

Index Exchange

Anti-Modern Slavery Statement

CONCERNING THE FINANCIAL YEAR ENDING DECEMBER 31, 2025

Introduction

This Anti-Modern Slavery Statement (this “**Statement**”) is made by Index Exchange Limited, Index Australia Pty Ltd., and their parent company, Index Exchange Inc. (collectively, “**Index Exchange**”) in accordance with the United Kingdom’s *Modern Slavery Act 2015* and Australia’s *Modern Slavery Act 2018*.

Index Exchange has a zero-tolerance approach to all forms of modern slavery, including servitude, forced or compulsory labour, human trafficking, and any exploitation that deprives a person of their liberty for personal or commercial gain (together, “**Modern Slavery**”).

This Statement outlines the steps Index Exchange has taken to identify, assess, and address risks of Modern Slavery in its operations and supply chains during the financial year ending December 31, 2025.

Organizational Structure and Supply Chains

Index Exchange is an online media and technology company that connects sellers of digital media inventory with buyers, and provides technology to optimize that inventory.

Index Exchange Inc. is headquartered in Toronto, Canada, and operates through local entities in the United Kingdom (Index Exchange Limited) and Australia (Index Australia Pty Ltd.). The company has offices in eleven countries: Canada, the United States of America, the United Kingdom, France, Australia, Germany, Italy, Singapore, Spain, Japan, and India.

Risk Assessment

Index Exchange’s supply chains primarily consist of technology services, office and IT equipment, and professional services (e.g., legal, accounting and consulting). These supply chains are short, rely predominantly on skilled professional labour in regulated markets, and do not involve high-risk geographies or labour-intensive manufacturing. Accordingly, Index Exchange assesses its Modern Slavery risk as very low.

Key risk areas and mitigations are outlined in the table below.

Key Risk Areas	Mitigations
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<p>Employees</p>	<ul style="list-style-type: none"> • Right-to-work verification is completed for all employees upon commencement of their employment. • Employment terms are communicated through contracts and corporate policies. • All employees sign a Code of Conduct and Employee Handbook upon hire and annually, affirming commitment to a respectful, safe workplace. • HR policies are reviewed and updated regularly in line with legislative changes. • All employees are paid into a bank or building society account in their name.
<p>Subcontractors</p>	<ul style="list-style-type: none"> • Subcontractors must confirm their employees are eligible to work in their jurisdiction. • Subcontractors are required to follow standards consistent with those applied to Index Exchange employees.
<p>Suppliers</p>	<ul style="list-style-type: none"> • Supplier agreements are subject to a Signing and Spending Authority Policy, which governs review and approval and ensures transparency in supply chain decisions. • Suppliers are expected to follow standards consistent with Index Exchange’s Anti-Modern Slavery commitments.

Due Diligence

Index Exchange has implemented formal policy and processes governing vendor due diligence throughout the vendor lifecycle. Prior to engaging a new vendor, employees must complete a risk assessment covering areas relevant to Index Exchange’s operations, including Modern Slavery risk where applicable, and obtain approval from relevant internal subject matter experts.

Monitoring and Reporting

Index Exchange maintains a global whistleblower reporting program. The Whistleblower Protection Policy establishes procedures for employees or third parties to report legal and ethical violations, including suspected or actual Modern Slavery, with multiple anonymous reporting options available (e.g., via a [helpline](#)). These reporting channels are promoted through internal policies, communications, and mandatory compliance training.

Remediation

Reported Modern Slavery concerns are reviewed to determine whether further investigation is required. Formal investigations may be directed by the General Counsel.

Where evidence of Modern Slavery is found, remedial action will be implemented. The first priority is to protect the safety, privacy, and well-being of the affected person(s). Where this is not possible, further action, including termination of the business relationship, will be taken.

Additional Efforts: Exchange Quality

Exchange Quality, Index Exchange’s internal advertising review team, removes or blocks supply and demand content that facilitates human exploitation or any other form of Modern Slavery. This includes



content involving adult themes targeting minors, underage or non-consensual sexual content, compensated sexual acts, or other content that may facilitate Modern Slavery or violate applicable law. Exchange Quality enforces these prohibitions through regular monitoring of supply and demand content.

Training & Awareness

Index Exchange's Anti-Modern Slavery Policy is posted on its intranet, external website, and the U.K. and Australian government registries.

All employees receive training on ethics and compliance, which includes guidance on the Anti-Modern Slavery Policy. Additionally, Index Exchange is developing targeted training on Modern Slavery indicators and reporting channels for employees involved in vendor onboarding, procurement, sales, customer service, and compliance.

Assessment of Effectiveness

Index Exchange assesses the effectiveness of its Anti-Modern Slavery Policy and associated practices through a risk-based policy audit program, which includes but is not limited to this Statement, the Code of Conduct, the whistleblower program, and associated supporting procedures.

Effectiveness is evaluated using a range of qualitative and quantitative indicators suited to the subject matter, such as whistleblower reports and training completion rates.

Index Exchange will monitor applicable legal developments and refine its approach as needed.

Review and Approval

This Statement is reviewed annually by Index Exchange management.

This Statement was approved by the Index Exchange Inc. Board of Directors following consultation with stakeholders from Index Exchange Limited, Index Australia Pty Ltd., and relevant global functions. This Statement covers all activities undertaken by Index Exchange's global entities.

DocuSigned by:

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Jason Cicchetti
Secretary
Index Exchange