

**TRADEWEB EUROPE LIMITED
MIFIDPRU DISCLOSURE
YEAR ENDED 31 DECEMBER 2024**

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Introduction

Tradeweb Europe Limited (‘the **Company**’) is authorised and regulated by the Financial Conduct Authority (‘**FCA**’) since 2000 and has firm reference number 193705. The Company has been authorised to operate a Multilateral Trading Facility (‘**MTF**’) pursuant to the Markets in Financial Instruments Directive (‘**MIFID**’) by the FCA in the United Kingdom (‘**UK**’). Since 3 January 2018 the Company has also been authorised to operate an Organised Trading Facility (‘**OTF**’) and Approved Publication Arrangement (‘**APA**’). The Company’s immediate parent company is TWEL Holding LLC, which is a limited liability company formed in the USA wholly-owned by Tradeweb Markets LLC (‘**Tradeweb**’). Within the meaning of the Companies Act 2006 London Stock Exchange Group plc is regarded as the Company’s ultimate parent company and controlling party.

This document sets out the Investment Firm Prudential Regime public disclosure as set out in MIFIDPRU 8 of the FCA’s handbook. Disclosure is made on an individual basis as at 31 December 2024. Unless there is a major change to the Company’s business model or a merger has taken place, this document is updated and published on Company’s website on an annual basis.

The Company is permitted to apply proportionality to provide a level of detail in its qualitative disclosure that is appropriate to its size and internal organization and activities. Information disclosed in this document has not been audited by the Company’s external auditors and cannot be relied upon in making any decisions on the Company unless at your own risk.

Risk management objectives and policies

The Company has assessed material risks to its business as part of its Internal Capital Adequacy and Risk Assessment Process (‘**ICARA**’) and has set out appropriate actions to manage them. In particular, the Company has identified all material risks through scenario analysis and has assessed whether or not it would be appropriate to hold capital against those risks and / or whether or not to implement alternative risk mitigation. The ICARA is owned by the Company’s board of directors and is updated annually or when there is a material change to the business, whichever is earlier. The ICARA forms a key part of the formal risk assessment and monitoring process and the Company’s risk management processes are considered to be adequate given the nature and complexity of the business in compliance with SYSC.

The Company has implemented a ‘three lines of defence’ model for the risk management:

1. The first line of defence comprises the business leaders, including product management and technology management, operational risk management and information security teams. Each of these individuals is responsible for proactively identifying risks related to their business lines and implementing procedures to mitigate them.
2. The second line of defence includes the Company’s functional teams such as enterprise risk management team and regulatory compliance, as well as the governance committees described above. The second line of defence ensures the efficiency of the Company’s risk management, works to keep the Company within the Board of Directors’ (‘**Board**’) risk appetite, and monitors compliance with applicable regulatory requirements.
3. Tradeweb’s Internal Audit department serves as its third line of defence. The Chief Audit Executive reports to Audit and Risk Committee of Tradeweb. Internal Audit provides risk-based and objective assurance, advice and insight. Internal Audit’s Charter and Plan are approved by the Audit and Risk

Committee. Additionally, Internal Audit reports relevant scope and results to senior management and internal governance committees within Tradeweb.

Management’s philosophy influences the way the Company is managed, including the Company’s risk appetite and the types of business risk accepted. In addition to the board and risk committee meetings, the firm’s management meet on a regular basis and discuss key controls and performance measurements.

The Company’s board of directors has agreed that its risk appetite should align with the Tradeweb’s enterprise risk appetite, which is defined by Tradeweb’s Senior Management through the RiskCo. Generally, Tradeweb has an overall conservative approach to risk appetite. The Company acts in accordance with this risk appetite statement to achieve strategic objectives and remain a pre-eminent trading application provider.

Governance arrangements

The firm is required - under SYSC Rule 4.1.1 - to have robust governance arrangements, including a clear organisational structure, effective risk identification, management, monitoring and reporting processes, and international control mechanisms.

The Board comprises of executive and non-executive directors and is ultimately responsible for the Company’s overall risk appetite and management, and for maintaining an appropriate internal control framework, responsibility for risk management is delegated to the ARCC, which in turn is supported by RiskCo, chaired by the Head of International Compliance. Directors are appointed from within the Company or wider group, having regard to their individual and combined knowledge, diversity, skills and experience to effectively direct and oversee the Company.

The Company maintains high ethical standards in conducting company affairs and in its relationships with customers, suppliers, employees, advisors and the community; it expects a high level of integrity from its employees and the persons who represent the Company. The Company has various policies, including diversity statement, in place to promote employee integrity and adherence to ethical values and management expects all employees to maintain high moral and ethical standards.

The Company is required to disclose the number of directorships (executive and non-executive) held by each member of the Board as of December 2024.

Director	Role	Number of directorships
Enrico Bruni	Managing Director	2
James Dale	Managing Director	2
Douglas Friedman	General Counsel	1
Anita Staussi	International Finance Director	1
Scott Zucker	Chief Risk Officer	1

Own funds

The Company is required under MIFIDPRU to disclose compositions and deductions of own funds and its reconciliation to capital in the balance sheet in the audited financial statements ('AFS'). Information below is extracted from the audited financial statements for the year ended 31 December 2024.

The Company's own funds consist of fully paid-up capital, retained earnings and other reserves.

Composition of regulatory own funds			
	Item	Amount (GBP thousands)	Source based on reference numbers/letters of the balance sheet in the audited financial statements
1	OWN FUNDS	70,092	
2	TIER 1 CAPITAL	70,092	
3	COMMON EQUITY TIER 1 CAPITAL	70,092	
4	Fully paid up capital instruments	6,000	Note 18 of AFS
5	Share premium	-	
6	Retained earnings	33,037	Balance sheet of AFS
7	Accumulated other comprehensive income	38,626	Balance sheet of AFS
8	Other reserves	(48)	Balance sheet of AFS
9	Adjustments to CET1 due to prudential filters	-	
10	Other funds	-	
11	(-)TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	(7,523)	
19	CET1: Other capital elements, deductions and adjustments	(7,523)	Note 9 of AFS
20	ADDITIONAL TIER 1 CAPITAL	-	
21	Fully paid up, directly issued capital instruments	-	
22	Share premium	-	
23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	-	
24	Additional Tier 1: Other capital elements, deductions and adjustments	-	
25	TIER 2 CAPITAL	-	
26	Fully paid up, directly issued capital instruments	-	
27	Share premium	-	
28	(-) TOTAL DEDUCTIONS FROM TIER 2	-	
29	Tier 2: Other capital elements, deductions and adjustments	-	

Own funds: reconciliation of regulatory own funds to balance sheet in the audited financial statements			
		Balance sheet as in audited financial statements	Cross- reference to own fund composition
		As at 31 December 2024	
		GBP thousands	
Assets - Breakdown by asset classes according to the balance sheet in the audited financial statements			
1	Deferred tax	7,523	Item 19
2	Tangible assets	18,079	
3	Cash and cash equivalents	44,250	
4	Debtors	69,881	
5	Financial assets at fair value through profit and loss	4,194	
6	Total Assets	143,927	
Liabilities - Breakdown by liability classes according to the balance sheet in the audited financial statements			
1	Creditors – current	(58,289)	
2	Provisions for liabilities	(289)	
3	Lease liability	(6,139)	
4	Other non current liabilities	(1,595)	
5	Total Liabilities	(66,312)	
Shareholders' Equity			
1	Called up share capital	6,000	Item 4
2	Capital contribution reserve	38,626	Item 7
3	Foreign exchange reserve	(48)	Item 8
4	Profit and loss account	33,037	Item 6
5	Total Shareholders' equity	77,615	

Own funds requirements

The Company's own funds is calculated in accordance to the requirements set out in MIFIDPRU 4.3 which is the minimum capital required to be held by the Company. A summary of K-factor requirements and fixed overheads requirement as of 31 December 2024 is disclosed below.

Requirements	GBP thousands
Sum of K-AUM, K-CMH and K-ASA	-
Sum of K-COH and K-DTF	3
Sum of K-NPR, K-CMG, K-TCD and K-CON	7,608
Fixed overheads requirement	19,809

The Company assesses the adequacy of the own funds through ICARA. Under the process of updating ICARA own funds is reviewed and revised in accordance to the Own Funds Adequacy Rule ('**OFAR**') which requires the Company to hold adequate amounts of own funds and liquid assets to ensure financial viability by addressing any material potential harms arising from ongoing activities or by minimizing harms to customers and participants during the wind down of Company's businesses.

Remuneration Policy and Disclosure

The UK Remuneration Policy of Tradeweb Europe Limited (TWEL) is designed to comply with the FCA's MIFIDPRU Remuneration Code, ensuring risk-focused remuneration practices. The policy applies to all employed staff and promotes effective risk management, aiming to avoid excessive risk-taking.

The remuneration structure includes five components. Basic salary: Market-competitive, regularly reviewed; Annual bonus: Based on individual and company-wide performance, discretionary in nature; Equity incentive plan: Offered to senior staff to promote long-term interest in the firm's growth; Pension: All employees may participate in the company pension scheme; Benefits: Other traditional employee benefits.

The overall compensation structure is determined by the CEO with assistance from Human Resources and Finance departments. Compensation for senior staff is set independently from business performance to prevent conflict of interest.

The policy complies with the FCA's Remuneration Code, ensuring variable pay does not hinder the firm's ability to strengthen its capital base. The firm applies proportionality to certain aspects of the Code, as appropriate.

Bonuses are determined by a performance management process that evaluates individual and business-wide success. Compensation is adjusted based on non-financial factors, such as conduct and compliance with regulatory standards.

Certain individuals are designated as Code Staff under the FCA's Remuneration Code. These include senior managers and heads of material business units.

The remuneration policy is reviewed annually to ensure continued compliance with FCA regulations and alignment with company objectives.

As of 31 December 2024, 11 material risk takers are identified. During the financial year 2024, there were no guaranteed variable remuneration awards made and no severance payments awarded. The total amount of remuneration awarded to senior management, other material risk takers and other staff in the financial year ended 31 December 2024 is as followed:

GBP thousands	Fixed remuneration	Variable remuneration	Total remuneration
Senior management	1,605	12,840	14,445
Other material risk takers	1,105	1,670	2,775
Other staff	45,464	22,673	68,137
Total	48,174	37,183	85,357

---End of MIFIDPRU Disclosure---