

Modern Slavery Act Transparency Statement

PURPOSE AND BACKGROUND

On behalf of DTCC Derivatives Repository PLC (“DDRL”) and DTCC Europe Limited (“DEL”), as part of The Depository Trust & Clearing Corporation (“DTCC”), (collectively, the “Company”), and pursuant to section 54 of the *Modern Slavery Act 2015* (hereinafter, the “Act”), the Company has taken steps to combat modern slavery and human trafficking in connection with supply chains. This statement is made in relation to the financial year ending on 31 December 2025.

INTRODUCTION

The Company recognizes its obligations to combat slavery and human trafficking and remains strongly committed to preventing such human rights abuses from occurring internally and within its supply chains. The Company also recognizes the seriousness of such crimes and is committed to taking appropriate steps and enforcing such measures that will aid the prevention, identification, and reporting of such abuses.

THE COMPANY’S CORE BUSINESS SERVICES AND ORGANISATIONAL STRUCTURE

Through its subsidiaries, DTCC, a U.S. holding company, provides a post-trade market infrastructure for the financial services industry, advancing the automation, centralization, standardization and streamlining of processes critical to the market’s safety and soundness. Through DTCC’s trade repository and swap data repository subsidiaries, DTCC also serves as an industry provider of choice for global over-the-counter (OTC) derivatives reporting to the global derivatives market. Through its subsidiaries, DTCC operates in 14 countries, including the U.K., and has in excess of 9,000 staff globally. DDRL is a registered trade repository incorporated in England, providing a suite of post-trade recordkeeping and trade reporting services for listed and OTC equity, credit, and interest rate derivatives to the global derivatives market. DDRL operates from the United Kingdom. DTCC Europe Limited, an affiliate of DDRL, is a company organized under the laws of England and Wales, whose principal activity is to act as a service company to affiliated subsidiaries of DTCC.

THE COMPANY’S SUPPLY CHAIN

The Company’s supply chain is structured to support the provision of the foregoing services and largely consists of the following infrastructures and services required to do so:

Office Space

This includes the offices leased by the Company or any affiliates which its employees or affiliate employees that provide any services to the Company, occupy from time to time. It also includes the services procured to maintain daily operation of such spaces including cleaning and security.

Professional Services

This includes any professional advisory services the Company sources in relation to matters such as accounting, legal services, regulations, and tax.

Technology

This includes the ecosystem of software, systems, and hardware that comprises the Company’s technology infrastructures.

POLICIES AND TRAINING ON MODERN SLAVERY AND HUMAN TRAFFICKING

The Company requires adherence to several policies and procedures that are pertinent to mitigating the risk of slavery and human trafficking that could occur within the Company’s business or in any part of its supply chains. In particular, DTCC, as the ultimate parent company, has implemented the following policies,

which are applicable to all subsidiaries:

Code of Conduct

The Company's Code of Conduct for Employees, as well as its Code of Conduct for Contingent Workers, underscore the Company's continued commitment to integrity and the highest ethical standards in all business engagements undertaken by and with its employees and contingent workers. The Codes of Conduct and its associated training module promote awareness of the dangers of modern slavery as well as the need for the Company to comply with the requirements of the Act. The Codes of Conduct direct employees and contingent workers to report any instances of suspected non-compliance with the Act and instruct as to the mechanism for such reporting.

Reporting Mechanisms of Compliance Concerns

The Company maintains policies that require staff to report any compliance concerns or compliance queries through applicable internal and external reporting mechanisms. The mechanisms include hotlines for anonymous reporting of any compliance concerns.

Equal Employment, Non-Discrimination, and Anti-Harassment Policy

The Company's policy on Equal Employment, Non-Discrimination and Anti-Harassment reinforces its commitment to providing a work environment that promotes equal employment opportunities, prohibits discriminatory practices including harassment, and ensures all individuals are treated with respect and dignity.

Supplier Code of Conduct and Purchasing Policy

The Company's Code of Conduct for Suppliers describes expectations of how Suppliers and its personnel conduct business to align with the Company's commitment to integrity and high ethical standards. The Company also maintains a formal purchasing policy and program governing the procurement of goods and services and requires vendors to maintain any licenses, permits, or insurances required to perform the services concerned.

Standard Contractual Obligations

The Company seeks, as a standard practice, to include contractual provisions requiring its vendors to comply with all applicable laws.

Remuneration of Interns, Apprentices, and Employees

The Company does not use unpaid interns or apprentices, and all employees and contingent workers are remunerated fairly for the work or services they provide.

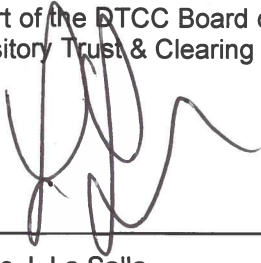
DUE DILIGENCE

The Company maintains a formalized due diligence review process – including sanctions screening – for the onboarding of vendors in its supply chain. Once a vendor is onboarded, the Company continues to engage in routine negative news and illegal activity reviews of all vendors across all jurisdictions. The Company's 2025 reviews of vendors for negative news resulted in no adverse findings related to human trafficking and modern slavery.

PREPARATION OF THIS STATEMENT

The Company's Compliance department produced this statement with input from Legal, Human Resources, Corporate Procurement Services, and other operational areas of the Company. The statement was subsequently reviewed and approved by the DTCC Board of Directors on February 10, 2026, and shared with the Directors of DEL and Directors of DDRL on February 25, 2026

As part of the DTCC Board of Directors' review and approval, this document was signed on behalf of The Depository Trust & Clearing Corporation by **Francis J. La Salla, Chief Executive Officer and Director.**

A handwritten signature in black ink, appearing to read 'F. La Salla', is written over a horizontal line.

Francis J. La Salla