

Clear Junction Group

Modern Slavery and Human Trafficking Statement

For the financial year ending 31 December 2025

Statement status

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board on 17 May 2026. It constitutes the Clear Junction Group Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2025.

1. Group structure and scope of this Statement

Clear Junction Holding Ltd. is a company registered in England and Wales under company number 10266710. It is the ultimate holding company of the Clear Junction group of companies and is incorporated in the United Kingdom.

As the ultimate parent company, Clear Junction Holding Ltd. is making this Modern Slavery and Human Trafficking Statement on behalf of those group companies that meet the conditions set out in section 54(2) of the Modern Slavery Act 2015 and for which a group statement is appropriate.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2025. It is made by Clear Junction Holding Ltd on behalf of Clear Junction Limited, a company registered in England and Wales under company number 10266827 and authorised by the Financial Conduct Authority as an Electronic Money Institution under firm reference number 900684 and, if applicable, on its own behalf as the ultimate parent company of the Clear Junction Group. References in this Statement to the Clear Junction Group describe the wider group framework and controls applied across the Group's operations, including relevant overseas subsidiaries, but the entities required to report under section 54 are those expressly identified in this Statement.

This is a group statement. It describes the steps taken across the Clear Junction Group during the relevant financial year to help ensure that slavery and human trafficking are not taking place in any part of the Group's business or, so far as is reasonably possible, within its supply chains.

2. Our business and operating model

Clear Junction is a group of companies which focuses on the wholesale market (financial institutions and regulated companies), where it uses its systems and payment infrastructure to offer access to interbank clearing through its own BIC, issuance of virtual accounts to facilitate payment reconciliation and other B2B services. Clear Junction works exclusively with corporate clients including remittance companies, banks, payment services providers, card issuers and digital currency businesses. As a general rule, Clear Junction does not provide these services directly to retail customers. Its clients are themselves regulated firms which provide services to their own corporate and individual customers. That operating model reduces direct exposure to labour intensive consumer facing activity. It does not remove modern slavery risk, particularly in relation to third party supply chains and the risk that financial services may be misused to facilitate the proceeds of exploitation.

3. Our approach

Clear Junction has a zero tolerance approach to modern slavery and human trafficking. We do not accept any form of slavery, servitude, forced or compulsory labour, or human trafficking in our business, and we expect the same standard from those with whom we do business.

Our approach is based on proportionate risk management. Clear Junction is a regulated financial services group with a largely professional and technology based operating model. The most relevant modern slavery risks for the Group are not linked to direct manufacturing or large scale manual labour within our own operations. Instead, the principal areas of focus are, first, employment and working conditions within our own workforce and contractor population, secondly, risks arising in supplier relationships and subcontracting chains, and thirdly, the possibility that our services could be used to move funds connected with human trafficking, labour exploitation or related criminal conduct.

We address those risks through governance, staff standards, employment controls, supplier due diligence, contractual protections, financial crime controls and channels for escalation and reporting.

4. Governance and internal framework

Responsibility for this area sits within the Group's broader legal, compliance and risk framework, with oversight by senior management and the Board. Modern slavery risk is considered as part of the Group's wider approach to legal compliance, financial crime prevention, third party risk management and conduct.

The main internal documents relevant to this Statement are the Code of Conduct, the Whistleblowing Policy, the Third Party Risk Management Policy and the AML, CTPF, CDD and Sanctions Policy. These documents are designed to work together. They set the standard for ethical behaviour, provide routes for speaking up, establish expectations for third party onboarding and oversight, and support the identification and escalation of suspicious activity, including activity which may be linked to trafficking or exploitation.

Clear Junction expects employees, officers and relevant contractors to act lawfully, ethically and with proper regard to red flags of exploitation or abuse. Suspected breaches are escalated through appropriate internal channels and, where required, to competent authorities.

5. Employment practices and people controls

Clear Junction is committed to lawful and fair employment practices across the Group. We seek to ensure that employment is freely chosen, that individuals are treated with dignity and respect, and that no one is subject to forced labour, coercion or unlawful exploitation within our business.

The Group applies recruitment and onboarding controls appropriate to the jurisdictions in which it operates. These include checks on identity and right to work where legally required, written terms of engagement, and compliance with applicable employment law requirements. Clear Junction does not knowingly employ child labour or forced labour.

The Group also seeks to maintain a working environment in which employees can raise concerns safely. The Whistleblowing Policy supports confidential reporting of actual or suspected wrongdoing, including concerns that may indicate modern slavery, labour exploitation or other serious misconduct.

6. Supply chains and third party risk

Clear Junction's supply chain is typical of a regulated financial services and technology group. It includes technology and software providers, cloud and infrastructure providers, professional advisers, payment and banking partners, corporate service providers, recruitment support, facilities and office related services, and other operational vendors.

While the Group's supply chain is not generally concentrated in sectors commonly regarded as presenting the highest inherent modern slavery risk, Clear Junction recognises that risk can arise in any supply chain, particularly where subcontracting, outsourced support services, facilities services, labour providers or cross border delivery models are involved.

The Third Party Risk Management Policy supports a risk based approach to onboarding and oversight of suppliers and other relevant third parties. Depending on the nature of the service and risk profile, due diligence may include consideration of the supplier's ownership and control, regulatory standing, adverse information, geographic risk, service model and reliance on subcontracting. Where relevant and proportionate, contractual terms are used to require compliance with applicable law and to support escalation where serious concerns arise.

Clear Junction expects suppliers to operate in a lawful and responsible manner and reserves the right to take appropriate action where concerns are identified, including enhanced review, remediation requests or disengagement where justified.

7. Financial crime controls and customer risk

Because Clear Junction operates in regulated payments and crypto related markets, an important part of its response to modern slavery risk lies in its financial crime framework. Human trafficking and labour exploitation generate criminal proceeds and may involve the misuse of payment accounts, payment flows, exchange services and other financial channels.

For that reason, the Group's AML, CTPF, CDD and Sanctions Policy forms a material part of its control environment in this area. Customer onboarding, customer due diligence, enhanced due diligence where appropriate, transaction monitoring, sanctions screening and escalation processes help the Group identify and assess indicators that may point to trafficking, exploitation or associated laundering activity.

This is especially relevant given Clear Junction's business model, in which the Group serves regulated client institutions whose own customers may include individuals or businesses exposed to sectors or behaviours associated with exploitation risk. Where concerns arise, Clear Junction may investigate, escalate internally, decline or exit relationships where appropriate, and make reports to relevant authorities in line with its legal and regulatory obligations.

8. Training and awareness

Clear Junction supports awareness of modern slavery risk through its compliance and conduct framework. Staff are expected to understand the Group's standards of behaviour, the importance of speaking up, and the need to identify and escalate red flags relevant to financial crime, third party risk and workplace misconduct.

Modern slavery is addressed through compliance training and related awareness measures, including training on conduct, whistleblowing and financial crime controls. The purpose is to help

relevant staff recognise indicators of exploitation, understand escalation routes and apply the Group's policies in practice.

Training is reviewed and updated in line with the Group's legal and regulatory obligations and with the development of the business.

9. Monitoring and effectiveness

Clear Junction keeps its approach under review as part of its wider compliance and risk management activity. In practice, effectiveness is supported through policy governance, risk assessment, onboarding and periodic review of relevant third parties, financial crime monitoring and internal reporting channels.

The Group does not treat the publication of this Statement as a one off exercise. The intention is to keep the risk profile and control framework under review and to improve visibility where this is proportionate to the nature of the business and the risks identified.

During and after the reporting period, Clear Junction will continue to focus on maintaining a proportionate control framework, embedding modern slavery considerations into third party oversight where relevant, and ensuring that financial crime controls remain capable of identifying indicators linked to trafficking and exploitation.

10. Approval

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board on 17 May 2026. It constitutes the Clear Junction Group Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2025.

A handwritten signature in black ink, appearing to read 'Teresa', with a small arrow pointing to the right below the signature.

Signed on behalf of the Board of Clear Junction Holding Ltd.

Teresa Cameron

CEO