

Modern Slavery Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that CLS UK Intermediate Holdings Ltd. and CLS Services Ltd. (respectively, “**CLS UKIH**” and “**CLS Services**” and collectively “**CLS**”) have taken, and are continuing to take, to ensure that modern slavery or human trafficking is not taking place within CLS’s business or supply chain.

The term “modern slavery” encompasses slavery, servitude, human trafficking and forced labour. CLS has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and, where appropriate, to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. We are committed to preventing discrimination and providing a supportive and inclusive working environment for our employees.

CLS is a provider of FX post-trade services. Both CLS UKIH and CLS Services operate in the UK and have an operating affiliate office, CLS Bank International, in the United States. CLS UKIH has a branch office and a representative office in Hong Kong and Tokyo respectively. CLS’s ultimate parent company, CLS Group Holdings AG, is registered in Switzerland.

CLS’s internal policies, at a group level, ensure that CLS conducts business in an ethical and transparent manner. Such internal policies include, but are not limited to:

- A whistleblowing policy. We operate an anonymous whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our organisation without fear of reprisals.
- A code of conduct policy. This code restates CLS’s “*zero -tolerance approach to any form of modern slavery*” and requires employees to act honestly, ethically, professionally, avoid conflicts of interest, potential or actual, and abide by all applicable laws and regulations.
- A third-party risk management and procurement process which is underpinned by a Third Party Management Policy. We maintain an approved supplier list. We conduct due diligence, including financial, security and compliance checks on applicable suppliers prior to onboarding an approved supplier. We have an enhanced third-party risk management and procurement process having implemented specific modern slavery related provisions whereby we seek assurance from our prospective suppliers that they have adequate policies and processes in place to identify and address the risk of modern slavery and also that they continue to remain compliant with all applicable modern slavery laws and regulations. For actual engagements with our suppliers, our standard contract with suppliers includes appropriate modern slavery provisions.
- A financial crime policy, CLS Policy to Prevent and Detect Financial Crimes. This policy includes a specific reference to the Modern Slavery Act and reiterates CLS’s commitment “*to acting ethically, with integrity and transparency in all business dealings and, where appropriate, has established processes and controls to detect and disrupt modern slavery and human trafficking (“MSHT”), in furtherance of the aims of the UK Modern Slavery Act of 2015*”.

During 2025 we continued to advocate and promote in our mandatory financial crime compliance training programme for all employees an awareness and understanding of modern slavery and our responsibilities and obligations under the Modern Slavery Act.



At Board level Modern Slavery is the subject of an annually scheduled agenda item at which meeting the respective CLS Board gives due consideration to its company's continued activity pursuant to s.54 of the Modern Slavery Act.

This statement was approved by the Board of Directors of CLS UK Intermediate Holdings Ltd. on 23 April 2026 and the Board of Directors of CLS Services Ltd. on 21 April 2026

CLS Services Ltd.

CLS UK Intermediate Holdings Ltd.

John Hagon

Thomas Berkery