

Modern Slavery Statement

2024

Optiver Australia Holdings Pty Limited
30 June 2025





Table of Contents

1. Identify the reporting entity and describe the reporting entity’s structure, operations and supply chains	3
2. Describe the risks of modern slavery practices in the operations	4
3. Describe the risks of modern slavery practices in the supply chains	4
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	4
5. Describe how the reporting entity assesses the effectiveness of these actions	5
6. Describe the process of consultation with any entities the reporting entity owns or controls	6
7. Statement	6



1 Identify the reporting entity and describe the reporting entity's structure, operations, and supply chains

Optiver is a global electronic market maker and proprietary trading firm with locations across Europe, Asia-Pacific and North America.

This modern slavery statement is made on behalf of Optiver Australia Holdings Pty Limited (ACN 077 364 286) and its wholly owned Australian subsidiaries / consolidated entities:

- Optiver Australia Pty Limited (ACN 077 364 366)
- Optiver Pty Limited (ACN 135 181 136)
- Optiver Trading Pty Limited (ACN 123 177 971)

(Collectively referred to as **Optiver Australia** or the **Optiver Australia Reporting Entities**), pursuant to the requirements of the Modern Slavery Act 2018 (Cth) ("**the Act**"). This is our fourth modern slavery statement under the Act and sets out the approach we have taken to understand and address modern slavery and human trafficking risks in our operations and supply chains for the financial year ending 31 December 2024 (the "**Reporting Period**").

Optiver Australia has continued to review our approach in assessing our modern slavery risk within our supplier base. We are not aware of any slavery or human trafficking in any part of its supply chain, and we remain dedicated to ensuring we enhance our capabilities in assessing this risk.

The Optiver Australia Reporting Entities are Australian private companies with their registered office located at 33-39 Hunter Street, Sydney, NSW, Australia.

Optiver Australia Pty Limited holds an Australian Financial Services Licence issued by the Australian Securities and Investments Commission and is a member of various exchanges.

As a proprietary trading firm and electronic market maker, Optiver Australia Pty Limited's principal activity is derivatives market making and trading.

Optiver Australia Pty Limited trades multiple asset classes (including securities, options, futures, and exchange traded funds) directly and indirectly through brokers on exchanges globally.

To directly support Optiver Australia Pty Limited's market making and trading activities, Optiver Australia Reporting Entities purchase services from clearing institutions, trading data from stock exchanges, IT related services (software & hardware).

Indirectly Optiver Australia Pty Limited are also supported by a supply chain that deliver services for business operations, HR and Enterprise IT.



2 Describe the risks of modern slavery practices in the operations

Optiver Australia employees approximately 462 staff who are based in Sydney, Australia. As staff carry out highly skilled activities, the risk of these individuals being subject to modern slavery is very remote. All staff are employed or engaged on contractual terms that comply with applicable laws including those relating to pay, working conditions and health and safety.

3 Describe the risks of modern slavery practices in the supply chains

In the reporting period, Optiver's Australian operations sourced goods and services from approximately 464 suppliers. While over 55% of these suppliers operate in Australia, we also work with offshore suppliers, mainly in the Singapore, Hong Kong, United States and Korea which are considered lower risk jurisdictions. These suppliers are predominantly providing technology, financial services, media & telecom and administrative & support which are considered low risk categories.

We further enhanced our assessment approach to ensure we are working with updated data points to enhance our assessment of Modern Slavery risks with Optiver Australia's suppliers. Following that assessment, Optiver Australia has concluded that our suppliers do not raise any significant risks of Modern Slavery, nor are we aware of any actual incidents of Modern Slavery related to our suppliers during the Reporting Period.

4 Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

We continually review our practices and procedures to ensure we improve our understanding and management of Modern Slavery risks in our supply chain.

Optiver Australia maintains and reviews relevant policies and processes that include, but are not limited to:

- Code of Conduct
- Anti-Bribery and Corruption Policy
- Whistle-blower Policy
- Global Procurement Policy



To mitigate modern slavery risks with our suppliers, we use tools such as external data sources and the incorporation of the Modern Slavery assessment in the procurement process to ensure our suppliers meet our standards including identifying where there are heightened risks of modern slavery practices.

In the Reporting Period, we continue to engage with an Australian Bureauⁱ that specialises in ESG assessments which leverages technology and data to assess suppliers for modern slavery risk. As a result we have gained further detailed insights into the jurisdictions our suppliers operate in including any parent entities and their industry to determine their associated modern slavery risk. Through this partnership we periodically scan our active suppliers and identify inherent modern slavery risks. If we identify a supplier that meets the high modern slavery risk rating, we will apply additional due diligence in-line with our protocols.

Additionally, Optiver's Asia Pacific ESG Forum was established in 2022 to support the fulfilment of our objectives and responsibilities in relation to environmental and social matters including modern slavery legislation and the delivery of commitments made within our Modern Slavery Statement. This forum has now expanded its scope to also include Charity organisations we contribute to directly as well as indirectly through staff managed engagements.

5 Describe how the reporting entity assesses the effectiveness of these actions

In 2024, Optiver Australia continued to deepen its understanding of our supplier landscape through the Modern Slavery risk assessment process. Our approach to this program builds upon the strong foundations already in place, with a focus on increasing its effectiveness and driving continuous improvement.

By systematically refining our processes, we aim to not only meet regulatory and operational expectations but also to elevate our supplier engagement strategy. This ensures that we remain proactive in identifying risks, fostering transparency, and supporting long-term value creation across our supply chain.

Some of the actions we will consider and seek to implement during 2025 include:

- Operationalise our Global Procurement Policy.
- Develop a supplier management framework that ensures there are clear roles and responsibilities and effective oversight and management of high-risk suppliers.



6 Describe the process of consultation with any entities the reporting entity owns or controls

This modern slavery statement was developed by the Optiver Australia Reporting Entities, in consultation with each of the wholly owned subsidiaries and affiliated entities of the Optiver Australia Group of entities, which includes:

- GT Technologies (Australia) Pty Ltd (ACN 612 743 727) which is an affiliated entity of the Optiver Australia Reporting Entities; and
- Optiver Private Fund Management (Shanghai) Co., Ltd which is a wholly owned subsidiary of Optiver Australia Pty Limited.

It should be noted that all Optiver Australia Reporting Entities and GT Technologies (Australia) Pty Ltd are subject to Optiver Australia policies, procedures and systems, and are party to group-wide information and resource-sharing arrangements. Accordingly, the information (including supplier information) detailed in this statement is applicable to all Optiver Australia Reporting Entities and GT Technologies (Australia) Pty Ltd.

7 Statement

This statement was approved by the Board of Directors of Optiver Australia Holdings Pty Limited.

Paul Cotter

Director

26th June 2025



ⁱ The external Australian Bureau assesses a business's modern slavery exposure rating through a composite of country risk and industry risk ratings of the company and its corporate group. The country risk rating is determined by the geographic locations where the corporate group operates. This assessment considers the strength of local regulations and enforcement against forced labour, levels of corruption that may undermine worker protections, and the modern slavery prevalence within the country. The industry risk rating reflects the sector's inherent vulnerabilities, including the prevalence of low-wage or seasonal employment, transparency levels within typical supply chains, and the extent of market regulation and government oversight governing the sector. By analysing both dimensions together, the methodology captures how geographic and operational factors interact to create modern slavery exposure rating, providing businesses with a comprehensive understanding of their potential exposure across all group entities.