strategy is anchored to four primary areas:

1. Leadership
2. Environment
3. Our People, Clients and Communities
4. Resilience and Governance

By integrating our sustainability strategy into our operations, underpinned by our core values, we strive to create better products and services for our clients and greater value for our stakeholders.



1 Interactive Brokers Group, Inc., together with its affiliates, are referred to here as "Interactive Brokers," "IBKR," "we," "us," and "our."
2 All statistics as of December 2024.

Important Facts[2]

We have been in business for 47 years.
We trace our roots to the market-making business founded by our **Chairman, Mr. Thomas Peterffy**, on the floor of the American Stock Exchange in 1977.

IBKR is an automated global electronic broker, processing **3.1 million orders/day**.

We serve customers around the world on more than 160 electronic exchanges and market centers in 36 countries and 28 currencies around the world.

Our IBKR Campus has approximately **133,000 users/month**. Our student trading lab, a free resource, is used by more than 34,000 students and 2,000 educators, at over 1,400 educational institutions worldwide.

Sustainable Development Goals

At IBKR, the UN Sustainable Development Goals (SDGs) continue to guide our sustainability priorities throughout our operations. We regard five SDGs as best aligning with our core values and business.

Throughout this 2024 report we will elaborate on our positive impact to people and the environment. For further information please see the IBKR Impact below, and visit the corresponding pages.

4 QUALITY EDUCATION — Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

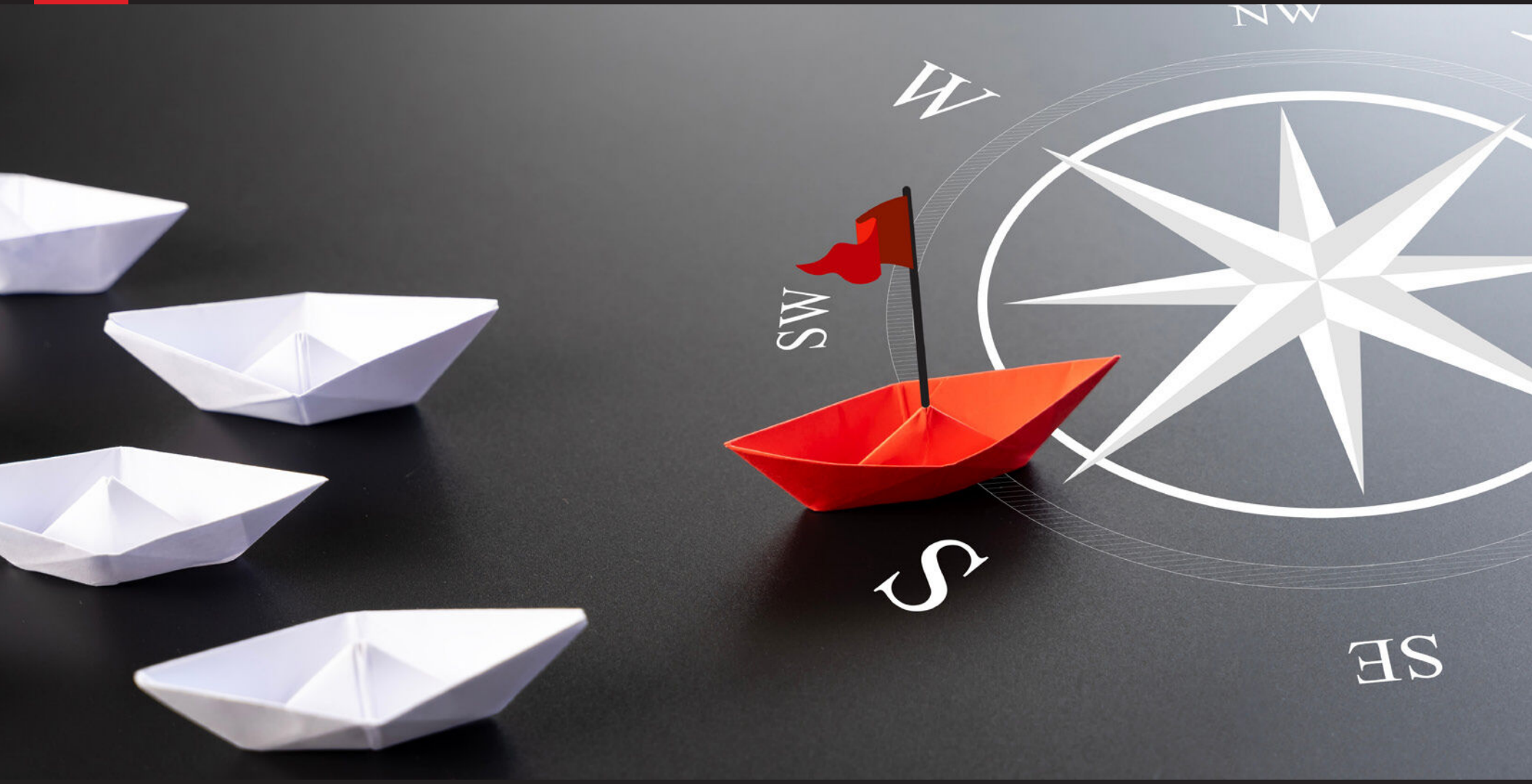
8 DECENT WORK AND ECONOMIC GROWTH — Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE — Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.

12 RESPONSIBLE CONSUMPTION AND PRODUCTION — Ensure sustainable consumption and production patterns.

13 CLIMATE ACTION — Take urgent action to combat climate change and its impacts.

IBKR Impact	SDG Targets	Page
We encourage our staff to pursue additional educational opportunities. Where appropriate, we support staff for role specific educational development.	**4.4** By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship.	20
We have a dedicated Trading Education Department. Their objective is to enhance trading and market education both in IBKR and externally to all clients to aid them in their financial literacy goals.	**4.6** By 2030, ensure that all youth and a substantial proportion of adults, both men and women, achieve literacy and numeric.	25, 26
We are proud of our global trading platform offering sophisticated award winning trading technology and services to clients. We provide an ESG integrated application (IMPACT) making it easier for clients to find and invest in companies that share their values. Through our financial strength, and direct access to global markets, we offer opportunities to clients to expand how they avail of financial services.	**8.2** Achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high-value added and labour-intensive sectors. **8.3** Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services. **8.10** Strengthen the capacity of domestic financial institutions to encourage and expand access to banking, insurance and financial services for all.	7, 8, 23, 24, 26
We have the highest calibre of employees. Their educated and innovative backgrounds ensure our Company continues to lead in online trading. We have staff globally across North America, EMEA & APAC.	**8.3** Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services.	19
We are focused on Responsible Sourcing, through our Vendor Code of Conduct and Environmental Framework we are focused on sourcing sustainably, by assessing our value chain to ensure alignment with our sustainable business practices.	**9.2** Promote inclusive and sustainable industrialization and, by 2030, significantly raise industry's share of employment and gross domestic product, in line with national circumstances, and double its share in least developed countries. **9.3** Increase the access of small-scale industrial and other enterprises, in particular in developing countries, to financial services, including affordable credit, and their integration into value chains and markets. **12.2** By 2030, achieve the sustainable management and efficient use of natural resources.	15
We have enhanced our Waste and Water program and expanded our emission capturing, with a focus on reduction, recycling and reuse through supply chain and reduction planning.	**12.5** By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse	13, 14
We are dedicated to our Greenhouse Gas capturing, 2024 saw the inclusion of Scope 3 (Waste Generated in Operation & Upstream Leased Assets) and other Scope 3 categories will be assessed in 2025. We continue to work on reducing our usage and waste and opting for responsible sourcing. Through our IMPACT app we work to offer customers the ability to select areas they align with when investing and education on ESG & climate change.	**13.1** Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries. **13.2** Integrate climate change measures into national policies, strategies and planning. **13.3** Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.	12-17, 24, 26



LEADERSHIP

Our leadership at IBKR drives our sustainability agenda to ensure alignment with our mission and our culture code. Our leaders are focused on ensuring IBKR leads on client centric innovation across our operations, delivering investment information and technology efficiently and effectively.

About Interactive Brokers

Headquartered in Greenwich, Connecticut, IBKR has 2,998[3] employees in the United States, Canada, the United Kingdom, Ireland, Switzerland, Estonia, Hungary, India, China (Hong Kong and Shanghai), Japan, Singapore, and Australia. IBKR is regulated by the SEC, FINRA, CBI, FCA[4], and other regulatory agencies around the world.

Globally, we offer sophisticated trading technology and services to retail and institutional investors, financial advisors, proprietary trading firms, and introducing brokers at some of the lowest fees in the industry. Because we recognize that successful investment practices start with robust financial literacy, we maintain a comprehensive suite of free training and educational support services, including courses, videos, podcasts, webinars, and blogs. We also offer wide-ranging research and market data provided by third-party organizations.

We are an automated global electronic broker specializing in executing and clearing trades in stocks, options, futures, foreign exchange instruments, bonds, mutual funds, exchange-traded funds, precious metals, and other products on more than 160 electronic exchanges and market centers in 36 countries and 28 currencies around the world. We offer custody, prime brokerage, and securities and margin lending services to our clients. In addition, our clients can use our trading platform to trade cryptocurrencies through third-party service providers that execute, clear, and custody the assets. On average, our trading systems execute more than 3.1 million orders per day.[5]

We continually look for ways to expand our services and automate our processes while maintaining low costs. Our relatively flat organizational structure supports rapid decision-making and complex product development. We have grown organically, which we believe results in a more integrated operation than competitors of comparable size. The resulting efficiency allows us to keep our fees low while continuing to offer comprehensive data and advanced technology.

IBG office locations

3 As of December 2024.
4 US Securities Exchange Commission ("SEC"), Financial Industry Regulatory Authority ("FINRA"), The Central Bank of Ireland ("CBI") in the Republic of Ireland, The Financial Conduct Authority ("FCA") in the UK.
5 As of December 2024.

2024 Awards

BROKERCHOOSER
Best Online Broker
#1 Best Broker for ESG Investing

investing in the web
Best ESG and Impact Investing App (for IMPACT, by IBKR)

Investopedia
Best for Advanced Traders
Best for Risk Management

StockBrokers.com
#1 ESG Offering
Best in Class: Education

ForexBrokers.com
#1 ESG Offering
5 out 5 Stars Overall

PREQIN
Featured as a Top Prime Broker

Forbes ADVISOR
Best Online Broker for Day Trading
Best Online Broker for Traders

Rankia
Best Multi Product Broker

See all awards: ibkr.com/awards

Financial Strength[6]

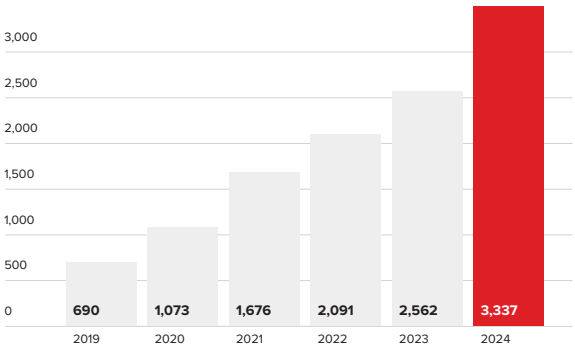
We operate under the fundamental principle that serving clients effectively is critical to the financial strength of a brokerage firm. We believe IBKR is one of the strongest and most financially sound global brokers.

- As a regulated securities broker-dealer – not a bank – we mark to market all of our positions daily.
- The only type of loans we make to clients are margin loans fully secured by marketable securities.
- IBKR invests cash in very short-term investments that mature within a few months. We hold no material positions in over-the-counter securities or derivatives. We hold no collateralized debt obligations, mortgage-backed securities or credit default swaps.
- Our real-time margining system marks all client positions to market continuously. All orders are credit-vetted before being executed, and positions in accounts with inadequate margin deposits are automatically liquidated.
- We have no long-term debt.
- The majority of our payables/receivables are automatically reconciled to outside sources.
- Interactive Brokers LLC (our primary brokerage affiliate) is rated "A- Outlook Stable" by Standard & Poor's.[7]

Five-Year Compound Annual Growth Rate

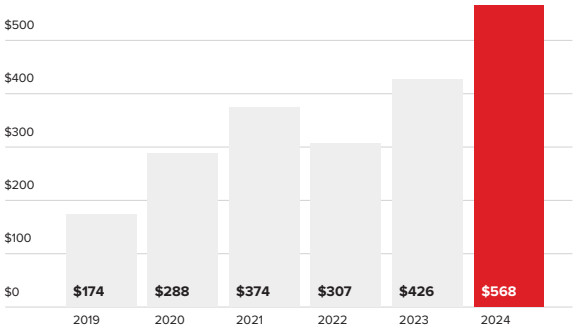
Client Accounts
(Thousands)

37%
Growth



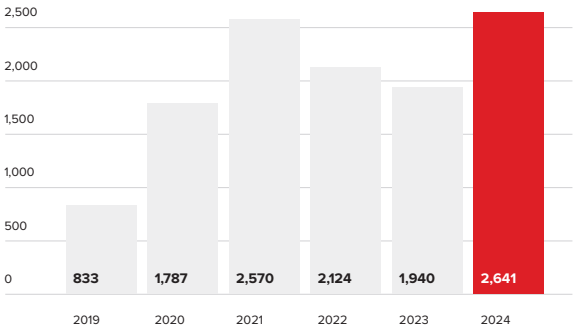
Client Equity
(Billions)

27%
Growth



Total Client DARTs†
(Thousands)

26%
Growth



† Daily Average Revenue Trades.

74.2%
Privately Held

$3.7B
Pretax Profit

71%
Pretax Margin

$16.6B
Equity Capital

$5.2B
Net Revenue

$150.5B
Total Assets

6 For more information, please visit our website: ibkr.com.
7 As of December 31, 2024. Includes IBG and all affiliates.

Our Leadership & Governance

Our leadership, including our Board of Directors, Chairman, and CEO, drives our sustainability agenda, which covers both financial and non-financial objectives. In 2024, our Board was comprised of nine directors, four of whom were independent.[8] Our Board committees include the Audit Committee, Compensation Committee, and Nominating and Corporate Governance Committee.

In 2024, our ESG department was rebranded to Sustainability and restructured how we deliver sustainability developments to our Board. On a quarterly basis, Sustainability provides updates to our CEO for discussion with the Board. Sustainability, environmental, and social matters are a responsibility for the Nominating and Corporate Governance Committee.

Sustainability collaborates with senior management globally to further the firm's sustainability goals and enhance our programs and initiatives across all regions.[9]

IBKR's policies, procedures, and internal controls promote responsible practices and comply with relevant legal obligations. Our department heads collaborate in managing key concerns including data privacy, cybersecurity, anti-money laundering, sanctions, anti-corruption, and responsible supplier practices. Our Environmental and Social Policy Statement outlines the expectations for our business operations and supply chain in the areas of human rights and environmental management. Our Vendor Code of Conduct continues to ensure our vendors align with the Code of Business Conduct and Ethics of Interactive Brokers Group, Inc.

IBKR is owned by our public company, Interactive Brokers Group, Inc. (25.8%) and our founders, employees and their affiliates (74.2%). Unlike many other firms, where management owns a relatively small share, our founder and other senior executives own a substantial majority of our equity, which strongly aligns management with our stockholders. This incentive-compatible structure ensures that management does not take unnecessary or unwise risks to further their own benefit.[10]

Organizational Structure

8 Annual Report 2024 outlines 10 directors with five independents, one of which relinquished their role in April 2024.
9 See Appendix A, for information on our Governance.
10 For more information, please visit our website: ibkr.com.

Our Sustainability Approach & Materiality Assessment

IBKR completed our first Materiality Assessment[11] in 2022. This assessment identified sustainability issues that may impact our business and the communities in which we operate. Now in 2025, we are in the process of conducting our group wide financial materiality assessment.

In accordance with the Corporate Sustainability Reporting Directive (CSRD) and in conjunction with the European Sustainability Reporting Standards (ESRS), IBKR conducted a double materiality assessment (DMA) in 2024 for our European footprint and reporting.[12] This was conducted with consideration from our Company wide materiality assessment and sustainable business objectives. Our DMA considered both financial and impact materiality across Environment, Social and Governance topics. CSRD reporting is conducted in alignment with our TCFD Disclosure (Task Force on Climate-Related Financial Disclosures).

In conducting the DMA, we considered guidance from the OECD Due Diligence Guidance for Responsible Business Conduct, UN Guiding Principles on Business and Human Rights 2011 in addition to other International Financial Reporting Standards guidelines, and local scientific consensus and studies to determine potential impacts to people and the environment.

Our process included:

- Stakeholder identification & engagement.
- A three-step topic assessment.
- A financial materiality consideration of actual or potential risk and opportunity to the Company.
- An impact materiality consideration of actual or potential impact to people and the environment.
- Reviewing our materiality results with stakeholders.

IBKR is awaiting finalization of the amended Omnibus[13] to determine applicability once proposed changes are implemented.

11 The assessment was informed by the: GRI Sustainability Reporting Standards 2021 (GRI Standards) and Sustainable Accounting Standards Board (SASB) Materiality Map for the Investment Banking & Brokerage Industry. Consideration was given to United Nations Sustainable Development Goals (UNSDGs).

12 At the time of reporting, IBKR awaits the finalization of the Omnibus amendment by the European Parliament and Council.

13 Under the European Commission (EC) the "Omnibus" is a simplification package assessing sustainability reporting (including CSRD).

ENVIRONMENT

In 2024, IBKR expanded the capture of Greenhouse Gas (GHG) to include Scope 3, assessing waste, water and data center emissions. We strive to operate efficiently in line with our intent to reduce our environmental impact.

Climate Change & Our Business

IBKR management entrusts our dedicated Sustainability team with responsibility for assessing climate change, identifying associated risks in collaboration with Enterprise Risk Management (ERM), and delivering our environmental program.

As we continue to improve our environmental stewardship, the Sustainability team has worked with departments across the Company to enhance our GHG capture and continue to identify opportunities for efficiencies. Our Environmental Standards framework provides guidance across our offices to ensure our impact on the environment is an important consideration in decision-making regarding energy, waste, water and our supply chain. Our Environmental and Social Policy Statement[14] sets forth what we require and expect from our employees and supply chain members.

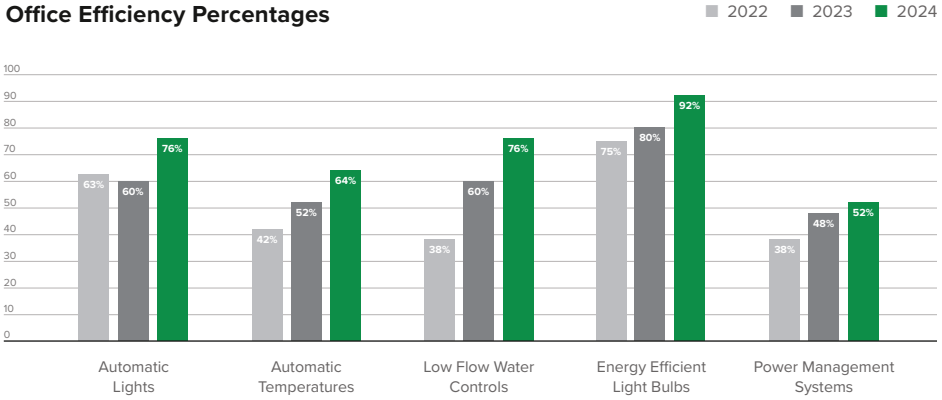
In 2024 we continued to make improvements across our offices, and when opportunity allows we consider Green Building relocation:

- 37% of our operational controlled offices are LEED & BREEAM certified (Chicago, NYC, London, Vancouver, Dublin, Zug, Hong Kong and Singapore).
- 72% of our buildings hold sustainability certificates or awards.
- Our Chicago and Dublin offices have rooftop bee programs.

95.46% Renewable energy for Scope 1 & 2

97.17% Renewable energy for data centers and co-locations

Office Efficiency Percentages

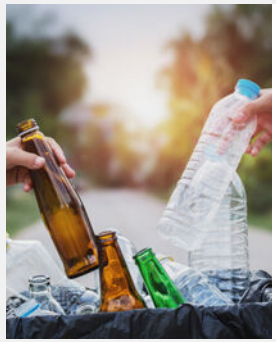


14 https://www.interactivebrokers.com.au/download/IBG_Environmental_and_Social_Policy.pdf

We continue to support eco-friendly and charitable initiatives.

Our UK and Ireland offices **donated 35,888 meals** to Akshaya Patra via the Feedr Lunch vendor.

Our North American Offices **donated 40,843 meals** to Feeding America via Sharebite.



Staff in our Dublin Office supports a local charity, Ringsend and Irishtown Community Centre (RICC), through a recycling program of cans and plastic bottles. As part of its program RICC teaches children about recycling. In 2024, **our recycling donations generated €701** which is invested back into the community to support the center's activities.

In 2024 our staff in Budapest participated in tree planting.

Our team in London supported **301 trees** plantings through London Fruitful fruit basket purchases.

Waste

For many of our offices, waste collection is managed by our landlords. IBKR staff continue to collaborate with our building management teams to expand our waste stream options. In 2022, we identified an opportunity involving compostable bins, and since then have successfully increased our compostable waste stream offerings.

Our move to silverware, reusable water bottles and coffee mugs has helped reduce single-use plastics in our office pantries. As we continue to upgrade our offices, we assess the space to determine if the "binless concept"[15] can be implemented.

Many of our food vendors use recyclable or compostable packaging for food and beverage orders. We encourage our staff to utilize the correct waste bin when disposing of this packaging through disposal signage and assessment of our offices globally to identify where improvements can be made.

We continue to encourage employees to use digital copies. IBKR staff use recycled or eco-friendly paper for instances in which staff need to print. Our offices now have disposal solutions for electronic waste such as mobile phones, tablets, cameras, chargers, headphones, and other small electronic devices. Toner cartridges are collected separately and recycled appropriately.

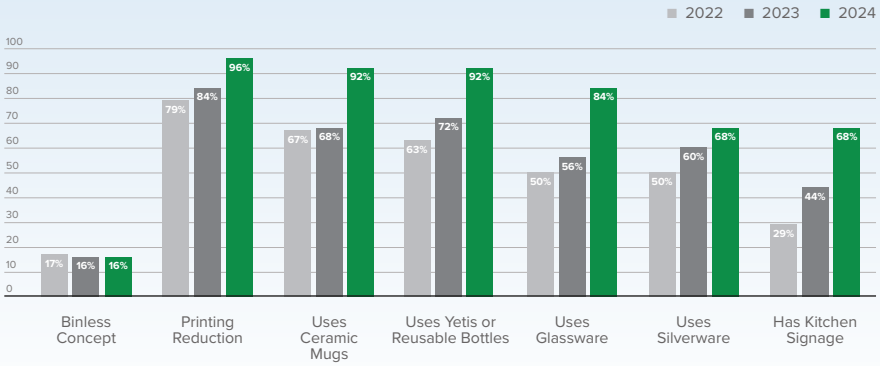
In 2024, our Mumbai office moved to a more sustainable approach using InfinityBox, a firm that offers cleaning services for silverwear, allowing Mumbai to move away from single-use plastics and ultimately reduce waste deposits in our office.

In alignment with the expansion plan for capturing IBKR's Greenhouse Gas emissions, we decided to take a phased approach across 2024 and 2025 for Scope 3. Waste and water emissions were selected for the first phase. We conducted Greenhouse Gas capture across all operating offices and worked to deliver accurate waste and water data by utilizing live data where available, communal waste data and through waste audits.

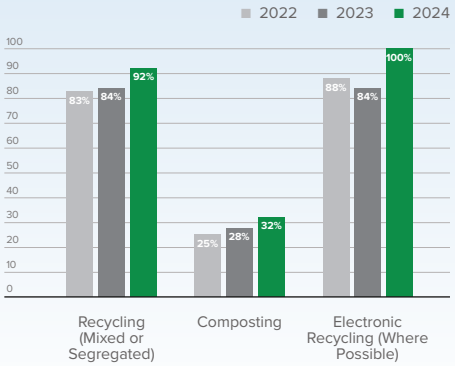
We continue to assess our waste streams and worked in 2024 to improve waste segregation and where possible add to recycling and composting initiatives. This drove an increase in the number of offices which offer recycling (either through mixed recycling or segregated cardboard/paper, plastics and metal recycling) and composting waste streams, segregated according to local guidelines. We have collaborated with our landlords to capture the end of waste treatment. For our combusted waste, we have assessed where energy recovery was possible. This energy was used to help power UK homes.

We have also assessed our global offices and assured that all offices recycle electronics where there are no data-sensitivity concerns. In 2024, IBKR offices recycled all e-waste and did not dispose of devices requiring data shredding.

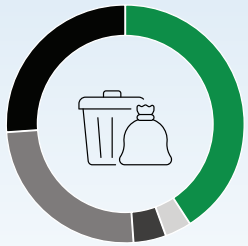
Waste Efficiency Measures



Waste Stream - Recycling & Composting



Waste Treatment Breakdown



- **40.65%** Recycling
- **3.45%** Composting
- **4.18%** Combustion with Energy Recovery
- **25.31%** Combustion without Energy Recovery
- **26.41%** Landfill

15 Binless concept: where employees do not have an under desk bin and instead bring segregated waste to AWS (Area Waste Stations) located strategically on office floors.

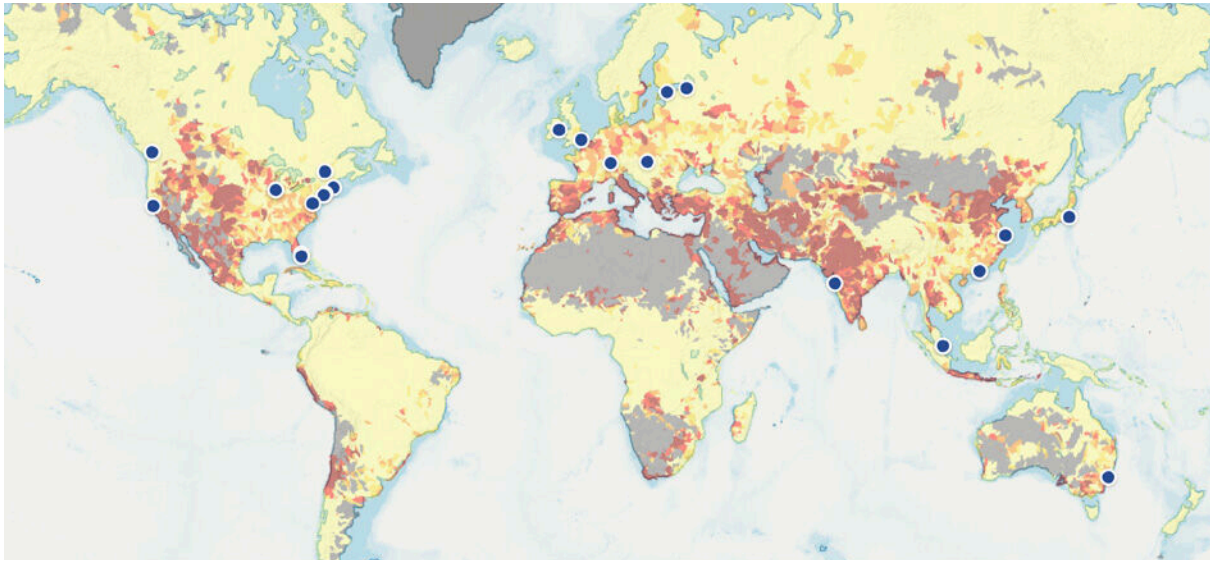
Water

Across our global offices, we are focused on identifying opportunities for water management improvement. While IBKR is not a significant water consumer we know that water is a global concern and are intent on ensuring our operations are efficient, only using what is essential to our operational needs.

For new office fit-outs, where appropriate and within our control to do so, we moved to optimize efficient water use by utilizing low flow water controls, focusing in particular on automatic faucets. Water meters allow us to be aware of water usage and detect leaks should any occur. In existing offices, we determine how water use can be reduced.

In 2024, we assessed our overall water risk[16] and performed water testing for offices where we have operational control of the office space. Our ongoing aim is to identify offices in high and extremely high water stress regions and work toward ensuring on-site water preservation is a priority.

- Water Emissions: **1.12 tCO2e**
- Water consumed: **5.57 Megaliters**
- Water use in regions with High / Extremely High Baseline Water Stress: **13.15%**



Water Stress

Low	Medium-Low	Medium-High	High	Extremely High
<10%	10-20%	20-40%	40-80%	>80%

Arid

No Data

16 IBKR has assessed water risk and water-stressed regions through the WRI Aqueduct water risk atlas tool. The tool is available at www.wri.org/applications/aqueduct/ water-risk-atlas/. Kuzma, S., M.F.P. Bierkens, S. Lakshman, T. Luo, L. Saccoccia, E. H. Sutanudjaja, and R. Van Beek. 2023. "Aqueduct 4.0: Updated decision-relevant global water risk indicators." Technical Note. Washington, DC: World Resources Institute.

Responsible Sourcing

IBKR understands we have a responsibility to source sustainably. That is why we encourage our vendors to exercise discipline in avoiding excess use of resources, and adopt best practices to prevent unnecessary environmental impact, including reuse, recycling and reduction.

In recent years, our stationery purchases have been conducted with sustainability in mind, and we have reduced single-use plastics by moving to sustainable alternatives. We prioritize the purchase of 100% recycled paper and, where available, products that are Forest Stewardship Council (FSC) certified. Where possible, we have focused on products which can either be recycled or composted.

IBKR is committed to doing our part to minimize our environmental footprint. Our primary focus for responsible sourcing in 2024 was office buildouts. Under our Environmental Framework, we are ensuring that all new offices meet our sustainability objectives.

We are committed to the protection and preservation of human rights, continue to conduct our business in a responsible and ethical manner and expect our vendors to have the same commitments. Our Vendor Code of Conduct[17] seeks compliance with applicable international and local environmental and social laws and regulations. Due to the nature of our industry, geography and services, we are not at high risk of having modern slavery in our business or supply chain.

Our Procurement Policy and vendor management system continues to improve the ways we evaluate vendors for responsible sourcing. An integrated third-party lifecycle management process handles vendor identification, risk assessment, due diligence, onboarding, contracting, performance management, governance, compliance and offboarding.

Critical vendors must have management systems and practices to prevent money laundering, insider trading, conflicts of interest and fraud. As part of the onboarding process, certain vendors are required to submit documented environmental credentials, and complete due diligence questionnaires.

Please see the Supplier Code of Conduct on our website for additional information.[18]

17 This includes regulations for environmental compliance, workplace health and safety, labor practices, and human rights.
18 https://www.interactivebrokers.com/download/Vendor-CoC-2023-01-31.pdf?v=20230228

GHG Emissions

In 2024, IBKR saw a positive reduction in our scope 1 GHG emissions. This is due to our London office moving from Natural Gas to Biogas. While there was an addition of mobile combustion to our Mumbai office, the emissions generated are minimal.

We continue to reduce our Scope 2 location-based emissions through operation efficiencies. We opt for renewable energy where possible, and purchasing match contracts and Renewable Energy Certificates.[19] These renewable options are accounted for under market-based emissions.

We commenced our Scope 3 emission capture in 2024 with assessment of Waste Generated in Operations and Upstream Leased Assets which includes our data center emissions. We will assess all other applicable Scope 3 categories in 2025.

Absolute GHG emissions	2024 tCO2e	2023 tCO2e**	2022 tCO2e Base Year
Gross tCO2e	**268.22**	**263.06**	**1858.99**
Gross Scope 1: Direct emissions (tCO2e)	121.79	170.44	212.26
Gross Scope 2: Energy indirect emissions (tCO2e) Market based*	0	92.62	1646.73
Gross Scope 3: Category 8 Upstream Leased Assets (tCO2e) Market-based*	101.58	-	-
Gross Scope 3: Category 5 Waste Generated in Operation (tCO2e)	44.86	-	-

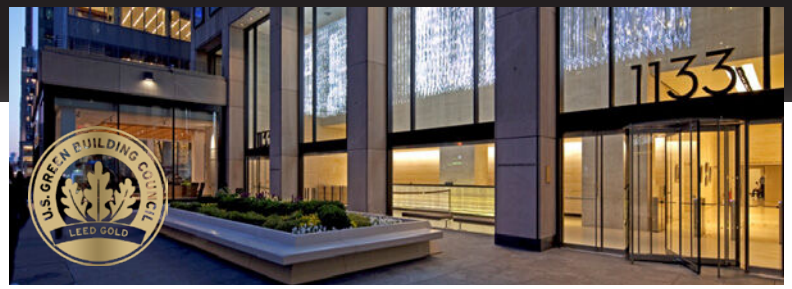
* Market based data - following the deduction of electricity generated from renewable energy at source, a match contract or REC purchase (Including: GOs, IRECS, TIGR, J-Credit and LGC)

** Post Assurance for 2023 we were notified of data inaccuracies from our landlord. This resulted in a change to our 2023 emissions.

19 RECs or local equivalent (GOs, IREC, TIGR, LGC & J-Credit).

OFFICE CASE STUDY[20]

INTERACTIVE BROKERS CORP
1133 AVENUE OF THE AMERICAS, NEW YORK



The IBKR NYC office has undergone significant growth and transformation this past year, marked by the completion of an expansion and eco-friendly renovation that nearly doubled the workspace.

With this expansion, IBKR NYC now occupies the entire 36th floor. Sustainability was a key focus throughout the project, influencing many of the design choices. Notable features include the use of energy-efficient LED lighting with motion sensors to reduce energy consumption, the installation of Optima® plant-based acoustic ceiling tiles, and Teknion desks made from FSC certified wood. In addition, a number of plants were introduced in private offices, conference rooms, entryways, and open spaces—not only enhancing aesthetics but also contributing to improved air quality.

IBKR NYC is located at 1133 Avenue of the Americas, overlooking Bryant Park. This prime location is ideal for commuters and working professionals, with many employees opting to commute sustainably through walking, cycling or use of the subway, aligning with New York City's ongoing efforts to reduce emissions. Our building is a leader in sustainability within the NYC real estate market and was among the first two buildings in the city to receive LEED Silver Certification under the LEED v4 Existing Building: Operations + Maintenance Rating System. **The building has since been awarded a higher status of LEED Gold Certification**.

IBKR continues to support a greener, more efficient workplace while contributing to New York City's broader environmental goals.

- **Sharebite** - In July 2024, we implemented Sharebite as our lunch credit service provider. Their mission is simple: for every meal purchased, they donate one to help fight food insecurity in our local community, working alongside organizations like City Harvest and Feeding America. Since launching the partnership, IBKR NYC concluded the year with **6,820 meals donated to those in need**.
- **Teknion** - Teknion is dedicated to reducing environmental impact and advancing sustainability within the manufacturing and furniture industry through education and outreach. They prioritize the use of sustainable materials, sourcing only FSC® (Forest Stewardship Council®) certified wood to ensure responsible forestry practices.

Key Sustainability Initiatives

High-efficiency ECM fan wall technology, coils, and motors, providing floor-by-floor service for improved energy efficiency.

EPA WaterSense-labeled plumbing fixtures, designed to enhance water conservation and performance.

A comprehensive tenant recycling and organics collection program, supporting composting and waste reduction.[21]

The use of eco-friendly cleaning products, equipment, and strategies, promoting a healthier indoor environment.

100% of the building's electricity is offset by renewable wind power, reinforcing our commitment to sustainability.

20 Focus on community initiatives please visit page 27.
21 For more on our recycling and composting and responsible sourcing, please visit pages 13, 15.

OUR PEOPLE, CLIENTS & COMMUNITY

IBKR is a dynamic, global organization with a workforce exceeding 2,900 employees in 25 cities in 15 countries. Our dedicated and well-educated workforce is focused on delivering efficiently for our clients and giving back to local communities through a number of charitable initiatives.

Our People & Global Workforce

Innovation is at the heart of our business, demanding a disciplined work ethic and a dedication to continuous improvement. Our organizational structure allows employees to take on complex projects early in their careers, providing a unique environment for professional growth. We continue to refine our management approach by ensuring that teams are structured efficiently to foster collaboration across departments and geographies.

In 2024, we launched the IBKR Culture Code, outlining key competencies essential for success within our organization. This initiative provides employees with a clear framework for shared objectives and expectations, ensuring alignment with our Company values. To support this effort, we introduced comprehensive training programs that define what high performance means at IBKR, equipping employees with the knowledge and skills needed to excel in their roles.

We introduced new leadership training initiatives designed to further develop and empower our managers. Leaders are encouraged to create work environments that align with their business needs while maintaining a focus on performance and operational effectiveness. Our managers maintain a continued focus on employee engagement and career development to build our workforce.

As part of our ongoing commitment to our employees, we appointed a Chief People Officer in 2024. This strategic addition to our leadership team underscores our dedication to investing in our people and ensuring that we provide the highest quality learning and HR services to support career growth, engagement, and workplace excellence. This role is instrumental in enhancing employee experience, developing robust HR strategies, and driving new learning initiatives that align with our organizational goals.

Evolving Talent Strategy

To remain agile and competitive, we are refining our workforce strategy to better align with our global business needs. We continue to improve our approach to international hiring, ensuring that we attract top talent while respecting local workplace customs and best practices. Our turnover is 11.74% which provides an opportunity to re-evaluate roles, mobilize internal talent, and introduce new skillsets and talent to IBKR.

88%

2024 Retention Rate

▲ +0.5% from 2023

Recruitment and Workforce Development

KEY HIRING AND TRAINING INITIATIVES IN 2024

- Hired 363 external full-time employees across multiple departments, reinforcing our commitment to growth.
- Hosted 48 US-based interns across 36 universities and expanded our internship program to India and Europe.
- Implemented new training workshops focused on emerging financial technology trends and client service best practices.
- Introduced updated onboarding programs to accelerate new hire integration and role readiness.

Building a Stronger Workplace Culture

Our Company culture is firmly rooted in four core principles: integrity, resilience, innovation, and operational efficiency.

Our merit-based culture ensures that employees are recognized and rewarded for their contributions, fostering an environment where performance and innovation drive career progression. We continue to encourage team engagement through social and professional networking events. We leverage Viva Engage to build communities across the Company, and highlight milestones and employee interviews in the employee-led IBKR magazine.

The Women's Resource Group continues to be an important part of our organization, offering events to increase networking across the workforce as well as access to training. We recognize our employees' different life experiences bring unique perspectives to our Company, enriching our culture and driving innovation. We have colleagues from over 80 countries, and sponsor employees from around the world to ensure we remain at the forefront of innovation.

At IBKR, we foster a strong sense of community by providing opportunities for employees to connect beyond the workplace. In 2024, we hosted summer events for employees and their families across our global locations, allowing teams to celebrate and engage with one another in a relaxed setting. Additionally, we organized a global event in New York City, bringing together employees from around the world to strengthen relationships and recognize our collective achievements.

Summer Family Event at the Intrepid Museum

Beyond company-hosted events, we encourage employees to form communities around shared interests. Many have created walking clubs, while others use our engagement platform to share their photography and travel experiences, creating a vibrant and connected workforce. By fostering these informal networks we aim to enhance collaboration, engagement, and workplace satisfaction across our global offices.

IBKR Employee Sports

As we look ahead to 2025 and beyond, our focus remains on refining our people strategies to foster innovation, enhance productivity and maintain a strong and engaged workforce.

Employee Engagement Survey

The 2024 Employee Engagement Survey at IBKR saw a strong 76% participation rate, with an overall positive engagement score. Employees expressed high confidence in the company's future and reported receiving supportive feedback from managers. We learned that our employees appreciate working in an innovative environment with challenging projects.

In response to this feedback, we have increased lunch stipends, enhanced leadership communication and expanded career development programs. These initiatives aim to reinforce employee satisfaction, career growth and workplace collaboration.

Benefits

Global Benefit Highlights

While benefits vary by region, we strive to provide comprehensive support across our global teams including:

Comprehensive Healthcare Coverage
Including medical, dental, and vision insurance. We fully cover health premiums for all North America-based employees.

Financial Security & Retirement Planning
Life, disability, and accident insurance, complemented by retirement savings support including 401(k) matching (US) and pension contributions (global locations).

Work-Life Balance Support
Generous leave policies, including maternity and paternity leave, plus stipends or reimbursement for caregiving expenses.

Daily Meal Benefits
Lunch stipends provided in all global locations.

Career Growth & Learning Opportunities
Tuition reimbursement for job-related education.

Flexible Commuting
Access to discounted or pre-tax commuter programs.

Relocation Assistance
Support for eligible employees, including moving expense coverage.

24/7 Global Well-Being Support
Access to a comprehensive Employee Assistance Program (EAP) for emotional, practical, and physical well-being.

Regional Benefit Highlights

In addition to our core benefits, we offer region-specific benefits tailored to local needs.

India
A quarterly team-bonding budget to strengthen collaboration.

Estonia
Reimbursement for vision and dental expenses, ensuring accessible healthcare.

Hungary
Subsidized gym memberships to encourage a healthy lifestyle.

Ireland & UK
A bicycle incentive program with tax benefits, promoting sustainable commuting.

Switzerland
Global accident insurance coverage for added peace of mind.

Compensation & Wellbeing

Global Total Rewards

We offer a holistic Total Rewards package with competitive compensation and benefits designed to support employee well-being and financial stability. 97% of our workforce is full-time and eligible for our benefits package.

Compensation

- Competitive base salaries for all full-time positions.
- Annual cash and stock bonuses tied to individual and company performance.
- Long-term incentive compensation offered through the IBKR Stock Incentive Plan.

Workplace Flexibility

We continue to refine our hybrid work model, balancing remote flexibility with in-office collaboration. While we value in-person engagement, we recognize the importance of flexible arrangements in supporting work-life balance.

Learning & Development

Continuous Growth Opportunities

We remain committed to providing employees with access to learning tools that support both professional and personal growth. Our focus for 2024 was on enhancing job-specific skills and fostering leadership competencies. Global mandatory training[22] is essential, both to our operations and our fulfillment of regulatory requirements. Our staff adhered to training on enterprise risk management, achieving a 100% completion rate. We launched our first in-house Anti-Bribery and Corruption training, tailored to IBKR's policies. To meet regional requirements in Europe, 100% of our staff from licensed European entities completed the European Compliance Training program, which reinforces our Code of Conduct.

Year-on-year, average training hours per employee has marginally decreased due to considerably fewer new hires in 2024 compared to prior years.

Learning Hub

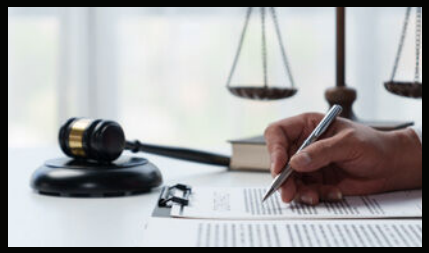
Our internal learning platform now offers over 1,000 courses, covering areas such as financial modeling, regulatory compliance and management strategies. Employees can self-enroll in courses that align with their career goals.

13.1
Average training hours

1000+
Courses available
▲ Up 11.1%

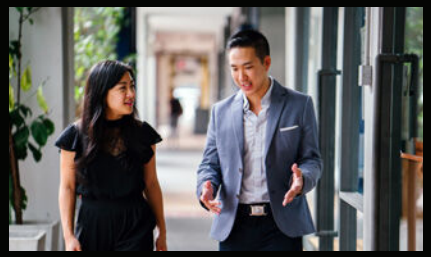
100%
Completion on key mandatory training

Updated Core Learning Programs



Regulatory Training

Enhanced quarterly training sessions covering anti-money laundering, cybersecurity, and compliance topics.



Mentorship Program

130 pairings across the globe tailored to individual career goals and objectives.

Leadership Development

Over 402 leaders participated in our updated leadership programs, with a focus on practical skills such as decision-making and team motivation.

Instructor-Led Training

Number of live training sessions increased by 38% to provide real-time learning experiences tailored to employee needs.

22 See page 44 for a list of mandatory training modules.

Trading Marketplace

IBKR Desktop

Our products and services include:

Trading Platforms: We offer advanced trading platforms that cater to the needs of both active traders and long-term investors. Trader Workstation (TWS), our flagship platform, is powerful and customizable, providing clients with access to global markets, advanced order types, real-time market data and a wide range of analytical tools. IBKR Desktop is our cutting-edge, next generation platform designed to meet the needs of modern traders with a user-friendly interface that combines the most popular tools from TWS with a growing suite of original features suggested by clients. For investors on-the-go, we offer the IBKR Mobile app, which allows clients to trade and monitor their portfolios, and IBKR GlobalTrader, a streamlined app for trading global financial instruments that allows clients to deposit funds in their local currencies. Client Portal is our one-stop, web-based platform on which clients can check quotes, place trades, fund accounts, run reports, see account balances, review P&L and key performance metrics and more. In 2024, we introduced IBKR ForecastTrader which allows clients to use exchange-listed forecast and event contracts to trade their opinions on yes-or-no questions about US political and economic data, global climate events and key futures data.

Pricing: We allow eligible clients in the U.S. to select the services and pricing methodology that best meets their needs. IBKR Pro, our core service designed for sophisticated investors, offers among the lowest-cost access to financial instruments available, from a single unified platform. IBKR Lite provides unlimited commission-free trades on U.S. exchange-listed stocks and exchange-traded funds ("ETFs"), and low-cost access to global markets without account minimums or platform fees to eligible U.S. clients.

Global Market Access: We provide access to an array of global markets, including stocks, options, futures, foreign exchange, bonds and more. Clients from more than 200 countries can trade in 28 currencies in more than 160 markets, enabling them to diversify their portfolios and capitalize on investment opportunities around the world.

Margin Lending: We offer competitive margin lending services, allowing clients to borrow against their investment portfolios to fund additional trading and investment activities. The margin lending program provides clients with flexible borrowing and attractive interest rates.

Robust Research and Analytical Tools: We provide clients with access to a wealth of research and analytical tools that can help them make informed investment decisions. Our platforms offer comprehensive market data, news feeds, advanced charting capabilities, and research reports from leading financial institutions, along with personal finance tools for retirement planning, budgeting and financial goals.

PortfolioAnalyst

Portfolio Analysis and Risk Management: Our solutions include portfolio analysis tools that enable clients to assess the risk and performance of their investment portfolios. These tools provide valuable insights into asset allocation, risk exposure and potential areas for optimization.

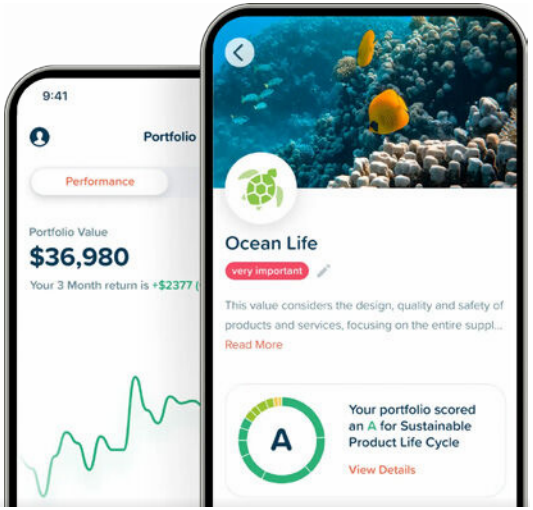
Automated Investing: We offer eligible clients automated investing solutions such as the Recurring Investment feature, Interactive Advisors and Passiv, a third-party automated portfolio tool.

Application Programming Interface (API) Solutions: We provide robust APIs that allow clients to build their own trading applications, integrate third-party platforms and access a wide range of financial data. The APIs enable clients to leverage our infrastructure and connectivity to build customized trading and investment solutions.

Prime Brokerage Services: For institutional clients, we offer prime brokerage services that provide comprehensive clearing, custody and financing solutions. These services cater to the unique needs of hedge funds, proprietary trading firms and other institutional clients.

Integration of ESG within IBKR Products & Interactive Advisors Portfolios

We believe that clients need access to timely and relevant information as part of their investment decision-making process. Historically, this information focused predominantly on financial metrics, e.g. net income and price-to-earnings ratios. More recently, the use of our ESG tools demonstrates how important ESG can be to our clients as they make investment decisions.



We addressed this need by developing our award-winning application known as "IMPACT by Interactive Brokers (IMPACT)." **IMPACT** makes it easier for clients to find and invest in companies that share their values, helping them better align their investments with the kind of world they want to create. We have also integrated ESG features and tools into our more traditional product offerings. Clients can view a rich set of ESG data through multiple lenses: **Financial**, **ESG and "impact"– using IMPACT**, the **Impact Dashboard** and **ESG Scores**.

IMPACT filters investments through 13 ESG values:

- Clean Air
- Company Transparency
- Customer Safety
- Ethical Leadership
- Fair Labor & Thriving Communities
- Gender Equality
- LGBTQ Inclusion
- Land Health
- Mindful Business Models
- Ocean Life
- Pure Water
- Racial Equality
- Sustainable Product Lifecycle

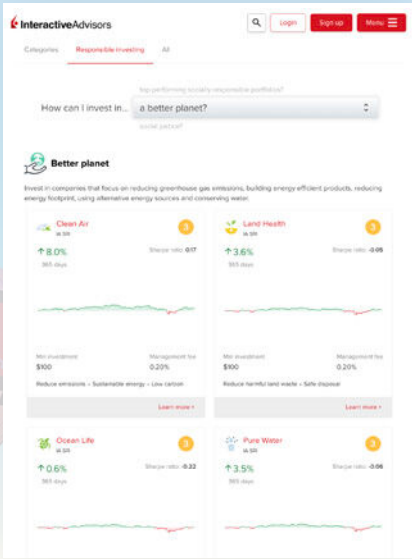
Clients can flag companies with business practices they find unacceptable, and use IMPACT to align their portfolio with one, several or all 13 values.

IMPACT also allows clients to purchase carbon credits to offset their carbon footprint. Several core IBKR products incorporate ESG ratings, including Fundamentals Explorer, PortfolioAnalyst and Model Marketplace. Clients can share their portfolio's IMPACT grade and values on social network platforms to showcase the issues they care about most.

Award Winning

BROKERCHOOSER #1 Broker for ESG Investing in 2024 by BrokerChooser

https://www.interactivebrokers.com/en/general/awards.php?p=awards-2024



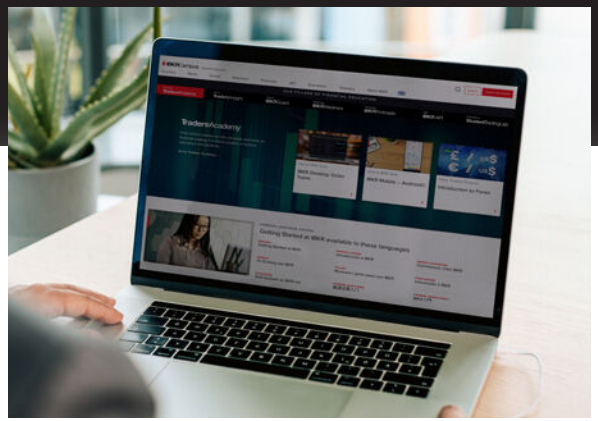
Interactive Advisors offers 17 portfolios mapped to the 13 ESG IMPACT values and to five ESG Smart Beta portfolios.

Interactive Advisors ("IA"), our robo-advisory platform, currently offers 17 portfolios mapped to the 13 ESG IMPACT values listed above, along with five ESG Smart Beta portfolios.

Additionally, IA clients who wish to avoid investing in companies that, in their view, do not share their values, can select types of business practices to avoid from several predefined sustainable investing exclusionary lists. These lists include companies involved in animal testing, business ethics controversies, corporate political spending and lobbying, energy-intensive operations, fossil fuels, greenhouse emissions, hazardous waste, high water usage, tobacco, alcohol and gambling, and weapons and gun manufacturing.

SPOTLIGHT ON:

TRADING EDUCATION DEPARTMENT



The Trading Education Department consists of 10 employees, augmented by three non-staff personnel in Dublin and two in Hong Kong, with expertise in trading and financial markets, education, digital media, web application development, content production and design. Together the team has 87 years of combined experience at IBKR, with a combined 125 years of industry experience.

IBKRCampus

Traders'Academy Traders'Insight IBKRQuant

IBKRWebinars IBKRPodcasts IBKR-API

What does the team oversee?

Our team collaboratively manages and produces content for IBKR Campus, comprised of six channels, including Traders' Insight, Podcasts, Webinars, a Quant blog, API training and Traders' Academy, each focused on enhancing our clients' knowledge of markets, trading and IBKR platforms.[23]

In addition, we collaborate with our Sales team to present key elements of the IBKR platform to institutions, ranging from account opening requirements and complex trading specifics, to custom statements and reports. We also create templates for associated media[24]. Full integration with Google Analytics allows us to monitor growth and usage over time.

Why is this department important to IBKR?

IBKR Campus is the global hub for all client and employee-facing educational resources related to markets, trading and IBKR technology. Customer service representatives in live contact with clients can quickly search for courses that cover platform-specific tools, and share links to lessons while watching and learning themselves. A growing number of courses are also available in multiple global languages. Internally, IBKR managers can assign lessons and courses that help employees become more familiar with financial services in general and the IBKR business in particular. The education team also collaborates on webinars, podcasts and market commentary with research providers and financial services firms seeking deeper contact with IBKR clients, and supports content development for other IBKR departments, such as the global learning team's training materials for new hires.

23 See the Financial Literacy section on the next page.
24 Associated media refers to media styles that include emails and banners used around our website.

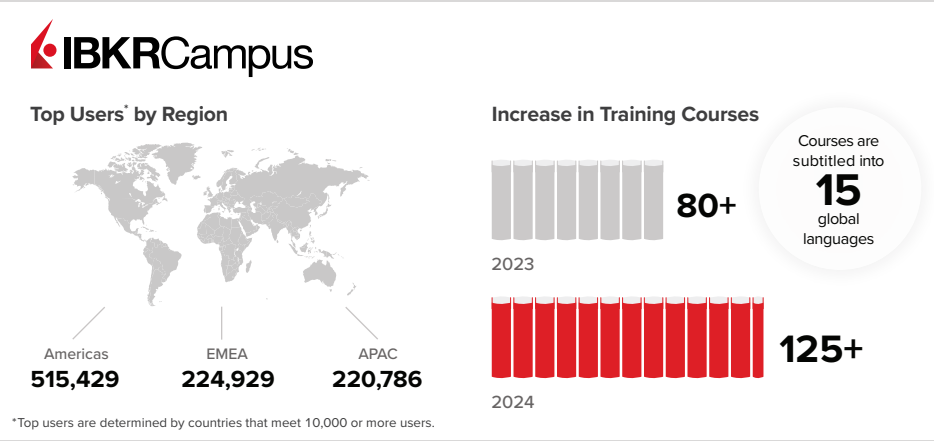
Promoting Financial Literacy

We believe our business benefits greatly when our clients learn to navigate the financial markets more confidently. As such, in 2024 we continued to expand IBKR Campus, our comprehensive free financial literacy platform, which offers courses, webinars, videos, podcasts, and blogs that cover everything from learning about investing for the first time, to sharpening advanced trading and investment skills.

IBKR's Traders' Academy: Our online learning platform is designed to educate traders of all levels, from beginner to advanced professionals. It offers a wide range of self-paced courses, interactive webinars, video tutorials, and articles covering various topics including trading strategies, technical analysis, risk management and more. In 2024, we expanded our library from 80 to more than 125 courses, 42 of which are new or updated, including 15 global language versions subtitled in Spanish, German, French, Italian, Portuguese (Brazilian), Russian, Chinese (traditional and simplified), Hungarian, and Japanese.

IBKR Webinars and Podcasts: We regularly host live, interactive webinars and podcasts presented by industry experts and seasoned traders covering a broad spectrum of trading topics. Each episode offers valuable insights, practical tips and real-world examples to help participants improve their trading skills and decision-making abilities. We also offer Spanish language podcasts, and a series that explores foundational economics and personal finance.

IBKR Video Tutorials: Our library of video tutorials offers step-by-step guidance on various aspects of trading, platform features, order types and risk management tools. These audiovisual demonstrations help clients better understand and utilize the trading tools available on our platforms.



IBKR Traders' Insight: We create market commentary for the public and provide analyses from nearly 100 industry professionals. Traders' Insight also contains content from our Chief Strategist and our Senior Economist.

Educational Articles and Insights: Our educational articles and market insights cover a wide range of topics, including market trends, trading strategies, macroeconomic analysis, and more. These resources provide in-depth analyses, practical guidance and timely market updates to help investors make well-informed trading decisions.

IBKR Quant Blog: A blog for quantitative professionals with an interest in programming, deep learning, API, AI6, Blockchain, and other transformative technologies. The IBKR Quant Blog provides quantitative and coding content for financial technology professionals and programmers. The blog's articles typically include helpful code snippets from Java, Python, Excel API, Rest, R-Development, Julia Development, and C++ programming languages.

Demos and Simulations: We provide demo accounts and simulation tools that allow clients to practice trading strategies, test new ideas, and familiarize themselves with our trading platforms without risking actual money. These tools provide a risk-free environment for traders to gain hands-on experience and build confidence before executing live trades.

Student Trading Lab: A free online resource for educators looking to blend finance and/or computer science classwork with real-world trading experiences. College professors and high school teachers from around the world use the IBKR Student Trading Lab to supplement classwork. Students can trade in almost all markets and products available to our clients. Finance instructors use the Student Trading Lab to teach students about trading and markets, and computer science instructors use our APIs to teach coding.

New Interface for API and Documentation

We developed a new API and documentation interface for Web API, TWS API, Excel, FIX, Order Types, Third-Party integrations, and more. Using the new platform, each API team member can update their own section's content and quickly deploy it live.

2024 Stats:

- Schools: **1,496**
- Professor Accounts: **2,153**
- Student Accounts: **34,722**

Research and Analysis Tools: We offer a suite of research and analysis tools that help traders access valuable market data, perform technical and fundamental analysis, and make informed trading decisions. These tools include real-time market data, advanced charting capabilities, scanning tools, news feeds and more.

Community Engagement

At IBKR we understand that a positive impact in our local communities benefits our employees and supports others who live in the cities where we operate. Around the globe, IBKR leaders and employees continue to work with their local communities to create lasting impacts.

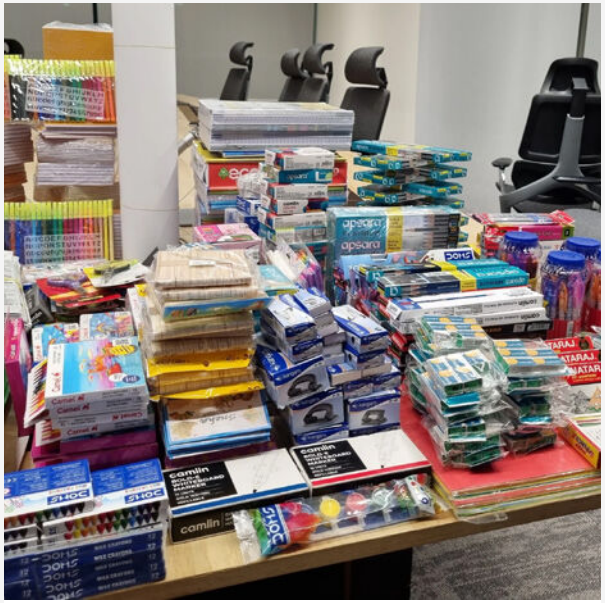
We remain committed to supporting community engagement through charitable contributions and volunteer programs. Our Workplace Giving initiative continues to match employee donations up to USD $1,000, allowing staff to support causes meaningful to them. Through our employee lunch program, we also partner with delivery services that give back to the community and support local businesses and social initiatives.

North America

- Hosted a virtual food drive around the holidays to support families in the Greenwich area.
- Partnered and donated to the Food Bank of Lower Fairfield County.
- IBKR's Chicago offices hosted a winter coat drive for the local community.

Europe

- IBKR offices hosted regional bake sales to raise money for breast cancer awareness and research.
- Employees participated in "Movember" to bring awareness to men's health issues.
- Staff in Budapest took part in a local tree planting initiative.
- Employees participated in charity runs for medical research.
- Employees donated goods across our offices to food drives and Christmas shoe box appeals for various children's charities.
- Staff helped with fundraising for various foundations.



Asia Pacific

- Our India offices planted trees for World Environment Day.
- The IBKR Mumbai office held a blood donation drive.
- Staff in Mumbai also participated in a community volunteering day which focused on giving back to society.
- Employees in Australia volunteered monthly at the Salvation Army food kitchen to serve food to those in need.
- Australia employees also participated in Bandana Day to raise funds for Canteen, an organization that supports young people impacted by cancer.

RESILIENCE & GOVERNANCE

IBKR takes great pride in our dedication and ability to withstand potential threats through a comprehensive security and protection program, and the oversight and governance of our organization globally.

Cyber & Information Security

As one of the premier global securities firms, we execute and clear millions of trades every day for clients. Maintaining mature cybersecurity practices is crucial to our business. We aim to achieve high levels of digital resilience by continually improving and monitoring our technology infrastructure.

Our Executive Vice President for Technology and our Chief Information Security Officer lead our multifaceted Information Security program, which combines the people, processes and technology needed to provide ongoing protection for the confidentiality, integrity, and availability of our systems and client data.

We align our security program to the National Institute of Standards and Technology's Cybersecurity Framework (NIST CSF). Our program is audited annually by an external auditor against the American Institute of Certified Public Accountants' Trust Services Criteria, as documented in the resulting Service Organization Control (SOC 2) report.

Our Information Security Committee meets monthly to:

- Make decisions related to cybersecurity risk.
- Provide support and oversight regarding the development, implementation and operation of our Information Security program.
- Discuss emerging threats.

The program is further aligned with our Enterprise Risk Management Framework, which enables us to effectively handle cybersecurity risks associated with daily operations and facilitate resilience against existing or potential threats.

Our Cyber/Information Security team engages external security firms to provide independent penetration testing of systems and applications, using a risk-based methodology. To further strengthen our ability to protect against real-world attacks, an internal "red team" is tasked with conducting periodic security testing of our systems throughout the year.

To complement these activities, our Internal Audit team conducts independent audits consistent with guidance from the Institute of Internal Auditors.

Security Operations and Cyber Incident Response

We utilize a variety of information sources to remain aware of current and emerging threats, including formal and informal threat intelligence sharing groups, public and proprietary bulletins and automated feeds.

We utilize a Security Operations Center that conducts cyber threat monitoring using security telemetry from data sources throughout our infrastructure. Events are analyzed for relevance and, where warranted, escalated to the Company's Cybersecurity Incident Response team.

Creating a Culture of Security

Our Information Security team has developed, and continues to enhance, a security awareness program aimed at inculcating our staff with the knowledge and skills necessary to recognize and react appropriately to cybersecurity threats, e.g., phishing. The program is composed of mandatory web-based learning modules, interactive security webinars, written communications on specific security-related topics and validation of learning through knowledge-based assessments, as well as practical exercises designed to simulate real-world threats.

We adopted a data-driven approach to cyber-security and continued building and refining relevant cyber metrics.

The Information Security program's cornerstone is a set of cybersecurity policies, procedures and technical capabilities that:

- Establish cybersecurity governance and oversight processes.
- Implement measures to protect the Company's technology and information assets, including our clients' information.
- Identify and address risks related to cybersecurity.
- Identify and address risks associated with access to client information and fund-transfer requests.
- Identify and address risks associated with vendors and other third parties.
- Detect unauthorized activity and other cyber threats and prevent or defend against cyber attacks.
- Engage the Company's workforce with appropriate training in cybersecurity and data protection best practices.
- Enable continual reassessment, and drive improvement of the firm's cybersecurity posture.

Recent Accomplishments and Advancements

In 2024, we made significant progress in strengthening our security posture, while addressing our regulatory obligations.

In particular:

- Our Cyber/Information Security team has been expanded and strengthened with the addition of new talent and new skillsets, especially in the areas of security operations, application security, vulnerability management, and "offensive" security.
- Investment in new technologies and partnerships has put us on a path to expanded cyber threat visibility and enhanced ability to counteract threats.
- We have achieved compliance with the Digital Operational Resilience Act (DORA), a newly introduced EU financial regulation. This has resulted in further maturing of our cybersecurity governance and technical capabilities.
- We adopted a data-driven approach to cybersecurity and continued building and refining relevant cyber metrics, thereby enabling executive management to measure the program's maturity, gauge its alignment to security objectives, and exercise accountability.

Data Protection

We have implemented security controls to protect personal data. We use a layered approach to safeguarding our clients' personal data, including the use of secure data centers, data encryption at rest and in transit, network segmentation, identity and access management, system endpoint protection, and anti-malware controls, among other measures.

These measures include access controls (at infrastructure, OS, database, and application levels), audit trails, authentication measures, penetration testing, vulnerability scanning, regular patching, and 24x7 security monitoring.

Data Privacy

We are committed to data privacy, and we understand its importance in protecting personal data. We have a global privacy program designed to protect the privacy and security of personal data in place and have implemented policies and procedures that detail our privacy practices across our businesses.

These include the Privacy Policy and Cookie Policy on our website, enhancing customer transparency which are reviewed and updated as required. We have appointed Data Protection Officers (DPO) for various jurisdictions, as required by law, who have oversight of our global privacy program which includes the following policies: Personal Data Protection Policy, Personal Data Breach Policy and Procedure, Data Subject Access Request Handling Procedure, Data Subject Rights Procedure, and Data Protection Impact Assessment Policy. We have a robust data privacy governance structure established, whereby DPO reports, and privacy updates are provided at Board level for review and oversight. Additionally, annual mandatory data privacy training for all staff serves to raise awareness of our data privacy obligations. Internal Audit helps validate compliance with said obligations.

Auditing & Assurance

Our Internal Audit department provides independent, objective assurance and consulting services designed to add value and improve operations. Their mission is to enhance and protect organizational value by providing risk-based and objective assurance, advice, and insight.

The Internal Audit department helps the organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes. The department's governing principles adhere to the mandatory elements of The Institute of Internal Auditors' International Professional Practices Framework, including the Core Principles for the Professional Practice of Internal Auditing, the Code of Ethics, the International Standards for the Professional Practice of Internal Auditing, and the Definition of Internal Auditing.

Physical Security & Safety at IBKR

At IBKR, safeguarding our people, assets, and operations is a fundamental component of our commitment to sustainability.

We recognize that a secure workplace fosters employee well-being, operational resilience and business continuity. Our **Physical Security and Safety Program**, managed by the Corporate Security Department, is designed to ensure a proactive, consistent and globally aligned approach to workplace safety.

Comprehensive Security Infrastructure

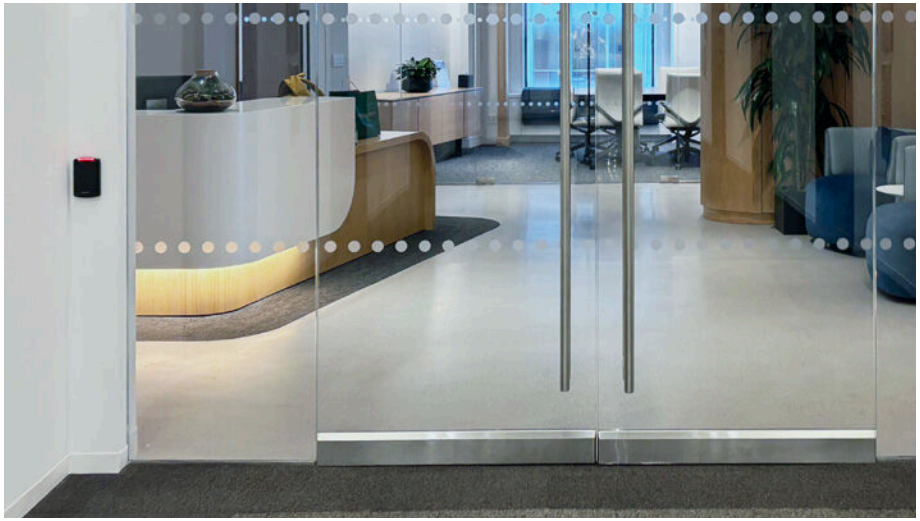
We utilize a layered physical security framework that includes:

- **Access ID Badges:** All personnel are issued secure access ID badges with role-based permissions. Badges must be visibly worn at all times while on-site to maintain secure and accountable access to our facilities.
- **CCTV Surveillance:** Our global locations are equipped with 24/7 video surveillance systems to deter unauthorized activity and enhance situational awareness.
- **Visitor Management:** Stringent visitor protocols ensure all guests are registered, verified, and accompanied in restricted areas.

Training and Awareness

We deliver regular physical security and safety training to all employees, including:

- Security awareness and best practices
- Workplace violence prevention
- Emergency response protocols



ID badge scanner in the NY office

Specialized training and scenario-based drills are conducted for security teams and site leadership to reinforce readiness and response capabilities.

Threat Assessment and Response

Our structured **Threat Assessment and Escalation Procedures** enable swift evaluation of security concerns and coordination of protective measures in partnership with key stakeholders.

Emergency and Disaster Preparedness

Our **Emergency Response Guidelines** are customized for site-specific risks, such as earthquakes, extreme weather events, and other natural disasters. Each site has a tailored **Site Safety Plan** outlining evacuation route and emergency contact protocols. Regular drills are conducted to reinforce preparedness.

Global Travel Safety Support

Through our **travel risk management program**, employees have 24/7 access to support for medical emergencies, security incidents, and travel-related inquiries. This ensures business continuity while prioritizing employee safety and peace of mind. By continuing to strengthen our physical security posture and fostering a culture of safety and preparedness, we contribute to our broader sustainability goals—protecting our people, minimizing risk, and enabling responsible, resilient operations across the globe.

Navex EthicsPoint Hotline flyer posted in IBKR kitchens

Ethics and Integrity at Interactive Brokers

IBKR's Code of Business Conduct and Ethics holds all employees, executives, and directors accountable for preserving the integrity, ethics, and reputation of IBKR. Our employees are required to report any potential or actual violations of the code, company policies, and laws and regulations.

We offer a "whistleblower" channel, the **Navex EthicsPoint Hotline**, through which employees, directors, vendors, and shareholders can report violation on a secure and anonymous basis. We distribute these reports to authorized personnel who are responsible for review, including the Chair of our Audit Committee, our lead independent director. We conduct confidential investigations and implement corrective measures as necessary. We do not tolerate retaliation against employees or others who report concerns in good faith. A copy of our Code of Business Conduct and Ethics appears on our website.

Enterprise Risk Management (ERM)

We maintain conservative and robust market risk management policies. Our Market Risk Management Committee (which includes our CEO, CFO, COO, and other senior executives and market risk experts) continuously monitors and evaluates our risk management policies, including the implementation of policies and procedures to enhance the detection and prevention of potential events to mitigate margin losses.

We also have a designated Enterprise Risk group headed by our Chief Risk Officer and overseen by the Enterprise Risk Committee. We manage the financial and operational risk inherent in our business and limit potential exposure to incidents by maintaining a robust and comprehensive control environment, and stress testing risk exposures to maintain adequate financial buffers. This includes comprehensive stress testing of capital and liquid assets using both systemic (market) and idiosyncratic stress events.

Consistent with industry best practices, we utilize a “Three Lines of Defense” model to embed accountability and ownership for risks and controls at all levels throughout the Company. Through this model, risk ownership is aligned with first-line business functions and is subject to independent oversight and challenge from our ERM and Internal Audit teams in the second and third lines of defense, respectively. Our ERM team provides independent oversight of Interactive Brokers’ risk profile, quarterly reports to the Enterprise Risk Committee comprising leaders from across the Company, and more frequently to business leaders in the first line of defense.

We have implemented a robust industry standard Enterprise Risk Management Framework (ERMF). The ERMF identifies, assesses, and monitors capital, market, liquidity, credit, operational (including resiliency, legal, vendor, and outsourcing), technology, and cyber security risks to confirm that risk exposures remain within our risk appetite. The ERM team conducts a comprehensive risk assessment annually for groups within our critical business activities and undertakes targeted risk assessments of selected areas on an ad hoc basis. The team monitors a suite of key risk indicators on an ongoing basis to identify and mitigate outsized risk exposures.

We have designed our control environment to keep our services resilient during periods of extreme financial market volatility and/or during and after operational events that may cause significant business disruptions. These controls are periodically assessed for design appropriateness and operating effectiveness by both our ERM and Internal Audit functions. In addition, an Independent Service Auditor annually examines our brokerage operations system and the suitability of the design and operational effectiveness of the related controls; this is reported in the Service Organization Control (SOC 1) report.

ERM Lines of Defense

Conservative and Prudent Risk Management

Business Continuity and Disaster Recovery

Operational Resilience

Enterprise Risk Management (ERM) – Continued

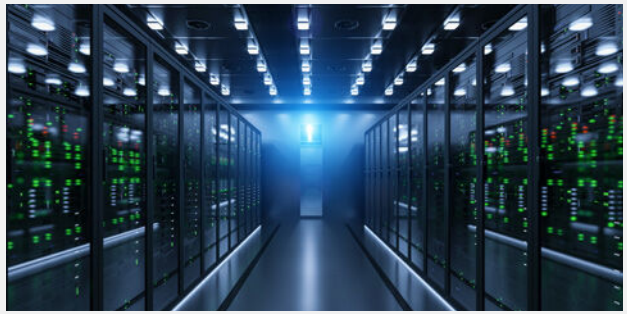
Conservative and Prudent Risk Management

We invest client cash in short-term government securities that mature in a few months:

- As assets mature, we continuously roll them forward into freshly issued securities.
- As interest rate sensitivity is low, the realized loss would be minimal if the assets ever needed to be sold. We are required to mark all investments to market and report their value to regulators and investors so that any issues are immediately recognized. In contrast, the risk management policies of banks do not require them to immediately recognize losses on their held-to-maturity investments and they can invest in longer-term assets to maximize their current profits. Our prudent risk management allows us to pay higher rates on deposits and charge the lowest rates on margin loans because we are always invested in the current short-term benchmark rate.
- Client and house funds are diversified across a wider portfolio of mainly investment grade globally systemic banks without an outsized exposure to any one single counterpart. This is supported by an internally created counterparty credit risk tool, the Early Warning System, which tracks daily changes in credit risk indicators from equity, credit and options markets, along with other technical and sentiment scores, enabling independent monitoring and assessment of banking counterparts.

Business Continuity and Disaster Recovery

We have a robust Business Continuity and Disaster Recovery Plan (BCDR) in place to facilitate stable operations during and after adverse events. The plan includes redundant systems, data backups, and alternate trading venues to mitigate the impact of potential disruptions. Regular testing and simulation exercises help validate the effectiveness of our plans and identify areas for improvement. Business Impact Analyses are conducted to document threats and vulnerabilities, the output of which provides key inputs into the BCDR Plan. Furthermore, the Business Continuity and Disaster Recovery Plan is reviewed and updated on an annual basis to ensure its relevancy and effectiveness.



Operational Resilience

We place the highest priority on the performance and stability of the platform and services we provide to our clients. We recognize that on occasion, and with limited or no forewarning, the availability of our platform and services may be impacted by incidents within or beyond our control. To minimize the risk of such an incident causing disruption to our clients, our counterparts, and the markets, we have built and implemented an Operational Resilience Framework that allows an efficient and structured response and recovery from such an incident.

We utilize the Operational Resilience Framework to manage our operational resiliency. This framework is comprised of governance, the firm's operating model, business activity criticality, planning, and testing. It requires the coordination of multiple programs to drive the timely and accurate identification and categorization of events to support effective response and recovery. It includes Business Continuity, Disaster Recovery, Technology & Cyber Risk Management, Operational Risk Management, Third-Party Risk Management, Incident and Crisis Management and Cyber Security.

We have put the Operational Resilience Framework into practice by building an operating model, identifying critical and important business services and activities, mapping our critical assets, establishing maximum downtimes for critical business activities, and putting in place measures to facilitate their efficient and timely recovery. Moreover, a Vendor Management Program has been developed and vendor risk assessments conducted to address the risk derived from the services that we receive from our third-party service providers.

Our operational resilience strategy is to implement and operate a control environment that minimizes the risk of disruptions and prioritize the recovery of critical business activities should a significant business disruption occur. This strategy is intended to align to the laws, rules and regulations provided by local regulators in the jurisdictions where we operate.

While this sustainability report identifies what we have already accomplished, we look forward to demonstrating continued progress in our next report.

TCFD[25] Disclosure (Task Force on Climate-Related Financial Disclosures)

Governance

Sustainability: In 2024, we enhanced our sustainability strategy:

1. Leadership
2. Environment
3. Our People, Clients and Communities
4. Resilience and Governance

The Board receives regular updates on our sustainability program and reviews annual reporting for completeness and accuracy through direct updates to our Chief Executive Officer, Mr. Milan Galik, and our Nominating and Corporate Governance Committee.

Nominating and Corporate Governance Committee: Makes recommendations to our Board concerning the structure and membership of the Board's other committees; monitors and reviews any issues regarding the independence of directors or potential conflicts of interest; and evaluates any change of status or circumstance with respect to a director and the propriety of the director's continued service in light of that change.

Our Nominating and Corporate Governance Committee are responsible for many key areas including reviewing corporate governance matters and overseeing and advising management on sustainability, environmental, and social matters.

Audit Committee: Has direct responsibility for the appointment, termination, compensation and oversight of the Company's independent registered public accounting firm retained to audit our financial statements. The Committee oversees the Company's risk policies and processes relating to the financial statements and financial reporting processes as well as the guidelines, policies and processes for mitigating those risks.

For further information, please see our Audit Committee Charter.[26]

Steering Committee: Our Chairman, named executive officers, and select members of senior management comprise what we refer to as the Steering Committee. The committee governs the management of the Interactive Brokers Group of companies and its subsidiaries. The Steering Committee handles day-to-day and strategic management issues and is led by our CEO. IBKR management is responsible for managing risk and bringing to the Board's attention any material risks to the Company. Our risk management policies are developed and implemented by our Steering Committee and comprised of senior executives of our various operating subsidiaries.

Enterprise Risk Committee: The Chief Risk Officer ("CRO") briefs the Enterprise Risk Committee on the overall risk profile of the Company, highlights key and emerging risks, risks beyond appetite, and new projects, strategies or events that may be of interest, including new regulation. The risk report includes the qualitative and quantitative measures of risk against approved thresholds, and highlights any indicators of outsized risk exposures, and any planned remedial strategies. The report also provides updates on key risk or regulatory related projects. The committee members have the

25 In late 2023, the Financial Stability Board announced that the work of the TCFD has been completed, with the ISSB Standard marking the culmination of work of the TCFD. IFRS Standards S1 and S2 fully incorporate the recommendations of TCFD, and our disclosures are aligned with these standards to meet the reporting recommendations of TCFD.

26 Download the Audit Committee Charter here: https://www.interactivebrokers.com/download/IBG_Audit_CommitteeCharter.pdf

authority to request further information on ongoing action plans. Additionally, local Chief Risk Officers may provide similar briefings to relevant committees. Management's oversight is augmented through the Company's Enterprise Risk Management Framework, which includes risk and control assessments.

Strategy

Through our robust procedures for enterprise risk management, detailed in the section below, we have identified two transitional climate-related risks that align with our overall risk management framework. These include legal/policy-related risks and reputational related risks. Our 10-K outlines specific key risks considered by the Company.

1. Legal/Policy-Related Climate Risks: IBKR is subject to risks relating to litigation and potential securities laws liability. We are exposed to these risks due to heightened regulatory and legislative requirements and changes in the U.S. and globally that have increased our compliance, regulatory and other risks and costs. This includes the EU Corporate Sustainability Reporting Directive (CSRD) and the California Senate Bill SB 253 & SB 261. Failure to comply may result in fines and penalties. We believe these risks are present over the short and medium-term (1-5 years) due to current regulatory developments in the US and Europe. Our strategy for managing these risks is to continue collaborating with key departments to deliver on these rules. There have been significant changes in regulatory requirements with some regulations in the process of changing. IBKR continues to monitor the developments of these rules and will enhance our reporting to ensure alignment and compliance with the regulation and to do so in a cost-effective manner. Due to these changes in regulatory requirements we acknowledge that regulatory and legal uncertainties could harm our business.

Other risks include the possibility that our future efforts to sell shares or raise additional capital may be delayed or prohibited by regulations. We may incur additional tax expense or become subject to additional tax liabilities. An adverse resolution of any future lawsuits or claims against us could result in a negative perception of the Company and have a material adverse effect on our business, financial condition and results of operations. This includes potential lawsuits related to the labeling and marketing of certain products and features aligned with social impact, environmental responsibility, or other sustainability claims. We believe these risks are present over the short and medium-term (1-5 years) due to current legal developments in the US and Europe and recent lawsuits related to "greenwashing". Our strategy for managing these risks is to partner with relevant departments to monitor these developments closely and include robust documentation and evidence for all public claims to limit our risk exposure.

2. Reputational Risks: Damage to our reputation could harm our business. Maintaining our reputation is critical to attracting and maintaining customers, investors, and employees. If we fail to address, or appear to fail to address, issues that may give rise to reputational risk, we could significantly harm our business. These issues may include inadequate actions to align our business with global climate developments, as well as insufficient or inaccurate disclosures regarding our performance on climate-related risks. Other non climate specific areas include appropriately dealing with potential conflicts of interest, legal and regulatory requirements, ethical issues, money laundering, cybersecurity and data privacy, record-keeping, sales and trading practices, and employee misconduct.

Adverse developments could impair our reputation and materially adversely affect our business, financial condition and results of operations. We believe these risks are present over the medium and long term (5-10 years) due to current sentiments on corporate climate action both domestically and internationally. Our strategy to manage these risks is to continue advancing our environmental stewardship pillar through ongoing reporting and working to manage our climate footprint aligned with stakeholder sentiments, which we monitor through regular engagement. This includes employees, customers, and investors.

Due to our operating model and limited capital expenditures in the form of property, plant, and equipment, we have not identified any material physical climate-related risks to our operating model. Through our current risk management procedures, we have not formally identified any locations that would result in a material impact from weather-related events exacerbated by climate change. We continue to monitor weather-related impacts annually to determine if our assessment of materiality requires amendment.

As we continue to enhance our risk management procedures, we intend to phase in more rigorous assessment of climate-related risks that include assessment of physical climate risks over various time horizons and scenarios to validate or refine our determination of physical climate risks. We also intend to assess additional transitional risks through our ERM procedures to improve our risk management practices. While physical climate risks have not been determined to be material at this time, we do have robust strategies and procedures to mitigate risks during weather-related events.

Federal regulators and industry self-regulatory organizations have passed a series of rules in the past several years requiring regulated firms to maintain business continuity plans that describe what actions firms would take in the event of a disaster (such as a fire, natural disaster or climate-related event) that might significantly disrupt operations.

IBKR has developed business continuity plans that describe steps that we and our employees would take in the event of various scenarios. We have built backup capabilities for key operations performed at our regional offices in North America, Europe and Asia that would be utilized in the event of a significant outage at our main data center or primary office locations.

Since 2020, we have strengthened our technical infrastructure and have built redundancy of systems so that most operations can be handled from multiple offices or remotely. Enhancements to infrastructure and our remote access capabilities enable our employees, including all with critical job functions, to work remotely.

Risk Management

The Enterprise Risk Management team maintains a Key & Emerging Risk Register, including a section on Environmental risks. This is updated annually and provided to the Group Enterprise Risk Committee for review.

In addition, completed on an annual basis the Risk & Control Self-Assessment ("RCSA") is a Company-wide program to identify, measure, and control operational risks through assessment of the risks inherent in the operating model and the effect of the control environment in mitigating these risks to within acceptable levels (driven by the Risk Appetite Framework). This tool is one of a series which the Company uses to build an aggregated view of operational risk across the Company and provides:

- Insight into our operational risk profile, the control environment and the factors that may stress it.
- A way to prioritize investment in the operating model as the business evolves and grows.
- A defensible framework to justify capital ratios and risk management disclosures.

The RCSA forms a key part of the Operational Risk Management Framework in IBKR and its affiliates. To ensure consistency and completeness, the RCSA leverages the Group Process Inventory, Risk Taxonomy and Control Library for all IBKR entities. Additionally, a standard scoring methodology is in place to structure risk and control assessment.

The ESG risks are included in the Company's risk register, updated regularly. IBKR maintains business continuity planning process and regularly performs legal reviews of upcoming or draft legislation on climate related topics.

As mentioned in our strategy section, we are working to enhance our assessment of climate-related risks and opportunities through our ERM procedures. This includes a more analytical assessment of potential physical risks through climate scenario analysis as well as a more holistic review of transitional risks through the assessment of key market developments. We plan to share the details of these risk assessment procedures and our findings in future reporting.

Metrics and Targets

At IBKR, Greenhouse Gas capture is a vital aspect of our sustainability strategy. In 2024, we expanded data capture to include select Scope 3 emissions. We continued our focus on reduction of Scope 1 and 2 emissions through renewable energy, efficiency measures and, where possible, collaboration with our landlord, moving away from natural gas and opting for a more environmentally friendly option. We are also considering other climate related metrics that can help us mitigate relevant climate risks and realize climate-related opportunities.

IBKR commenced capturing Scope 3 data in 2024, assessing Category 5: Waste Generated in Operation and Category 8: Upstream Leased Assets. In 2025 we commenced capturing all other relevant Scope 3 categories.

These Scope 1, 2 and 3 emissions are verified by a third-party auditor to ensure accountability and accuracy. Through our Environmental Framework, we also assess our facilities. In continuing with the objectives outlined in our Environmental Strategy, where possible we work to implement additional eco-friendly factors across our offices to improve our environmental footprint and demonstrate that we value responsible action across our operations.

European Union (EU) Regulation:

In the EU, we have seen the advancement of regulations that may impact our entities in the applicable regions. As part of our assessments, we determined eligibility under the original CSRD requirements.

Under TCFD, and aligning our EU requirements for climate risk assessment, IBKR considers physical and transitional risks relating to our operations and value chain. Relying on existing risk management processes we have assessed climate impacts, risks and opportunities to our EU entities along with potential material matters under double materiality assessment.[27]

As part of our DMA, we consider the financial and impact materiality, considering the risks associated with the potential material matters and assessing the actual or potential, positive or negative impact to the Company or society. For financial risks we consider the magnitude and likelihood of the risk or opportunity and for impact risks or opportunity we determine the scale, scope and irremediability.

27 Aligning to CSRD for European Union located entities. We are awaiting decisions in the EU on the Omnibus proposals.

Compliance Management

Our Compliance department supports and helps us operate our business in a manner designed to comply with applicable regulatory requirements.

The Global Chief Regulatory Officer (GCRO) is the senior executive responsible for the department, which includes General Compliance and Anti-Money Laundering (AML), as well as Chief Compliance Officers (CCO) for each of our electronic brokerage subsidiaries. Each CCO reports to the Chief Executive Officer (CEO) or their subsidiary's business head, in addition to the GCRO (or regional Compliance head).

We have documented policies that identify and assess money laundering, terrorist financing, sanctions risk, and predicate crimes, such as securities fraud, insider trading, market manipulation, terrorist financing, and sanctions violations based on each regulated subsidiary's local regulations and procedures.

Monitoring Systems

The philosophy of the Compliance Department, and the Company as a whole, is to build automated systems that minimize manual steps in the compliance process and then augment these systems with experienced employees who apply their judgment where needed.

We maintain automated systems that handle wide ranging compliance issues such as trade and audit trail reporting, enforcement of short sale rules, enforcement of margin rules and pattern day trading restrictions, review of employee correspondence, archiving of required records, execution quality and order routing reports, approval and documentation of new client accounts, surveillance of client trading for market manipulation or abuse or violations of exchange rules, and AML and anti-fraud

surveillance in line with our AML policies. Our automated operations and compliance systems provide our Compliance Department with substantial efficiencies. As part of this ongoing effort, we have implemented a robust case management and surveillance system and increased our Compliance staffing over the past several years to meet the growing regulatory demands faced by industry participants.

Regulatory Compliance

Our securities and derivatives businesses are extensively regulated by U.S. federal and state regulators, foreign regulatory agencies, and numerous exchanges and self-regulatory organizations of which our subsidiaries are members. Our approach to regulatory requirements has been to build many regulatory and compliance functions into our integrated order routing, custodial, client onboarding, and transaction processing systems, and augment these systems with experienced employees.

Anti-Money Laundering

We are fully committed to combating money laundering and other financial crimes, upholding the highest standards of integrity, and providing a safe and secure financial ecosystem. To achieve these goals, we maintain robust AML and enhanced due diligence programs that serve as pillars of our risk management framework. Our AML program is designed to detect, prevent and report any suspicious activities that may be indicative of money laundering, terrorist financing, or other illicit financial activities. We have implemented stringent policies, procedures and controls that align with global regulatory requirements, industry best practices and evolving AML frameworks.

In line with regulatory requirements under the USA Patriot Act, EU AML Directive, and other rules, we have established a comprehensive AML program that includes the following:

- AML and client identification.
- Designated AML compliance officers for our electronic brokerage subsidiaries.
- Formal AML training for our AML, client-facing, and other relevant employees.
- Regular independent audits of our AML program.
- **AML Surveillance and Screening:**
  - We screen using a mix of automated and manual reviews structured to comply with regulations in various jurisdictions.
  - We have designed and implemented restrictions to prevent certain types of high-risk activity, including potentially manipulative patterns of trading and higher-risk patterns of money movement.
  - We collect required information through our new account opening process, and screen accounts against databases for the purposes of identity verification and for review of potential negative information and appearance.
  - We generate and review a sophisticated suite of surveillance reports and queues to identify potential money laundering, market manipulation or abuse, fraud, and other suspicious activities.

Client Protection

We take a proactive approach to client protection. Our technology drives computations that determine the amount of cash and securities owed to clients daily and segregates funds for the exclusive benefit of clients, along with a conservative buffer, where permitted. We were one of the first broker-dealers approved by FINRA to calculate our client reserve obligation daily (under Rule 15c3-3), while the industry standard is to do so on a weekly or monthly basis.

Anti-Bribery and Corruption

IBKR's policy prohibits all forms of bribery. We are committed to strict compliance with the U.S. Foreign Corrupt Practices Act and applicable anti-corruption laws in other jurisdictions where IBKR conducts business. Our Anti-Bribery and Corruption Policy prohibits employees, officers, directors, and agents from offering, promising, giving, requesting, soliciting, agreeing to accept, or accepting a bribe in connection with IBKR's business in either the public or private sector.

Sanctions

IBKR is committed to complying with sanctions issued by the U.S. Treasury Office of Foreign Assets Control as well as the United Nations, EU, UK and other applicable sanction measures. The Sanctions Policy establishes Company-wide requirements for managing sanctions compliance risk by identifying and preventing activities prohibited by relevant sanctions requirements. We screen all customers, users on client accounts and their transactions against relevant government sanction lists, including the Office of Foreign Assets and Control, Specially Designated Nationals and Blocked Persons lists, the United Nations, EU, UK and other non-U.S. sanction lists.

Anti-Fraud, Antitrust and Anti-Competitive Behavior

All employees, officers, and directors must comply with applicable antitrust and similar laws that regulate competition in the countries in which we operate. We have zero tolerance for fraud, and expect all employees to conduct themselves accordingly.

APPENDIX

GHG Metrics

Metrics[1]	Group			North America			EMEA[8]			APAC		
	FY 2024	FY 2023[2]	FY 2022[3]	FY 2024	FY 2023	FY 2022	FY 2024	FY 2023	FY 2022	FY 2024	FY 2023	FY 2022
Total tCO2e (location-based)	**2,830.59**	2,893.62	3,019.77	1,300.45	1,405.81	1,389.61	390.51	430.19	486.63	1,139.62	1,057.62	1,143.53
Total tCO2e (market-based)	**268.22**	263.06	1,858.99	56.57	23.89	386.47	105.69	165.77	350.76	105.96	73.39	1,121.75
Scope 1 & 2 Emissions												
Scope 1 & 2 emissions (location-based)	**2,684.16**	2,893.62	3,019.77	1,269.08	1,405.81	1,389.61	381.23	430.19	486.63	1,033.84	1,057.62	1,143.53
Scope 1 & 2 emissions (market-based)	**121.79**	263.06	1,858.99	25.19	23.89	386.47	96.41	165.77	350.76	0.19	73.39	1,121.75
Percentage of Change Scope 1 & 2												
Renewable Percentage of Emissions Per Year	**95.46%**	90.91%	38.44%									
Market Based % of Positive Change since Base Year	**93.45%**	85.85%										
Gross Scope 1: Direct Emissions (tCO2e)												
Stationary Energy - Natural Gas	117.27	167.45	209.04	20.88	17.24	18.02	96.39	149.74	190.43	0.001	0.48	0.31
Stationary Energy - Biogas (N2O and CH4 only)	0.02	0	0	0	0	0	0.02	0	0	0	0	0
Stationary Energy - Diesel (Generator use)	4.35	2.99	3.22	4.31	2.82	2.87	0	0	0	0.04	0.18	0.64
Stationary Energy - CNG (Vehicle)	0.06									0.06		
Stationary Energy - Petrol (Vehicle)	0.09									0.09		
Gross Scope 2: Energy Indirect Emissions (tCO2e)												
Scope 2 emissions (location-based)	2,562.36	2,723.18	2,807.50	1,243.89	1,385.76	1,368.72	284.82	280.46	296.20	1,033.66	1,056.96	1,142.58
Scope 2 emissions (market-based)[4]	0	92.62	1,646.73	0	3.84	365.58	0	16.04	160.33	0	72.74	1,120.81
Gross Scope 3: Other Indirect Emissions (tCO2e)[5]												
Total Scope 3 emissions (market-based)	**146.43**			31.37			9.28			105.78		
Category 5: Waste Generated in Operations	44.86			31.37			9.28			4.20		
Category 8: Upstream Leased Assets (market-based)	101.58			0			0			101.58		
Consumption Scope 1 & 2 (MWH)												
Total Consumption	**7,464.48**	**8,126.43**	**8,542.04**	**4,211.33**	**4,464.69**	**4,527.90**	**1,728.24**	**2,063.45**	**2,417.58**	**1,524.92**	**1,598.30**	**1,596.57**
Total Energy Consumption	**7,463.80**	**8,126.43**	**8,542.04**	**4,211.33**	**4,464.69**	**4,527.90**	**1,728.24**	**2,063.45**	**2,417.58**	**1,524.23**	**1,598.30**	**1,596.57**
Total Electricity	**6,691.86**	**7,194.96**	**7,382.39**	**4,079.09**	**4,358.44**	**4,417.13**	**1,088.68**	**1,241.54**	**1,372.88**	**1,524.08**	**1,594.97**	**1,592.37**
Renewable Energy Purchased through REC / Match Contract	6,347.82	6,443.53	3,929.43	4,079.09	4,160.57	3,313.00	744.64	794.32	584.78	1,524.08	1,488.65	31.65
Green Electricity Supply	344.04	391.65	347.70	0	0	0	344.04	391.65	347.70	0	0	0
Non - Renewable Energy	0	359.77	3,105.26	0	197.88	1,104.13	0	55.57	440.41	0	106.32	1560.72
Total Stationary Combustion	**772.63**	**931.48**	**1,159.65**	**132.23**	**106.24**	**110.76**	**639.56**	**821.91**	**1,044.69**	**0.84**	**3.32**	**4.20**
Stationary Energy - Natural Gas	644.99	919.65	1,145.83	115.21	95.12	99.44	529.78	821.91	1,044.69	0.01	2.62	1.69
Stationary Energy - Biogas	109.78	0	0	0	0	0	109.78	0	0	0	0	0
Stationary Energy - Diesel	17.17	11.82	13.83	17.03	11.12	11.32	0	0	0	0.15	0.70	2.50
Stationary Energy - CNG	0.31	0	0	0	0	0	0	0	0	0.31	0	0
Stationary Energy - Petrol	0.38	0	0	0	0	0	0	0	0	0.38	0	0

GHG Metrics

Metrics		Group	North America	EMEA	APAC
Waste Consumption (tCO2e)		**FY 2024**	**FY 2024**	**FY 2024**	**FY 2024**
Total Waste Generated		**43.73**	31.21	9.19	3.33
Waste to Landfilled		25.37	15.22	7.34	2.8
Waste Incinerated		14.1	13.66	0.44	0
Waste Recycled		4.11	2.22	1.4	0.5
Waste Composted		0.15	0.11	0.01	0.03
Non-Hazardous Waste Generated		43.73	31.21	9.19	3.33
Hazardous Waste Generated		0	0	0	0
Waste Treatment (Metric Tons)	**Waste Treatment Method Percentage**	**FY 2024**	**FY 2024**	**FY 2024**	**FY 2024**
Total Hazardous Waste		**0**	**0**	**0**	**0**
Total Non-Hazardous Waste		**167.81**	**83.49**	**66.61**	**17.71**
Waste to Landfilled	26.41%	44.32	23.81	14.78	5.74
Waste Combusted with Energy Recovery	4.18%	7.01	0	7.01	0
Waste Combusted without Energy Recovery	25.31%	42.48	28.82	13.66	0
Waste Recycled	40.65%	68.21	29.97	30.01	8.23
Waste Composted	3.45%	5.79	0.89	1.16	3.74
Water Use - Operations					
Total Water tCO2e		**1.12**			
Water Consumed & Withdrawn (Megaliters)		5.57			
Total % of water use in regions with High/Extremely High baseline water stress[6]		13.15%			
Revenue					
Net Revenues		5.2 Billion			
Energy Intensity Measurements - tCO2e Metrics					
Total tCO2e (location-based) / Net Revenue[7]		0.00000057			
Total tCO2e (market-based) / Net Revenue[7]		0.00000005			
Energy Consumption MWH					
Total Scope 2 (Indirect) MWH / Net Revenue[7]		0.00000134			
Total Scope 1 (Direct) MWH / Net Revenue[7]		0.00000015			
Waste Production Tons					
Total waste production in Tons / Net Revenues[7]		0.00000003			
Total hazardous waste production in Tons / Net Revenues[7]		0			
Water Withdrawal M³					
Total water withdrawal in Cubic Meters / Net Revenue[7]		0.00000111			

1. All metrics are calculated to 2 decimal places and are rounded to the nearest number.
2. Following independent verification for the year 2023, we were informed by our landlords that KWHs were incorrectly shared. We have revised our data on this basis.
3. Base Year Scope 1 & 2.
4. All Scope 2 emissions derive from Direct Purchase Renewable Energy or Purchased Renewable Energy Certificates / Match Contracts.
5. Category 1, 2, 4, 6 & 7 were not captured in 2024.
6. Locations of which IB has operational control of office space.
7. For the purpose of these calculations IB Net Revenues are represented in Billions.
8. EMEA: Europe, the Middle East and Africa

People Metrics

Metrics[1]	Group		North America		EMEA		APAC	
Employees by Gender	**FY 2024**	**FY2023**	**FY 2024**	**FY2023**	**FY 2024**	**FY2023**	**FY 2024**	**FY2023**
Total Male	**2,121**	**2,081**	**1,096**	**1,074**	**484**	**478**	**541**	**529**
<30 Years	559	564	261	254	77	82	221	228
30-39 Years	674	682	259	261	193	201	222	220
40-49 Years	518	487	288	290	154	139	76	58
50-59 Years	265	254	198	188	49	47	18	19
>59 Years	105	94	90	81	11	9	4	4
Total Female	**877**	**851**	**316**	**314**	**241**	**230**	**320**	**307**
<30 Years	262	283	65	69	52	54	145	160
30-39 Years	333	303	92	92	99	97	142	114
40-49 Years	173	164	94	89	57	52	22	23
50-59 Years	84	79	45	46	30	24	9	9
>59 Years	25	22	20	18	3	3	2	1
Full or Part Time[2]								
Full Time Male	2,096	2,063	1,086	1,067	475	471	535	525
Full Time Female	815	811	308	313	187	191	320	307
Part Time Male	9	7	5	4	2	2	2	1
Part Time Female	8	8	1	1	7	7	0	0
Permanent or Temporary								
Permanent Male	2,096	2,063	1,086	1,067	475	471	535	525
Permanent Female	815	811	308	313	187	191	320	307
Temporary Male	8	1	4	0	2	0	2	1
Temporary Female	4	0	4	0	0	0	0	0

Metrics	Group		North America		EMEA		APAC	
Health & Safety Accidents	**FY 2024**	**FY2023**	**FY 2024**	**FY2023**	**FY 2024**	**FY2023**	**FY 2024**	**FY2023**
Accidents / Incidents	1	3	0	3	0	0	1	0

Metrics	Group
Percentage of:	**FY 2024**
Employee Satisfaction as Reported by the Company	81.37%

1. All metrics are calculated to 2 decimal places and are rounded to the nearest number.
2. Employee categories such as contractors, zero hour workers, and temps are not included in these figures but are included in our total reported employees.

People Metrics

(2 of 2)

Metrics	Group			North America			EMEA			APAC		
Employee Turnover Data	**FY 2024**		**FY2023**	**FY 2024**		**FY2023**	**FY 2024**		**FY2023**	**FY 2024**		**FY2023**
Annual Turnover Rate	**11.74%**		**12.32%**									
Hires & Leavers												
Total Hires	**363**		**505**	**131**		**228**	**82**		**114**	**150**		**163**
Total Leavers	**344**		**373**	**125**		**146**	**83**		**76**	**136**		**151**
Age	**FY 2024**	**FY 2024%**	**FY2023**	**FY 2024**	**FY 2024%**	**FY2023**	**FY 2024**	**FY 2024%**	**FY2023**	**FY 2024**	**FY 2024%**	**FY2023**
<30 Years	226	62%	298	76	58%	118	36	44%	60	114	76%	120
30-39 Years	84	23%	116	29	22%	50	25	30%	28	30	20%	38
40-49 Years	35	10%	63	15	11%	39	15	18%	20	5	3%	4
50-59 Years	17	5%	25	11	8%	18	6	7%	6	0	0%	1
>59 Years	1	0%	3	0	0%	3	0	0%	0	1	1%	0
Gender												
Female	124	34%	151	31	24%	55	33	40%	44	60	40%	52
Male	239	66%	354	100	76%	173	49	60%	70	90	60%	111
Leavers												
Age												
<30 Years	153	44%	163	50	40%	49	22	27%	18	81	60%	96
30-39 Years	104	30%	124	23	18%	43	38	46%	32	43	32%	49
40-49 Years	49	14%	50	25	20%	27	17	20%	18	7	5%	5
50-59 Years	26	8%	30	15	12%	23	6	7%	6	5	4%	1
>59 Years	12	3%	6	12	10%	4	0	0%	2	0	0%	0
Gender												
Female	121	35%	119	37	30%	31	33	40%	27	51	38%	61
Male	223	65%	254	88	70%	115	50	60%	49	85	63%	90
Voluntary	283	82%	325	98	78%	117	56	67%	65	129	95%	143
Involuntary	58	17%	48	26	21%	29	26	31%	11	6	4%	8
Deceased	3	1%	0	1	1%	0	1	1%	0	1	1%	0

Metrics	Group			North America			EMEA			APAC		
Training Average Training Hours	**FY 2024**	**FY2023**	**FY 2022**	**FY 2024**	**FY2023**	**FY 2022**	**FY 2024**	**FY2023**	**FY 2022**	**FY 2024**	**FY2023**	**FY 2022**
Female	13.7	15.41	15.76	11.64	13.85	12.98	15.22	16.83	16.42	14.64	15.94	17.9
Male	12.5	13.45	12.36	11.18	12.42	11.42	13.03	13.48	11.68	14.56	15.51	14.9
All Staff	13.1	14.02	13.36	11.28	12.75	11.77	13.73	14.57	13.2	14.59	15.66	16
Mandatory Training Completion Rates												
Anti-Money Laundering & Terrorism	100%	100%	99.6%	100%	100%	99.5%	100%	100%	99.7%	100%	100%	99.9%
Information & Cyber Security	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Data Protection	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Communication	100%	100%	99.9%	100%	100%	99.9%	100%	100%	99.9%	100%	100%	100%
Training and Development Expenditure												
Average per Full time Employee	$179.46	$197.00	$166.95									

Appendix A – Governance Table

Information Required	Location or Reference	Page Number or Information
Leadership and Governance Disclosure Topics		
Audit Committee Structure	Proxy Statement	Pages 7-8: Audit Committee
Auditor Change	Proxy Statement	Page 35: Item 2: Ratification of Appointment of Independent Registered Public Accounting Firm
Auditor Fees	Proxy Statement	Page 35: Fees Paid to Independent Registered Public Accounting Firm
Board Diversity	Proxy Statement	Page 31-34: Board Diversity
Board Experience	Proxy Statement	Page 31-33: Nominees for Election to our Board
Board Independence	Proxy Statement	Page 7: Director Independence
Board Tenure	Proxy Statement	Page 7: Board Leadership Structure
CEO Pay	Proxy Statement	Page 18: Summary Compensation Table
Conflict of interest policies or description of how the board ensures that conflicts are prevented or mitigated	Proxy Statement	Page 30: Review, Approval or Ratification of Transactions with Related Persons
Director Appointment & Removal	Proxy Statement	Page 31: Item 1: Election of Directors
Director Stock Ownership	Proxy Statement	Page 25
LTI Performance Metrics	Proxy Statement	Page 24: Financial Performance Measures
Ownership Structure	10K	Page 3 of 10K
Pay for Performance Proxy Materials	Proxy Statement	Page 12: Compensation Discussion and Analysis Page 12: Setting Executive Compensation Page 13: Elements of Compensation Page 22: Pay versus Performance
Pay Magnitude Proxy Materials	Proxy Statement	Page 12: Compensation Discussion and Analysis Page 21: Pay Ratio Disclosure
Proportionality - One Share/One Vote	10K	Exhibit 4.1.
Related Party Transactions	Proxy Statement	Page 30: Review, Approval or Ratification of Transactions with Related Persons
Risk Oversight Proxy Materials	Proxy Statement	Page 7: The Board's Role in Risk Oversight
Say on Pay Proxy Materials	Proxy Statement	Page 12: Compensation Discussion and Analysis Page 12: Setting Executive Compensation Page 13: Elements of Compensation
STI Performance Metrics	Proxy Statement	Page 22: Pay versus Performance Page 12: Compensation Discussion and Analysis Page 13: Elements of Compensation
Total compensation ratio of highest paid individual to the median annual compensation of all employees	Proxy Statement	Page 21: The median of the annual total compensation of all employees of our Company (other than our Chief Executive Officer and President) was approximately $106,000; The annual total compensation of our Chief Executive Officer and President was $17,333,150 (as disclosed in the Summary Compensation Table herein); Based on this information, the ratio of the annual total compensation of our Chief Executive Officer and President to the median employee was 164 to 1.
Voting Structures	Proxy Statement	Page 2

Proxy Statement and 10K: https://investors.interactivebrokers.com/en/general/about/annual-report-and-proxy.php

Appendix B – SASB

Information Required	Disclosure Number	Disclosure Metric	Location or Reference
Investment Banking & Brokerage			
Employee Diversity & Inclusion	FIN-IB-330a.1	Percentage of (1) gender and (2) diversity group representation for (a) executive management, (b) non-executive management, (c) professionals, and (d) all other employees	IBKR 2024 Sustainability report, "People Metrics". Page 43.
Incorporation of Environmental, Social & Governance Factors in Investment Banking & Brokerage Activities	FIN-IB-410a.1	Revenue from (1) underwriting, (2) advisory and (3) securitisation transactions incorporating integration of environmental, social and governance (ESG) factors, by industry	Not applicable to IBKR's business model, except for what is described on Pages 8 and 9.
	FIN-IB-410a.2	(1) Number and (2) total value of investments and loans incorporating integration of environmental, social and governance (ESG) factors, by industry	IBKR does not provide loans and investments other than margin loans. Not applicable to IBKR's business model.
	FIN-IB-410a.3	Description of approach to incorporation of environmental, social and governance (ESG) factors in investment banking and brokerage activities	Interactive Brokers is not a bank, investment or asset management organization except for what is described on Page 24. IBKR is an electronic platform that does not sell products or advise clients. ESG is integrated in our platform as described in IBKR 2023 Sustainability Report "ESG Integration in our products", Page 24.
Business Ethics	FIN-IB-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations	IBKR did not have monetary losses as a result of material legal proceedings.
	FIN-IB-510a.2	Description of whistleblower policies and procedures	IBKR 2024 Sustainability Report "Ethics and Integrity at Interactive Brokers", Page 32.
Professional Integrity	FIN-IB-510b.1	(1) Number and (2) percentage of licensed employees and identified decision-makers with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	Zero employees with investigations or complaints initiated in 2024. IBKR is an electronic platform that does not sell products, advise clients, or provide clients with human financial advisors. As such, complaints against individuals are very rare.
	FIN-IB-510b.2	Number of mediation and arbitration cases associated with professional integrity, including duty of care, by party	IBKR has one material incident associated with professional integrity as disclosed in our 10-K.
	FIN-IB-510b.3	Total amount of monetary losses as a result of legal proceedings associated with professional integrity, including duty of care	During 2024, the Company was subject to legal proceedings arising out of our business operations, including lawsuits and arbitrations, as well as other actions and claims. Material proceedings for the Company are disclosed in our 2024 10-K Annual Report.
	FIN-IB-510b.4	Description of approach to ensuring professional integrity, including duty of care	IBKR 2024 Sustainability Report "Ethics and Integrity at Interactive Brokers", Page 32.
Systemic Risk Management	FIN-IB-550a.1	Global Systemically Important Bank (G-SIB) score, by category	Not applicable to IBKR's business model.
	FIN-IB-550a.2	Description of approach to integrate results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	IBKR 2024 Sustainability report, "Enterprise Risk Management". Page 33.
Employee Incentives & Risk Taking	FIN-IB-550b.1	Percentage of total remuneration that is variable for Material Risk Takers (MRTs)	Not applicable to IBKR's business model.
	FIN-IB-550b.2	Percentage of variable remuneration of Material Risk Takers (MRTs) to which malus or clawback provisions were applied	Not applicable to IBKR's business model.
	FIN-IB-550b.3	Discussion of policies around supervision, control, and validation of traders' pricing of Level 3 assets and liabilities	Not applicable to IBKR's business model. IBKR does not have material level 3 assets and liabilities.
Consumer Finance Standards			
Customer Privacy	FN-CF-220a.1	Number of account holders whose information is used for secondary purposes	Refer to Interactive Brokers Group Privacy Policy found on our website.
	FN-CF-220a.2	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	IBKR did not have monetary losses as a result of material legal proceedings.
Data Privacy & Security	FN-CF-230a.1	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards.	IBKR 2024 Sustainability report, "Cyber & Information Security". Page 29.

Appendix C – GHG Verification

RAMBOLL

VERIFICATION STATEMENT

Client	**Interactive Brokers Group**
Date	**May 20, 2025**
Reporting Period	**1st January 2024 to 31st December 2024**
Assurance Team	**Brooke Dillon, Alice Roberts, Kylie McKinley, Ramboll**

Introduction

This Verification Statement has been prepared for Interactive Brokers Group (IBG) by Ramboll Americas Engineering Solutions, Inc. This verification:

1. Was performed in accordance with the specification and guidance defined in ISO 14064-3:2019.
2. Provides a limited level of assurance about whether the Scope 1, 2, and 3 greenhouse gas (GHG) assertions for FY24 is free from material misstatement.

Applicable Criteria

The criteria for this Limited Assurance assessment is based on the principles of Completeness, Transparency, Accuracy, Consistency and Relevance and the following criteria:

- World Resources Institute (WRI)/World Business Council for Sustainable Development (WBCSD) Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard.

Scope

The GHG assertion relates to the following against which verification testing was conducted:

Categories:

- Scope 1 – Direct GHG emissions from on-site fuel combustion of natural gas and diesel.
- Scope 2 – GHG emissions from purchased and consumed electricity and steam.
- Scope 3 – Category 5 Waste Generated in Operations
- Scope 3 – Category 8 Upstream Leased Assets

Time periods:

- FY24 – 1st January 2024 to 31st December 2024

Responsibilities

The management of IBG is responsible for all institutional, managerial, and technical arrangements made for the collection of data, preparation of the GHG assertion, and implementation of steps to manage the quality of the GHG assertion.

It is Ramboll's responsibility to express an independent GHG verification opinion on the GHG assertion in accordance with our contract with IBG.

Methodology

The following work was performed by the verification team as a risk-based sampling exercise in order to test the GHG information and associated GHG assertion:

- Reviewed the reporting organization, roles and responsibilities, tools used and information flow in order to assess the correct understanding and application of criteria.
- Compared a sample of reported data and primary evidence.
- Performed an arithmetic verification of calculations.

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- Reviewed emission factors used within the calculations.
- Reviewed renewable energy contracts (RECs).
- Conducted an analytical review, analysing changes between the previous year's data and the current year data.
- Reviewed the internal controls which have been implemented to ensure the reliability of reported data.
- The verification team also reviewed the methodology and documentation's alignment with the WRI/WBCSD GHG Protocol.

Materiality

A materiality level of 5% was applied.

Intended Users

The intended users of this verification statement are the Management of IBG and its stakeholders.

Statement of Independence and Competence

Ramboll is a leading sustainability consultancy, operating in more than 35 countries and providing services including engineering; quality, environmental, social, and ethical consultancy, auditing, and training; and environmental, social and sustainability report assurance. The Ramboll team affirms our independence from IBG, being free from bias and conflicts of interest with the organization, its subsidiaries, and stakeholders. The assurance team was assembled based on their knowledge, experience, and qualifications for this assignment, including experience in inventory verification and assurance of environmental data.

Conclusion and Recommendations

Based upon the process and procedures conducted and the evidence obtained, there is no evidence that the scope 1, 2 and partial scope 3 GHG assertion for FY24 as summarised in Table 1:

- is not materially correct or a fair representation of GHG data and information; and
- has not been prepared in accordance with the requirements defined by the WRI/WBCSD GHG Protocol as agreed.

Kylie McKinley
Lead Verifier

On behalf of:
Ramboll
1999 Broadway
Denver, Colorado
U.S.

Table 1: Summary of IBG's FY2024 Scope 1, 2 and 3 GHG Assertion

Category	FY24
Scope 1 (MTCO2e)	121.79
Scope 2 Location-based (MTCO2e)	2,562.36
Scope 2 Market-based (MTCO2e)	0
Scope 3 Category 5 Waste Generated in Operations (MTCO2e)	44.86
Scope 3 Category 8 Upstream Leased Assets (MTCO2e)	101.58

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