Expana Modern Slavery and Human Trafficking Statement

Financial year ended 31 December 2025

Introduction from the CEO

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. These are heinous activities that we will never engage in or condone as a business, and that we condemn in others who engage in them.

We have a zero-tolerance approach to modern slavery and will not engage in business of any description with any business or entity that we know, or have reasonable grounds to suspect, does so. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Organisation's structure

Expana, together with its subsidiary and group entities, is a provider of global commodity price data, price forecasts and market intelligence for the food, CPG and capital goods supply chain sectors. These services are predominantly delivered by way of a Software-as-a-Service ("SaaS") platform.

Expana primarily comprises Wizard Topco Limited, Mintec Limited, Mintec Inc (based in the United States), Mintec Europe A/S (based in Denmark), Mintec SAS (based in France), Expana APAC Pte. Ltd (based in Singapore), and AgriBriefing Limited (based in the UK), which owns our AgriBriefing, Urner Barry, GDS and Tallage entities. Expana's ultimate parent company is Wizard Topco Limited (registered in England and Wales, company no. 13855769). This statement is made by Wizard Topco Limited and covers all of its subsidiaries.

Expana is ultimately owned and controlled by (i) an investment fund operated by Five Arrows Principal Investments and (ii) investment funds operated by Synova. The Group has approximately 300 employees worldwide, based principally in the United Kingdom, France, Denmark, the United States and Singapore. Our employees are predominantly professional, office-based and directly employed. We also engage independent consultants and contractors in other countries.

Our supply chains

Expana is predominantly a SaaS and data business. With that in mind, our supply chains are limited in number and scope. Our primary suppliers are third-party suppliers of (i) commodity price data and (ii) computer software and hardware – some of which are short-term suppliers while others have been Expana suppliers for years. Beyond these, our supply chain comprises cloud and software vendors, IT hardware, professional services, recruitment agencies, office facilities and cleaning services, business travel, and the venues, catering and event-services suppliers used for our conferences and events. We do not manufacture or trade in physical commodities; our exposure to physical goods is limited to IT hardware and office supplies.

Assessing and managing risk

We have reviewed the modern slavery risk profile of our own operations and of each category of spend in our supply chain, taking into account the sector, sourcing country and type of work involved, and drawing on recognised external sources such as the Global Slavery Index. We assess the risk of modern slavery within our own workforce as low: our people are predominantly skilled, office-based professionals who are directly employed on written contracts. Within our supply chain we have identified IT hardware, facilities and cleaning services, event venues and catering, and recruitment agencies as the categories carrying a higher potential risk, and we prioritise these for due diligence. We did not identify any instance of modern slavery in our operations or supply chain during the year.

Due diligence processes for suppliers

The Expana Supplier Code of Conduct and Anti-slavery and human trafficking policy for suppliers define our expectations of our suppliers and our commitment to ethical business practices and legal compliance.

Our standard practice is to require suppliers to complete a due diligence questionnaire before we onboard them, which includes questions on their policies and processes in place to prevent modern slavery and human trafficking. Any non-compliant responses are investigated. Where concerns are identified, our approach is to work with the supplier to remediate them promptly, and to terminate the relationship only where remediation cannot be achieved. Our Supplier Code of Conduct requires suppliers to comply with the Modern Slavery Act 2015 and all other applicable anti-slavery and human trafficking laws throughout their own supply chains, and our standard supplier contracts include specific modern slavery provisions.

Our policies on slavery and human trafficking

Our policies underpin our commitment to preventing modern slavery and human trafficking in our supply chains and in every part of our business.

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The Board has overall responsibility for our approach to modern slavery and approves this statement each year; day-to-day responsibility sits with our Sustainability lead, supported by the legal and compliance teams described below. We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Supplier Code of Conduct and Anti-slavery and human trafficking policy for suppliers;
- Code of Conduct and Ethics;
- Whistleblowing Policy;
- Sustainability Policy; and
- Anti-bribery and Corruption Policy.

Employee Handbook and employees

Our Employee Handbook forms the foundation of our ethical business framework. It provides our people with the guidance and support necessary to carry out their work in the right way. We designed our Handbook to help our people understand Expana's core values and the behaviours which underpin them.

All employees must comply with our Code of Conduct and Ethics. Employees can also raise concerns outside the whistleblowing process through line managers, HR, and our grievance procedure, and we survey employee engagement annually.

All of our employees undergo identity and Right to Work checks prior to commencing employment. We also carry out reference checking and, where applicable, DBS checks. We engage workers directly or through reputable agencies, we do not charge workers any fee for recruitment, we do not retain employees' physical identity documents, and we pay at least the statutory minimum wage in every jurisdiction in which we employ staff.

Whistleblowing

We encourage our employees, contractors, suppliers and their workers, and other stakeholders to report any concerns about unlawful conduct that they suspect is taking place. This includes any concerns regarding the risk of fraud, misconduct or wrongdoing (including but not limited to slavery or human trafficking). Our Whistleblowing Policy provides our employees with the ability to report suspected wrongdoing. This service enables individuals to report concerns with the right not to be dismissed, subjected to any other detriment, or victimised, because they have made such a disclosure. No reports relating to modern slavery or human trafficking were received through our whistleblowing channels during the year.

Supplier adherence to our values

We have zero tolerance for slavery and human trafficking. To ensure all those in our supply chain, our contractors and consultants comply with our values, we have in place a dedicated compliance team, with involvement from the following departments:

- Legal;
- Audit and compliance;
- Human resources;
- Procurement; and
- Sales.

We expect our suppliers to comply with all applicable laws and regulations, and require the same undertakings from them within our contract terms.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are introducing mandatory modern slavery training for all employees, covering how to recognise and report the indicators of modern slavery.

Our priorities for 2027

Building on the steps described in this statement, our priorities for 2027 are to: complete a supplier-level modern slavery risk assessment, starting with our higher-risk categories; extend our due diligence to existing suppliers in those categories; and adopt key performance indicators against which we will report in future statements. The Board reviews the effectiveness of these steps when it approves this statement each year.

Our commitment

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Wizard Topco Limited and its subsidiaries for the financial year ended 31 December 2025. It was approved by the board of directors of Wizard Topco Limited on 11 November 2026 and is signed below by Julie Harris, Chief Executive Officer of Expana and a director of Wizard Topco Limited. It has been published on our website. Our statements for previous years remain available on our website.

We invite readers of this statement to engage with us in constructive dialogue to help drive improvements in our implementation and performance.



Julie Harris
Chief Executive Officer, Expana, and Director, Wizard Topco Limited