

Modern Slavery Statement

February 2025

Place Trade Financial, Inc. is committed to ensuring that modern slavery, human trafficking, and exploitation have no place within our operations, supply chain, or business activities. We recognize the importance of maintaining ethical business practices and adhering to all applicable modern slavery legislation, including but not limited to the United States, the United Kingdom, and Australia.

In compliance with the **Modern Slavery Act 2015** in the UK, the **Trafficking Victims Protection Act (TVPA)** in the USA, the **California Transparency in Supply Chains Act (CTSCA)**, and the **Modern Slavery Act 2018** in Australia, we confirm the following:

Commitment to Ethical Practices:

- We have zero tolerance for any form of modern slavery or human trafficking within our operations, including our suppliers and partners.
- Our procurement processes and business activities are designed to mitigate the risks of modern slavery, ensuring transparency and accountability across all levels of our operations.

Risk Assessment and Due Diligence:

- We regularly assess and audit our supply chains to identify and address potential risks related to modern slavery.
- Our due diligence process includes verifying that our suppliers and business partners meet the highest ethical standards and comply with the relevant legal frameworks in all the jurisdictions we operate.

California Transparency in Supply Chains Act (CTSCA):

- In compliance with the **California Transparency in Supply Chains Act**, we disclose that we are actively working to eliminate the risk of modern slavery in our supply chain by engaging in regular audits and monitoring of our suppliers and contractors.
- We do not tolerate forced labor, child labor, or human trafficking in any part of our business or supply chain, and we require that our suppliers disclose their practices and policies on modern slavery.

Employee Awareness and Training:

- We are committed to ensuring that all our employees are aware of the issue of modern slavery, its implications, and their role in preventing it.

- Training and awareness programs are conducted regularly to ensure that our team understands the signs of modern slavery and how to report any concerns.

Supplier and Partner Expectations:

- We hold our suppliers and business partners to the same high ethical standards and expect them to comply with all relevant anti-slavery and human trafficking laws, including the **California Transparency in Supply Chains Act** and the **Modern Slavery Act 2015** (UK).
- Suppliers are required to sign agreements affirming their commitment to prevent modern slavery and to report any violations.

Actions Taken and Ongoing Review:

- We have established procedures for reporting and investigating any suspicions or cases of modern slavery within our business or supply chains.
- We regularly review our policies and practices to ensure that they remain effective in preventing modern slavery and human trafficking.

Compliance with Legislation:

- We comply with all modern slavery-related legal obligations in the countries in which we operate, including the **Trafficking Victims Protection Act (TVPA)** (USA), **California Transparency in Supply Chains Act** (USA), **Modern Slavery Act 2015** (UK), and **Modern Slavery Act 2018** (Australia).
- We will continue to monitor and adapt to any changes in the legislation to ensure compliance.

This statement reflects our commitment to the prevention of modern slavery in all its forms and outlines the steps we take to address this issue. We recognize the importance of fostering an environment that respects human rights, and we are dedicated to ensuring that modern slavery is never part of our operations or supply chains.

Approved by the board of directors of Place Trade Financial, Inc. 12 February 2025.

Sarah M. Place

Sarah M. Place
Chair and CEO
Place Trade Financial, Inc.
12 February 2025

Disclaimer and forward-looking statements

This Modern Slavery Statement is provided for informational purposes only. It reflects the current practices and policies of Place Trade Financial, Inc. (PTF) as of the date of issuance as well as forward-looking statements about our business and operations.

The information contained in this statement is subject to change and may be updated periodically to reflect changes in our business practices, supply chains, or legal requirements, however, PTF does not undertake to update this document or any information contained in this document, to reflect changes or events that occur after that date.

Forward-looking statements are based on PTF's current expectations and assumptions about the future, which are subject to inherent risks and uncertainties. Actual results may differ significantly from those anticipated, so forward-looking statements should not be unduly relied upon. Further, these statements speak only as of the date they are provided and PTF does not undertake to update them to reflect changes or events that occur after the date provided.

The information discussed in this document does not guarantee future results, performance, occurrences or conditions.

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