



Modern 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 2024 and ending 30 June 2025.

This Statement is made on behalf of Maven’s UK-incorporated entities (the “**Maven Entities**”), which form part of the wider Maven group of companies (“**the Group**”). While the Group is not required by law to publish a modern slavery statement, we have chosen to publish one voluntarily to demonstrate actions we have taken to support wider anti-slavery efforts.

Modern slavery involves a wide range of illicit activities such as human trafficking, forced labour, and slavery. 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 a highly regulated 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 as well as 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 and expects its supply chain to adopt a zero-tolerance policy towards modern slavery and human trafficking. Where appropriate, the Group seeks to conduct due diligence on new suppliers.

The Maven Entities employees are based in the UK, the Netherlands, Australia, Hong Kong, and Singapore. The majority 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.

While the Maven Entities have not taken any new steps to tackle modern slavery risks this financial year, the Group continues to remain vigilant and protect itself from any potential risks associated with modern slavery.

This statement was approved by the relevant Boards of Directors in March 2026 and will be reviewed annually to ensure that it continues to align with the Group’s duties under the Act.