

## Modern Slavery and Human Trafficking Statement

### Introduction

Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour, and human trafficking. Interactive Brokers (U.K.) Limited (**IBUK**) remains committed to preventing modern slavery and human trafficking in all part of its business and supply chains.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and covers the year ending 31st December 2024. It includes IBUK's operations in the UK, its branch in the Dubai International Financial Centre (**DIFC**), and its representative office in Switzerland. The statement also aligns with IBUK's Code of Business Conduct.

### Who we are

IBUK is an online execution and clearing-only broker. It is a privately held company incorporated in England and Wales and authorised by the Financial Conduct Authority. IBUK is part of the Interactive Brokers Group (**IBKR**), a global financial services firm headquartered in the US and is listed on the NASDAQ.

IBKR conducts business across more than 200 market destinations worldwide, providing online trade execution and clearing services for electronically traded products including stocks, options, futures, forex, bonds, and CFDs.

IBUK has a representative office in Switzerland, and in October 2024, IBUK opened a branch in the Dubai International Financial Centre (**DIFC**), marking its entry into the Middle East. IBUK's organisational structure ensures robust governance, with the Board and senior management overseeing regulatory compliance, supplier management, and operational risk.

### Our Supply Chains

IBUK's supply chains include internal IBKR service providers supporting operations (e.g., technology, systems, infrastructure, and corporate support). These services are governed by outsourcing agreements and monitored through IBUK's outsourcing framework, which includes initial due diligence and ongoing performance evaluations.

Additionally, IBUK engages local suppliers that provide goods or services such as:

- Professional advisory and consultancy services.
- Facilities management and building services.
- Routine office supplies and services.
- Recruitment and employment services
- Technology services and products.
- Employee benefit services.

While we consider our overall supply chain risk to be low relative to higher-risk industries, we recognise that some categories, particularly facilities management and recruitment services in Dubai, may present moderate inherent risk due to local labour practices. In Switzerland, risk is assessed as low due to strong labour protections.

### Risk Assessment and Policies

While we continue to consider the inherent risk to be low due to the nature, scale, and location of IBKR's business, we recognise that risk factors may evolve.

To address these risks, IBUK conducts regular risk assessments, evaluating geographical, sectoral, and operational risk indicators. With the establishment of our Dubai branch, we have expanded our risk framework to address region-specific factors, including local regulatory requirements, labour practices, and supplier conditions. We ensure compliance with both UK and UAE legal frameworks and ethical standards, strengthening our commitment to mitigating modern slavery risks across all our operations.

We have integrated our approach to identifying and addressing modern slavery risks across several core policies. Our Whistleblowing Policy explicitly recognises modern slavery and human trafficking as reportable concerns, ensuring staff can raise issues confidentially. Our Procurement Policy embeds due diligence requirements for suppliers and contractors, supported by our Vendor Code of Conduct, which sets out clear expectations on human rights, labour standards, and compliance with the UK Modern Slavery Act 2015.

Together, these policies create a consistent framework for identifying, escalating, and addressing modern slavery risks both within our operations and across our supply chain.

We continue to review our internal governance arrangements to ensure modern slavery considerations are embedded across relevant policies and procedures.

### **Due Diligence Processes**

IBUK has established due diligence procedures to:

- Identify and assess potential risks in our supply chains
- Mitigate the risk of slavery and human trafficking occurring within our supply chains.
- Monitor potential risk areas on an ongoing basis.

These procedures are periodically reviewed to ensure they remain effective and fit for purpose.

To mitigate risk across all operations, we apply the following procedures:

- **Supplier onboarding:** All material suppliers, including those in Dubai and Switzerland, complete a due diligence questionnaire confirming compliance with local laws and IBKR's Vendor Code of Conduct.
- **Contractual protections:** Contracts include reasonable obligations to comply with modern slavery laws, permit audits, and flow down requirements to subcontractors.
- **Ongoing monitoring:** Supplier performance is reviewed periodically. For Dubai, we plan enhanced monitoring of recruitment agencies and facilities suppliers, including verification of licensing and worker welfare standards.

### **Supplier Adherence to Our Values**

Suppliers are expected to comply with our Vendor Code of Conduct, which prohibits forced labour and human trafficking. IBUK monitors supplier performance through service level agreements, contractual obligations, and periodic audits. Where full compliance cannot be confirmed, we assess the supplier's practices and take appropriate action, which may include additional monitoring, remedial steps, or disengagement.

### **Staff Training and Awareness**

To enhance awareness and understanding of modern slavery risks, IBUK provides mandatory training for employees involved in reviewing and selecting suppliers. This training is reviewed annually to reflect evolving risks and best practices.

## **Measuring Effectiveness**

Since our last statement in 2022, no human rights breaches or incidents of slavery or trafficking have been identified. We have established key performance indicators to monitor the effectiveness of our policies and procedures. These indicators are used internally to support ongoing governance, review, and continuous improvement of our approach to preventing modern slavery across our operations and supply chains.

## **Further Steps**

IBUK is enhancing its measures by integrating the Dubai branch into ongoing risk assessments.

As part of our commitment to continuous improvement, we IBUK will:

- Expand supplier audits for deeper risk assessments
- Extend due diligence to existing suppliers in higher-risk categories
- Roll out enhanced supplier monitoring in in DIFC recruitment and facilities management.
- Continue to update training materials annually to reflect regulatory guidance and emerging risks across all locations.

## **Implementation**

IBUK's Board of Directors has overall responsible for this statement. Senior management are responsible for day-to-day implementation. Progress is reported annually to the Board.

## **Management Approval**

This statement was approved by the Board of Directors on 15<sup>th</sup> October 2025.