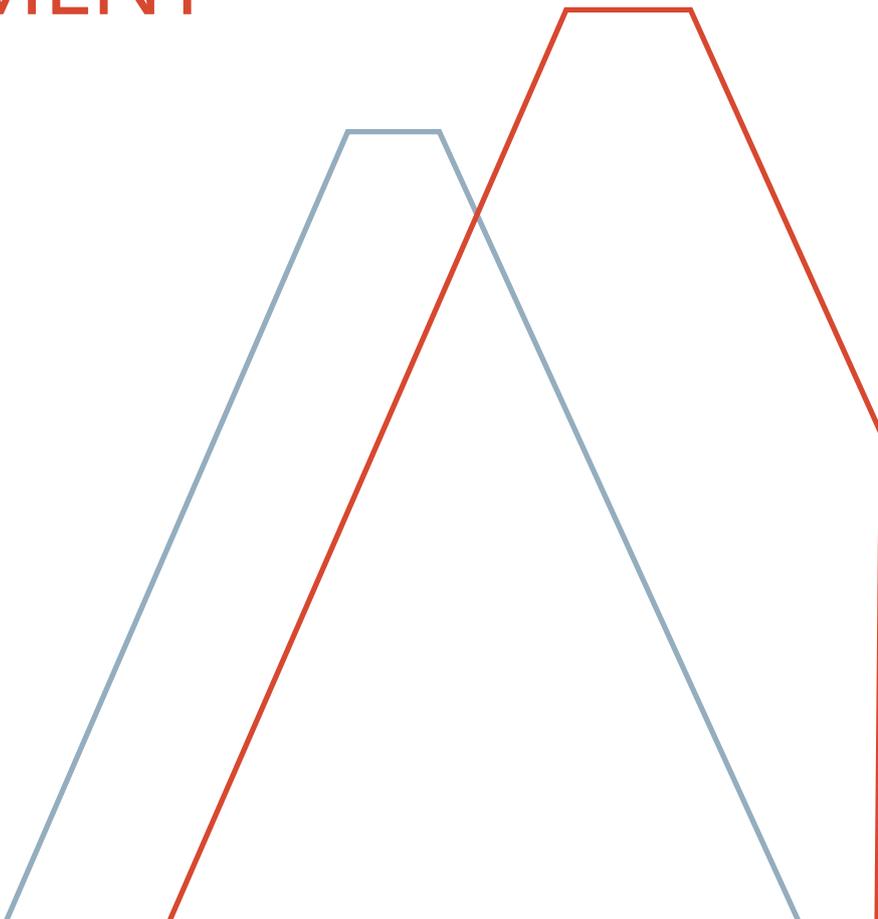


OPTIVER AUSTRALIA HOLDINGS PTY LIMITED

MODERN SLAVERY STATEMENT

2020



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 nine locations across Europe, Asia-Pacific and North America.

This modern slavery statement is made on behalf of Optiver Australia Holdings Pty Limited (ACN 077 364 286) and its wholly owned Australian subsidiaries / consolidated entities:

- Optiver Australia Pty Limited (ACN 077 364 366)
- Optiver Pty Limited (ACN 135 181 136)
- Optiver Trading Pty Limited (ACN 123 177 971)
- TechInvest Pty Ltd (ACN 084 084 444) (in members voluntary liquidation)

(collectively referred to as **Optiver Australia** or the **Optiver Australia Reporting Entities**), pursuant to the requirements of the Modern Slavery Act 2018 (Cth). This statement relates to the reporting period commencing 1 January 2020 and ending 31 December 2020.

The Optiver Australia Reporting Entities are Australian private companies with their registered office located at 33-39 Hunter Street Sydney NSW Australia.

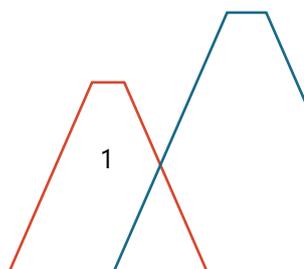
Optiver Australia Pty Limited holds an Australian Financial Services Licence issued by the Australian Securities and Investments Commission and is a member of various exchanges.

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 support Optiver Australia Pty Limited's market making and trading activities, Optiver Australia Reporting Entities license trading data from stock exchanges and develop and purchase IT software and hardware.

The supply chain of the Optiver Australia Reporting Entities therefore comprises: exchanges and clearing institutions; third party data providers, IT software and hardware providers and other IT infrastructure providers; and other miscellaneous suppliers as set out below.



2. DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS

Optiver Australia has assessed the risk of Modern Slavery on the exchanges we trade and the major counterparties we engage with (including a review of their published modern slavery policies) and we have deemed them to be low risk.

Optiver Australia engages approximately 300 staff who are based in Sydney, Australia. As staff carry out highly skilled activities, the risk of these individuals being subject to modern slavery is very remote. All staff are employed or engaged on contractual terms that comply with applicable laws including those relating to pay, working conditions and health and safety.

3. DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE SUPPLY CHAINS

Our business model does not include the supply of goods or services to external parties. In 2020, our Australian operations sourced goods and services from more than 300 suppliers. While over 70% of these suppliers operate in Australia, we also work with offshore suppliers, mainly in the United States, United Kingdom, Hong Kong, the Republic of Korea, and Singapore which are considered lower risk jurisdictions. These entities predominantly provide technology, administrative and support services, property services or other professional services.

A targeted risk-based approach was taken to assess and address Modern Slavery risks in Optiver Australia's supply chain. This involved the following steps:

- 1) Identification of the broad operations and overall supply chain structure of Optiver Australia
- 2) Classification of each supplier based on the following:
 - a) Sector and industry
 - b) Product and services
 - c) Geography
 - d) Entity specific features
 - e) Value
- 3) Undertake a risk-based assessment on the above factors, categorising the risk as either high, medium, low.

As part of our phased Modern Slavery program of work, we issued a detailed supplier self-assessment questionnaire to a selection of our potentially higher risk suppliers, as classified in the above risk assessment process. The questionnaire assesses suppliers on their Modern Slavery reporting requirements and policies or procedures, supplier oversight and engagement, labour arrangements and remediation. The risk assessment outcomes allow Optiver Australia to identify specific red flags and therefore what actions, if any, are needed.

Following this assessment, Optiver Australia has concluded that our supply chain does not raise any significant risks of Modern Slavery, nor are we aware of any actual incidents of Modern Slavery related to our procurement activities 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

Our work on Modern Slavery is supported by policies that include, but are not limited to:

- Code of Conduct
- Anti Bribery and Corruption Policy
- Whistleblower Policy

We continue to engage with suppliers in a collaborative manner and strive to build long-term relationships by being open and transparent with them. This approach promotes our expected standard of work, and ongoing communication with suppliers allows us to continually address Modern Slavery and improve practices across our supply chain. Modern slavery risks may exist in our indirect suppliers and our focus is to use tools such as contract clauses and the incorporation of the Modern Slavery assessment in the procurement process to ensure our suppliers meet our standards. We continually review our practices and procedures to ensure they are in line with best practice and continue to improve our understanding and management of Modern Slavery risks in our supply chain.

5. DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF THESE ACTIONS

Optiver Australia has taken a focused, phased approach to the Modern Slavery reporting requirements. This year Optiver Australia concentrated on direct suppliers and further strengthening of our foundation of risk assessment and review. This will better allow the assessment of vendors and the identification of potential risk areas. Our program of work is iterative, and we will continue to build on the current foundations, and improve the efficiency and effectiveness of existing policies, programs, practices, awareness and reporting. Some of the actions we will consider and seek to implement over the coming reporting periods include:

- Implementation of a Modern Slavery Policy;
- Requirements for training and awareness on Modern Slavery;
- Expanding supplier risk assessments to more suppliers;
- Incorporation of Modern Slavery assessment in procurement and contractual process.

6. DESCRIBE THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

This modern slavery statement was developed by the Optiver Australia Reporting Entities in consultation with each of the following wholly owned subsidiaries and affiliated entities:

- GT Technologies (Australia) Pty Ltd (ACN 612 743 727) which is an affiliated entity of the Optiver Australia Reporting Entities; and
- Optiver Investment Management (Shanghai) Co., Ltd (incorporated in China) which is a wholly owned subsidiary of Optiver Australia Pty Limited.

It should be noted that all Optiver Australia Reporting Entities and GT Technologies (Australia) Pty Ltd are subject to Optiver Australia policies, procedures and systems, and are party to group-wide information and resource-sharing arrangements. Accordingly, the information (including supplier information) detailed in this statement is applicable to all Optiver Australia Reporting Entities and GT Technologies (Australia) Pty Ltd. Consultation with GT Technologies (Australia) Pty Ltd was conducted through the sharing of relevant supplier information and financial reporting information. Optiver Investment Management (Shanghai) Co., Ltd was incorporated in 2020, but is not yet fully operational.

7. STATEMENT

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



Wouter Stinis

Director

28 June 2021