

## Susquehanna Pacific Pty Ltd Modern Slavery Statement

This Modern Slavery Statement is made in accordance with the Modern Slavery Statement Act 2018 (Cth) and covers the activities of Susquehanna Pacific Pty Ltd ACN 082 467 605 ("Susquehanna").

### Structure, operations and supply chains

Susquehanna is a proprietary company incorporated in Australia. Susquehanna does not own and does not control any other entities. We note where we own or control any entities or have prepared a joint Modern Slavery Statement we would be required to describe the process of consultation with such entities. As at the end of 31 December 2021 Susquehanna employed approximately 185 staff, all based in Sydney.

Susquehanna's core operations are proprietary trading and market making.

Susquehanna's supply chains include vendors supplying:

- trading services (for example clearing, market data, electronic execution);
- professional services (for example audit, accounting and legal services);
- IT infrastructure and IT services; and
- office services, office consumables, and food and beverage.

### Definition of Modern Slavery

Modern slavery describes situations where *"...offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include:*

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour

*Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers, though these practices are also harmful and may be present in some situations of modern slavery."<sup>1</sup>*

### Identified operations and supply chain risks

As a business engaged in proprietary trading and market making, the nature of our operations and the goods and services within our supply chain provide relatively limited opportunities for modern slavery practices.

Nonetheless, the potential for modern slavery exists in certain areas with which Susquehanna interacts such as (i) IT infrastructure and IT services and (ii) office services, office consumables, and food and beverage.

### Actions

Susquehanna has undertaken its annual modern slavery risk assessment and has not identified any material risks where Susquehanna causes, contributes to or is directly linked to modern slavery practices through its operations and supply chains.

Susquehanna has also taken the following actions to assess and address the potential risk of modern slavery practices in its operations and supply chains:

- assessing the modern slavery risks for the top 20% of Susquehanna's suppliers by annual spend;
- engaging with key stakeholders of the business in relation to its annual modern slavery risk assessment;
- reviewing and updating supplier on-boarding procedures including supplier due diligence to identify any new suppliers with heightened risks of modern slavery practices.

### Assessment of effectiveness

An annual Modern Slavery Statement will be prepared to report on Susquehanna's exposure to modern slavery risk across its operations and supply chains as required by the Modern Slavery Act 2018 (Cth). The modern slavery framework will be reviewed periodically, as determined by the Management Committee of Susquehanna.



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This Modern Slavery Statement has been approved by the Board of Directors of  
Susquehanna Pacific Pty Ltd.

Date: 28/06/2022

A handwritten signature in black ink, appearing to read 'John Chul Lee', written over a horizontal line.

John Chul Lee, Director

Susquehanna Pacific Pty Ltd

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<sup>1</sup> Australian Government, Department of Home Affairs at <https://www.homeaffairs.gov.au/about-us/our-portfolios/criminal-justice/people-smuggling-human-trafficking/modern-slavery> as at 11 January 2022