

**GALAXY DIGITAL HOLDINGS LP**  
**MODERN SLAVERY ACT TRANSPARENCY STATEMENT**  
**2025**

## **1. Introduction**

Galaxy Digital is a technology-driven financial services and investment management firm that provides institutions and direct clients with a full suite of financial solutions spanning the digital assets ecosystem. Our business lines include asset management, principal investments, trading, investment banking, mining, and AI datacenters (including development and operation of AI-focused datacenter infrastructure). We are headquartered in New York, with office locations in Cayman Islands, Chicago, Hong Kong, London, New Jersey, Dallas and Tokyo.

## **2. Our Business & Employee Training**

Galaxy Digital's Modern Slavery Act Transparency Statement, along with our Employee Handbook and Global Code of Conduct, reflect our commitment to conducting business in accordance with the highest standards of business conduct, ethics, and integrity. Accompanying this is our Whistleblowing Policy, which provides a system for our employees to escalate breaches and issues of Galaxy Digital policies.

All our employees are required to complete compliance training and attest to the Global Code of Conduct on an annual basis. As part of our onboarding process, all new employees are trained on the Global Code of Conduct and related compliance policies.

## **3. Our Supply Chain & Due Diligence Process**

Galaxy Digital conducts business on a global scale, and, through our activities, we interact with a number of different parties. Galaxy Digital does not tolerate slavery, forced labor, or human trafficking in any form and will not knowingly work with third-parties who engage in these practices or permit their subcontractors to engage in these practices. Third-parties are expected to fully comply with the requirements of applicable slavery, forced labor and human trafficking laws, including without limitation to the U.K. Modern Slavery Act 2015. We consider the risk of modern slavery or human trafficking existing within our business or our supply chains to be low. Galaxy Digital does not act as a producer, manufacturer, or retailer of physical goods and has no supply chain in relation to such activities.

## **4. Conclusion**

This statement was prepared for the financial year ending 31 December 2025 and is approved by the Board of Directors of Galaxy Digital Inc. on 23 February 2026.