



Modern Slavery Statement

This is our first Modern Slavery Statement. It is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") and constitutes the slavery and trafficking statement for the last financial year ended 31 June 2021 for GSR International Limited and its UK and overseas subsidiaries (the "GSR Group").

We do not tolerate forced labour either within our business itself or within our supply chain. We expect our supply chain (whether direct suppliers or those that directly or indirectly supply our direct suppliers) to share the same values.

As a provider of services relating to digital assets, the GSR Group does not have a long or complex supply chain. We therefore consider our business and supply chain to be at relatively low risk of engaging in practices of slavery and human trafficking. Nonetheless, we are committed to ensuring any risks are identified and acted upon as quickly as possible.

In our first financial year we took the following steps to assess and manage any risk that our supply chain may use forced labour:

- Participated in the Association for Digital Asset Markets ("ADAM"), an organisation that we co-founded in 2018, and followed its Code of Conduct.
- Adopted an outsourcing policy, which requires all group companies to undertake a risk evaluation before engaging with outsourced service providers.

In the current financial year, we have:


- Carried out an analysis of our business and the key suppliers in our supply chain. This has included a review of any statements published by our key suppliers on use of forced labour to ensure that they in turn are taking what appears to us to be appropriate steps. Neither we nor, to the best of our knowledge, our key suppliers make use of forced labour.
- Adopted a Modern Slavery Policy, which rejects the use of forced labour.
- Introduced a Code of Conduct for the GSR Group.

In the future we plan to amend our Employee Handbook to introduce further procedures which underscore our commitment to our Modern Slavery Policy.

We think these steps are appropriate given our relatively low risk of engaging in practices of slavery and human trafficking.

References in the statement to "forced labour" mean any conduct which is an offence under Part I of that Act including slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

Approved by the Board of Directors of GSR International Limited on 4 February 2022


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DAVID M SOLA