

# Modern Slavery Statement

## 360T Group

FY 2023

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## I. About this Statement

This statement outlines the actions taken by 360 Treasury Systems AG (“**360T AG**”) and its subsidiaries (together the “**360T Group**”) to identify, assess and mitigate the modern slavery in our business and service provider chains, over the financial year ending 31<sup>st</sup> of December 2023. This statement has been prepared to comply with the requirements of The Australian Modern Slavery Act 2018 and it has been approved by the 360 Treasury Systems AG’s Management Board in their capacity as principal governing body on 30<sup>th</sup> of August 2024.

Furthermore, we refer to our ultimate parent company Deutsche Boerse AG and its group statement on the UK Modern Slavery Act 2015 which is publicly available on its company website at: [Deutsche Börse Group \(deutsche-boerse.com\)](https://www.deutsche-boerse.com)

## II. About our Company

360T AG is an independent and globally established financial services provider operating both a Multilateral Trading Facility (*MTF*) trading venue and Over the Counter (*OTC*) trading platform. 360T AG is also a provider of financial information, integration solutions and related services.

360T AG was established in July 2000 is headquartered in Frankfurt am Main, Germany. 360T AG also maintains subsidiaries in: New York, 360 Trading Networks Inc.; Singapore, 360T Asia Pacific Pte. Ltd.; Dubai, 360 Trading Networks (DIFC) Limited; Kuala Lumpur, 360 Trading Networks Sdn. Bhd. and Mumbai, ThreeSixty Trading Networks (India) Pvt Ltd.

360T AG is lead regulated by the German Federal Financial Supervisory Authority (*BaFin*) and German Centralbank (*Bundesbank*).

Since October 2015 360T Group is part of Deutsche Boerse Group (“**DBG**”).

## III. Identifying the Risk of Modern Slavery

Being a part of DBG, 360T AG is committed to a high degree of transparency towards its stakeholders – along every step of the value creation chain.

Referring to the DBG purpose statement - *We at Deutsche Boerse create trust in the markets of today and tomorrow* – the 360T Group constantly strives to create the best environment for its employees to perform, innovate and develop. Integrity, loyalty, and fairness are the key elements of 360T Group’s corporate culture which is explicitly laid out in its Code of Business Conduct.

We understand that slavery can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, and human trafficking. In this statement we refer to ‘modern slavery’ as defined by The Australian Modern Slavery Act 2018

We constantly strive to understand and improve human rights impacts throughout our broader value chain and not purely where we have operational control. However, given our scale and diversity we are aware of the risk of indirect exposure to human rights impacts, particularly via our procurement activities where more than one party may stand between us, and the rights holders affected. Accordingly, we seek to understand our impacts and exercise influence where possible.

## IV. Actions taken to identify, assess and mitigate the Risks of Modern Slavery

360T Group operates in compliance with its groupwide established Code of Business Conduct, which summarizes the essence of the values we stand for and the principles that each and every one of us at 360T Group and DBG adheres to.

This code commits us and our employees to:

- Act with honesty and integrity, and in accordance with all applicable laws and regulations in all relevant jurisdictions in which 360T and Deutsche Boerse Group operates.
- Avoid conflicts of interest, and, where this is not possible, deal with them appropriately.
- Show fair play towards competitors while being committed to fair competition.
- Treat customers fairly and with a commitment to service.
- Interact with one another with openness and confidence, respect the life choices of others, and intervene when witnessing any sort of discrimination or abuse.
- Show responsibility towards the environment and the communities in which we operate.
- Recognize and manage risks.
- Take the initiative in recognizing and reporting non-compliance, including mitigating the risk thereof.

Apart from our Code of Business Conduct, our commitment to human rights is supported by internal policies and processes that identify, assess, and mitigate risks of modern slavery.

These include, but are not limited to our:

- Outsourcing Policy
- Anti-Corruption Policy
- Anti-Money Laundering and Combating the Financing of Terrorism Policy
- KYC/Customer Due Diligence Procedure
- Employee Due Diligence Procedure
- Compliance Policy
- Market Abuse Policy
- Whistleblower Policy.

Our relevant processes and procedures include, but are not limited to the following:

- We monitor and review the effectiveness of relevant internal policies, containing relevant processes and procedures relating to modern slavery risks, and track the implementation of those processes and procedures across our business areas.
- We provide mandatory compliance trainings to our employees and continuously raise awareness.
- We undertake supplier risk assessments and due diligence on outsourced services, including with regards to modern slavery risks. These assessments include inter alia vendor risks (financial stability, compliance and reputational risks), country risks (such as political risks or sanctions) etc.;
- We have processes in place to monitor the outsourced services within the company, including the ones with regards to modern slavery risks.
- We have a range of policies and implement programs to support an inclusive workplace with freedom of association.
- We conduct annual internal, external, and statutory required audits.
- Our employees and external service providers have access to the 360T Group's / DBG's Whistle-Blowing hotline, to anonymously report or raise any concerns or suspected unethical or corrupt behavior.

Violations of the principles set out in our Code of Business Conduct and policies may result in disciplinary action, up to and including termination and other legal consequences.

We will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

## V. Consulting and overseeing the Modern Slavery Risk across 360T Group

360T AG has established consulting, management, and reporting procedures across the 360T Group, including, but not limited to:

- Regular meeting of the Group Executive Board
- Quarterly and annual risk-, compliance-, IT security- etc. -reports to management and supervisory board

Further 360T Group established a process to assess risks related to the outsourcing of services, including among others the extensive assessment of the vendor/ service provider compliance, reputation, business codes, policies etc.

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This Modern Slavery Statement will be reviewed and updated annually.

This statement has been endorsed by the Management Board of 360T AG.



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Carlo Kölzer  
*360T AG Management Board Member,  
Group CEO*



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Thomas Spaun  
*360T AG Management Board Member,  
Group CFO/COO*



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David Hable  
*360T AG Management Board Member*