



# Modern Slavery Statement

2024 - 2025





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*December 2025*

## 1 Message from the Board

At Swyftx, our mission is to empower our customers today to unlock their financial freedom tomorrow. For a leading digital asset exchange like ours, our commitment against modern slavery is an extension of our core values - *Trust and Security*.

This is Swyftx's second annual statement since Australia's *Modern Slavery Act 2018 (Cth)* (the **Act**) came into force and shows our ongoing commitment to assess our modern slavery risks.

This statement also outlines that we are committed to continuously improve to minimise and remove associated risks and remain focused making a positive contribution where we operate globally.

This Modern Slavery Statement has been developed by the reporting entity Swyftx Pty Ltd ABN 72 623 556 730 (**Swyftx**), in accordance with the requirements of the Act. This statement provides the relevant actions taken to address the risks identified within Swyftx group entities during the financial year of 2024 to 2025 (the reporting period).

The Swyftx Board as the principal governing body has formally endorsed this Statement and verify it to be true and correct.

## 2 Our Structure, Operations, Business and Supply Chains

Swyftx is an Australian founded cryptocurrency exchange, operating within the global cryptocurrency market. It allows users to buy, sell and swap over 440 crypto currencies. At the end of the reporting period, Swyftx supported over 1,200,000 customers across the ANZ region. Swyftx is AUSTRAC registered and ISO 27001 certified.

Swyftx acquired Easy Crypto, a New Zealand cryptocurrency exchange, during the reporting period. Swyftx and its subsidiaries (**Swyftx Group**) had 176 employees as at 30 June 2025. A full list of its subsidiaries are outlined in **Annexure A** of this Modern Slavery Statement.

Swyftx manages a supply chain of over 130 core suppliers. Our supply chain consists of the provision of FinTech and professional services, corporate partnerships, and essential operational goods and services, with a primary focus on technology and infrastructure support, and is actively managed through our risk assessment framework to ensure compliance and ethical sourcing. Our supply chain is diversified across multiple regions, with the largest concentration of suppliers located in the United States, Asia and the Middle East.

## 3 Modern Slavery Risks for Swyftx Group

This section sets out the modern slavery risks identified and assessed for the Swyftx Group. We note we have an existing robust AML/CFT program, addressing Modern Slavery elements – it is a separate program not included as part of this statement.

### 3.1 Risk assessment and methodology

With our expansion, this year we proactively commissioned our first independent Modern Slavery Assessment via a third party, to identify any potential Modern Slavery exposure that may be emerging with our increasing global presence.

A questionnaire was distributed to our global suppliers for completion, and we received high response rate from our vendors. A robust inherent and residual risk assessment was completed by our third parties to help us review our current operating environment, identifying existing roles, functions, policies and controls that exist within Swyftx to address potential Modern Slavery risks.

### 3.2 Swyftx Modern Slavery Responsibilities

Swyftx has a multi-tiered risk management program to review, assess and manage modern slavery risks within the Swyftx Group. The independent Modern Slavery Assessment identified some higher-risk activities across three main categories:

- **Vulnerability of the Sector:** the assessment identified the potential for modern slavery based on *what* a supplier does and *where* they operate. By sourcing services in sectors like security, cleaning, building services retail and manufacturing, Swyftx is connected to industries that may be more globally prone to forced and potential child labour. Our enhanced due diligence and monitoring program has regard to these heightened risks.
- **Practices of our contingent workforce:** all Swyftx suppliers are expected to conduct their business in line with Swyftx’s approach to modern slavery. Where operational exposures have been identified (for example a vendor based in a high-risk country, and we identify their workers may be vulnerable to exploitation), we will engage with these partners to enhance their protective policies.
- **Supply chain risk:** Swyftx suppliers are global and diverse. We are in the process of introducing the Swyftx Supplier Code of Conduct and Ethics, which includes more specific and rigorous requirements for all suppliers.

## 4 Swyftx Commitment for continuous improvement

We are committed to reducing any modern slavery risks, as demonstrated by the following existing Policies, which outline due diligence, processes and procedures to address and mitigate Modern Slavery risks.

**Swyftx AML CTF Program**

This is a critical tool for identifying financial red flags associated with human trafficking and forced labour are predicate offences for money laundering, our transactions monitoring systems can detect unusual financial patterns that may indicate illicit activities.

**Swyftx Modern Slavery Policy**

The Modern Slavery Policy is made available to all team members and vendors (upon request). The policy highlights key commitments such as maintaining a zero-tolerance approach to Modern Slavery practices, compliance with Modern Slavery legislation and ensuring transparency in operations and supply chains through production and publication of its annual Modern Slavery Statement (if required).

<b>Swyftx Third Party Risk Management Policy</b>	The policy stipulates suppliers and vendors are subject to a modern slavery assessment should Swyftx satisfy the reporting threshold during a financial reporting period. Further, the introduction of a Compliance Questionnaire during the onboarding process of new vendors & suppliers focuses on identifying high-risk operations, recent assessments and policies adopted by the supplier.
<b>Swyftx Whistleblower Policy</b>	The Whistleblower policy provides a secure and confidential channel for employees, suppliers, and other stakeholders to report concerns without fear of retaliation. This is vital for uncovering risks that are difficult to detect through formal audits, such as hidden instances of forced labour and unethical recruitment practices.
<b>Swyftx Recruitment Policy</b>	The Swyftx Recruitment Policy delivering a recruitment process that promotes equal opportunities for all applicants.
<b>Swyftx Staff Training and Awareness</b>	Part of the Swyftx employee onboarding process requires mandatory training modules on understanding what is Modern Slavery, identification procedures, penalties, risks and responsibilities.
<b>Swyftx Supplier Code of Conduct</b>	<p>We will introduce a Swyftx Supplier code of conduct: This serves as a foundation for our due diligence, requiring suppliers to acknowledge and commit to prohibiting forced labour, child labour, and human trafficking within their own operations.</p> <p>Supplier Onboarding Process - Upon the approval and onboarding of a new supplier, the supplier is entered into the iPro Modern Slavery Assessment Tool and is provided with the task of completing a Modern Slavery Assessment on their operations.</p> <p>This is to be read in conjunction with the existing Swyftx Third-Party Outsourcing Policy.</p>

We are committed to continuously reviewing and updating our policies and procedures. Any changes to the above policies must be approved by the Board of Directors of Swyftx.

## 5 Measuring Swyftx effectiveness in combating modern slavery

Swyftx understands that reducing the risk of modern slavery in its business and in its supply chains is an important goal that requires development of policies and procedures, and ongoing iterations of existing policies and procedures.

We recognise education and awareness are a key defence against modern slavery and we raise ongoing awareness to our staff through a range of initiatives.

As this is the first year Swyftx has used the platform to conduct an independent supplier assessment, we will be able to use these results to focus on areas that require uplift and then be able to objectively measure the effect when the assessments are completed during the next reporting period.

## 6 Stakeholders involved in this statement

Swyftx has consulted with the other entities that it owns or controls through a process of review whereby key stakeholders representing these subsidiaries have reviewed this document. Key stakeholders include:

- Finance
- GRC Security
- Risk & Compliance
- Operations
- People & Culture
- Legal

## 7 Approval and sign off

This Modern Slavery Statement has been prepared in accordance with the requirements of the Act.

The Board of Directors of Swyftx Pty Ltd is committed to the principles outlined herein and approves the actions taken and the commitments made within this statement.

The Board (or Governing Body/CEO) confirms that the information contained in this statement is, to the best of its knowledge and belief, true and accurate.

**Signed:**



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**Jason Titman**

**Executive Chairman**

**Swyftx Pty Ltd**

**Date:** 8th December 2025

## Annexure A:

The Swyftx group subsidiaries under the Swyftx reporting entity at the end of this reporting period 30 June 2025 included:

### **Australia**

- Swyftx Brokers Pty Ltd (ABN 58 648 337 893);
- Crypto News Pty Ltd (ABN 88 611 395 067);
- Swyftx Markets Pty Ltd (ABN 72 654 897 720); and
- EC Systems Pty Ltd (ABN 17 624 780 409).

### **New Zealand**

- Swyftx New Zealand Pty Limited (NZBN 942 905 2588 006);
- Swyftx NZ Limited (previously Moon Ventures) (NZBN 942 904 8073 257);
- EC Systems Limited (NZBN 942 904 6917 737);
- ECNZ Limited (NZBN 942 904 6530 141);
- ECDD Holdings Limited (NZBN 942 905 1266 622); and
- Dott Enterprises Limited (NZBN 942 905 0933 914).

### **Singapore**

- Swyftx Asia Pacific Pte Ltd (UEN 202 524 407 D)

### **South Africa**

- EC Advantage Limited (Registration Number 2021/893536/07)

### **United Kingdom**

- Swyftx UK Ltd (Company number 13293982)