



Modern Slavery and Human Trafficking Statement

Introduction

In accordance with section 54 of the Modern Slavery Act 2015 ("the Act"), this statement sets out TradingHub Group Limited's ("TH") actions to understand all potential modern slavery and human trafficking risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business or our supply chains. This statement relates to actions and activities during the financial year ending 31st December 2025 ("FY25").

TH recognises that it has a responsibility to take a robust approach to slavery and exploitative behaviours and is absolutely committed to preventing this in our business activities and supply chains. We are committed to improving our practices to combat modern slavery and human trafficking in our business by taking steps, as far as we are able, to ensure that our supply chains are free from slavery and human trafficking.

What is modern slavery and human trafficking?

Modern slavery and human trafficking are international crimes, affecting millions of people around the world. Sadly, vulnerable people from overseas as well as across the UK, are forced to work illegally against their will across many different sectors from agriculture, construction, hospitality, retail, manufacturing, and more.

Organisational structure and supply chains

TH is a private company limited by shares, incorporated in England and Wales. We are a finance-focused big data firm - our goal is to create the world's leading financial markets analytics platform to help our customers unleash their organisational potential.

Our headquarters are based in London and we also have subsidiary companies based in Canada, the US, Singapore and Australia.

Our business largely uses people employed directly by TH or its subsidiaries. Our external suppliers are mostly UK and North American based companies in low-risk sectors such as financial and professional services. We believe that the risk of modern slavery and human trafficking in our supply chain is low, but we remain vigilant and continue to review our processes, in respect of new and existing suppliers, and our internal policies.

Policies

We have a zero-tolerance approach to modern slavery and human trafficking and all forms of discriminatory or exploitative behaviour and treatment, whether within our own business or that of those who supply us. Our specific policies and procedures that ensure we conduct business in a fair, honest and lawful way include:

- Business ethics policies outlining the minimum standards of ethical behaviour required, for example:

- Anti-Slavery and Human Trafficking Policy;
- Anti-Bribery and Corruption Policy;
- Anti-Money Laundering Policy;
- Gifts and Hospitality Policy; and
- Anti-Facilitation of Tax Evasion Policy.

These policies do not provide an exhaustive list of every law that might apply or action that an employee needs to take for every situation, but instead provides a framework and guidance for employees to operate in an open, honest, ethical and principled way.

- Employment policies that protect our employees from unfair treatment and promote a fair and inclusive workplace.
- Robust recruitment processes in line with relevant employment laws.
- Competitive pay and rewards that are reviewed annually.
- A Sustainable Procurement and Supplier Management Policy which sets out how we deal with suppliers and the due diligence that is undertaken.
- A Supplier Code of Conduct which sets out our expectations of suppliers.
- A Whistleblowing Policy which seeks to encourage employees to report any concerns related to the direct activities, or the supply chains of, TH.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our policies and procedures are continuously kept under review and updated.

Due diligence

As a first step in any procurement process, employees are required to undertake due diligence on any new supplier, including a reputation check. When identifying high risk areas in our supply chain relationships we consider:

- Financial risk;
- Business, operational and transactional risk;
- Regulatory risk; and
- Environmental, social and governance compatibility.

Our environmental, social and governance questionnaire, which forms part of our Sustainable Procurement and Supplier Management Policy, includes specific questions for material and critical suppliers on modern slavery and human trafficking. Any risks identified in the due diligence process (including any potential modern slavery or human trafficking risks) are assessed by key stakeholders before final sign off is given. We aim to ensure that our supplier due diligence procedures are appropriate to our modern slavery and human trafficking risk.

Where possible we build close, stable and long-standing relationships with our suppliers. Our expectations of suppliers, including in the areas of labour and human rights, are set out in our Supplier Code of Conduct.

Key suppliers are subject to ongoing yearly due diligence which includes, amongst other things, reputation checks and verification that they have produced a modern slavery statement in line with the Act (“**Ongoing Due Diligence**”).

If agency workers are employed, this would only be through reputable employment agencies that adhere to our anti-slavery and human trafficking policy (or equivalent policies).

Monitoring and training

As set out in this statement, TH has in place internal procedures to ensure the business is clear on its obligations to combat modern slavery and human trafficking. We also have an internal legal and finance team to assist in this area.

All employees are required to complete a mandatory modern slavery online training module once a year.

Employees are encouraged to report any concerns or suspicions regarding the presence of modern slavery or human trafficking within the supply chain. Our policies (including the Whistleblowing Policy) are available to all employees on the internal HR platform.

Should any employee need further information or support with regards to modern slavery or human trafficking this will be provided.

Performance indicators

Key performance indicators ("KPIs") help to measure how effective we have been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chain. During FY25 we maintained our 2024 KPI outcome figures and developed an additional KPI regarding due diligence. The KPIs are as follows:

- **Training:** percentage of TH staff completing training on identifying and addressing the risk of slavery and human trafficking in our business and supply chain.

Outcome FY25: 100%

- **Initial due diligence:** percentage of new key suppliers sent our Supplier Code of Conduct.

Outcome FY25: 100%

- **Ongoing due diligence (new FY25 KPI):** current key suppliers for whom we have completed Ongoing Due Diligence.

Outcome FY25: 100%

- **Incidents:** reports or incidences of modern slavery or human trafficking in our operations or supply chain.

Outcome FY25: 0

Forward looking objectives

Our focus for the next financial year will be to:

- continue to strengthen and enhance our approach to identifying and managing modern slavery and human trafficking risk across our business operations;
- continue to provide training to our employees on their obligations to tackle and identify modern slavery and human trafficking risks; and
- report on our current KPIs (aiming to improve / maintain the FY25 KPI percentage or figure) and develop future metrics to assess the effectiveness of our actions and enhance our monitoring over time, in line with continuous improvement.

Approval

This modern slavery and human trafficking statement is made in connection with section 54 of the Act, for FY25. It was formally approved by TH's Board of Directors on 30 January 2026

Elaine Thomas

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Director, TradingHub Group Limited

Date: 30 January 2026