

## Susquehanna Pacific Pty Ltd Modern Slavery Statement FY23

This Modern Slavery Statement is made in accordance with the Modern Slavery Statement Act 2018 (Cth) and covers the activities of Susquehanna Pacific Pty Ltd ACN 082 467 605 ("Susquehanna").

### Structure, operations and supply chains

Susquehanna is a proprietary company incorporated in Australia. In the development of this statement, we consulted with SIG India Trading Private Limited ("SIG India") an Indian incorporated entity owned and controlled by Susquehanna. We note SIG India's Board of Directors is aware of the content and development of this statement and Susquehanna manages all sourcing and procurement for Susquehanna and SIG India. Accordingly, the processes, actions and assessments detailed in this statement are also applicable to SIG India.

As at the end of 31 December 2023 Susquehanna employed approximately 267 staff, all based in Sydney.

Susquehanna's core operations are proprietary trading and market making.

Susquehanna's supply chains include vendors supplying:

- trading services (for example clearing, market data, electronic execution);
- professional services (for example audit, accounting and legal services);
- IT infrastructure and IT services; and
- office services, office consumables, and food and beverage.

### Definition of Modern Slavery

Modern slavery describes situations where "...offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour

*Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. These practices are also harmful and may be present in some situations of modern slavery."<sup>1</sup>*

### Identified operations and supply chain risks

As a business engaged in proprietary trading and market making, the nature of our operations and the goods and services within our supply chain provide relatively limited opportunities for modern slavery practices.

Nonetheless, the potential for modern slavery exists in certain areas with which Susquehanna interacts such as (i) IT infrastructure and IT services and (ii) office services, office consumables, and food and beverage.

### Actions

Susquehanna has undertaken its annual modern slavery risk assessment and has not identified any material risks where Susquehanna causes, contributes to or is directly linked to modern slavery practices through its operations and supply chains.

Susquehanna has also taken the following actions to assess and address the potential risk of modern slavery practices in its operations and supply chains:

- assessing the modern slavery risks for the top 20% of Susquehanna's suppliers by annual spend;
- engaging with key stakeholders of the business in relation to its annual modern slavery risk assessment;
- reviewing and updating supplier on-boarding procedures including supplier due diligence to identify any new suppliers with heightened risks of modern slavery practices.

### Assessment of effectiveness

We assess on an ongoing basis the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, assessing our partnership with suppliers and other external partners, and undertaking internal governance. Based on the results of these processes we adapt our actions to improve our response to modern slavery. An annual Modern Slavery Statement will be prepared to report on Susquehanna's exposure to modern slavery risk across its operations and supply chains as required by the Modern Slavery Act 2018 (Cth). The modern slavery framework will be reviewed periodically, as determined by the Management Committee of Susquehanna.



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This Modern Slavery Statement has been approved by the Board of Directors of Susquehanna Pacific Pty Ltd.

Date: 13 June 2024



John Chul Lee, Director

Susquehanna Pacific Pty Ltd

<sup>1</sup> Australian Government, Attorney-General's Department at <https://www.ag.gov.au/crime/people-smuggling-and-human-trafficking/modern-slavery> as at 22 May 2024