

# Modern Slavery & Human Trafficking Statement

EquiLend Holdings LLC and its Group Companies

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## 1. Introduction

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of EquiLend Holdings LLC and its group companies ('EquiLend' or 'the Group') for the financial year ended 31 December 2025.

EquiLend is committed to acting ethically and with integrity in all of our business relationships. We have a zero-tolerance approach to modern slavery and human trafficking in any form – whether within our own business, among our employees, or within our supply chains. This statement sets out the steps we have taken during the year to uphold that commitment, and identifies the areas where we are building out our programme for 2026.

*We acknowledge that this is our first published Modern Slavery Statement. We are committed to continuous improvement and to strengthening our framework year on year in line with the UK Home Office's updated statutory guidance published in March 2025.*

## 2. About EquiLend – Our Structure, Business and Supply Chains

### 2.1 Our Business

EquiLend is a leading global financial technology firm providing Trading, Post-Trade, Data & Analytics, RegTech and Platform Solutions to the securities finance industry. Founded in 2001, EquiLend serves more than 190 global financial institutions across North America, EMEA and Asia-Pacific. The Group is Great Place to Work Certified in the United States, United Kingdom, Ireland and India.

### 2.2 Our Workforce

EquiLend directly employs approximately 400 people across offices in 6 countries: the United Kingdom, United States, Ireland, Canada, Hong Kong and India. Our workforce is predominantly employed in knowledge-intensive technology, data, compliance and client services roles. All employees are engaged under formal contracts of employment with terms that meet or exceed the statutory minimum requirements of their respective jurisdictions.

In addition to our directly employed workforce, EquiLend engages a small number of workers in Japan through an Employer of Record (EOR) provider. These individuals are legally employed by our EOR provider and are not direct employees of EquiLend.

We do not use agency workers for core operational roles, and we do not use zero-hours contracts. We consider the risk of modern slavery within our direct workforce to be low to low-medium. Our assessment by area is set out in section 5.

### 2.3 Our Supply Chains

As a technology company, EquiLend's supply chain is predominantly comprised of:

- Technology infrastructure providers – cloud hosting, data centre services, software licensing, hardware
- Professional services firms – legal, audit, tax, consulting and recruitment
- Data providers and market data vendors

- Facilities management providers – office services, cleaning, catering and security across our global offices
- Employer of Record and workforce solutions providers – including an EOR for Japan-based workers
- Financial market infrastructure providers – clearing, settlement and connectivity services

### 3. Our Policies

EquiLend has the following policies in place that are relevant to our approach to modern slavery:

- Modern Slavery & Human Trafficking Policy - sets out our zero-tolerance commitment, due diligence expectations for suppliers, employee training obligations, and reporting mechanism.
- Global Whistleblowing Policy - provides employees globally with a confidential route to raise concerns about wrongdoing, including modern slavery concerns. Full implementation, including a third-party reporting channel, is a priority action for 2026.
- Code of Conduct - all employees are required to act with integrity and to report concerns about unethical or illegal conduct.
- Supplier engagement standards – EquiLend expects its suppliers to comply with all applicable laws, including those relating to labour rights, forced labour and human trafficking. This expectation is included in our standard supplier terms and applies to Employer of Record providers.

*We recognise that our policies are in the early stages of development at a global level. The actions set out in section 7 of this statement describe our programme to strengthen the policy framework during the year ahead.*

### 4. Due Diligence

#### 4.1 Supplier Due Diligence

EquiLend's procurement function conducts due diligence on significant new suppliers as part of the onboarding process. This currently includes:

- Verification of supplier registration and legal standing
- Review of supplier policies where available, including any published modern slavery statements
- Contractual requirements on suppliers to comply with applicable laws, including the Modern Slavery Act 2015 where relevant

*We acknowledge that our supplier due diligence process does not yet include a specific modern slavery risk assessment framework. Developing and implementing such a framework – including coverage of Employer of Record arrangements – is a priority action for 2026, as set out in section 7.*

#### 4.2 Workforce Due Diligence

EquiLend carries out the following checks for all direct employees:

- Right to work verification prior to commencement of employment in all jurisdictions
- Background screening including employment history verification
- Reference checks for all permanent appointments
- Salary benchmarking to ensure compensation is above statutory minima in all locations

All employees are paid directly into personal bank accounts, hold their own identity documents, and are free to resign or take leave as provided by their contracts and applicable law. We have no indicators of forced or compulsory labour within our direct workforce.

Workers engaged through Employer of Record providers are not direct EquiLend employees. EquiLend expects all EOR providers to apply equivalent workforce standards and to comply with all applicable employment and labour laws in the jurisdictions in which they operate.

## 5. Risk Assessment

EquiLend has conducted an initial assessment of modern slavery risk across its business and supply chain. This assessment has been conducted by EquiLend's HR and Compliance teams based on the nature of our operations, workforce profile and supply chain characteristics in each area. The risk levels reflect our current state of knowledge and are not yet underpinned by a formal risk assessment framework.

Area	Risk level	Rationale
Direct workforce – UK, US, Ireland, HK, Canada	Low	Skilled roles, formal contracts, salary above statutory minima, right to work checks conducted
Direct workforce – India (EquiLend India Private Limited)	Low-Medium	Skilled technology roles, formal contracts. India's broader labour market carries elevated modern slavery risk relative to other EquiLend jurisdictions. Formal modern slavery due diligence for India-based employees is a priority action.
Extended workforce – Employer of Record (Globalization Partners, Japan)	Low-Medium	EquiLend engages a small number of workers in Japan through an EOR. These individuals are not directly employed by EquiLend. The EOR is subject to EquiLend's supplier engagement standards. EOR arrangements will be included in the formal supplier due diligence framework.
Technology infrastructure supply chain	Low-Medium	Major cloud and software providers have published modern slavery statements; hardware manufacturing supply chains warrant further scrutiny
Facilities management (offices globally)	Low-Medium	Cleaning, catering and security services can involve lower-skilled workers; formal due diligence not yet conducted at supplier level
Professional services (legal, audit, consulting)	Low	Regulated firms in mature jurisdictions; modern slavery risk considered low
Recruitment and staffing agencies	Low-Medium	Standard agency terms include compliance with applicable employment law; specific modern slavery screening not yet formalised

*The development of a formal modern slavery risk assessment framework, including an objective risk rating methodology and coverage of Employer of Record arrangements, is Action MS-01 in section 7 below. The risk levels in this table will be reviewed and updated against that framework once it is complete.*

## 6. Training & Awareness

During the financial year ended 31 December 2025, the following training and awareness activity was undertaken:

- EquiLend's HR team reviewed and updated the Modern Slavery & Human Trafficking Policy, which is communicated to all UK employees
- Modern slavery awareness is included in EquiLend's employee Code of Conduct, which all employees are required to read and acknowledge on joining.
- HR and Compliance leadership reviewed EquiLend's obligations under Section 54 of the Modern Slavery Act 2015 and commenced the development of a structured training programme.

*We recognise that dedicated modern slavery training has not yet been delivered across the global workforce. Building and launching a mandatory training module through our Absorb learning management system is a confirmed priority action for 2026.*

## 7. Our Commitments for 2026

EquiLend is committed to strengthening its modern slavery framework during 2026. The following actions have been identified and owners assigned. Progress against these commitments will be reported in our FY2026 statement.

Ref	Action	Owner	Target
MS-01	Develop and implement a formal modern slavery risk assessment framework for the supplier base, including Employer of Record arrangements, prioritising facilities management and technology hardware suppliers. The risk levels in section 5 will be reviewed and updated once complete.	Procurement / Legal	Q3 2026
MS-02	Implement supplier contractual clauses requiring compliance with the Modern Slavery Act 2015 and equivalent legislation as standard in all new and renewed supplier agreements	Legal / Procurement	Q3 2026
MS-03	Build and launch mandatory all-employee modern slavery awareness training module in Absorb, including reporting channels and escalation procedures	HR / L&D	Q4 2026
MS-04	Operationalise the Global Whistleblowing Policy including third-party reporting channel, creating a confidential route for modern slavery concerns to be raised	HR / Compliance	Q3 2026
MS-05	Conduct a formal review of facilities management suppliers across all 10 global offices to assess modern slavery risk and agree remediation where required	HR / Facilities	Q4 2026
MS-06	Register FY2025 Modern Slavery Statement on the UK Government's online registry at modernslaveryregistry.org	HR / Legal	In Progress – June 2026
MS-07	Appoint a Board-level sponsor for the modern slavery programme with responsibility for annual statement approval and oversight of progress against commitments	CEO / Board	Q3 2026

## 8. Approval History & Scope

It will be reviewed and approved annually by the Board of Directors of EquiLend Holdings LLC in accordance with Section 54 of the Modern Slavery Act 2015 and published on the EquiLend website within six months of the end of each financial year.

<b>Covers financial year</b>	Year ended 31 December 2025
<b>Published</b>	Q2 2026
<b>Prepared pursuant to</b>	Section 54, Modern Slavery Act 2015

Name	Title	Date	Signature
Kazuko Wachter	Director, EquiLend Holdings LLC	30-Jun-26	<i>Kazuko Wachter</i>

## 9. Revision History

Version ID	Date of Change	Author	Rationale
1.0	4-Jun-26	Amanda Moore, Natalie Schmulian	Original draft creation & revisions
1.1	30-Jun-26	Kazuko Wachter	Review & revisions
	Q2 2027		Scheduled annual review

*This statement covers EquiLend Holdings LLC and all its subsidiary entities.*