

# **2025 Modern Slavery Statement**

## **Introduction**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Interactive Brokers Australia Pty Ltd (**IBA**) is committed to preventing slavery or human trafficking in any part of its business or supply chains.

This statement is made in accordance with section 13 and 16 of the *Modern Slavery Act 2018* (Cth) (**Act**), for the financial year ending 31 December 2025. The statement also aligns with IBA's Code of Business Conduct and Ethics.

## **Organisational structure**

IBA offers Australian clients online trade execution, clearing and custodial services regulated by the Australian Securities and Investments Commission. IBA is part of a global group of financial services companies that are under the common control of Interactive Brokers Group, Inc., a U.S. based firm (**IBKR**) which is a member of the S&P 500 stock index and is listed on the NASDAQ. IBKR does not provide legal, financial product or taxation advice and does not engage or employ any human "brokers" to manage client accounts. IBKR conducts its automated global electronic broker business across more than 200 market destinations worldwide and provides online trade execution and clearing services for a wide variety of electronically traded products, including stocks, options, futures, forex, bonds and CFDs.

## **Our supply chains**

A supply chain can be described as a network of entities, people and activities that facilitate the delivery of a product or service to the customer. Within IBKR's organisational structure, IBA's supply chain is predominantly comprised of affiliated IBKR entities that provide systems, infrastructure and other corporate services required by IBA to operate its business. The delivery of these services is documented via outsourcing agreements that are monitored through the global outsourcing oversight program overseen by the APAC Outsourcing Oversight Committee. As part of the IBKR outsourcing framework, IBA conducts initial and ongoing service provider due diligence and has measures in place to evaluate the ongoing performance of intragroup and third-party service providers.

In addition to IBKR entities, IBA also contracts with several local suppliers that provide goods or services such as:

- Professional advisory and consultancy services.
- Facilities management and building services.
- Routine office supplies and services.
- Recruitment and employment services.
- Technology services and products.

## Risk Assessment and our Policies

We are committed to our framework which seeks to prevent modern slavery or human trafficking in our supply chains or in any part of our business. Given the nature, scale, and location of the IBKR businesses, we believe that there is an inherently low risk of modern slavery and human trafficking being part of IBA's business or supply chain.

Despite this being the case, IBA remains committed to taking appropriate actions in the event that an instance of modern slavery is identified. In light of the obligation to report on measures to ensure that all parts of our business and supply chain manage slavery risks towards the goal of being slavery-free, we have adopted an integrated approach to identifying and addressing modern slavery risks across several core policies. Our APAC Whistleblowing Policy explicitly recognises modern slavery and human trafficking as reportable concerns, ensuring staff can raise issues confidentially as protected disclosures. Our Procurement Policy embeds due diligence requirements for suppliers and contractors, supported by our Vendor Code of Conduct, which sets out clear expectations on human rights and labour standards.

Together, these policies create a consistent framework for identifying, escalating, and addressing modern slavery risks both within our operations and across our supply chain.

We continue to review our internal governance arrangements to ensure modern slavery considerations are embedded across relevant policies and procedures.

## Due diligence for slavery and human trafficking

As a responsible corporate citizen and in line with our risk appetite, we have established due diligence procedures to:

- Identify and assess potential risks in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring within our supply chains.
- Monitor potential risk areas on an ongoing basis.

These procedures are periodically reviewed to ensure they remain effective and fit for purpose.

To mitigate risk across all operations, we apply the following procedures:

- **Supplier onboarding:** All material suppliers complete a due diligence questionnaire confirming compliance with local laws and IBKR's Vendor Code of Conduct.
- **Contractual protections:** Contracts include reasonable obligations to comply with modern slavery laws, permit audits, and flow down requirements to subcontractors.
- **Ongoing monitoring:** Supplier performance is reviewed periodically.

## Supplier adherence to our values

We have zero tolerance for slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, IBA will continue to monitor, through

its service level agreements and contracts, its dealings with local suppliers to ensure compliance with the Anti-Slavery Measures set out in the IBKR Vendor Code of Conduct.

All local suppliers are subject to ongoing third-party risk management due diligence and key suppliers are publicly listed companies, subject to the Act or overseas equivalent, with Modern Slavery Statements available for effectiveness reviews.

## **Training**

To ensure a high level of understanding and awareness of the risks related to modern slavery and human trafficking in our business and supply chains, we provide mandatory training to the IBA staff that are likely to be involved with reviewing and selecting suppliers. We continue to review the quality and content of our training materials on an annual basis.

## **Our effectiveness in combatting slavery and human trafficking**

The purpose of our policies is to prevent, identify and address incidents as they arise. In 2025 we had no reported incidents of human rights breaches, slavery or trafficking. We have established key performance indicators to measure the ongoing effectiveness of our policies, procedures, intragroup outsourcing and third-party supplier arrangements. We are committed to maintaining robust governance in this area.

## **Further steps**

Following the review of the effectiveness of the measures in place, we intend to consider what enhancements should be implemented to combat modern slavery and human trafficking. We are committed to continuously improving our policies and processes to monitor and mitigate the risk of modern slavery and human trafficking in all parts of our business. IBA does not own or control other entities with which to consult over this statement.

## **Implementation**

The Board of Directors of IBA has overall responsibility for this statement. IBA's senior management is responsible for implementing the objectives considered in this statement.

## **Management approval**

This statement was approved by the board of IBA on 16 May 2026.



**Darren Halse**  
**Managing Director**  
**Interactive Brokers Australia Pty Ltd**