

Slavery and Human Trafficking Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and constitutes our modern slavery and human trafficking statement (“Statement”) for the financial year commencing 1 July 2022 and ending 30 June 2023.

This Statement is made on behalf of the following entities:

- Maven Securities Holding Limited
- Maven Investment Partners Ltd
- Maven Europe Ltd

collectively, the Maven entities (the “Maven Entities”), which are part of the wider Maven group of companies (the “Group”).

The Group firmly condemns modern slavery and human trafficking and acknowledges the importance of complying with the Act. The Group always operates in accordance with its core values and is committed to acting with integrity and fairness in all its business dealings and relationships. The Group continues to implement and enforce effective systems to ensure modern slavery does not take place anywhere in its own businesses or within those of its suppliers.

The Group specialises in multi-strategy trading and market making within the financial sector. To support the Group’s trading business, the Group licenses trading data from stock exchanges and purchases IT software and hardware. The Group’s supply chain is limited and mainly includes IT software and hardware providers, exchanges and clearing institutions, data providers and professional advisors. The Group therefore considers the risk of modern slavery and human trafficking within its supply chain to be low. However, the Group is aware that modern slavery and human trafficking can happen in any sector of activity.

The Maven Entities employ just over 285 employees who are based in the UK, the Netherlands, Australia, Hong Kong and Singapore. Most of the Group’s employees are highly skilled professionals so the likelihood of these individuals being at risk of modern slavery or human trafficking is low. All employees are employed on contractual terms that comply with applicable law, including those in relation to working conditions and pay. The Group also conducts robust background checks on prospective employees to help prevent unethical behaviour throughout its business.

The Group has the following policies in place to assist with the detection and prevention of modern slavery within its operations and supply chains:

- **Code of Conduct** – to assist employees in maintaining proper conduct in relation to the Group’s business.
- **Outsourcing Policy** – ensures that the Group considers any risks related to the outsourcing of regulated activities in accordance with applicable regulations and guidelines.
- **Whistleblowing Policy** - outlines the procedure for employees to anonymously report any suspected wrongdoings, including modern slavery and human trafficking, either directly to the Group or the FCA.
- **Dignity at Work Policy** – sets a clear standard of acceptable behaviour for the Group’s employees and outlines the procedure for reporting incidents of bullying and harassment in the workplace.

The Group continues to provide a training course on modern slavery to all employees through the Group’s e-learning platform. The training is designed to educate employees on how to recognise signs of modern slavery. The Group also hosts events such as the recent Social Mobility Panel Event, where external partners were invited to share their insights and experience in addressing socioeconomic inequality. We believe that by promoting a bottom-up approach, the Group will help protect itself from any potential risks associated with modern slavery.

This statement was approved by the relevant Boards of Directors on 9 January 2024 and will be reviewed annually to ensure that it continues to align with the Group’s duties under the Act.