Optiver

Modern Slavery Statement

2025

Optiver Australia Holdings Pty Limited

30 June 2026

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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 by Optiver Australia Holdings Pty Limited (ACN 077 364 286) and covers its wholly owned Australian subsidiaries / consolidated entities, being:

- Optiver Australia Pty Limited (ACN 077 364 366);
- Optiver Pty Limited (ACN 135 181 136); and
- 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**) and is a joint statement under section 14 of the Act, covering each of the Optiver Australia Reporting Entities. For clarity, the Optiver Australia Reporting Entities are the only entities making, and jointly covered by, this statement for the purposes of the Act. Other Optiver group entities may be referred to in this statement where relevant to Optiver Australia's structure, operations, supply chains, consultation process or modern slavery risk management activities, but are not reporting entities for the purposes of this statement unless expressly identified as an Optiver Australia Reporting Entity. This is our fifth 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 2025 (the "**Reporting Period**").

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

The Optiver Australia Reporting Entities are Australian private companies with their registered offices located at Level 32, 275 Kent 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 and IT related services (software and hardware).

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

2 Describe the risks of modern slavery practices in the operations of Optiver Australia

Optiver Australia considers the risk of modern slavery practices occurring within its direct operations to be low. Optiver Australia's workforce primarily performs professional, highly skilled roles and is largely based in Sydney, Australia. Staff are employed or engaged under written contractual arrangements that comply with applicable employment, workplace health and safety, and related laws. Optiver Australia also maintains policies and reporting channels relevant to workplace conduct and compliance. To the extent Optiver Australia uses contractors or outsourced operational services, these risks are considered as part of its supplier risk assessment process.

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

Optiver Australia considers the risk of modern slavery practices in its supply chains to be low, having regard to the nature of its supplier base, supplier locations, and the goods and services procured.

During the Reporting Period, Optiver Australia commissioned Purpose Bureau, an external ESG and modern slavery due diligence provider, to support its assessment of labour and human rights risks across its supply chain.[1] Purpose Bureau used its monitoring platform and methodology to assess 485 suppliers across 25 countries.[2] The assessment considered supplier-specific factors including country, industry and supply chain characteristics, as well as available evidence of supplier controls, including certifications, accreditations, transparency disclosures, memberships, government screening and recognised third-party audits.[3]

Optiver Australia's reviewed supplier base was predominantly concentrated in Australia and other lower-risk jurisdictions, with key supplier locations including Australia, the United States, the United Kingdom, Singapore and Korea.[4] Key supplier categories included professional services, financial services, information media & telecommunications services, administrative & support services, and technology-related goods & services.[5]

[1] Purpose Bureau, *Modern Slavery Statement | Supply Chain Intelligence Summary*, Reporting Period 1 January 2025 to 31 December 2025.
[2] Purpose Bureau, *Modern Slavery Statement | Supply Chain Intelligence Summary*, Reporting Period 1 January 2025 to 31 December 2025, p 1.
[3] Purpose Bureau, *Modern Slavery Statement | Supply Chain Intelligence Summary*, Methodology Appendix, pp 4 - 5.
[4] Purpose Bureau, *Modern Slavery Statement | Supply Chain Intelligence Summary*, p 2.
[5] Purpose Bureau, *Modern Slavery Statement | Supply Chain Intelligence Summary*, p 2.

Optiver Australia recognises that modern slavery risks can arise in supply chains even where direct suppliers operate in lower-risk jurisdictions or provide professional, financial or technology-related services. In particular, certain categories may carry higher inherent risk where they involve lower-skilled labour, outsourced services, electronics hardware, extended offshore supply chains, or corporate groups with operations in higher-risk jurisdictions.

Purpose Bureau's methodology combines inherent exposure indicators with available controls indicators to develop a supplier-specific view of residual risk. Following this assessment, no suppliers were identified with a high residual risk rating.[6] Optiver Australia also did not identify any verifiable instances of modern slavery in its supply chain 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

During the Reporting Period, Optiver Australia continued to develop its modern slavery risk management approach by strengthening procurement governance, improving supplier oversight and using external risk intelligence to support supply chain due diligence.

Optiver Australia's approach is supported by policies and processes relevant to the identification, assessment and management of modern slavery and broader labour and human rights risks, including its Global Code of Conduct, Global Anti-Bribery and Corruption Policy, Global Whistleblower Policy and Global Procurement Policy.

During the Reporting Period, Optiver operationalised its Global Procurement Policy. This supported a more consistent approach to procurement governance, supplier risk review and supplier management. These processes support Optiver Australia's broader approach to identifying and managing third-party risks, including modern slavery risk where relevant. Where suppliers are assessed as presenting higher risk, Optiver Australia may undertake further review, seek additional information, consider available supplier controls and determine whether any further action is required.

Optiver Australia also leveraged a globally developed a supplier management framework made available through Optiver's Global Procurement function to support the ongoing oversight and management of suppliers. The framework is designed to clarify roles and responsibilities for supplier management and to support a risk-based approach to suppliers that may present elevated third-party risk, including labour and human rights risk.

Optiver Australia continued to engage Purpose Bureau, an external labour and human rights risk intelligence provider, to support its assessment of modern slavery risks across its supply chain. Purpose Bureau's platform uses supplier data and external risk indicators to assess risk by reference to factors such as country, industry, supply chain characteristics, corporate group exposure and

[6] Purpose Bureau, *Modern Slavery Statement | Supply Chain Intelligence Summary*, Reporting Period 1 January 2025 to 31 December 2025, p 1.

available evidence of supplier controls. Optiver Australia understands that Purpose Bureau continues to refine its methodology and monitoring capability, which further supports Optiver Australia's ongoing review of modern slavery risk in its supply chain.

Optiver Australia's Asia Pacific ESG Forum continued to support oversight of environmental and social matters, including modern slavery compliance and the delivery of commitments made in Optiver Australia's Modern Slavery Statement. If a modern slavery concern were to be identified in relation to a supplier, Optiver Australia would assess the nature and severity of the concern, engage with the relevant supplier to seek further information or clarification, escalate the matter to senior management and, where appropriate, work with the supplier to support remediation or corrective action. Depending on the circumstances, Optiver Australia may also consider adjusting or terminating the supplier relationship.

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

Optiver Australia assesses the effectiveness of its modern slavery risk management actions by considering whether the actions taken during the Reporting Period have improved supplier risk visibility, strengthened procurement governance and supported appropriate oversight of modern slavery risks.

Optiver Australia assesses the effectiveness of its engagement with Purpose Bureau by reviewing the quality and usefulness of Purpose Bureau's risk intelligence outputs, including whether the outputs assist Optiver Australia to identify areas of elevated supplier risk and prioritise further review where appropriate. Optiver Australia also engages with Purpose Bureau regarding its methodology, monitoring capability and product development, including through informal annual comparisons with available market approaches to identify opportunities to improve the usefulness of reporting and analysis for Optiver Australia.

Optiver Australia assesses the effectiveness of the operationalisation of its Global Procurement Policy and supplier management framework by considering whether modern slavery risk considerations are being incorporated into procurement and supplier management through ongoing internal control and assurance processes.

Optiver Australia assesses the effectiveness of the Asia Pacific ESG Forum through periodic review of its role, scope and operation, including whether the forum remains an appropriate forum for considering environmental and social matters, including modern slavery risks.

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

This statement was prepared on behalf of the Optiver Australia Reporting Entities and developed as a joint statement for those entities. The directors of the Optiver Australia Reporting Entities reviewed the statement and agreed with its contents before approval by the Board of Directors of Optiver Australia Holdings Pty Limited.

In preparing this statement, the Optiver Australia Reporting Entities also consulted or considered the following non-reporting entities:

- Optiver Private Fund Management (Shanghai) Co., Ltd, which is a wholly owned subsidiary of Optiver Australia Pty Limited. Although it is not itself a reporting entity under the Act, it is an entity owned or controlled by an Optiver Australia Reporting Entity and was therefore considered in assessing modern slavery risks in the operations and supply chains of the Optiver Australia group.

- GT Technologies (Australia) Pty Ltd (ACN 612 743 727), which is an affiliated entity of the Optiver Australia Reporting Entities. GT Technologies (Australia) Pty Ltd is not a subsidiary of Optiver Australia Holdings Pty Limited and is not a reporting entity for the purposes of this statement. It was considered because it is a key provider of technology, operational and support services to the Optiver Australia Reporting Entities and is therefore relevant to Optiver Australia's supply chain and modern slavery risk assessment.

The consultation process was supported by circulating the draft statement to directors or relevant representatives of the entities described above for review and comment. This process was intended to confirm that the statement appropriately reflects the operations, supplier arrangements, policies, procedures and systems relevant to the Optiver Australia Reporting Entities, their owned or controlled entities, and key supply chain arrangements.

7 Statement

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

Paul Cotter

Director

29 June 2026