

Japan Exchange Group UK Modern Slavery Act Statement
For FY2024 (April 1, 2024 to March 31, 2025)

This statement is made and published in line with Section 54 of the Modern Slavery Act 2015 of the United Kingdom and sets out the steps we have taken to prevent modern slavery and human trafficking in our business operations and supply chains in the fiscal year ending March 31, 2025.

Organization structure and supply chains

Japan Exchange Group (JPX Group) is a financial instruments exchange and clearing group, of which Japan Exchange Group, Inc. (JPX) is the holding company and Tokyo Stock Exchange, Inc. (TSE; cash equity exchange), Osaka Exchange, Inc. (OSE; derivatives exchange), Tokyo Commodity Exchange, Inc. (TOCOM; derivatives exchange), JPX Market Innovation & Research, Inc. (JPXI; market-related service provider), Japan Securities Clearing Corporation (JSCC; clearing house), and Japan Exchange Regulation (JPX-R; self-regulatory organization) are the fully owned subsidiaries. JPX also has three “affiliates” accounted for under the equity method.

All entities in JPX Group are headquartered in Japan and employ approximately 1,250 people in total. JPX Group's operations are almost entirely based in Japan, but there is one branch in Singapore and small representative offices in Beijing, Hong Kong, New York, and London that each represent particular Group companies. The London representative office represents JPX, TSE, and OSE, and carries out mostly research on trends in capital markets in Europe and the Middle East, as well as maintaining relations with those investing in the Japanese equity and derivative markets from these regions. While not all entities in JPX Group are required to publish a statement, this statement covers not only TSE and OSE, which are the entities subject to the UK Modern Slavery Act, but all the above entities within JPX Group.

As JPX Group provides financial infrastructure and related products and services, our most notable suppliers are IT services providers which develop and supply our trading and other systems. These are mostly based in Japan, the U.S., and Europe. Other suppliers include staffing agencies, real estate companies, network and communications providers, and companies providing office-related services such as catering and security. These are almost all based in Japan. Due to the nature of our supplier relationships, the vast majority are through long-term contracts.

Policies in relation to slavery and human trafficking

JPX Group is committed to respecting internationally recognized human rights, including the prevention and mitigation of modern slavery and human trafficking within our business operations and supply chains, through establishing and implementing relevant policies as below. Information on these policies is circulated internally through inclusion in the Compliance Handbook, which is

distributed to all officers and employees (including non-regular workers such as those hired through agencies and secondees). They are also available in both Japanese and English on the JPX website. In addition, the Human Rights Policy is made known to all business partners and affiliated companies.

1. Charter of Corporate Behavior

Employees and officers at JPX Group are required to conduct business in line with the Charter of Corporate Behavior, which sets out standards on human rights and compliance with laws and regulations as below.

Respect for Human Rights and Prohibition of Discrimination

We will give due regard to individual human rights and safety in the workplace, and work to ensure that employees can fulfill their potential in a pleasant and rewarding workplace free from discrimination and harassment.

Compliance with Laws and Regulations

We will maintain an accurate understanding of and strictly comply with all laws and regulations related to our business, including the Financial Instruments and Exchange Act and Companies Act. Furthermore, we will conduct corporate activities in-line with social ethics and best practices, and commit our best efforts to problem prevention.

Charter of Corporate Behavior:

<https://www.jpx.co.jp/english/corporate/governance/charter/index.html>

2. Human Rights Policy

JPX has created a Human Rights Policy in line with the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights which applies to all JPX Group officers and employees. This Policy denounces human rights violations in any form, including forced labor, child labor, and human trafficking. It also states that JPX expects all business partners to support and respect the Policy and will work with them on human rights issues.

JPX Group Human Rights Policy:

<https://www.jpx.co.jp/english/corporate/sustainability/jpx-esg/humanrights/index.html>

Risk assessment and management

JPX carries out human rights assessments in our own business operations and supply chains. This involves a) creating a map of key Tier 1 suppliers, revised annually, to assess which areas of the supply chain need further evaluation, and b) conducting desktop surveys in reference to external tools and reports regarding internationally recognized human rights to assess potential human rights violations that the Group could cause, contribute to, or be directly linked to among those suppliers. We also hold interviews and conversations with relevant departments where necessary. In FY2024, these assessments identified no risks relating to modern slavery.

Human rights-specific risk assessments are fed into the Group-wide risk management process under the umbrella of sustainability (ESG) issues, managed by the Sustainability Department.

JPX has a Risk Policy Committee, chaired by an outside director, to address the various risks that face the company, including those relating to social issues such as human rights. Every fiscal year, the Risk Policy Committee researches and debates the "significant risks" to JPX Group and presents its findings to the board of directors, which makes the final decisions. JPX designated "risk of reduced confidence and support for our market infrastructure due to an inadequate response to the promotion of sustainability which includes ESG issues" as a significant risk for FY2024.

Due diligence processes

Our ongoing assessment, supported by the above risk assessments, is that, due to the nature of our business and the structure of our supply chains, the inherent risk of involvement in modern slavery and human trafficking is low. Nevertheless, we continue to be vigilant and implement our due diligence processes in order to prevent and mitigate potential human rights risks in all areas of our business operations and supply chains, to the extent practical. For example, our supplier selections are determined on several factors including quality of service, price, ability to meet legislative and regulatory obligations, and our own standards of business conduct including our Human Rights Policy. The Human Rights Policy is available to all suppliers and business partners, and those that JPX Group has the most exposure to are actively requested to support and respect it. JPX also engages annually with its three affiliates to discuss potential human rights risks in their businesses.

To make sure that possible human rights violations connected to JPX Group can be communicated easily, and that JPX can regularly monitor any concerns or grievances, a grievance mechanism has been set up on the JPX website where anyone can make an enquiry or provide information. If it becomes clear that JPX Group has caused or contributed to an adverse impact on human rights, it will take remedial action using appropriate means. In the fiscal year 2024, there were no significant modern slavery or other human rights issues reported through the mechanism.

To allow anonymous reporting of possible violations of internal rules, including those on human rights, JPX Group maintains an internal reporting system called the Compliance Hotline. For details on the Compliance Hotline and the processes that follow a report being made, please see the below document.

Compliance Hotline:

<https://www.jpx.co.jp/english/corporate/governance/compliance/tvdivq0000006sac-att/hotline.pdf>

Furthermore, JPX Group regularly conducts employee engagement surveys and monitors employee perceptions of the working environment, among other things. Demonstrating JPX's commitment to our employees, the results of these engagement surveys have been set as KPIs for non-financial commitments under the new Medium-Term Management Plan 2027, which was published in March 2025.

Training

All JPX Group employees and officers are required to take an annual e-learning course on compliance. This includes training on the contents and meaning behind the Charter of Corporate Behavior, as well as the contents of the Compliance Handbook including the Human Rights Policy. We also include relevant practical examples of how to approach human rights in everyday duties. Employees of new subsidiaries are also given training on the same topics as part of the onboarding process.

The above statement was approved by the JPX Board of Directors on September 26, 2025.

Signed by:

A handwritten signature in black ink, appearing to be 'R. G. S.', written over a horizontal line.

Director & Representative Executive Officer, Group CEO

September 26, 2025