



**Modern Slavery Statement
2024**

**Akuna Capital Australia Pty Ltd and
Akuna Digital Australia Pty Ltd**



1. Introduction

This joint Modern Slavery Statement has been prepared to comply with the Modern Slavery Act 2018 (the **Act**) in respect of the year ending 31 December 2024 (the **reporting period**). This statement covers the following Akuna entities:

- Akuna Capital Australia Pty Ltd (ACN 622 473 750); and
- Akuna Digital Australia Pty Ltd (ACN 622 349 393).

(Together, referred to as **Akuna Australia**).

The Akuna Australia entities are wholly owned subsidiaries of Akuna Holdings, LLC, a private limited company, registered in Delaware, USA.

The Akuna family of companies strongly condemns the use of slavery and human trafficking in any circumstances.

2. Akuna's Structure, Operations and Supply Chains

The Akuna Australia entities are based in Sydney, Australia and are part of a global group of companies with a primary office in Chicago. The Akuna Australia entities are proprietary trading firms with no external customers or clients.

Akuna Capital Australia Pty Ltd holds an Australian Financial Services Licence issued by the Australian Securities and Investments Commission.

As at the end of 31 December 2024, Akuna Australia employed approximately 90 staff, based in Sydney.

All Sydney employees have employment contracts that are subject to Australian Fair Work standard terms. In addition, all employees are introduced to Akuna Australia's human resource policies which include information and resources to ensure all employees are aware of Akuna's commitment to fair working conditions and safe working environments.

Akuna Australia's supply chain primarily consists of:

- **Banking and financial services firms** (e.g., banks, brokers, insurers, and exchanges);
- **Technology providers** (e.g., data storage, hardware, and software);
- **Building and Office services** (e.g., building maintenance, cleaning, office supplies);
- **Others**, including recruitment services, courier services, catering, and corporate travel.

Akuna Australia's key suppliers are predominately located in lower risk jurisdictions, such as, Australia, Hong Kong, Singapore, the United States of America, and the United Kingdom.



3. Risks in Akuna's Operations and Supply Chains

For the reporting period, Akuna Australia carried out a risk assessment of the potential modern slavery risks within the firm's operations and supply chains.

In conducting this assessment, Akuna took into consideration the following factors:

- Industry type/ sector; and
- Country of supplier.

Based on the results of this risk assessment, Akuna Australia considers the presence of modern slavery practices within its operations and supply chains to be low.

Akuna Australia, however, acknowledges that there may be risks of modern slavery within its supply chain, primarily arising from i) the technology sector; ii) the hospitality and entertainment sector; and iii) the building and office services sector.

4. Actions taken to assess and address modern slavery risks

i. Policy Framework

Akuna Australia maintains, and regularly reviews, a comprehensive set of policies and procedures that contribute towards identifying and addressing modern slavery risks, including, but not limited to firm's:

- Modern Slavery Policy;
- AML/ CTF Program;
- Anti-Bribery and Corruption Policy;
- Compliance Code of Conduct;
- Regulatory Breach and Incident Policy;
- Whistleblower Policy; and
- Work, Health and Safety Policy.

ii. Modern Slavery Training

Akuna Australia employees have been provided with specific training on Modern Slavery. In addition, all new and existing employees of Akuna Australia are required to complete training on the firm's Code of Conduct and related compliance policies.

iii. Supplier Risk Assessment and Due Diligence

During the reporting period, Akuna Australia undertook a modern slavery risk assessment of the firm's suppliers. Akuna Australia's full year 2024 risk assessment did not identify any high-risk suppliers.



5. Assessing the effectiveness of actions

Akuna Australia has developed several key performance indicators (**KPIs**) to assess the effectiveness of the actions taken to identify and address modern slavery practices in the firm's operations and supply chains, including:

- the number of suppliers assessed for modern slavery risks;
- the percentage of medium and high-risk suppliers vs total suppliers;
- the percentage of modern slavery questionnaire responses received from medium-risk suppliers and, if applicable, from high-risk suppliers;
- the number of reports of modern slavery or related incidents;
- the number and percentage of new staff members who have successfully completed background checks, including verification of their 'right to work' status;
- the number of modern slaving training sessions offered to staff; and
- the percentage of staff who have attested their adherence to the firm's compliance policies, including the firm's Modern Slavery Policy.

Akuna Australia is committed to continuous improvement and will adjust its monitoring and reporting processes as necessary to ensure that the modern slavery risks it may reasonably face are effectively identified and addressed.

6. Consultation and Approval

Appropriate consultation has been undertaken between Akuna Capital Australia Pty Ltd, Akuna Digital Australia Pty Ltd and Akuna Holdings LLC in the preparation of this Modern Slavery Statement.

This Modern Slavery Statement was approved by the Board of Akuna Holdings LLC as the parent entity of the following entities on 9 June 2025:

- Akuna Capital Australia Pty Ltd; and
- Akuna Digital Australia Pty Ltd.

DocuSigned by:

John Harris

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John Harris
Director
Akuna Capital Australia Pty Ltd
and Akuna Digital Australia Pty Ltd