

# **Tradition Modern Slavery & Human Trafficking Statement 2020**

pursuant to clause 54 of the Modern Slavery Act 2015 (MSA)

## **Context**

Under the MSA, modern slavery is defined as “slavery, servitude and forced or compulsory labour” and “human trafficking”. UK companies are under a duty to ensure that no slavery or human trafficking is taking place in their business or in any of their supply chains.

At Tradition, we aim for professional excellence through integrity and accountability, while taking care of our staff. It goes without saying that no one wishes to support, even inadvertently, modern slavery.

## **Our Structure, Supply Chains and Risks**

Tradition is the interdealer broking arm of Compagnie Financière Tradition (CFT) and one of the world's largest interdealer brokers in over-the-counter financial and commodity-related products. Represented in over 28 countries, CFT is listed on the Swiss stock exchange.

As a regulated intermediary in the financial services industry, we believe that there is a very low risk of modern slavery occurring in our core business. However, we are committed to ensuring that there is no modern slavery or human trafficking in any part of what we do and our Anti-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.

We therefore have concentrated on external suppliers to Tradition. By way of example, those third parties connected with Tradition’s provision of IT services – e.g. those who may maintain or develop our IT or network systems; suppliers of related hardware; any providers of specialist professional or advisory services; and including contractors or other suppliers of building or other facilities and office services. Most of our suppliers tend to be major providers of telecoms, IT, market data and professional services, located in the UK, Europe and the US.

## **Our Policies**

CFT has Group-wide policies and governance processes that of themselves assist in ensuring compliance with our MSA duties. For example:

- Anti-Slavery and Human Trafficking Policy;
- Whistleblowing Policy, which encourages staff to report any concerns including any related to any matter whatsoever of public significance, including modern slavery/trafficking;
- Group Code of Ethics, which sets the standards that are expected to be maintained, globally, at all levels of our business;
- Staff Handbook, which aims to cultivate a workplace environment that is fair, open and respectful, and one that promotes and protects the rights of all staff.

## **Our Suppliers' Obligations**

We include in our third party contracts a Modern Slavery clause in the form of that Appended to this Statement.

## **Approval date**

This 2020 statement was approved by the Tradition London Board on 8<sup>th</sup> September 2020.



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Mike Anderson  
CEO

## **SUPPLIERS' MODERN SLAVERY ACT COMPLIANCE CLAUSE**

### **Compliance with Laws and Policies**

In performing its obligations under the agreement, the Supplier shall and shall ensure that each of its subcontractors shall:

- (i) comply with all applicable laws, statutes, regulations in force from time to time including but not limited to the Modern Slavery Act 2015; and
- (ii) take reasonable steps to ensure that there is no modern slavery or human trafficking in the Suppliers or subcontractors supply chains or in any part of their business.

### **Due Diligence**

The Supplier represents and warrants that neither the Supplier nor any of its officers, employees or other persons associated with it has been convicted of any offence involving slavery and human trafficking, and, to the best of its knowledge, has been or is the subject of any investigation, inquiry or enforcement proceedings by authority regarding any offence or alleged offence of or in connection with slavery and human trafficking.

The Supplier shall implement due diligence procedures for its own suppliers, subcontractors and other participants to ensure that there is no slavery or human trafficking in its supply chains.

### **Reports**

The Supplier shall notify Tradition as soon as it becomes aware of any actual or suspected slavery or human trafficking in a supply chain which has a connection with this agreement.

### **Warranties**

The Supplier represents, warrants and undertakes that it conducts its business in a manner that is consistent with the principles of the Modern Slavery Act 2015.

### **Termination**

Tradition may terminate the agreement with immediate effect by giving written notice to the Supplier if the Supplier commits a breach of this Clause.