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# 2024 Modern Slavery Statement

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## 1. Reporting entity

This Modern Slavery Statement (**'Statement'**) is made on behalf of Xpansiv Limited pursuant to section 54 (Transparency in Supply Chains) of the *Modern Slavery Act 2015* (UK) and 16 of the *Modern Slavery Act 2018* (Cth). This statement relates to the reporting period commencing 01 January 2024 and ending 31 December 2024 (the **'Reporting Period'**).

## 2. Organisation structure and supply chains

Xpansiv Limited (ACN: 610 645 148) (**'Xpansiv'**) is an unlisted public company incorporated in Australia. Xpansiv wholly owns and controls a number of subsidiary companies, which are incorporated variously, including in Australia, the United States of America, the United Kingdom and Canada. Xpansiv's registered address is Level 13, 20 Bridge Street, Sydney NSW 2000.

Our company's mission and values are informed by environmental, social and governance considerations. Xpansiv is not aware of any modern slavery in its operations or supply chains, and we endeavour to take a continuous improvement approach to ensuring such risks are minimised to the greatest possible extent.

### ***Our operations***

Formed in 2019 through the merger of CBL (founded 2009) and Xpansiv (founded 2016), at the end of 2024, Xpansiv had employees and offices in Sydney, New York, Houston, London, Milan, and Bendigo.

Xpansiv operates the world's largest integrated, open and neutral market infrastructure for the global energy transition. Through Xpansiv's comprehensive end-to-end technology platform, which covers the entire lifecycle of environmental commodities, the company connects diverse markets and participants worldwide playing a pivotal role in scaling the energy transition.

### ***Our supply chains***

During our reporting period we engaged suppliers from a number of industries, primarily:

- IT infrastructure, equipment, software and consulting services
- Financial services, including banking and insurance
- Professional services
- Lease of office premises

- Facilities management services, including security and cleaning
- Kitchen supplies and food and beverage supplies
- Office supplies, such as pens, paper, notebooks and folders
- Furniture, such as desks, chairs and filing cabinets
- Travel and hospitality
- Media, marketing, promotional materials and merchandise
- Utilities
- Telecommunication
- Postal services

### **3. Risk assessment and management**

We believe that the risks of modern slavery remains very low for the operations and supply chains within our direct control. Our employees work in office-based roles and are remunerated competitively. Our employment contracts and workplace policies are carefully developed to maximise employee wellbeing and ensure compliance with the applicable employment laws where we operate. Furthermore, the countries in which we operate have a very low prevalence of modern slavery according to the Global Slavery Index.

We recognise that there may be a risk of modern slavery in some of the operations and supply chains over which we do not have direct control or management. For example, we have limited visibility over the risk of modern slavery when acquiring office supplies, kitchen supplies, furniture, or food.

### **4. Due diligence processes**

Our Risk, Legal and Human Resources departments, in co-ordination with executive and senior management, take reasonable precautions to avoid complicity in modern slavery practices. As part of the due diligence process, where appropriate (e.g., where a supplier operates in an industry or country vulnerable to modern slavery), we may request additional information and assurances relating to the third-party provider's business operations and supply chain. Our standard form supply agreements also require vendors to comply with all local and international laws.

### **5. Policies in relation to slavery and human trafficking**

We minimise the risk of modern slavery in our operations by constantly striving to maximise employee wellbeing and ensuring adherence to applicable employment laws, as well as a number of best practices. Our workplace policies serve to mitigate the risks of modern slavery in our operations by creating a respectful and cordial work environment.

These policies include, but are not limited, to our:

- Code of Conduct which addresses bullying, harassment, discrimination, equal employment, and grievance handling.
- Anti-Bribery and Corruption Policy
- Whistle-Blower Policy

Xpansiv takes a risk-based approach to managing modern slavery and human trafficking in its use of third-party providers and vendors. Third-party providers and vendors are engaged in accordance with our Third-Party Risk Management Policy and Procedures which requires the vetting of providers. In addition, we conduct periodic risk and performance analysis of our active third-party providers and vendors. Given the nature of our business, we consider our third parties to have a low risk of modern slavery.

We also minimise risks in other ways, such as by exercising care in respect of our cost requirements and delivery timeframes to ensure our suppliers are not unduly pressured to cut costs on labour or rapidly increase their workforce. We also address indicators of modern slavery by remaining alert to any observable signs of modern slavery which might occur in the supply chains which we readily observe (e.g., our cleaning services). Consistent with our policies, we expect our employees to immediately report any such signs to our management or through the Whistleblower program.

Our appreciation of the risks of modern slavery and the importance of mitigating the risk of its occurrence in our supply chains and operations continued to evolve during the Reporting Period. We are firmly committed to a continuous improvement approach so that our policies and procedures improve in their ability to alleviate the risks of modern slavery.

## **6. Key performance indicators to measure effectiveness of steps being taken**

Xpansiv continually assesses the effectiveness of its policies and practices in relation to combatting modern slavery. As part of our continuous improvement approach, we look forward to implementing comprehensive tools and methodologies which will allow us to report on the effectiveness of our actions precisely.

## **7. Training on modern slavery and trafficking**

Our mandatory workplace training includes training all employees in respect of the workplace policies previously outlined. This promotes compliance and awareness of all workplace policies which address the risk of modern slavery and trafficking.

## **8. Process of consultation with entities the reporting entity owns or controls**

This Statement was developed by Xpansiv in consultation with each of its wholly owned subsidiaries, all of whom are subject to our policies, procedures, and systems. We routinely liaise and share information and resources with our corporate group.

## 9. Statement

This Statement was approved on June 12, 2025, by the Board of Directors of Xpansiv and is signed by the Chair of the Xpansiv Board of Directors.

DocuSigned by:



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Lawrence Leibowitz

Chair, Xpansiv Limited

**Appendix - Mandatory criteria reference table**

Modern Slavery Act 2018 (Cth) section 16 requirements	Modern Slavery Act 2015 (UK) section 54 requirements	Xpansiv Limited Statement Section reference
Identify the reporting entity, s 16(1)(a).	N/A	Reporting entity
Describe the structure, operations and supply chains of the reporting entity, s 16(1)(b).	The organisation's structure, its business and its supply chains, s 54(5)(a).	Organisation structure and supply chains
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls, s 16(1)(c).	The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place and the steps it has taken to assess and manage that risk, s 54(5)(d).	Risk assessment and management
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes, s 16(1)(d).	Its policies in relation to slavery and human trafficking, s 54(5)(b). Its due diligence processes in relation to slavery and human trafficking in its business and supply chains s 54(5)(c), the training about slavery and human trafficking available to its staff, s 54(5)(f).	Risk assessment and management  Due diligence processes  Policies in relation to slavery and human trafficking  Training on modern slavery and trafficking
Describe how the reporting entity assesses the effectiveness of such actions, s 16(1)(e).	Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Key performance indicators to measure effectiveness of steps being taken
Describe the process of consultation, s 16(1)(f).	N/A	Process of consultation with entities the reporting entity owns or controls
Include any other information that the reporting entity, or the entity giving the statement considers relevant, s 16(1)(9).	N/A	Provided where relevant