

**Susquehanna Pacific Pty Ltd
Modern Slavery Statement FY25**

Susquehanna is part of a larger corporate group of entities engaged in proprietary trading and global market making, with operations in Europe, North America and Asia-Pacific. This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth) and covers the activities of Susquehanna Pacific Pty Ltd ACN 082 467 605 ("**Susquehanna Australia**") and its two majority-owned Indian incorporated subsidiaries ("**Susquehanna India**") (together, **Susquehanna**). This Modern Slavery Statement covers the period of 1 January 2025 to 31 December 2025 (the **Reporting Period**).

Structure, operations and supply chains

Susquehanna Australia's registered office is located at Tower One, International Towers, Level 48, 100 Barangaroo Ave, Barangaroo NSW 2000. Its core operations are proprietary trading and market making in both exchange-based and OTC financial products.

Susquehanna Australia holds an Australian Financial Services Licence no. 244582 and is a member of various exchanges.

During the Reporting Period, Susquehanna's supply chains included 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.

Risk of modern slavery in operations

Susquehanna employs highly skilled professionals in a competitive job market. As at 31 December 2025, Susquehanna Australia employed approximately 401 staff in Sydney, Australia. Given the nature of the work and the contractual terms of engagement, the risk of Susquehanna's own employees being subject to modern slavery is considered to be very low. All personnel are engaged under formal employment contracts that comply with all applicable employment and WHS laws.

Risks of modern slavery in supply chains

As a business engaged in proprietary trading and market making, the nature of Susquehanna's goods and services within its supply chain provide relatively limited opportunities for modern slavery practices. A substantial majority of the services Susquehanna acquires are technology (data) and trading/financial in nature, which are considered to be low risk.

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

Actions taken to assess and address risks of modern slavery

Susquehanna Australia 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. This forms part of Susquehanna Australia's overall approach to continually review and update internal policies and procedures to maintain compliance with modern slavery laws such as its Standard of Conduct, Foreign Corrupt Practices Act Policy, Whistleblower Policy and Complaints Procedure.

In addition to the above Susquehanna Australia has 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 and seeking feedback from 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.

Where modern slavery incidents or heightened risks of modern slavery practices are identified during the Reporting Period, Susquehanna endeavours to engage with its key internal stakeholders and/or suppliers in a collaborative manner to mitigate and remediate risks of modern slavery practice.

Assessment of effectiveness of actions taken to address modern slavery risk

Susquehanna Australia assesses on an ongoing basis the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, assessing our partnership with suppliers and other external partners, and undertaking internal governance. Based on the results of these processes we adapt our actions to improve our response to modern slavery including maintaining and reviewing our policies and processes. 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 Australia.

Consultation Process

In the development of this statement, Susquehanna Australia consulted with Susquehanna India's Board of Directors and engaged directly with all relevant parties in the companies we own or control to ensure all information provided in this statement is accurate and complete. We note Susquehanna Australia manages all sourcing and procurement for Susquehanna Australia and Susquehanna India. Accordingly, the processes, actions and assessments detailed in this statement are also applicable to Susquehanna India.

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

Date: 22/6/22



Keith Fargher, Director

Susquehanna Pacific Pty Ltd