



Modern Slavery Statement

Effective date: 25 September 2023

About us

Aave Limited is authorised by the Financial Conduct Authority under the Electronic Money Regulations 2011 [firm reference number: 900984] for the issuing of electronic money.

Avara Virtual Assets Limited [firm reference number: [TBC]] is registered with the Financial Conduct Authority as a cryptoasset business and complies with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 as amended.

Aave Limited and Avara Virtual Assets Limited (together “Avara”) provides cryptocurrency exchange services to retail consumers in accordance with Avara’s [User Terms](#).

Purpose

Avara is committed to preventing modern slavery and human trafficking in all its forms within our business operations and supply chains. This Modern Slavery Statement outlines our commitment and the actions we are taking to combat these issues in accordance with the scope of section 54 of the Modern Slavery Act of 2015.

Our Commitment

1. **Policy:** We have a zero-tolerance policy for modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business relationships.
2. **Due Diligence:** We undertake due diligence when engaging with new suppliers, partners, and contractors to assess and mitigate the risk of modern slavery in our supply chain.
3. **Training:** We provide training to our employees to raise awareness of modern slavery risks and to ensure they understand their responsibilities in preventing it.
4. **Reporting:** We encourage our employees, suppliers, and other stakeholders to report any concerns related to modern slavery through our confidential reporting channels.

Supply Chain

As a financial services and technology company, Avara's supply chains are relatively short, and predominantly comprise organisations used on an ongoing basis. Onboarding reviews are conducted on new vendors, as well as ongoing monitoring of critical vendors, to ensure they are complying with their

contractual commitments and not otherwise breaching applicable law. Should deficiencies be found, Avara may adjust or, if necessary, terminate agreements. This would include any identified risk of modern slavery or human trafficking.

Actions Taken

Avara has taken the following actions to address modern slavery:

1. Established a confidential reporting mechanism for team members and other stakeholders to report concerns related to modern slavery.
2. Implemented a Code of Conduct that requires all team members, individually and collectively, to uphold the highest standards of ethical conduct to emphasise our company values and foster an inclusive and safe workplace. Compliance with the Code of Conduct should help reduce the risks of modern slavery and human trafficking in our supply chains.
3. Conducted a review of our supply chain to identify potential risks.
4. Introduced anti-slavery and human trafficking provisions within contractor service agreements.

Future Steps

We are committed to continually improving our efforts to combat modern slavery. In the coming year, we plan to:

1. Expand our due diligence efforts to identify and mitigate modern slavery risks.
2. Strengthen our supplier engagement and monitoring processes.
3. Continue to educate our employees and stakeholders about modern slavery risks and prevention.
4. Review and update this Modern Slavery Statement to reflect our progress and ongoing commitment to this critical cause.

Conclusion

Avara is not aware of any slavery or human trafficking issues within its group businesses or supply chains. In the last financial year, no potential issues of this type have been identified or reported through internal reporting channels, audit processes, or otherwise. Avara has not received any information from any other entities operating within its group indicating that there may be any such issues with any of its intra-group suppliers or their supply chains.

Reflecting upon the position as set out above, we consider the risk of slavery or human trafficking in Plaid, and its supply chain continues to be low. However, should any potential issue be identified, Avara will act swiftly to investigate and, where necessary, act to ensure there is no modern slavery or human trafficking occurring in its business or supply chains.