Bitpanda Group
Modern Slavery and Human Trafficking Statement
Financial Year 2025

Issued by Bitpanda Group AG

Introduction

This slavery and human trafficking statement (the "**Statement**") is made by Bitpanda Group AG ("**Bitpanda**"), in accordance with section 54 of the UK Modern Slavery Act 2015 (the "**Act**"), on behalf of Bitpanda and its consolidated subsidiaries (together, the "**Bitpanda Group**") on the basis that at least some of the entities in the Bitpanda Group are 'commercial organisations' within the scope of the obligation to issue such a statement provided for in section 54(1) of the Act. This Statement outlines the steps taken by the Bitpanda Group during the 2025 financial year to address the risk of modern slavery in its own operations and those of its suppliers, as well as the Bitpanda Group's future plans in that regard.

For the purposes of this Statement, the term "**Modern Slavery**" includes 'slavery and human trafficking' as defined in section 54(12) of the Act. By this Statement, Bitpanda, on behalf of itself and the in-scope members of the Bitpanda Group, acknowledges those entities' legal obligations under the Act and confirms their commitment to maintaining high standards of ethical conduct across their operations, partnerships, and supply chains, to avoid involvement in Modern Slavery.

Our Business and Organisational Structure

The Bitpanda Group operates a European digital investment platform with over seven million registered users, headquartered in Vienna, and with offices in, among other cities, Barcelona and Berlin.

As a digital finance platform, the Bitpanda Group operates with a relatively streamlined supply chain, primarily involving technology providers and professional service partners. Given our focus on regulated markets within Europe and the UK, regions generally considered to have a lower risk of Modern Slavery, we assess the overall risk of exposure to Modern Slavery as low. Nevertheless, the Bitpanda Group remains vigilant and committed to upholding robust internal controls and due diligence measures to promptly identify and address any potential or emerging risks within our operations and/or supply relationships.

Three potential areas of elevated risk that the Bitpanda Group has identified are:

1. The IT hardware that the Bitpanda Group uses as part of its operations, including both desktop hardware, such as laptops, and network hardware, including servers. We are aware that the production of such hardware involves extractive industries, which present a risk of, among other things, forced labour. To mitigate this risk, the Bitpanda Group relies only on top-tier hardware suppliers.
2. The manufacturing and supply of Bitpanda-branded clothing and merchandise, for reasons analogous to those set out in (1) above.

3. The facilities management service providers (including cleaning, security, and catering personnel) appointed by the Bitpanda Group in its office spaces. We understand that certain operators in this industry provide poor working conditions and employ exploitative practices.

Relevant Policies

The Bitpanda Group is firmly committed to human rights and ethical conduct. The following policies reflect our commitment to preventing any form of Modern Slavery:

- **Code of Ethics and Business Conduct**: opposes child, slave, and any form of forced labour. Mandates fair wages, non-discrimination, and freedom of employment.
- **Employee Handbook**: reinforces a zero-tolerance policy for discrimination and promotes a respectful, inclusive workplace.
- **Whistleblowing Policy**: provides secure, confidential channels for raising Modern Slavery concerns, with protection against retaliation. During the 2025 financial year, the Bitpanda Group did not receive any reports regarding Modern Slavery through the available whistleblowing channels.
- **Third-Party Risk Management:** The Bitpanda Group maintains an ongoing process for identifying and managing ESG-related risks, including those related to Modern Slavery, across its supply chain and operations. This is weighted in our overall risk assessment and management of the third parties with whom we engage.

Due Diligence Processes, and Risk Assessment and Management

The Bitpanda Group considers most of its third-party relationships, primarily with technology, cloud, and digital service providers, as representing a low risk for Modern Slavery. For non-tech vendors, including those providing goods or facility services, we prioritise established and reputable partners.

As part of our vendor onboarding and reassessment procedures, particularly for outsourced and ICT-critical service providers, the Bitpanda Group conducts detailed ESG-focused due diligence (and, in the context of this Statement, with a focus on the 'Social' head of ESG). Our due diligence includes a review of ESG data, including, where applicable, topics such as labour rights, working conditions, and fair wage structures, and examines external certifications, key sustainability KPIs, and recent ESG developments. These areas help us evaluate our partners' environmental and social practices, including their efforts to combat Modern Slavery.

All vendors are subject to our third-party due diligence framework, which includes verification of legal identity, and of any known security risks such as prior data breaches. If any risks or concerns regarding Modern Slavery are identified during the due diligence process, the Bitpanda Group will take immediate action, which may include requiring the vendor to implement corrective action plans or, failing that, terminating the relationship.

Effectiveness Monitoring

The Bitpanda Group's existing risk management frameworks already assess a wide range of operational and third-party risks, supported by established controls, due diligence processes, and continuous monitoring. These measures help us identify and address potential concerns, including Modern Slavery. As our business evolves, we will continue to observe and review our practices and supply chain exposures, and update our processes, to ensure relevant risks remain adequately and appropriately identified, assessed, and addressed.

Employee Awareness

All employees are required to adhere to our Code of Ethics and Business Conduct, and follow the standards set out in our Employee Handbook. Together, these measures help reinforce ethical conduct, legal compliance, and awareness of organisational risks across our workforce.

Governance, Approval, and Publication

The board of directors of Bitpanda has overall responsibility for the Bitpanda Group's approach to Modern Slavery. Day-to-day responsibility for implementing relevant policies, controls, and due diligence processes is delegated to senior management, including the Bitpanda Group's Risk, Compliance, Legal, Procurement, and People functions.

This statement is approved by Bitpanda’s Executive Committee on behalf of Board of Bitpanda Group AG and the in-scope members of the Bitpanda Group.