

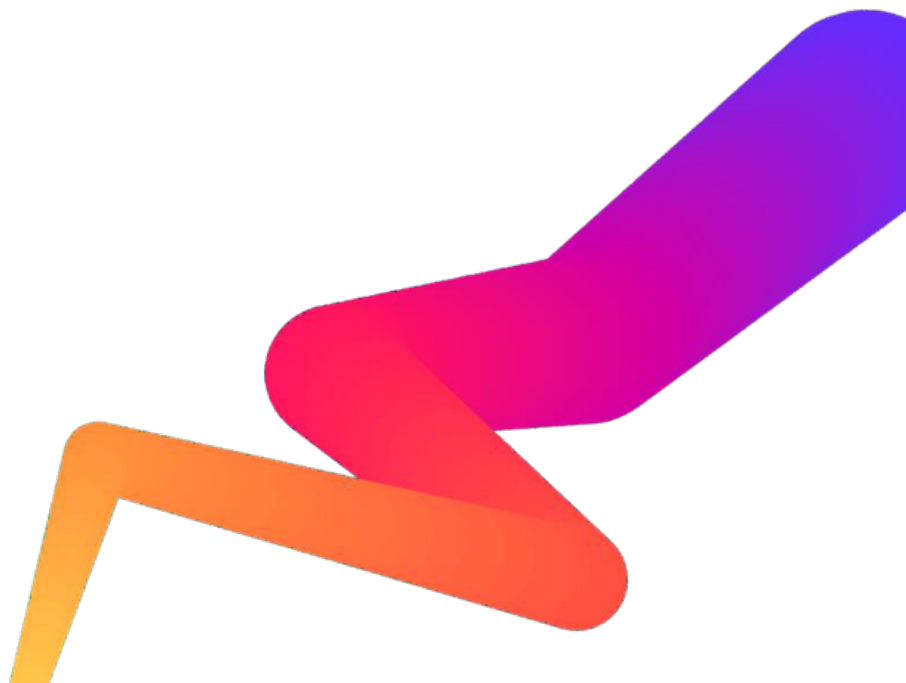


## Modern Slavery Statement

Airwallex (UK) Limited

("Airwallex UK")

Version 1.0 (May 2026)



## 1. Introduction

Airwallex (UK) Limited (“**Airwallex UK**”) is committed to ensuring that modern slavery does not take place in any part of our business or supply chains. This statement is prepared and made in accordance with the *Modern Slavery Act 2015 (UK)* and outlines the steps we have taken during the financial year ending 31 December 2025 to address these risks.

This statement has been approved by the Board of Directors of Airwallex UK.

## 2. Organisational Structure, Operations and Supply Chains

Airwallex UK operates as part of the broader Airwallex (Cayman) Limited and its affiliates (collectively, “**Airwallex Group**” or “**Group**”), a global financial technology group headquartered in Singapore. Our operations span various countries, employing over 2,400 employees globally.

While the Boards of each entity retain autonomy to ensure adherence to country-specific legal and regulatory requirements, the Group’s central governance provides a consistent framework to address modern slavery risks across all jurisdictions.

Our operations include:

- the development, maintenance, and monitoring of payment, FX, and settlement infrastructure;
- cross-border fund routing and reconciliation;
- risk monitoring, compliance functions, and customer support;
- internal IT, security, data services, and shared services across jurisdictions.

Our supply chains support these operations and comprise a mix of direct and indirect third-party providers, who support us in a multitude of areas including:

- technology products and services such as hardware and software, including computer equipment, software licences, verification services, networking, servers and cloud-based software;
- professional services (such as recruitment, compliance, legal, audit, and marketing services) from our advisors including law firms, recruitment agencies, consulting and accounting firms;
- financial and banking services (from payment infrastructure vendors, banking correspondents, market counterparties); and
- other services such as data storage, card production, cleaning, and facility management services.

## 3. Risks of Modern Slavery Practices in Operations and Supply Chains

Airwallex UK is committed to ethical business practices and respecting human rights in our operations and our supply chain. We will not knowingly support, tolerate and/or do business with any suppliers who are involved in any form of modern slavery.

We recognise the potential risks of modern slavery within the financial services sector, particularly in areas such as outsourced services, technology supply chains, and recruitment processes. While the majority of our suppliers are based in Australia, the UK, the EU, North America, and other low-risk regions, their subcontractors or labour providers may operate in jurisdictions with weaker labour protections. Furthermore, we recognise that within our operations and supply chains identified in Section 2, contract labour or outsourced services (e.g. maintenance, cleaning, logistics) may be vulnerable to exploitation, and while unlikely, suppliers’ improper practices around recruitment, wages, and working conditions (e.g. charge

workers recruitment fees, withhold documents, or underpay wages) can magnify risk of modern slavery exposure.

We remain vigilant and proactive in identifying and addressing any potential risks.

## 4. Actions Taken to Assess and Address Modern Slavery Risks

### Due Diligence

To mitigate modern slavery risks, Airwallex UK has implemented robust due diligence processes across our supplier and third-party relationships:

- **Third-Party Due Diligence:** We deal with a broad range of third parties and it is our intention to only contract with those who meet our standards regarding ethical employment and welfare practices. We conduct risk-based due diligence on existing and new third parties, which include asking them questions in relation to their compliance with the modern slavery laws. Where potential risks are identified, additional screening steps or follow-up enquiries may be undertaken to ensure that suppliers meet Airwallex's expectations before onboarding proceeds.
- **Vendor Onboarding & Approval:** We apply a risk-based Third-Party Risk Management ("TPRM") lifecycle for onboarding, approving, and managing third parties. This workflow is managed via Optro platform and includes risk classification, distribution of due diligence questions, domain reviews by relevant stakeholders, and documented approvals before engagement. Approved suppliers are subject to ongoing monitoring, with periodic reviews proportionate to their overall risk profile.
- **Contractual Obligations:** Airwallex's standard vendor and customer agreements already include a broad obligation to "comply with all applicable laws and regulations" that captures compliance with modern slavery and human rights laws, as well as clear termination rights for breach of law or contractual obligations (including modern slavery-related obligations). In addition, restrictions under our associated policies under our contractual arrangements prohibit engagement in any form of modern slavery, forced labour, or human trafficking activities. These provisions collectively ensure that our counterparties are contractually bound to act lawfully and responsibly in all aspects of their operations, and enable Airwallex to take appropriate action where non-compliance is identified.

These measures ensure that Airwallex only contracts with third parties who meet our standards on employment practices, welfare conditions, and ethical conduct. We will not support or deal with any supplier where there is evidence of involvement in modern slavery or human rights abuses.

### Training and Awareness

We provide regular training to our employees and key stakeholders on identifying and addressing modern slavery risks. This training includes:

- **Modern Slavery E-Learning:** A mandatory module for all employees, focusing on how we mitigate the risk of modern slavery in our supply chain, third parties, and direct operations. The module includes explanation of key concepts, real-life examples, information on the evolving global regulatory landscape, knowledge-check questions and attestations.
- **Annual Financial Crime Training:** All employees are required to complete annual training on financial crimes. This training highlights key red flags that may indicate exploitation and wrongdoings, and sets out clear escalation paths to ensure any suspected issues are properly reviewed and investigated.

Our employees are expected to behave in accordance with our values, which emphasise ethics, transparency, and integrity. In addition, our policies and procedures are designed to ensure awareness of modern slavery and human trafficking risks in our business and supply chains. Employees are encouraged to raise concerns through the appropriate channels, and the company will take corrective action where necessary, including in regards to slavery or human trafficking.

## Reporting Mechanisms Under Whistleblower Policy

Our Whistleblower Policy applies across all operations and encourages the reporting of any misconduct, including unethical, unlawful, or undesirable conduct. This covers issues such as modern slavery or human rights violations, which may be reported confidentially and without fear of reprisal.

The Policy provides secure and confidential channels for employees, contractors, representatives, agents, and business partners to raise concerns. Whistleblowers are protected from retaliation, intimidation, or disadvantage. All reports made in good faith are thoroughly investigated, with appropriate actions taken. The Airwallex Whistleblowing Service also allows anonymous reporting, ensuring concerns are addressed swiftly, fairly, and transparently.

## Governance and Responsibility

The responsibility for ensuring compliance with the *Modern Slavery Act 2015 (UK)* lies with Airwallex UK's Board of Directors. This statement has been approved by the relevant Boards and signed by a Director of Airwallex UK. For further inquiries, please contact our UK Regulatory Compliance Officer.

## Ongoing Assessment

Approved third parties undergo ongoing monitoring and periodic reassessment based on risk rating and materiality. Performance monitoring, due diligence refresh, and inventory validation are conducted on defined cycles. Triggers for reassessment may include contract renewals or amendments, repeated SLA failures, material changes in services, or regulatory changes.

## 5. Assessing Effectiveness of Actions

To ensure the effectiveness of our actions, we undertake an annual review of this Modern Slavery Statement and our anti-modern slavery controls and the outcomes, examining:

- Appropriateness and effectiveness of procurement and TPRM due diligence controls (onboarding, approvals, ongoing monitoring) and whether they are operating as intended.
- On-time completion rates for due diligence and performance monitoring tasks recorded on our GRC platform.
- Coverage and completion rate of required training modules.
- Concerns raised by employees regarding our suppliers and resolution timeliness.
- Impact of our actions on reducing modern slavery risks.

## 6. Board Approval and Signatures

Airwallex UK is committed to staying up-to-date on global legal developments related to human rights and modern slavery. We continue to monitor and adapt our practices to ensure we effectively combat the risk of modern slavery in our business.

This statement is made pursuant to section 54 of the *Modern Slavery Act 2015 (UK)* and constitutes our modern slavery statement for the financial year ending 31 December 2025. This statement has been approved by the Board of Directors of Airwallex UK.

A handwritten signature in black ink, appearing to read 'Wu Kai', written in a cursive style.

Name: Kai Wu

Title: Director, Airwallex (UK) Limited