

# MODERN SLAVERY STATEMENT

Financial Year End: 31<sup>st</sup> December 2020

## **MODERN SLAVERY STATEMENT FOR LMAX EXCHANGE GROUP LIMITED**

### **1. INTRODUCTION**

1.1. We are committed to improving our practices to ensure slavery and human trafficking are not taking place in any part of our business or our supply chain, and this statement sets out the steps we have taken during the financial year.

We expect the same commitment from our suppliers, contractors and business partners.

### **2. ORGANISATIONAL STRUCTURE**

2.2. LMAX Exchange Group Limited (“the Group”) is a privately-owned limited company headquartered in Jersey and is the holding company of LMAX Exchange, LMAX Global and LMAX Digital. The Group has approximately 150 employees and operates in 11 separate jurisdictions. The Group is a global financial technology business, operating multiple institutional execution venues for electronic foreign exchange and crypto currency trading. This statement applies to each company within the Group.

### **3. OUR SUPPLY CHAINS**

3.1. The Group’s key supply chains comprise:

Technology Service Providers – including Managed Hosting Services, Cloud Solutions, Software Licenses and Hardware Supply.

People Services - including Recruitment Agencies, People Management Systems, Professional Service Advisors and Benefits Providers.

Facilities Management – including Building Maintenance, Refreshment providers and Office Consumable Suppliers, transport and logistics.

### **4. OUR APPROACH TO SLAVERY AND HUMAN TRAFFICKING**

4.1. We have assessed the risk to the Group’s business and supply chains from modern slavery and human trafficking as being low.

4.2. Nevertheless, we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all our business relationships, and this statement reflects our commitment to implementing and enforcing proportionate and effective systems to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

### **5. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

5.1. We engage in business partnerships with established and reputable business partners/clients, with whom we aim to build long-term partnerships.

As part of our initiative to identify and mitigate risk, we have systems in place to:

- Identify and assess potential risk areas in our supply chain;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chain; and
- Protect whistle-blowers.

## **6. THIRD PARTY ADHERENCE TO COMPANY VALUES**

6.1. We have a zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a supply chain compliance programme. This consists of carrying out the due diligence referred to above as to the potential level of risk of slavery and human trafficking for any new suppliers or business partners/clients. Should we discover that any of our suppliers or business partners/clients tolerate or turn a blind eye to modern slavery, we would take steps to terminate our business relationships with them at the earliest practical opportunity.

6.2. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 2020. It was approved by our board on 5<sup>th</sup> October 2020.



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**Grant Pomeroy**

Finance Director

**Date:** 5<sup>th</sup> October 2020