



## Modern Slavery and Human Trafficking Statement

This statement is made in accordance with the Modern Slavery Act 2015 (the Act) and outlines the steps taken by Phare Global Markets, Inc., Phare Global Markets, Ltd, and Southeast Empreendimentos, Consultoria Financeira e Participações Ltda. (collectively, Phare Global) to prevent modern slavery and human trafficking in our business operations and supply chains.

### About Phare Global

Phare Global is an international advisory and market access firm that provides strategic, operational, and regulatory guidance to financial services firms entering and expanding within Latin American and other emerging markets. Our operations span multiple jurisdictions, including North America, Europe, and Brazil, and we operate in partnership with local and international institutions.

This statement has been prepared in line with Section 54 of the Act and reflects the actions undertaken during the last financial year by Phare Global to identify and mitigate the risks of modern slavery and human trafficking within our business and supply chain.

### Our Risk Areas

Phare Global employs a highly skilled workforce comprising professionals with secondary, tertiary, and often postgraduate qualifications. Our team is primarily office-based and operates in English and Portuguese-speaking professional environments, placing our direct employment practices at low risk of modern slavery or human trafficking.

Our supply chain consists predominantly of professional services providers, software vendors, IT infrastructure partners, and compliance consultants. We work with reputable third-party vendors, many of which are subject to regulatory oversight in their respective jurisdictions, and often have their own modern slavery policies in place.

### Reducing Risk in Our Supply Chain

All employees, contractors, and consultants working with Phare Global are expected to adhere to our internal Code of Conduct, which includes a firm commitment to ethical business practices and compliance with all applicable laws, including the Modern Slavery Act. Any violation or suspected violation of the Code can be reported confidentially through established internal channels, including anonymous reporting.

### To further address supply chain risks, Phare Global is in the process of formalizing its vendor management procedures, including:

Implementing due diligence checks on key suppliers and partners.

Ensuring contracts with critical vendors include provisions requiring compliance with anti-slavery and anti-human trafficking laws.

#### São Paulo

**Operational Headquarters**  
Rua Hungria, 664 10th Floor  
Jd. Europa 01455-904  
São Paulo, SP – Brazil

**Commercial Offices**  
Av. 9 de Julho, 4939 Suite 73B  
Jd. Europa 01407-200  
São Paulo, SP - Brazil

#### Rio de Janeiro

**Commercial Offices**  
Praia de Botafogo, 300, 5º Andar  
Praia de Botafogo 22250-040  
Rio de Janeiro, RJ – Brasil

#### New York

**Commercial Offices (North & Central America)**  
Phare Global Markets Inc.  
375 Park Avenue, Suite 2607  
New York, NY 10152-2600 – U.S.A.  
+1 (212) 634-6839

#### Santiago de Chile

**Commercial Offices (Latin America)**  
Phare Global Markets Inc.  
Av. Vitacura, 2670 Piso 15  
Las Condes 7550098 – Chile  
+56 -22-8204313

#### London

**Commercial Offices (U.K & The Commonwealth)**  
Phare Global Markets Ltd.  
Level 1, Devonshire House,  
One Mayfair Place  
London W1J 8AJ – U.K.  
+44 207 268 4824



Requiring vendors to confirm that they do not engage in any form of modern slavery or forced labor within their operations or supply chains.

Establishing regular reviews of vendor practices and re-confirming their adherence to ethical and legal standards.

### **Ongoing Commitment**

Phare Global remains committed to maintaining and continuously improving systems and controls to ensure that modern slavery and human trafficking do not take place within our organization or in any part of our supply chain. We will continue to review and update our policies and procedures in line with best practices and legal requirements.

Jose Carlos Duarte Areia Filho  
CEO  
Phare Global Markets, Inc.

#### **São Paulo**

**Operational Headquarters**  
Rua Hungria, 664 10th Floor  
Jd. Europa 01455-904  
São Paulo, SP – Brazil

#### **Commercial Offices**

Av. 9 de Julho, 4939 Suite 73B  
Jd. Europa 01407-200  
São Paulo, SP - Brazil

#### **Rio de Janeiro**

**Commercial Offices**  
Praia de Botafogo, 300, 5º Andar  
Praia de Botafogo 22250-040  
Rio de Janeiro, RJ – Brasil

#### **New York**

**Commercial Offices (North & Central America)**  
Phare Global Markets Inc.  
375 Park Avenue, Suite 2607  
New York, NY 10152-2600 – U.S.A.  
+1 (212) 634-6839

#### **Santiago de Chile**

**Commercial Offices (Latin America)**  
Phare Global Markets Inc.  
Av. Vitacura, 2670 Piso 15  
Las Condes 7550098 – Chile  
+56 -22-8204313

#### **London**

**Commercial Offices (U.K & The Commonwealth)**  
Phare Global Markets Ltd.  
Level 1, Devonshire House,  
One Mayfair Place  
London W1J 8AJ – U.K.  
+44 207 268 4824