





# Sustainability Report



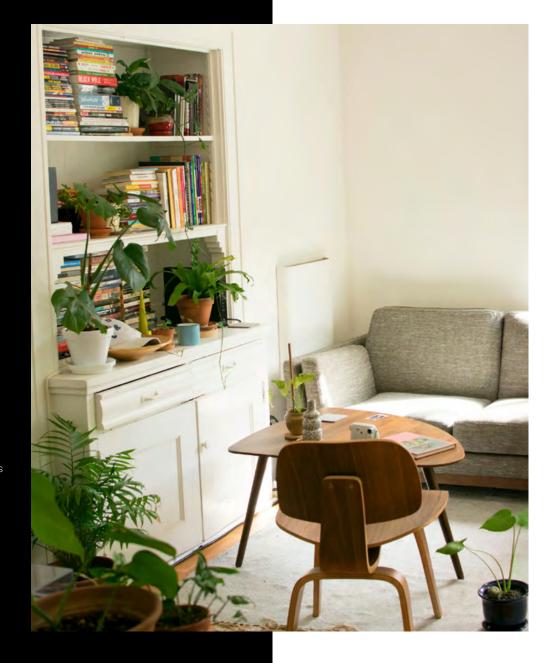
# Introduction from the Chair of the Sustainability and ESG Committee, **Richard Lewis**

At ATG, our mission is to power the discovery of items worth finding again and therefore driving growth of the circular economy. This mission not only drives our commercial success but also underpins our contribution to a more sustainable world.

We recognise that building a responsible and resilient business goes beyond environmental impact. It also means ensuring that we operate to the highest standards with our suppliers, that our employees have the opportunity to thrive and flourish, and that our activities are underpinned by strong corporate governance and accountability. These principles guide the way we do business every day.

Our commitment and progress have once again been recognised externally, with ATG included in the FTSE4Good Index for the third consecutive year, reinforcing our belief that operating responsibly is fundamental to sustainable growth.

Looking ahead, the Board and the Sustainability and ESG Committee remain focused on strengthening ATG's role in advancing the circular economy, while embedding sustainability more deeply across our strategy, operations, and culture. We are confident that by continuing to operate responsibly, we will create long-term value for all our stakeholders.





# Sustainability Report | Continued

# **Board oversight of sustainability and ESG**

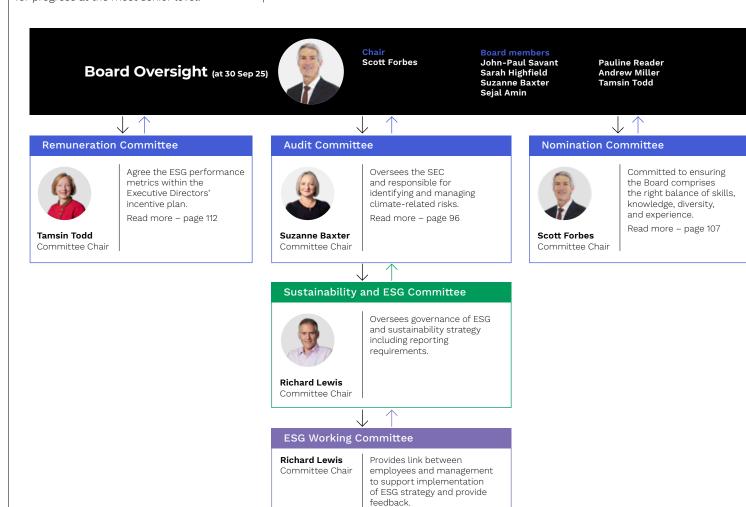
The Board has overall responsibility for the Group's sustainability and ESG strategy, ensuring that it supports the delivery of our long-term strategic priorities and reflects the issues most material to our stakeholders. In FY25, the Board continued to oversee progress against our sustainability goals, receiving regular updates on climate risks and opportunities and ensuring that ESG considerations are embedded in strategic decision-making, risk management, and financial planning.

The Audit Committee reviews climate-related risks and opportunities annually and reports to the Board, enabling effective oversight of progress and alignment with the Group's strategy. The Sustainability and ESG Committee ("SEC") meets twice per year and reports at least annually to the Audit Committee, ensuring ESG and climate-related issues are incorporated into business strategy, risk management, and reporting. The SEC is chaired by Richard Lewis and its members include the Chief Financial Officer, Chief People Officer, Chair of the Audit Committee, Company Secretary and representatives from finance, risk, internal audit, and investor relations. In FY25, the SEC Chair continued to provide direct updates to the Board on ESG matters.

The ESG Working Committee, led by the SEC Chair, comprises colleagues from across the business who are passionate about sustainability and helping to build employee awareness and drive practical change. The Committee meets monthly and reports into the SEC.

From FY24, the Remuneration Committee introduced performance measures for Executive Directors linked to the delivery of carbon reduction targets. In FY25, these ESG-linked remuneration metrics were maintained, reinforcing accountability for progress at the most senior level.

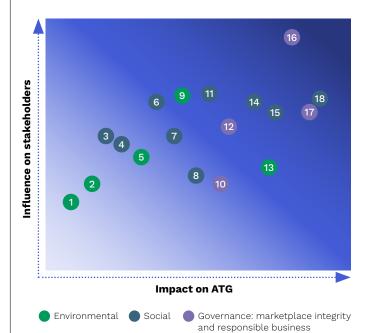
The Board also receives periodic training and horizon-scanning updates on evolving ESG regulation, reporting standards, and stakeholder expectations, ensuring it has the insight needed to guide the Group's sustainability strategy effectively.





### **Materiality assessment**

The Board is committed to integrating stakeholder priorities into decision-making. Our FY23 double materiality assessment, undertaken with external specialists, identified the issues of greatest significance to stakeholders and to the business. In FY25, we remain focused on these key areas, strengthening the link between ESG priorities and our long-term strategic objectives. The chart below illustrates the results of this assessment.



#### Key:

- 1 Waste management and water use
- 2 Packaging and plastic
- 3 Responsible tax strategy
- 4 Supply chain management
- 5 Energy management
- 6 Human rights
- **7** Health and safety
- 8 Communities and partnerships
- **9** Climate change and emissions
- 10 CEO remuneration

- **11** Employment practices and labour management
- **12** KPIs
- 13 Innovative and efficient services
- **14** Diversity and inclusion
- **15** Talent and workforce development
- **16** Ethical conduct and integrity
- 17 Product quality and safety
- **18** Cyber security



# **Progress against material issues**

Key issue	Why the issue is important to ATG	Link to strategic growth driver	Progress in FY25	Plans for FY26
Cyber data security protection	Ensuring the safe collection, retention and use of confidential data of our sellers, buyers and employees, and safeguarding this data	123456	<ul> <li>No reportable data breaches or security events.</li> <li>Established CIO role and new Head of Security, strengthening governance and leadership.</li> </ul>	<ul> <li>Optimise the security vendor portfolio to reduce cost, eliminate redundant tools and improve performance.</li> </ul>
	against security breaches and cybercrime is a cornerstone of our business and financial performance.		Completed NIST-based security assessment and developed a multi-year maturity roadmap.	<ul> <li>Deliver the FY26 security maturity roadmap, closing key gaps and strengthening resilience through new Business Impact and Business Continuity.</li> </ul>
Ethical conduct and integrity 16	Managing our business with integrity in an honest, ethical and responsible manner is key to ensuring we maintain our strong reputation	123456	<ul> <li>Appointed new Non-Executive Directors.</li> <li>Introduced an independent third-party whistleblowing service, providing employees with a confidential and secure channel</li> </ul>	<ul> <li>Refresh the Group Code of Conduct to reflect evolving risks (e.g. Al ethics, data privacy, and ESG expectations).</li> </ul>
	and protect future revenue-generating opportunities.		to raise concerns. There have been zero whistleblowing reports in FY25.	<ul> <li>Embed ethical-risk considerations into our enterprise risk management framework and Provision 29 control mapping.</li> </ul>
Product quality	Although we have no direct responsibility	1234	Reviewed and updated sensitive items policy.	Ongoing testing of all products and services before
and safety	for the products sold, their specification or quality, adherence to their specifications is crucial to protect our reputation and future revenue-generating opportunities.		<ul> <li>Continued work with sellers to ensure listings are appropriate, accurate and fair representations of the items to be sold.</li> </ul>	rollout or update.  • Continue to monitor and review sensitive items and policies.
Talent and workforce			• New ATG Academy with 54 courses and an average feedback rating of 4/5.	Rollout of Career Pathways across functions, creating clarity across all roles and levels.
development 15	belong and can reach their full potential are essential to ensure our business maintains		<ul> <li>Launched a new Career Hub and Career Conversation Toolkit.</li> <li>Designed and tested a new Career Pathways framework with</li> </ul>	<ul> <li>Refresh our ATG Academy with new offerings based on employee and manager feedback.</li> </ul>
	competitiveness and can innovate.		Product function.	Agree and work on FY26 DE&I Working Group Focus
Therefore, alo	We re ongside the top four priority focus areas ide	cognise the pivotal r entified from the ma	role we can play in facilitating the circular economy. teriality assessment, we continue to prioritise climate actio	on and reducing our own carbon emissions.
Carbon emissions	We recognise that the changing climate could impact all our stakeholders. Although we have a relatively small carbon	1256	<ul> <li>Continued to progress towards our near-term and Net Zero emissions targets.</li> <li>Improved our data quality for some of the more difficult</li> </ul>	<ul> <li>Target our higher emissions Scope 3 categories (e.g. Purchased Goods &amp; Services) to make significant reductions in emissions.</li> </ul>
	footprint, we aim to minimise our own environmental impact.		to measure categories e.g. Use of Sold Products.	<ul> <li>Rebaselining our near-term and Net Zero targets, in accordance with the Science Based Targets Initiative guidelines.</li> </ul>
Innovative and efficient services	Our marketplaces play a pivotal role in facilitating the circular economy. We invest	1234	Continued the rollout of atgShip to make it even easier to transact at online auctions.	<ul> <li>Continue to invest in products and services to make it easier to buy and sell at online auctions.</li> </ul>
13	to improve the online auction experience.		Search and discovery investment to remove frictions in online auction process.	
Six Strategic Grov	wth Drivers 1 Extend the tot	al addressable market	3 Enhance the network effect 4 Grow take rate via value-added services	Expand operational leverage     Pursue accretive M&A



# Sustainability Report |

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# **Sustainability in focus:**

# Cyber security and data protection

As one of our most material risks, we have focused on strengthening our policies and procedures in this area during FY25.

"Protecting the confidential data of our sellers, buyers and employees remains critical to our business. We continue to prioritise strong data governance and cybersecurity to ensure this information is collected, stored and used safely, and safeguarded against breaches and cyber threats."

# **Cyber security**

# ATG's cyber security policies and procedures

- The Information Security team, under the direction of the Chief Information Officer ("CIO"), serves as the intermediator between the information security management system ("ISMS") and the organisation, with oversight by the CTO and CIO. The team is responsible for performing information security operations and monitoring activities.
- All ISMS policies and procedures are updated, reviewed and approved annually by our Information Security Steering Committee ("ISSC") which is composed of the CIO, Head of Information Security, Group Data Protection Officer ("DPO"), and Group Head of Risk and Internal Audit. The ISSC is also responsible for recommending additions/ removals to the ISMS. Policies and procedures cover a full range of cyber security and data protection areas.



- We have a proactive awareness programme to educate all employees on cyber security risks with mandatory training annually for all staff.
- Data protection policies apply to 100% of Group operations.
- Our incident response plan and major incident response simulations are carried out periodically with custom response playbooks drafted and refined yearly.
- All employee accounts are protected by multi-factor authentication, with geolocation restrictions for sensitive access groups.

# How we strengthened cyber security in FY25

- Appointed a newly created CIO role to drive strategic alignment between security initiatives and business objectives, with a focus on developing Information Security, DevOps, and IT as centres of excellence for the organisation.
- The new CIO strengthened the security team with the addition of experienced personnel, bringing decades of experience leading enterprise-scale security programmes.
- Conducted a comprehensive NIST-based baseline security assessment across all Group operations to establish maturity benchmarks and identify opportunities for programme enhancement.
- Developed and presented a multi-year security maturity roadmap to the Board and executive leadership, receiving strong support for strategic investments in security capabilities.
- Advanced the consolidation of web and application firewalls across marketplace platforms, migrating several products to a more robust, standardised solution with enhanced monitoring capabilities.
- Maintained zero reportable security incidents throughout FY25.

### What are our priorities for FY25?

As cyber threats continue to evolve in sophistication and frequency, we remain committed to advancing our security posture. Our priorities for FY26 include:

- Execute the security maturity roadmap developed in FY25, focusing on remediating identified gaps and elevating our security programme to function as a centre of excellence.
- Complete the consolidation of web and application firewalls across all marketplace platforms to achieve a unified, best-in-class security architecture with streamlined monitoring and response capabilities.
- Develop and implement comprehensive Business Impact Analysis and Business Continuity Planning frameworks to enhance organisational resilience and recovery capabilities.
- Optimise the security and IT vendor portfolio to improve operational efficiency and return on investment, including renegotiating major contracts, eliminating redundant tooling, and replacing underperforming solutions with higher-value alternatives without compromising security or service quality.
- Continue to strengthen the alignment between security initiatives and business strategy, ensuring security enablement supports growth objectives while managing risk effectively.
- Enhance security governance and risk management processes to maintain Board and executive visibility into the security programme's strategic direction and performance.



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# **Data privacy**

# ATG's data protection policies and procedures

- Our approach to data protection is guided by, the UK Data Protection Act ("GDPR"), and the UK Privacy and Electronic Communications Regulations, alongside international legislation including applicable North American, EU and Mexico requirements.
- We foster a strong culture of data protection across the organisation, overseen by the Board and embedded into everyday working practices.
- Our independent Data Protection Officer ("DPO") is actively involved across all business functions, ensuring data protection is considered by design and by default.
- Data protection policies and procedures are integrated with our wider security, risk management and compliance frameworks.
- All employees complete mandatory annual data protection training, reinforced by ongoing awareness and communication activities.
- Data subject requests are handled through formalised processes with oversight from the DPO to ensure compliance and timely responses.

# How we strengthened data protection in FY25

- Incorporated relevant aspects of the UK Data (Use and Access) Act 2025 ("DUAA") into data protection governance, management and operations.
- Selected by the UK Information Commissioner's Office as having one of the UK's leading websites, for their Website Cookie Assessment Programme, and gained ICO approval without further actions required.
- Driving continuous improvements via the Data Protection and Information Security policies and procedures.
- Enhanced organisational design for data protection, to help embed data protection controls into change and operational processes more deeply.
- No reportable data breaches or security events.

# What are our priorities for FY25?

- Further embed data protection by design and default into business and technical change governance functions.
- Monitor and incorporate legal and regulatory changes, including evolving guidance from the UK ICO relating to the DUAA and evolving US federal and state-level legislative changes.
- Maintain diligence through continuous improvement assessments and enhancements.
- Maintain staff training and awareness.





We recognise that climate change affects all of our stakeholders. Although our operations have a relatively small environmental footprint, we are committed to driving continuous reductions in our impact and to supporting a sustainable circular economy that limits the need for new manufacturing.

# **Our roadmap to Net Zero** by 2040

Financial Statements

Our commitment to achieve Net Zero greenhouse gas emissions across Scopes 1-3 by 2040 was validated by the Science Based Targets initiative ("SBTi") in FY24.

This aligns our ambition with the Paris Agreement's goal to limit global temperature rise to 1.5°C above pre-industrial levels.

Achieving this target will require reducing our absolute Scope 1-3 emissions by at least 90%, with any remaining unavoidable emissions neutralised through verified carbon removal initiatives. Progress against our 2040 Net Zero pathway is detailed on page 71.

# Task Force on Climaterelated Financial Disclosures ("TCFD")

This section sets out our disclosures in line with the four pillars and 11 recommended disclosures outlined in the Task Force on Climate-related Financial Disclosures: Implementing the Recommendations (October 2021) report. It explains how we identify, assess and manage the risks and opportunities that climate change presents to the Group across the four TCFD pillars: governance, strategy, risk management, and metrics and targets.

#### **Compliance statement**

In accordance with the UK Financial Conduct Authority ("FCA") Listing Rule 14.3.27R, the Group considers its climate-related financial disclosures to be consistent with the TCFD recommendations and all associated recommended disclosures. The table on page 57 indicates where each disclosure can be found within this report.



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# **TCFD** compliance index

TCFD framework pillars	Recommended disclosures	FY25 compliance	Our response
Governance	a) Describe the Board's oversight of climate-related risks and opportunities	Full	We have incorporated climate-related governance across all levels of our governance structure and encourage accountability for climate-related risks and opportunities throughout the business.
	b) Describe management's role in assessing and managing climate-related risks and opportunities		Details can be found in the Governance section on page 82.
	cumate-retated risks and opportunities		• The Group's governance structure is presented on page 83.
Strategy	a) Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long term	Full	We have undertaken a climate scenario analysis which assessed physical and transition climate-related risks and opportunities under three climate scenarios utilising quantitative data from the Network for Greening the Financial System ("NGFS").
	b) Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning		<ul> <li>The scenario analysis has supported our understanding of our climate-related risks and opportunities across the Group, how they might impact our business, and consideration of how they impact our strategy and financial planning.</li> </ul>
	c) Describe the resilience of the organisation's strategy,		• Details of our climate scenario analysis can be found on page 60.
	taking into consideration different climate scenarios, including a 2°C or lower scenario		• Details of our climate-related risks and opportunities can be found on pages 61 to 63.
Risk management	a) Describe the organisation's processes for identifying and assessing climate-related risks	Full	We have a well-established risk management framework that follows the Three Lines of Defence model. The Group Head of Risk and Internal Audit manages our Group risk register which includes climate-related risks, following a materiality-based approach.
	<ul><li>b) Describe the organisation's processes for managing climate-related risks</li><li>c) Describe how processes for identifying, assessing</li></ul>		<ul> <li>Alongside our wider risk management approach, to support the identification of climate-related risks, we have undertaken a climate scenario analysis which assessed physical and transition climate-related risks under three climate scenarios.</li> </ul>
	and managing climate-related risks are integrated into the organisation's overall risk management		• Our Group Head of Risk and Internal Audit is a member of the Sustainability and ESG Committee which supports the assessment, management, and incorporation of climate-related risks into our overall risk management approach.
			• Details of our overall approach to risk management can be found on pages 34 to 35.
			• Details of our climate scenario analysis can be found on page 60.
			Details of our ESG governance structure can be found on page 51.
Metrics and targets	a) Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process	Full	<ul> <li>We have had our near-term (2030) and long-term Net Zero (2040) emissions reductions targets formally validated and approved by the Science Based Targets initiative ("SBTi"). We are actively monitoring our progress against these targets, as demonstrated in our transition plan on pages 69 to 71.</li> </ul>
	b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas ("GHG") emissions, and the related risks		• Details of our Scope 1, Scope 2, and Scope 3 GHG emissions can be found on page 65.
			• Details of our climate-related targets can be found on page 71.
	<ul> <li>c) Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets</li> </ul>		Details of emissions-based remuneration targets for our Executive Directors can be found on page 128.

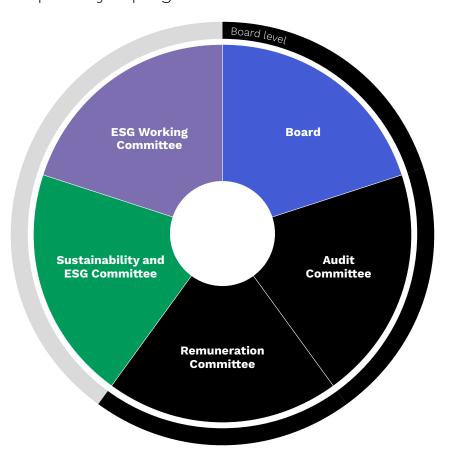
Annual Report 2025



# Sustainability Report | Continued

### **TCFD: Governance**

Climate considerations are embedded within our governance framework, with accountability for climate-related risks and opportunities integrated across the organisation. The Board remains committed to overseeing delivery of our environmental objectives and ensuring transparency in progress.



# How we govern our impact on the environment and response to climate change

#### **Board**

The Board has overall responsibility for the Group's climate-related matters. In FY25, this included ongoing oversight of progress towards our Net Zero by 2040 target and approval of key ESG-related Group policies, including our publicly available Environmental Policy.

#### **Audit Committee**

The Audit Committee oversees how the Group identifies and manages climate-related risks and opportunities. Meeting four times a year, the Committee provides the Board with updates on climate-related governance, progress against emissions reduction targets and overall risk management.

Further details can be found in the Audit Committee Report on pages 96 to 106.

#### Sustainability and ESG Committee

The Sustainability and ESG Committee ("SEC") focuses on climate-related risks and opportunities, including the setting, measurement and monitoring of near and long-term carbon reduction targets, strategies and compliance with TCFD requirements.

The SEC works closely with external advisers to stay aligned with the latest guidance and provides regular updates to the Audit Committee on regulatory developments, climate-related activities across the business, and investor feedback.

The SEC meets twice per year and reports into the Audit Committee.

#### **Remuneration Committee**

The Remuneration Committee includes climate-related measures in the performance targets for Executive Directors, linking remuneration outcomes to delivery of the Group's carbon reduction goals.

The Remuneration Committee meets four times per year and reports into the Board.

Further details can be found in the Remuneration Committee Report on pages 112 to 114.

#### **ESG Working Committee**

Established in FY23 and chaired by the Chief Operating Officer, the ESG Working Committee brings together colleagues from across the business who are passionate about sustainability. The Committee meets monthly, with climate change a standing agenda item, and reports into the SEC.

In FY25, the ESG Working Committee continued to lead practical initiatives to reduce the Group's emissions, including:

- maintaining office heating at 21.5°C in winter and cooling at 23°C in summer;
- auditing office facilities for energy efficiency, including metering, HVAC controls, LED lighting and appliance usage;
- ensuring all offices use LED lighting;
- continued upgrading of laptop docking stations and screens to more energy-efficient models;
- expanding employee awareness campaigns on energy conservation and sustainable workplace practices; and
- increasing recycling facilities and signage across all offices, including coffee cup and e-waste recycling points.

Employees are encouraged to actively participate in the ESG Working Committee, contributing to ongoing initiatives and suggesting new ways to further reduce the Group's emissions.



# **TCFD: Strategy**

As an online marketplace platform, our business model is inherently aligned with sustainability. Every item sold across our platforms represents an alternative to producing something new – extending product life, reducing waste, and avoiding the carbon emissions associated with manufacturing and distribution.



# Net Zero 2040

In FY24, our commitment to achieve Net Zero by 2040 was validated by the Science Based Targets initiative ("SBTi"), confirming that our targets align with the Paris Agreement's 1.5°C pathway.

#### How we will achieve this

We are already making good progress on achieving our emissions reduction targets (see page 71).

We are progressing against our emissions-reduction roadmap, focusing on key projects to reduce our Scope 1 and 2 emissions, such as optimising office energy use and exploring transitioning to 100% renewable electricity.

We are strengthening the accuracy and coverage of our Scope 3 emissions data to better understand the drivers of our value chain footprint and target meaningful reductions aligned to our Net Zero ambition.

# 2 Facilitating the circular economy

Our marketplaces play a vital role in advancing the circular economy by providing a global channel for re-commerce – connecting buyers and sellers of high-quality, second-hand goods across a range of categories. Every transaction helps avoid the emissions, waste and resource use linked to producing new items.

#### How we will achieve this

We continue to invest in our marketplace technology to make it even easier and more rewarding for users to list, sell and purchase second-hand items.

By supporting the resale of existing goods, we help drive sustainable consumer behaviour and extend the useful life of valuable assets, reducing the demand for new manufacturing and the emissions that come with it

# Getting auctions online

Our technology enables auctions to take place digitally, removing the need for long-distance travel and large, in-person events. This helps reduce emissions while expanding access for buyers and sellers worldwide.

### How we will achieve this

We are enhancing our online auction experience to support more virtual participation and reduce the carbon footprint of live events.

By connecting more buyers and sellers online, we not only reduce travel-related emissions but also strengthen our positive contribution to a more sustainable, low-carbon economy.





# Climate-related risks and opportunities

We integrate climate resilience into our business strategy by identifying and assessing climate-related risks and opportunities as part of our corporate risk management framework, with a specific climate focus reviewed annually.

As an online marketplace for second-hand goods, we also recognise the opportunity our business has to advance the circular economy and help reduce global emissions.

The summary below outlines our approach to identifying and evaluating these climate-related risks and opportunities.



### Identify

We scan data sources to identify climate-related risks and opportunities, such as sector research, climate policy updates, and peer analysis.

### Qualitative analysis

A scenario analysis is conducted to assess the qualitative impact of the identified risks and opportunities. This aids in ranking and prioritising the risks and opportunities, providing the top 10 as listed on page 61.

### Quantitative analysis

A quantitative scenario analysis is undertaken to determine the potential financial impact on cash flows of the risks and opportunities. When applying a materiality, it was concluded that no risks or opportunities were material to the business, however the top three have been detailed on pages 62 to 63.

### Incorporation into Group risk management

We integrate climate-related risks and opportunities into the Group's broader risk management processes, ensuring they are monitored and managed on an ongoing basis. The climate-related risks and opportunities we face are influenced by both the physical impacts of climate change and the transition risks arising from how sellers, buyers and other stakeholders respond to climate issues and related regulation.

In FY25, we continued to enhance our climate scenario analysis, building on the qualitative and quantitative assessments first undertaken in FY23. Using quantitative data from the Network for Greening the Financial System ("NGFS"), accredited by the Bank of England, we assessed physical and transition risks and opportunities under three climate scenarios across the following time horizons:

Short term: Present – 2025
Medium term: 2025 – 2030
Long term: 2030 – 2050

These horizons are aligned with the Group's wider business strategy.

The short term focuses on reducing Scope 1 and 2 emissions and advancing our circular economy initiatives, while monitoring near-term regulatory and market developments. The medium term supports progress towards our interim sustainability goals, and the long term aligns with our Net Zero by 2040 ambition, enabling us to assess long-range impacts and capture emerging opportunities.

Consistent with prior years, each identified risk and opportunity was evaluated for likelihood and impact across all three time horizons to determine overall materiality. A vulnerability assessment was then applied, considering sensitivity, exposure and adaptive capacity, to produce a consolidated vulnerability score.

Final risk scores were calculated by combining impact, likelihood and vulnerability, allowing us to prioritise key risks and opportunities for ongoing monitoring and management.

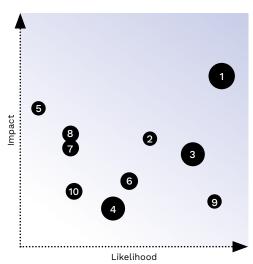
# NGFS-approved scenarios applied

NGFS scenario	Key characteristics	Justification
Net Zero 2050	Policies in alignment with the Paris Agreement goals.	Alignment with the Paris Agreement goals consistent with a transition to a lower-carbon economy, as per TCFD recommendations.
Delayed Transition	Assumes new climate policies are not introduced until 2030 with the availability of carbon dioxide reduction technologies kept low, pushing carbon prices higher than in Net Zero 2050.	
Current Policies	Assumes that only currently implemented policies are preserved, and no further political intervention on climate change is undertaken, leading to 3°C warming and severe physical risks.	A scenario that simulates low transition risks but severe physical risks.



### Climate-related risks

Our scenario analysis identified 26 potential climate-related risks to the Group. The assessment included consideration of the transition to a low-carbon economy and risks related to the physical impacts of climate change. Based on the risk scores calculated for each of these, the top 10 climate-related risks are as follows.



Size of the marker represents the Group's vulnerability to the risk

### Priority Risk identified

	events leading to loss of revenue and expenditure on customer compensation
2	Increased competition in the online secondary goods market, resulting in more choice for consumers and therefore diluting ATG's market share

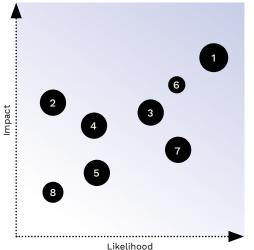
Data centre outages due to acute weather

- 3 Hosting providers passing on costs from increased carbon price, increasing expenditures
- 4 Carbon pricing mechanisms result in increased costs for ATG and suppliers, negatively impacting sales and profitability
  - Increased regulation may limit the sale of some goods and services (e.g. high emission vehicles)
  - Climate-induced economic and geopolitical instability leading to reduced supply and/or demand in the secondary goods market
- 7 Hosting providers passing on costs due to increased energy needs for cooling and carbon reduction measures
- 8 A decline in share price if ATG does not adapt to changing investor preferences for ESG improvements
- 9 Chronic and acute weather events disrupting operations/logistics leading to increased costs
- Carbon pricing mechanisms increasing the cost of living leading to higher wage bill and reduced profit margins

# **Climate-related opportunities**

By following the process summarised above we identified eight potential climate-related opportunities to the Group. The consideration of opportunities took into account resource efficiency and cost saving, adoption of low-emission energy sources, the development of new products and services, access to new markets, and building resilience along the supply chain. Based on the above, the eight opportunities were ranked as follows.

3



Size of the marker represents the Group's realisation rating to the opportunity

### Priority Opportunity identified

Further Information

Higher demand for secondary goods due
to increased public awareness of the
environmental implications of buying new
items and the circular economy, increasing
overall sales and commission

- Reputational benefits from ATG's approach to reducing carbon emissions leading to increasing sales
- Higher demand for secondary goods due to climate-related economic contraction increasing sales via ATG's platforms
- 4 Supply chain disruption due to climatic changes increasing demand for secondary goods and increased sales
- Investor preferences to invest in low-carbon companies increasing ATG's ability to raise finance
- Reduced carbon emissions leading to reduced risks associated with regulation and taxation
- 7 Adapting products in line with climate-related regulation and taxation e.g. Antiques Trade Gazette digitisation, leading to reduced expenditure
- 8 Reduced operational costs due to efforts to reduce carbon emissions and use of low-carbon technologies



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### Highest ranked climate-related risks to the Group

The top three climate-related risks are outlined and discussed below; the remaining risks are documented internally.

Risk type	Impact	Mitigation/response	Timeline	Risk sub- category	Geographic location	Business operation	Financial impact category	Financial impact
Physical and transition Data centre outages due to acute weather events leading to loss of revenue and expenditure on customer compensation	Due to the digital nature of the Group's operations, the highest risk to our operations is third-party data centre downtime and the implications of this on revenue and expenditure. We understand that, whilst we do not operate data centres ourselves, the impact of physical climate-related risks on our data centre suppliers, resulting in us being unable to access our services, would be significant.	The Group's systems are hosted across multiple cloud providers and regions, ensuring continuity if one location is affected by extreme weather or other disruption. Built-in redundancy and failover capabilities minimise downtime, supported by a business continuity framework that monitors third-party performance and response readiness.	Most likely to manifest under a Current Policies scenario, in the long term.	Acute (physical), market and reputational (transition)	All	Data centres	Revenues and expenditure	Low: not expected to have a material impact on the business
Transition Increased competition in the online secondary goods market, resulting in more choice for consumers and therefore diluting ATG's market share	Whilst it is unlikely that the breadth of the Group's business operations would be equalled by an existing or new entrant to the market, overall competition in the secondary goods market has been highlighted as one of the most material risks to the Group. This risk recognises that with growing awareness of the environmental benefits of the circular economy, consumers will likely have more options to purchase secondary-market goods in the future.	The Group continues to invest in technology and innovation to enhance platform usability, reach and customer experience, ensuring sellers and buyers choose ATG's marketplaces amid growing competition. By championing the circular economy and promoting sustainable commerce, the Group is well positioned to benefit from increasing consumer demand for second-hand goods. Ongoing market monitoring and innovation initiatives help maintain our competitive edge and long-term relevance in this evolving sector.	Most likely to manifest under Net Zero 2050 or Delayed Transition scenarios, in the medium to long term.	Market	All	All	Revenues	Low: not expected to have a material impact on the business
Transition Hosting providers passing on costs from increased carbon price, increasing expenditures	As highlighted in our highest ranked climate-related risk above, we have a significant reliance on third-party data centre providers. If there is an increase in the price of carbon, this is likely to impact the major cloud-providers and therefore there is a risk these costs get passed on to the Group.	We engage proactively with our cloud hosting providers to understand their sustainability commitments and prioritise partners targeting 100% renewable energy usage. The Group continues to optimise cloud resource efficiency to manage costs and reduce emissions. We also monitor developments in carbon pricing and incorporate potential impacts into our financial and supplier planning processes.	Most likely to manifest under Net Zero 2050 or Delayed Transition scenarios, in the medium to long term.	Market	All	Data centres	Expenditure	Low: not expected to have a material impact on the business

#### Our resilience to climate-related risks

Following a detailed assessment of the Group's climate-related risks and opportunities, including analysis of the three scenarios outlined on page 60 the Board has concluded that the Group's overall exposure to climate-related risks remains low. This reflects the nature of our operations as a low-emission, technology-driven business whose purpose supports the circular economy. Ongoing monitoring and periodic reassessment will ensure that any changes in the scale or nature of identified and emerging risks are promptly addressed.



# Sustainability Report | Continued

# Highest ranked climate-related opportunities to the Group

The top three potential opportunities are outlined and discussed below; the remaining opportunities are documented internally.

Opportunity type	Impact	Response	Timeline	Opportunity sub-category	Geographic location	Business operation	Financial impact category	Financial impact
Transition Higher demand for secondary goods due to increased public awareness of the environmental implications of buying new items and the circular economy, increasing overall sales and commission	The Group's business model enables the circular economy, facilitating the sale of secondary goods, keeping materials in circulation for longer. As a result, in the future it is likely that there will be increased public awareness of the environmental impacts of purchasing new items and a consumer shift to secondary items.	The Group is well positioned to benefit from growing demand for secondary goods, leveraging its established marketplaces to promote sustainable consumption and the circular economy. We continue to invest in technology, partnerships and customer engagement initiatives that make it easier for sellers and buyers to participate in the re-use of goods, further reinforcing our role in enabling sustainable commerce.	Most likely to manifest under Net Zero 2050 or Delayed Transition scenarios, in the medium to long term.	Products, services, markets	All	All	Revenues	Low: not expected to be a material opportunity for the business
Transition Reputational benefits from ATG's approach to reducing carbon emissions leading to increasing sales	Demonstrating progress in reducing carbon emissions enhances ATG's reputation as a responsible and sustainable business partner. As investor, customer and consumer focus on environmental performance continues to grow, a strong sustainability profile can strengthen brand loyalty, attract new clients and drive higher sales across our marketplaces.	The Group continues to communicate transparently on its sustainability commitments and progress towards its SBTi-approved Net Zero targets. By embedding carbon reduction and ESG considerations into business decision-making and external communications, ATG aims to reinforce its reputation as a trusted, sustainability-focused marketplace partner.	Most likely to manifest under Net Zero 2050 or Delayed Transition scenarios, in the short to medium term.	Products, services, markets	All	All	Revenues	Low: not expected to be a material opportunity for the business
Transition Higher demand for secondary goods due to climate-related economic contraction increasing sales via ATG's platforms	As public disposable income shrinks, and carbon prices increase, consumers are less likely to purchase luxury goods and services. New, full-price goods may see a fall in demand, but there may be a spike in the secondary goods market which is seen as a cheaper alternative during a period of economic downturn.	The Group continues to invest in its technology and platform capabilities to capture growth in the secondary goods market during economic downturns. Our diversified portfolio and global reach position us well to benefit from changing consumer behaviour toward more affordable and sustainable options.	Most likely to manifest under the Delayed Transition scenario, in the long term.	Markets	All	All	Revenue	Low: not expected to be a material opportunity for the business

Although the opportunities identified are considered to have a low financial impact and are not expected to be material to the Group, they will continue to be monitored as part of the Group's broader sustainability strategy. The Sustainability and ESG Committee reviews these opportunities on a bi-annual basis, ensuring they remain aligned with the Group's long-term objectives and transition plan. Any notable developments or strategic implications are reported to the Audit Committee as part of the regular sustainability reporting cycle.



# **TCFD: Risk management**

### **Risk management overview**

The Board retains overall responsibility for determining the principal and emerging risks facing the Group and for ensuring that an appropriate risk management framework is in place to identify, assess and manage significant strategic, operational, financial, compliance and reputational risks. The Board reviews and approves the Group's strategic risk register annually and considers risks that are new, developing or becoming more prominent through regular operational risk assessments and horizon-scanning activities.

Day-to-day responsibility for managing risks is delegated to the Senior Management Team. while the Audit Committee oversees the effectiveness of the Group's risk management and internal control framework.

The Group's risk management framework is based on the principles of the "Three Lines of Defence" model and sets out a structured process for identifying, assessing, mitigating and monitoring risks across the business. Further details of our risk management approach are provided on page 34.

### **Integrating climate-related risks**

The Board has undertaken a robust assessment of the principal risks facing the Group, including those that could threaten our business model, performance, solvency or liquidity. While climate change is not currently identified as a standalone principal risk, the changing climate has the potential to interact with. and amplify, several of our existing risks across the value chain.

The Group's Head of Risk and Internal Audit. as a member of the Sustainability and ESG Committee, supports the integration of climate-related considerations into the Group's broader risk framework and ensures that the links between climate issues and principal risks are well understood.

For example, as a predominantly online business, we are reliant on third-party data centre providers. Climate-driven weather events could affect these providers, posing a risk to the stability and continuity of our auction platforms - one of our principal risks.

Climate change may also influence competitive dynamics within the secondary goods market, intensifying our existing competition risk. In addition, wider climate-related economic and geopolitical pressures could contribute to higher operating costs, interacting with our principal risk of macroeconomic uncertainty.

We continue to monitor these interdependencies closely and will further enhance the integration of climate-related risk assessment into our broader risk management processes in the year ahead.

# **Integrating climate-related** opportunities

Climate-related opportunities are considered as part of our ongoing business development and strategic planning activities. As awareness of the environmental impact of consumption continues to increase, we expect growing demand for second-hand and pre-owned goods.

Our marketplaces are well positioned to benefit from this shift by enabling the resale and reuse of items across multiple categories, supporting a more sustainable circular economy. We continue to invest in our platforms to ensure they have the scalability and functionality needed to meet this growing demand over time.

# **TCFD: Metrics and targets**

#### Introduction

FY25 marks our fifth year of calculating and reporting our Scope 1, 2 and 3 greenhouse gas ("GHG") emissions across our operations in accordance with the World Resources Institute GHG Protocol, a Corporate Accounting and Reporting Standard, Revised Edition<sup>1</sup> ("the GHG Protocol"). Through this time, we have sought to incrementally increase the accuracy and completeness of our primary data and emission calculations, whilst maintaining consistency in our overall approach to allow for data comparison.

In FY25, we evolved our calculation approach in line with best practice to build on the accuracy and completeness of our GHG Inventory, which, for full transparency is described under Methodology on page 65 and should be referred to when comparing FY25 results. These improvements build on our understanding of our climate impact.

As a Group, we are committed to achieving Net Zero across our operations and value chain and have set a near-term science-based target ("SBT") to reduce our Scope 1 and Scope 2 GHG emissions by 42% by FY31. In addition, we have committed to becoming Net Zero across all scopes by FY41 in line with the SBTi Corporate Net-Zero Standard<sup>2</sup>. Both targets are absolute reductions from an FY22 base year and are in line with the global effort to limit global warming to 1.5°C above pre-industrial levels. Our targets are validated by the Science Based Target initiative ("SBTi").

#### **Our FY25 focus**

Our focus for EY25 has been to consolidate and standardise our data collation and emission calculations across Group companies.

As in previous years, the Group accepts that our overall emissions have and may continue to rise as a growing and acquisitive company.

We recognise the need to review and revalidate our SBTs due to improvements in our methodologies this year and the expansion of our operations. We are committed to ensuring our targets remain relevant to our operations and aligned with the latest climate science, and will review and revalidate our targets in FY26.

When calculating our GHG emissions, we have accounted for all relevant emissions associated with our operations, as required by the Companies Act 2006 and the Companies (Directors' Report, Regulations 2013) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018, with the exception of emissions from the acquisition of Chairish. For more detail on Chairish GHG emissions and our plans to fully incorporate their operations into our FY26 inventory, see Methodology, on page 65. Our GHG emissions can be found in Total Greenhouse Gas emissions (page 65), and in our Streamlined Energy Carbon Reporting ("SECR") table on page 66.

We continue to build on our transition plan to adapt and contribute to the shift to a low-carbon economy. We have identified our key Scope 1 and 2 reduction strategies and progress against our near-term Scope 1 and 2 reduction target has been monitored through an increased frequency of GHG emissions analysis. Reduction strategies to address Scope 3 are an ongoing focus for the Group. Reduction strategies have been set out on page 71 along with the progress we are making against each one of these strategies and targets. Progress against our Scope 1 and 2 reduction target was again included in remuneration policies for FY25. details of which can be found on page 128.

To ensure transparency, the presentation of our GHG emissions and other climate-related metrics (as shown in Our FY25 carbon impact, page 65) are guided by the principles of the UK's Competition and Markets Authority ("CMA") Green Claims Code.

- 1. WRI GHG Protocol Corporate Standard. Available at https://ghgprotocol.org/corporate-standard
- 2. SBTi Corporate Net-Zero Standard (v 1.2). Available at https://sciencebasedtargets.org/net-zero



# Methodology

### **Greenhouse gas emissions**

We were supported in calculating our GHG emissions by an external energy and sustainability consultancy.

An operational control approach has been taken, meaning that the inventory covers emissions from all operations under the Group's operational control across the UK, North America, and Germany, with the exception of Chairish emissions. Chairish was under the Group's operational control for a short period of FY25 and GHG emissions during this period are considered de minimis. As a priority in FY26, we will fully incorporate Chairish emissions into our GHG Inventory.

We continue to calculate emissions from all relevant Scope 3 categories, now covering 11 of the GHG Protocol's 15 categories, including the use of our sold products and remote working emissions, ensuring we account for all emissions that result from the Group's operations and services, and value chain. A Scope 3 screening process is conducted annually to ensure all relevant emissions are captured. The remaining Scope 3 categories, including emissions from franchises, processing of sold products, and investments, remain not applicable to the Group as none of our activities fall within these categories.

We use primary data wherever possible, and work with representatives from all sites and specific business functions (e.g. IT and HR) to improve data quality and consistency. These representatives make up the ESG Working Committee (see page 58). Specifically, we have consolidated our approach to capturing spend data for emissions associated with our procured goods and services, significantly increasing the completeness of our data in FY25.

We continue to move to activity data and supplier-specific emission factors where possible, now focusing on key suppliers across our top spend categories. Of our purchased goods and services emissions 11% are calculated using activity data directly from suppliers, whilst 8% of these emissions are calculated using supplier-specific spend-based emission factors from publicly available data, following the approach outlined in the GHG Protocol

Additional changes, in line with best practice. include the recategorisation of emissions associated with the transportation and distribution of the Antiques Trade Gazette to an "upstream" emissions source, recognising the control that we have over these emissions. As a result we no longer report any emissions in Scope 3-9 Downstream Transportation and Distribution. Following the expansion of atgShip, emissions associated with the transportation and distribution of items purchased on our marketplaces are also included for the first time. Our approach to understanding the carbon impact associated with the use of our sold products has also evolved in FY25, with primary data reflecting actual usage of our digital platforms.

We apply a "data hierarchy", with primary data being the highest preference and generic, intensity-based factors the least preferable. The ESG Working Committee members work to improve data, moving up the hierarchy each year and standardising the approach across business units. Emission factors have been chosen based on the location of the emissions: where country-specific emission factors are not available, UK Government emission factors have been applied.

Emissions are reported in line with the Group's financial year.

Following the GHG Protocol guidance, we are dual reporting location-based emissions from purchased electricity. We report market-based purchased electricity emissions, accounting for zero emissions only where we have certificates to prove the origin of the electricity. for example, in our London headquarters, and apply residual mix factors where we do not. Any certificate used must fulfil the requirements of the GHG Protocol's quality criteria. To ensure we fully account for the emissions from the electricity we consume, and to incentivise reductions in electricity demand, we use location-based purchased electricity emissions in our reduction targets and Net Zero commitment.

### **Our FY25 carbon impact**

Total greenhouse gas emissions

GHG emissions (tCO <sub>2</sub> e) <sup>3</sup>	FY25	FY24	FY23		% Change (from FY22 base year)
Scope 1	8.8	12.5	23.4	(30)%	(73)%
Scope 2 – location-based	131.9	189.5	289.2	(30)%	(66)%
Scope 2 – market-based	127.7	114.6	194.3	(11)%	_
Total (Scopes 1 & 2)	140.7	202.0	312.6	(30)%	(67)%
Scope 3	5,349.0	3,192.7	3,016.8	68%	119%
Total (Scopes 1, 2 & 3)	5,489.7	3,394.7	3,329.4	62%	91%
GHG emission intensity – Scopes 1, 2 & 3					
Turnover (\$)	181.8	174.2	165.9	4%	20%
Full time equivalents ("FTEs")	391.1	377.4	396	4%	16%
Carbon intensity (emissions per \$ million turnover)	30.3	19.5	20.1	55%	60%
Carbon intensity (emissions per average FTEs)	14.0	9.0	8.4	56%	65%
Percentage of operations included⁴	>95%	>95%	>95%		

<sup>3.</sup> GHG emissions reported in metric tonnes CO<sub>2</sub>e equivalent (tCO<sub>2</sub>e). Data is for the ATG financial year, a 12-month period from 1 October.

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<sup>4.</sup> This is an estimated value.



# **Streamlined Energy and Carbon Reporting ("SECR")**

# SECR overview

SECK OVER VIEW	
Descriptive information	
Methodology used	The methodology used to calculate our greenhouse gas emissions, our "GHG inventory", is based on the World Resources Institute GHG Protocol, A Corporate Accounting and Reporting Standard, Revised Edition ("the GHG Protocol") and follows the GHG Protocol's guiding principles of relevance, completeness, consistency, transparency and accuracy. We were supported to do this by energy and sustainability consultants.
	An operational control approach has been taken, meaning that the inventory covers emissions from all operations that are under the Group's operational control (with the exception of Chairish), including operations in the UK, Germany and North America. Emission factors have been chosen based on the location of the emissions. However, where emission factors are not available, UK Government emission factors have been applied. Emissions are reported in line with the Group's financial year.
Emission	UK Government emission factors have been applied from "UK Government
factors used	conversion factors for GHG reporting", International Energy Agency ("IEA"), as well
	as "European Residual Mixes Association of Issuing Bodies" and North America location-based emission factors for MROW, NYCP, and NWPP electricity and waste.
Intensity	The intensity ratio used displays total gross emissions (tCO <sub>2</sub> e) within Scope 1 and
ratio	2 per \$million turnover.
Measures undertaken to improve energy efficiency	We have established an ESG Working Committee with representatives from across our locations to focus on improving the energy efficiency of our buildings, including improving monitoring, reducing heating temperatures, increasing cooling temperatures, installing LED lighting throughout our offices and ensuring all electronic appliances are switched off when our offices are closed or the appliances are not needed.
Additional voluntary	As well as quantifying our direct emissions (Scope 1 and 2), as required by the Companies Act 2006 and the Companies (Directors' Report, Regulations 2013) and
reporting	Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018, ATG is
activities	committed to going beyond our statutory duty and comprehensively calculating
	and reporting indirect (Scope 3) emissions. As these emissions would not occur if
	we were not in existence, we consider it important for us to voluntarily report these
	emissions, providing our customers, clients and stakeholders with full transparency.

### SECR data

			oorting year '25		porting year 24
Category	Scope	UK and offshore	Global (excluding UK and offshore)	UK and offshore	Global (excluding UK and offshore)
Emissions from activities which the Company owns or controls including the combustion of fuel and operation of facilities (tCO <sub>2</sub> e)	1	5.1	3.7	7.2	5.3
Emissions from purchase of electricity, heat, steam and cooling purchased for own use (location-based, tCO <sub>2</sub> e)	2	17.9	114.0	16.2	173.3
Total gross Scope 1 and Scope 2 emissions (tCO <sub>2</sub> e)	1 & 2	23.0	117.7	23.5	178.6
Energy consumption used to calculate the above emissions (kWh)	1 & 2	102,464.2	425,966.6	99,841.4	678,977.2
Total gross Scope 1 and Scope 2 emissions UK and global (tCO <sub>2</sub> e)	1 & 2		140.7		202.0
Intensity ratio UK and global: emissions (tCO <sub>2</sub> e) per \$million turnover	1 & 2		0.8		1.2

Further Information

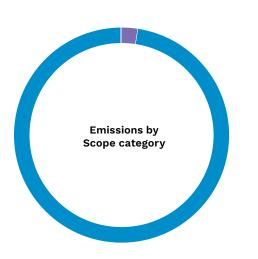
ECR change log							
Change in consumption, emissions, and intensity ratio between the previous and reporting year							
	Percentage change						
	(32)%						
	(30)%						
/ million \$ budget)	(33)%						
Description of changes in consumption, emissions, and intensity ratio between the previous and reporting year.  Absolute Scope 1 and 2 emissions have decreased by 30% the prior reporting year and our carbon intensity for Scope 2, i.e. a measure of our carbon emissions as a proportion of overall activity, has decreased by 33%. Our absolute Scope emissions have declined by 30% since the prior reporting year.							
We continue to measure and improve upon of our Scope 3 emissions. In total, our absolution emissions have increased by 62% since the In FY25, we have consolidated our approach data for emissions associated with our preservices, significantly increasing the comparison.	solute Scope 1, 2, and 3 ne prior reporting period. ch to capturing spend ocured goods and						
We confirm that this SECR report has be auditors as part of their full financial aud	•						
	/ million \$ budget)  Absolute Scope 1 and 2 emissions have de the prior reporting year and our carbon in 2, i.e. a measure of our carbon emissions overall activity, has decreased by 33%. Ou emissions have declined by 30% since the likewise, our absolute Scope 2 emissions  We continue to measure and improve upof our Scope 3 emissions. In total, our absemissions have increased by 62% since the In FY25, we have consolidated our approadata for emissions associated with our preservices, significantly increasing the comp.  We confirm that this SECR report has been						



# Our Scope 1 and 2 emissions

We are pleased with the progress made this year in reducing our Scope 1 and 2 emissions. Continued focus on energy efficiency, improved facilities management and the optimisation of our office footprint have all contributed to meaningful reductions.

In FY25, 2.6% of emissions (140.7 tCO<sub>2</sub>e) fell into Scopes 1 and 2, direct emissions associated with our operations and indirect emissions from the purchase of electricity and heat. Purchased electricity (82.7 tCO<sub>2</sub>e) was the largest contributor to Scope 1 and 2 emissions (59%), followed by purchased heat (35% and 49.2 tCO<sub>2</sub>e). Stationary combustion, mobile combustion and fugitive emissions account for the remaining 6% (8.8 tCO<sub>2</sub>e).



Scope category	tCO <sub>2</sub> e	%
Scope 1	8.8	<1%
Scope 2	131.9	2%
Scope 3	5,349.0	97%
Total	5,489.7	100%

#### Our Scope 3 value chain emissions

Scope 3 emissions increased again in FY25, which is disappointing, but reflects both business growth and improved data quality. The continued expansion of atgShip remains a key driver of higher shipping-related emissions, and refinements to our methodology this year identified previously unreported spend, resulting in more accurate but higher figures. We plan to re-baseline our Scope 3 emissions next year in line with SBTi guidance. Despite the rise, we are deepening our understanding of the key drivers of our indirect emissions and progressing initiatives to decouple future growth from emissions as we continue working towards Net Zero by 2040.

97% of our Group's emissions fall into Scope 3, our corporate value chain emissions. Scope 3 emissions, which are under a reporting organisation's influence but not control, typically make up the largest proportion of a company's carbon emissions, particularly when Scope 3 emissions are comprehensively covered.

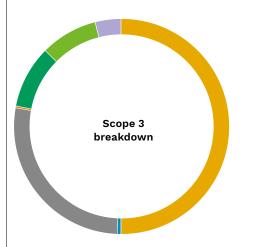
A breakdown of our Scope 3 emissions is shown opposite.

This year, the Group's largest Scope 3 emission source continues to be from purchased goods and services (2,684.8 tCO $_2$ e), accounting for 50% of Scope 3 emissions. These emissions are from the hosting of our online platforms in data centres operated by others, IT spend and all other spend, including professional services.

Other significant Scope 3 categories include upstream transportation and distribution (1,451.3 tCO<sub>2</sub>e and 27% of total Scope 3), which includes atgShip emissions; business travel (504.0 tCO<sub>2</sub>e and 9% of total Scope 3) and employee commuting and remote working (462.1 tCO<sub>2</sub>e and 8% of total Scope 3).

Emissions associated with the use of our products now make up only 4% (201.8  $tCO_2e$ ) of our total Scope 3, due to improved accuracy of data.

Our understanding of our Scope 3 emissions has improved significantly in FY25 due to consolidation of data and efforts to improve accuracy.



Scope	category	tCO <sub>2</sub> e	% of overall footprint
S3-1	Purchased goods and services	2,684.8	49%
■ S3-2	Capital goods	3.0	<1%
S3-3	Fuel- and energy-related activities not included in S1 or S2	23.9	<1%
■S3-4	Upstream transportation and distribution	1,451.3	26%
S3-5	Waste generated in operations	13.7	<1%
S3-6	Business travel	504.0	9%
S3-7	Employee commuting (& remote working)	462.1	8%
■ S3-8	Upstream leased assets	3.9	<1%
S3-11	Use of sold products	201.8	4%
S3-12	End of life treatment of sold products	<1	<1%
Total		5,349.0	97%

### Looking forward to FY26

Further Information

Following the acquisition of Chairish in August 2025, we have incorporated the business within our Group emissions boundary for FY25. Chairish represents a highly strategic addition to the Group, expanding our reach in the Arts & Antiques market and strengthening our position in the resale of unique secondary items. Given the timing of the acquisition and the fact that Chairish has a significant shipping component to its operations, we expect this to materially increase our Scope 3 emissions once fully assessed. We have therefore not included Chairish emissions in our FY25 calculations.

During FY26, we will undertake detailed work to calculate Chairish's full emissions profile and develop a strategy to reduce its footprint in line with Group objectives.

Additionally, as part of this process we also plan to rebaseline our near-term and Net Zero targets, in accordance with the SBTi requirement to review targets at least every five years. This rebaseline will also reflect changes in methodology, the inclusion of new entities, and refinements to prior-year data.



# Sustainability Report | Continued



### Additional climate-related metrics

We collect additional climate-related metrics as part of our GHG accounting processes. The Sustainability and ESG Committee is responsible for the governance of these metrics and ESG Working Group members collate data across our geographies in line with the operational control approach and Scope boundaries of our GHG emissions.

Water usage is minimal due to ATG's operations. Water withdrawal refers to all water drawn into the boundaries of the organisation from all sources. We follow the CDP's definition of water withdrawal which is adapted from the GRI Standards Glossary 2016<sup>5</sup>.

We are committed to preventing waste within our operations alongside preventing wasted raw materials through our services. We encourage the recycling of office waste and ensure that IT equipment, at end of life, is recycled or repurposed to minimise waste going to landfill. ATG recognises the consequences of long-term damage to biodiversity, and we aim to reduce the impact of ATG's operations on the local environment. Waste is reported in total tonnes generated and classified as recycled or non-recycled.

As with our GHG reporting, a data hierarchy is applied, and we are working across the Group to improve data quality annually, as well as aligning with internationally recognised reporting standards and frameworks as required.

#### Additional climate-related metrics

#### Energy

320,701	,	(,
528 <b>4</b> 31	772,819	(32)%
53,823	43,267	24%
53,823	43,267	24%
3,098	17,108	(82)%
302,858	476,643	(36)%
158,349	225,862	(30)%
10,303	9,939	4%
474,608	729,552	(35)%
FY25	FY24	% Change (in last fiscal year)
	10,303 158,349 302,858 3,098 <b>53,823</b>	474,608     729,552       10,303     9,939       158,349     225,862       302,858     476,643       3,098     17,108       53,823     43,267

GRI Standards Glossary, 2016. Available at https://reportadviser.com/wp-content/uploads/2021/05/GRI-standards glossary-2016.pdf.

#### Waste

Waste generation (tonnes)	FY25	FY24	% Change (in last fiscal year)
Total recycled	7.1	4.8	48%
Total non-recycled	22.8	27.4	(17)%
Total	29.9	32.2	(7)%
Percentage of operations included	>95%	>95%	

#### Water

Water withdrawal <sup>6</sup> (tonnes)	FY25	FY24	% Change (in last fiscal year)
Water withdrawal	1,470.8	1,763.4	(17)%
Water withdrawal intensity			
(withdrawal per £ million turnover)	8.1	10.1	(20)%
Percentage of operations included	>95%	>95%	

Water withdrawal refers to all water drawn into the boundaries of the organisation from all sources. We follow the CDP's definition of water withdrawal which is adapted from GRI Standards Glossary 2016.



# Sustainability Report | Continued

# **Transition plan**

We are delivering our climate ambition through actions that reduce our operational footprint and maximise our positive impact through the circular economy. Our strategy focuses on enabling reuse, reducing travel, and supporting sustainable consumption through our marketplaces. We aim to achieve Net Zero by 2040 (Scopes 1–3) and to help accelerate the transition to a more sustainable global economy.



# **Our vision**

To transform how people connect with unique finds

# **Our climate ambition**

To achieve Net Zero by 2040 and accelerate the circular economy by enabling sustainable commerce through our online marketplaces

# **Getting auctions online**

#### Key actions

- Support sellers in digitising auctions to reduce the need for in-person attendance and printed materials.
- Expand live and timed online bidding solutions to minimise travel-related emissions for buyers and sellers.
- Provide tools and training to help sellers transition to hybrid and online models
- Enhance the resilience and scalability of our technology to enable more auctions to take place sustainably online.

# Facilitating the circular economy

#### Key actions

- Enable the resale and reuse of second-hand goods across our marketplaces, extending product lifecycles and reducing waste.
- Encourage sellers to adopt sustainable listing practices and highlight the environmental benefits of resale.
- Partner with industry bodies and sustainability initiatives to promote circular economy principles.
- Track and communicate the environmental impact of resale activity, including estimated emissions avoided.

Enabled by

e Risk and opportunity management

Reporting and disclosure

Governance



# Sustainability Report | Continued

# **Dependencies and assumptions**

As part of our business planning and climate strategy process, we assess the key external dependencies and assumptions that underpin our ambitions and the timeframes over which we expect them to materialise. Our dependencies – including technology adoption, market trends, and supplier engagement – are closely interconnected and are considered when developing mitigating management actions. We monitor and manage our exposure to these dependencies, as well as our broader climate-related risks and opportunities, through our established risk management and governance frameworks.

Our key Sco	ope categories					
GHG Scope	Category	Data availability	% all Scope 1–3 emissions in FY25	Materiality of emissions¹	ATG's level of influence	Explanation
Scope 2	1 – Purchased heat	High	1%	Low	Medium	Some control over emissions in the medium term by engaging with landlords and seeking alternative offices with lower emissions.
Scope 2	2 - Purchased electricity	High	1%	Low	Medium	Dependency on grid decarbonisation in UK and US. Forecasts indicate that the US grid will reduce emissions by 84% and the UK grid will reduce emissions by up to 64% by 2040².
Scope 3	1 – Purchased goods & services	Medium	49%	High	Low/Medium	Key suppliers (including AWS and Azure) have made strong commitments to renewable energy and decarbonisation, helping to reduce the carbon intensity of our digital infrastructure. We seek to work with suppliers who demonstrate credible plans to lower their emissions, while recognising that ATG remains reliant on a long tail of smaller suppliers whose reductions will largely come through grid decarbonisation over time.
Scope 3	6 – Business travel	Medium	9%	Medium	Low	ATG Travel Policy restricts the use of Business Class in most cases and overseas travel is only approved when critical to the business.
Scope 3	7 – Employee commuting & remote working	Medium	8%	Medium	Medium	Through the ESG Working Group, environmentally friendly commuting habits are encouraged. Remote working emissions rely on grid decarbonisation.
Scope 3	11 – Use of sold products	Medium	4%	Medium	Low	Dependency on grid decarbonisation in UK and US. Forecasts indicate that the US grid will reduce emissions by 84% and the UK grid will reduce emissions by 66% by 2040².

<sup>1.</sup> Definitions of materiality expressed as % of total emissions: low <5%, medium 5%-20%, high >20%.

<sup>2.</sup> UK: Department for Energy Security and Net Zero, 2024, Energy and emissions. Projections: 2023 to 2050. US: World Economic Outlook, 2024.



# Sustainability Report | Continued

# **Our progress**

We have signed up to the Science Based Targets initiative ("SBTi") Business Ambition for 1.5°C. By doing so, we are committed to achieving Net Zero before 2040 and to reducing emissions in line with the Paris Agreement goals.

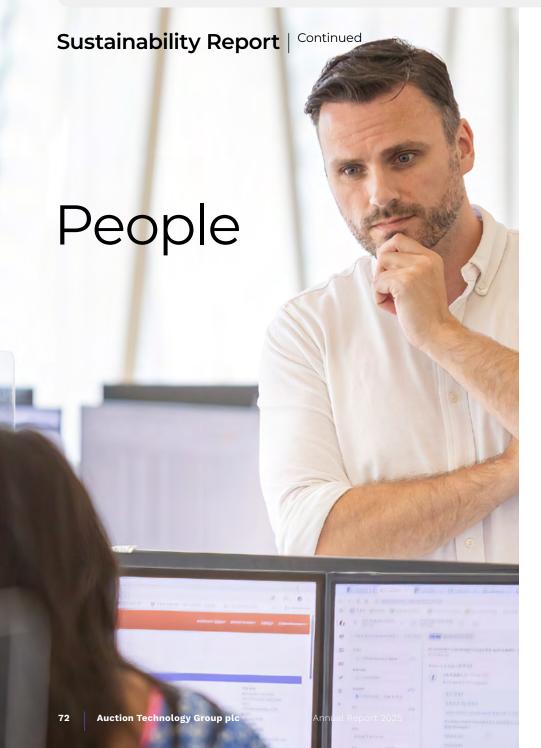
Throughout the year we have been monitoring our progress against our environmental targets. Below we have provided an update on our SBTi-approved near- and long-term targets.

Metric	Emission type	Target year	Base year	Current year	Target year	Status			
Reduction of absolute Scope 1 and 2 emissions by 42% by 2030 (FY31)	Scope 1 Scope 2	2030	424 <sub>tc0<sub>2</sub>e</sub>	$141_{tco_2e}$	$246_{tCO_2e}$	♣ On track			
from a FY22 base year.			<ul> <li>The Group has continued to make strong progress in reducing Scope 1 and 2 emissions, remaining well ahead of its SBTi-approved near-term target for 2030.</li> <li>Ongoing efficiency initiatives across our offices have helped drive this reduction, including optimised summer cooling and winter heating, LED lighting upgrades, replacement of legacy IT equipment with more energy-efficient models, and tighter controls to ensure HVAC systems and appliances are powered down when not in use.</li> </ul>						
Net Zero – Reduction of Scope 1-3 emissions by at least 90% by 2040 (FY41)	Scope 1 Scope 2	2040	2,869 <sub>tCO2</sub> e	5,490 <sub>tCO2</sub> e	287 <sub>tco2</sub> e	More work needed			
from a FY22 base year.	Scope 3		• Scope 3 emissions have increased during FY25, reflecting both business growth and improvements in data coverage and accuracy. While this means we remain some way off our 2040 Net Zero target, we continue to make progress in understanding and managing the key drivers of our indirect emissions.						
			<ul> <li>A key factor in this year's increase was the continued expansion of atgShip, which has resulted in higher shipping-remissions as usage grows. The recent acquisition of Chairish, which has a similar shipping component, will also be incorporated into future emissions management plans.</li> </ul>						
			<ul> <li>During the year, we made significant improvements to data quality and refined our measurement approach in li practice, leading to more accurate and comprehensive reporting. This also identified some previously unreporte contributing to higher figures this year but providing a stronger foundation for future measurement.</li> </ul>						
				our Scope 3 emissions next yea data sources, and methodology		e and to reflect changes in business			
				remains focused on decoupling ur largest Scope 3 sources and o		issions growth, with targeted initiatives for Net Zero by 2040.			









**Strategic Report** 

At ATG, we believe that our people are the foundation of our success. We are committed to fostering a culture where everyone feels a strong sense of belonging, is empowered to thrive, and has the opportunity to grow personally and professionally. Our ability to attract, develop, and retain talented individuals is critical to delivering on our strategy and creating long-term value for all stakeholders.

### How we work

Our culture is defined by shared behaviours that guide how we work with each other, our customers, and our partners. These five principles are:



**Customer-first:**Build what matters.
We create value by keeping our customers at the core.



**Commitment:**Own it. Deliver it.
We take responsibility and follow through with focus.



Capability:
Grow yourself.
Grow others.
We invest in learning

We invest in learning and help each other level up.



**Collaboration:** Win as one.

We focus on what drives outcomes. Share, listen, solve, and create – together.



Curiosity:
Ask why.
Imagine better.
We challenge
assumptions and explore
new ways forward.



# **Engagement**

We are committed to ensuring ATG remains a great place to work, where employees feel informed, valued, and empowered to contribute to our success. Regular, meaningful engagement with our workforce is a cornerstone of our culture. We use a range of communication channels to listen to employee feedback and foster two-way dialogue.

We conduct annual employee engagement surveys to understand sentiment across the organisation. Our December 2024 (FY25) survey saw an 89% participation rate and positive feedback on people, team and work-life balance, and we saw an improvement in our engagement score which was 69% (FY24: 67%).

Following the recent acquisition, Chairish and Pamono employees participated in a pulse survey, achieving an 88% participation rate. They will be included in the annual engagement survey at the end of 2025 to continue tracking sentiment and feedback.

To support a transparent and inclusive culture, we strengthened internal communications with the continuation of regular Group-wide "All Hands" meetings as well as introducing regional meetings to help keep employees connected, provide a platform to celebrate success and recognise outstanding individual and team contributions. We also launched our quarterly employee newsletter, atginsider, to further improve employee communications.

As designated Non-Executive Director for workforce engagement, Tamsin Todd met with groups of employees during the year to discuss employee views. Feedback was discussed by the Board, and recommendations were incorporated into workforce development and engagement initiatives, as detailed on page 91 of this report.

# Wellbeing, health, and reward

We recognise that the wellbeing of our employees underpins their performance and our collective success. ATG is committed to promoting a healthy, inclusive, and supportive working environment for all our people.

We offer a globally consistent suite of healthcare and wellbeing benefits, including access to mental health resources and support programmes such as virtual counselling sessions with trained therapists.

The health and safety of all ATG employees and visitors remains a priority. We maintain a comprehensive Health & Safety Policy and provide appropriate insurance coverage for all eligible employees. We are pleased to report that during FY25 there were no fatalities or serious injuries, and no disruption to operations due to work-related incidents or occupational illness.

At ATG, our approach to pay is guided by fairness, transparency, and alignment with performance. We aim to offer competitive and equitable compensation that reflects the skills and contributions of our people, supports talent retention, and enables internal progression.

We are committed to ensuring that pay practices are free from bias and regularly reviewed against leading market benchmarks. Our Total Rewards framework includes fixed pay and performance-related incentives, while participation in our equity programme is offered to all eligible employees to align employee interests with the long-term success of the Group. We also offer Share Incentive Plans and Employee Share Purchase Plans where ATG matches shares purchased by employees, or where employees acquire shares at a discount respectively. As at the year end, 26% of eligible employees were participating in one of these schemes (FY24: 34%).

We monitor pay equity metrics to support inclusive growth and uphold our values of fairness and integrity across the organisation.

Annual Report 2025

# Diversity, Equity and Inclusion ("DE&I")

At ATG, we believe that diversity of background, experience and perspective makes us stronger. We are committed to creating an inclusive culture where everyone feels respected, valued and able to contribute fully. Our approach to DE&I supports a working environment free from unlawful or unfair discrimination of any kind.

We are guided by our Board Diversity Policy and our Group-wide Diversity & Inclusion and Equal Opportunities Policy, which prohibit discrimination based on gender, ethnicity, age, disability, religion, sexual orientation, gender identity, pregnancy or maternity, marital or civil partnership status, nationality, social background or political belief. These policies are available on our website at www.auctiontechnologygroup.com.

In FY25, we ran two DE&I awareness sessions as well as expanding our Active Bystander Training, making it available to all employees through ATG Academy.

Our recruitment practices are designed to ensure fairness, consistency, and equal opportunity. We hire based on merit and the skills required for each role. In FY25, 37% of new hires were women, and we continue to partner with specialist recruitment agencies to diversify our talent pipeline.

We are committed to supporting employees with disabilities or neurodiverse conditions. This includes making reasonable adjustments to working arrangements or equipment as required. All candidates are given full and fair consideration during recruitment, and we are committed to enabling every employee to thrive.

### Number of employees by region

	FY25	FY24	FY23
Europe	131	115	116
North America	290	239	275
Mexico	48	32	_
Total	469	386	391





### Gender diversity

The Group is diverse in terms of gender mix, with women comprising 45% of the total workforce (FY24: 41%).

The Group's employee base is diverse at the management level, with 12 females on our Senior Leadership Team as defined by the Women Leaders Review (FY24: six), and two female leaders in a senior position on the Board (FY24: one). As of 30 September 2025, the Board comprised three males and five females. ATG also meets the FCA Listing Rules requirement for one senior board position to be held by a woman, with Sarah Highfield as CFO and Suzanne Baxter as Senior Independent Director, with 62% of women on the Board as of 30 September 2025.

### Targets: Gender diversity statistics (as at 30 September 2025)

		Male		Female		Other/Prefer not	to say	Total	
	_	No.	%	No.	%	No.	%	%	
Board	2025	3	38	5	62	-	-	100	
	2024	4	57	3	43		-	100	
	2023	5	63	3	37	_	_	100	
Number of senior positions on the	2025	2	50	2	50	_	_	100	
Board (CEO, CFO, SID and Chair)	2024	3	75	1	25	_	-	100	
	2023	4	100	0	0	_	_	100	
Senior Management <sup>1</sup>	2025	4	50	4	50	-	_	100	
	2024	6	86	1	14		-	100	
	2023	7	88	1	12	_	_	100	
Senior Leadership Team	2025	10	45	12	55	-	_	100	
	2024	11	65	6	35	_	_	100	
	2023	12	71	5	29	_	_	100	
New recruits	2025	66	63	39	37	-	_	100	
	2024	56	67	27	33		-	100	
	2023	54	63	32	37	_	_	100	
Total Group <sup>2</sup>	2025	260	55	209	45	-	_	100	
	2024	230	60	156	40	_	-	100	

<sup>1.</sup> This figure now includes the Company Secretary.

### **Ethnic diversity**

ATG's employees are diverse in terms of ethnicity, with 22% identifying as non-white (FY24: 25%). We are committed to strengthening ethnic diversity at all levels of the organisation, supported by inclusive recruitment practices and thoughtful succession planning. 38% of our senior management (FY24: 43%) and 27% of our Senior Leadership Team (FY24: 24%) identified as being from ethnically diverse backgrounds. We also satisfied the recommendation of the Parker Review that at least one Director should be from an ethnically diverse background, with both John-Paul Savant and Sejal Amin representing ethnically diverse backgrounds.

#### Targets: Ethnic diversity statistics (as at 30 September 2025)

		White British or other White (including minority-white groups)		Mixed/Multiple/ Other Ethnic Groups		Black/African/ Caribbean/Black British		Asian/ Asian British		Not specified	
		No.	%	No.	%	No. %		No.	%	No.	%
Board	2025	6	75	1 1	3			1	13	-	-
	2024	6	86	1 1	4			-	_	_	_
	2023	7	88	1 1	2			-	_	_	_
Number of senior positions on the	2025	3	75	1 2	5			-	_	-	_
Board (CEO, CFO, SID and Chair)	2024	3	75	1 2	5			_	-	_	_
	2023	3	75	1 2	5			-	_	_	_
Senior Management <sup>1</sup>	2025	5	63	2 2	5			1	13	-	_
	2024	4	57	1 1	4			2	29	_	_
	2023	5	63	1 1	3			2	25	_	_
Senior Leadership Team	2025	16	73	3 1	4			3	14	-	_
	2024	8	47	1	6			3	18	5	29
	2023	10	59	2 1	2			4	24	1	6
New recruits	2025	28	27	14 1	3	2 2		3	3	58	55
	2024	12	14	33 4	0	3 4		1	1	34	41
	2023	37	45	6	7	3 5		11	13	25	30
Total Group <sup>2</sup>	2025	194	41	60 1	3	9 2		32	7	174	37
	2024	159	41	53 1	4	14 4		30	8	130	33

<sup>1.</sup> This figure now includes the Company Secretary.

<sup>2.</sup> Our total employee figures include Chairish and Pamono employees.

<sup>2.</sup> Our total employee figures include Chairish and Pamono employees.



# Sustainability Report |

# **Investing in and supporting our talent**

We want everyone at ATG to have the opportunity to learn, grow, and succeed. All employees have access to training and learning resources available to progress their role and career development. Our ATG Academy serves as a central learning platform, offering a wide range of courses delivered by internal and external experts. In FY25, we offered 54 Academy courses, providing over 63 hours of training per employee across topics including leadership, product, and personal development. In FY25, 12 additional courses were added to the platform, including training on AI and the Power of Mindsets. New features were also added to ensure the platform is accessible and easy to navigate. All employees are also required to undertake mandatory training annually to ensure they understand their legal and regulatory duties in relation to insider trading, cyber security, and data security.

Our onboarding experience includes a day-one meeting with HR, a 30-day check-in, and a formal orientation within the first three months. New joiners also have the opportunity to meet ATG's Executive team during the orientation programme.

Formal performance reviews are conducted at least twice a year for all employees, encouraging open conversations about progress, feedback, and future growth. In FY25, 100% of eligible employees received an annual performance evaluation. Internal mobility and career progression are key markers of our success. We recorded 10% of employees having a significant role change, role expansion, or promotion in the 2024 calendar year.

ATG supports apprenticeship schemes to offer young people, or those without the opportunity to study further education, a placement at ATG. These provide qualifications, training, and on the job corporate experience in entry level roles.



#### Employee turnover

	Voluntary employee turnover (permanent employees only)				Total		
	FY25	FY24	FY23	FY25	FY24	FY23	
Europe	16	10	9	34	17	20	
North America	30	47	35	57	73	73	
Mexico	4	3	_	8	4	_	
Total	50	60	44	99	94	93	

#### **Employee training**

	FY25	FY24
Hours of mandatory training completed by employees	648	567
Hours of non-mandatory training completed by employees	850	312
Percentage of employees who are offered training	100	100

# **Political donations and expenditure**

The Company and its subsidiaries did not make any political donations or incur any expenditure during the year.

### **Community partnerships**

Developing the next generation of talent and broadening access to careers in both the auction and technology sectors is vital to the long-term success of our industry. We are committed to encouraging entrants from all backgrounds and supporting initiatives that promote learning and expertise.

ATG also plays an active role in supporting the wider secondary goods industry through sponsorship and the sharing of expertise at key events and conferences. In FY25, this included our participation in Industrial Auctioneers Association events in North America and Portugal.

#### **Charities**

In FY25, ATG has partnered with OnHand, a global volunteering app which gives employees the opportunity to sign up to "missions" where they can give back to their local community or make environmental pledges. This year, employees from our Lehi office also participated in the volunteering initiative "Cardz 4 Kids", making cards for unwell children. We are also involved in a gifting programme for local charities.



# Marketplace integrity

As a leading online platform, we are committed to operating a marketplace that is responsible, reliable and fair, and the trusted destination for online secondary goods purchases. Our aim is to provide a valuable platform for buyers and sellers to ensure we deliver relevant innovation, protect consumer data, and provide an engaging user experience.

# Marketplace governance and buyer protection

We conduct due diligence on all new sellers and have controls in place to reduce fraudulent buyer activity. Buyer security is supported by a dedicated team.

# Cyber security and data protection

We continued to invest in data and cyber security to protect users and platform integrity.

The Group maintains a comprehensive governance framework for data protection and security, and in FY25 the Group established a new Chief Information Officer position with oversight of IT, DevOps and security operations. Working closely alongside our newly appointed Chief Technology Officer, Head of Security, and Group Data Protection Officer, our technology leaders are working towards our commitment of consolidating our marketplaces and improving infrastructure, and continued to work to update and upgrade these platforms in FY25.

ATG looks to continually improve and develop its systems for protection, and conducts annual penetration testing on all proprietary systems as well as monthly reviews of security recommendations from third-party security providers. There were no reportable data breaches in FY25.

### **Customer engagement**

We regularly gather feedback from both sellers and buyers, including direct engagement by our CEO and via live chat. This feedback is used to drive improvements in our offering and ensure our customers have a positive and trusted experience, as a buyer or seller.

In FY25, we continued to update and enhance our platforms and offerings. This included the continued rollout of services such as atgShip, enhanced personalisation and recommendation tools, and reduced frictions in the buying and selling processes.

### **Product quality and restricted items**

While we are not responsible for item quality, we prohibit the sale of certain items through our restricted items policy, such as offensive items, illegal firearms and weapons, and illegal wildlife products. This policy is Board-approved, reviewed annually by our internal audit function, monitored by our compliance team, and is publicly available on the relevant marketplaces.



# Sustainability Report

Corporate Governance

# Responsible business

ATG is committed to operating in a transparent, responsible, and ethical manner, supported by a strong governance and compliance framework that underpins our strategy, builds stakeholder trust, and reduces risk.

# 1. Board oversight and governance

# **UK Corporate Governance Code Compliance**

We fully complied with the UK Corporate Governance Code during FY25, with the exception of a short period in September and October before we had appointed two independent Non-Executive Directors and when there was a temporary impact on Board and Committee composition. The steps taken to address this are detailed on page 82.

We review our governance framework in response to regulatory developments and commissioned an external Board effectiveness review during FY25. For more on our Board, Committees and governance structures, see pages 93 to 114.

### 2. Ethics, conduct and whistleblowing **Business Code of Conduct**

Our business Code of Conduct outlines the behaviours and practices expected of all employees and partners. This includes a formal employee Code of Conduct for both employees and Board members and mandatory annual training on insider trading, data protection, and information security. These expectations extend to suppliers, customers, and service providers.

### Anti-bribery and corruption

We take a zero-tolerance approach to bribery and corruption and enforce robust systems to prevent unethical behaviour. Our Anti-Bribery and Corruption Policy is available on our website at www.auctiontechnologygroup.com. There were no reported incidents of bribery in FY25 or the previous two years.

### Whistleblowing

ATG is committed to maintaining the highest standards of honesty, openness and accountability both within the organisation and in all its business dealings. ATG promotes a transparent culture where employees are encouraged to speak up. We offer a confidential external whistleblowing service operated by an independent organisation. New employees are made aware of the whistleblowing policy when they are onboarded, while existing employees were reminded about the policy in the year through the rollout of the updated ATG handbook. The Audit Committee receives regular reports on any issues raised as detailed on page 98. No whistleblowing reports were made in FY25 or the prior two years.

# 3. Human rights and fair employment Human rights and modern slavery

We are committed to upholding human rights and have zero tolerance for modern slavery, human trafficking, and forced or child labour in our business and our supply chain. ATG supports the principles set out in the UN Declaration of Human Rights and is committed to supporting human rights through our compliance with national laws and through our internal policies which adhere to internationally recognised human rights principles. All employees are paid above the Real Living Wage and are protected by policies covering equal opportunity, flexible working, and inclusion.

We remain compliant with the Modern Slavery Act 2015 and publish an annual Modern Slavery Statement, approved by the Board, which can be found on our website at www.auctiontechnologygroup.com. We are committed to ensuring that slavery and human trafficking are not taking place in any part of our business or our supply chain. The ATG People team is responsible for compliance with our policy. No incidents of modern slavery or human rights abuse were identified in FY25 or the previous two years.

### Grievance procedures

Our grievance policy outlines both informal and formal reporting mechanisms for addressing concerns. Employees can access confidential support via "Tell Jane", an independent service offering advice on bullying and harassment.

#### 4. Tax transparency

We are committed to responsible tax practices in line with our publicly available Tax Policy which is published on our website www.auctiontechnologygroup.com. This policy is reviewed annually and approved by the Board and Audit Committee.

Tax matters are managed by our Chief Financial Officer and local financial controllers, supported by external advisers where required. In FY25, taxes borne by the Group totalled \$20.6m (FY24: \$15.3m) and consist of corporation tax, employers NICs and US state taxes. Taxes collected by the Group totalled \$31.9m (FY24: \$32.5m) and consist of PAYE deductions, employees' NICs, net VAT and US sales tax collected.

# 5. Supplier standards and payment practices

#### Supplier Principles

We continue to review our Supplier Principles outlining our expectations regarding environmental responsibility, health and safety, and data protection. The Board receives regular updates on our supply chain, and has oversight of our systems of control including supplier onboarding and due diligence processes.

### Payments practice

We paid supplier invoices in an average of 24 days during FY25 (FY24: 24 days), in line with our commitment to responsible payment practices.

The Strategic Report, comprising the information on pages 2 to 77 inclusive, was approved by the Board of Directors on 25 November 2025 and signed on its behalf by:

John-Paul Savant Chief Executive Officer