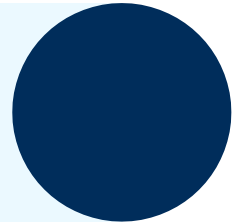


Tradeweb Third Party Risk Management Fact Sheet



Third Party Risk Management Strategy & Approach

As a global leader in electronic marketplaces, Tradeweb recognizes that strong, well-managed third-party vendor relationships are essential to maintaining its reputation as a trusted and innovative financial technology provider. Tradeweb has established a Procurement and Third-Party Risk Management (TPRM) program to engage with high-quality, strategic vendors that support business objectives, operational resilience, and regulatory obligations. Given the inherent risks associated with third-party engagements, Tradeweb takes a proactive and strategic approach to risk management—driving innovation, operational efficiency, and regulatory compliance while safeguarding security and resilience.

The Procurement and TPRM program is designed to identify, assess, and mitigate risks while simultaneously enabling growth and efficiency. Balancing traditional risk management methods with forward-looking innovation, the firm effectively navigates the evolving third-party risk landscape. The program includes pre-engagement risk assessments, contractual safeguards, ongoing periodic evaluations, and continuous monitoring to support vendors alignment with stringent security and operational standards. By leveraging cross-risk and threat intelligence data, Tradeweb maintains a holistic view of third-party risks, ensuring vendor partnerships remain both compliant and value-driven.

Tradeweb operates in a highly regulated environment, and our procurement and TPRM strategies and framework are guided by enterprise policies, industry best practices, and regulatory standards set forth by leading regulatory and industry bodies. Tradeweb's Procurement and Third-Party Risk Framework consists of the following components:

- Sourcing and Selection
- Vendor Risk Management
- Contract Management
- Onboarding
- Monitoring
- Renewal, Termination, or Off-boarding

Figure 1: Tradeweb's Procurement and Third-Party Risk Management Life Cycle



Governance

Tradeweb is committed to maintaining and overseeing a Procurement and Third-Party Risk governance framework that provides support and oversight to the Company's approach to Third-Party Risk Management (TPRM). The Procurement and TPRM teams work collaboratively to maintain a centralized and uniform approach to TPRM across the organization.

Senior-level oversight is provided through a dedicated Risk Committee, chaired by the Chief Risk Officer (CRO), with participation from senior leaders across Business and Corporate functions. This Committee is responsible for governing the third-party risk framework, reviewing the Company's risk profile, approving risk appetite, and evaluating material policy changes to strengthen the firm's approach to TPRM.

This structured governance model enhances vendor oversight, risk management, and regulatory alignment while facilitating efficient decision-making, risk mitigation, and vendor accountability across the organization.

Sourcing and Selection

Tradeweb employs a structured and strategic approach to vendor sourcing and selection, ensuring that engagements align with business objectives, risk management standards, and regulatory requirements. The process prioritizes value, risk mitigation, and long-term vendor partnerships, with Procurement playing a central role in oversight and coordination.

Procurement is engaged in the sourcing process for spend to maximize value, enhance efficiency, and support due diligence. For high-value procurements, a competitive bid process may be required to promote fairness, transparency, and cost-effectiveness. Procurement partners with the Business to assess vendor capabilities, evaluating factors such as performance history, compliance, risk exposure, pricing, and service delivery timelines. Vendor selections are approved through a governance process that supports alignment with Tradeweb's Procurement and TPRM framework.

To uphold integrity and ethical procurement practices, Tradeweb strictly prohibits personnel from using Company resources or affiliations for personal benefit in vendor engagements, reinforcing a transparent and compliance-driven procurement ecosystem.

Third Party Risk Management

Tradeweb applies a standardized and disciplined Third-Party Risk Management (TPRM) process to identify, assess, and mitigate risks throughout the TPRM Lifecycle. This structured approach promotes regulatory, operational, and security standards while supporting business objectives and reducing risk exposure.

Prior to contract negotiations, prospective third-party engagements undergo a standardized pre-engagement assessment conducted by Tradeweb's Third Party Risk and Cyber Risk teams. These assessments evaluate resiliency, financial, compliance, information security, cybersecurity, data privacy, and physical security risks to inform decision-making and establish necessary mitigation strategies.

Beyond the initial assessment, Tradeweb applies a standardized framework for continuous risk monitoring and periodic reassessments to proactively manage third-party risk. A risk-based approach determines the frequency and scope of these activities, ensuring high-risk engagements receive enhanced scrutiny while maintaining efficiency in vendor oversight.

Contract Management

Tradeweb employs a structured contract management process to support risk mitigation, regulatory compliance, and operational alignment throughout the vendor engagement lifecycle. This process governs the development, review, approval, execution, and management of vendor contracts to support business objectives and contractual obligations.

Vendor contracts undergo detailed validation to confirm they meet business requirements and include key provisions. The Vendor Relationship Owner and/or Procurement reviews financial terms, while Legal reviews for adherence to Tradeweb's legal standards, clearly defining rights, obligations, and measurable service-level agreements (SLAs) where applicable.

Contract execution requires approval from senior stakeholders across the Business and Corporate functions, ensuring alignment with Tradeweb's governance framework. Contracts must be executed by authorized signatories and undergo final review by Legal. Tradeweb maintains a centralized contract repository to enable efficient tracking, compliance, and governance.

Onboarding

At Tradeweb, we understand the importance of a well-defined vendor onboarding process in ensuring the security of our systems and facilities, internal control compliance, and proper payment processing. Tradeweb's vendor onboarding process establishes clear requirements and documentation standards to confirm vendors are fully vetted before engagement. Vendors requiring system or facility access undergo security risk assessments, including information security reviews, access controls, and physical security authorizations, to safeguard Tradeweb's infrastructure and data.

Prior to payment for products or services, vendors must be onboarded into Tradeweb's accounts payable system. The Vendor Relationship Owner or Procurement works with Accounts Payable to establish the necessary vendor record and confirm that the required documentation for purchase order issuance and payment is provided. Additionally, Tradeweb conducts a complete review of new vendors to prevent duplication of services and verify compliance with security, operational, and regulatory requirements across vendor engagements.

Monitoring

Monitoring is a critical component of the third-party management process, ensuring that engagements continue to meet performance, compliance, and risk management expectations. Tradeweb maintains a vendor monitoring process to assess vendor performance, contractual compliance, and evolving risk exposure throughout the engagement lifecycle. The Vendor Relationship Owner conducts ongoing performance evaluations to confirm vendors meet contractual obligations and continue to provide value in terms of risk management, cost-effectiveness, and service delivery.

Ahead of any contract renewals, Vendor Relationship Owners conduct a reassessment to determine whether the vendor remains a viable and strategic partner. Additionally, any material changes, performance concerns, or compliance issues are escalated to relevant teams, including but not limited to Procurement, Third Party Risk, Cyber Risk and Legal for corrective action or potential termination.

In addition, Tradeweb's TPRM team conducts ongoing monitoring of vendors, continuously evaluating emerging risks and notifying relevant stakeholders, including the Vendor Relationship Owner, of any negative developments that could impact Tradeweb.

Renewal, Termination and Offboarding

Tradeweb follows a consistent approach to vendor renewals, termination, and offboarding, ensuring contractual compliance, risk mitigation, and secure transitions at the end of an engagement. Contract renewals undergo a risk-based due diligence review, with the Vendor Relationship Owner consulting relevant internal teams such as Procurement, Legal, Third Party Risk and Cyber Risk to assess continued alignment with business needs and risk thresholds.

For terminations, Tradeweb implements a coordinated offboarding process to support secure disengagement. This includes removing vendor system and facility access, recovering or destroying Tradeweb data in accordance with contractual obligations, and deactivating vendors in the accounts payable system after a defined period of inactivity.

Procurement and Third-Party Risk Program Reviews

Tradeweb's Procurement and TPRM Program policy and procedures are formally reviewed and updated by the appropriate Policy Owners and Approvers annually at a minimum and when necessary, to incorporate any changes in laws, regulations or the Firm's business operations, personnel and organization. Tradeweb's Global Procurement and Vendor Management Policy is reviewed and approved by the Global Head of Risk, Procurement and the Enterprise Risk Committee on an annual basis.

Independent Reviews and Internal Audit

Tradeweb maintains strong internal controls, including Policy Documents that are regularly reviewed. We monitor changing laws, rules, regulations and guidelines in countries in which we operate to make sure our global Procurement and TPRM program is aligned with industry standards and best practices.

Tradeweb has an Internal Audit team that performs on-going internal reviews of the Company's controls. The Internal Audit team provides independent assurance that the procurement and TPRM control processes are operating effectively. Tradeweb undergoes annual SOC1 and SOC2 audit reviews performed by a third-party firm. In addition to these SOC1/SOC2 audit reviews, Tradeweb is also required to remain in compliance with the regulatory bodies in the jurisdictions in which it operates.