



ITIVITI

Slavery and Human Trafficking Statement

Itiviti Group AB

itiviti.com

Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54, Part 6 of the United Kingdom Modern Slavery Act 2015 and sets out the steps Itiviti Group AB and its subsidiaries (including Itiviti Limited, Itiviti UK Limited, Itiviti UK Services Limited, Ullink UK HoldCo 1 Limited, Ullink UK HoldCo 2 Limited, Ullink UK HoldCo 3 Limited, Itiviti Nyfix Global Services Limited and Itiviti Fix City Limited) (“Itiviti”) has taken during financial year 2020 to ensure that slavery and human trafficking does not take place in its business and supply chains. Itiviti is committed to acting ethically, transparently and with integrity in its business dealings and relationships.

About Itiviti

Itiviti is a world-leading technology provider for the capital markets industry. Trading firms, banks, brokers and institutional clients rely on Itiviti technology and expertise for streamlining their daily operations, to stay compliant, and to seize new market opportunities. Itiviti’s flexible offering includes products, solutions and services for end-to-end trading, market access, order routing, risk management and compliance. You can read more about Itiviti here: <https://www.itiviti.com>.

Our Supply Chains

Itiviti’s supply chains include IT infrastructure, software and data service providers, facilities and waste management, consulting and advisory services. Itiviti’s supply chains are focussed in the regions in which it has a presence.

Our Policies and principles in relation to slavery and human trafficking

Itiviti is committed to preventing human rights violations, including slavery and human trafficking, in its supply chains or any part of its business. Itiviti does not, directly or indirectly, use forced labour or other forms of involuntary labour, including prisoners, bonded workers, illegal workers, or other non-paid workers.

Itiviti has established set of policies and procedures that govern the way it operates. These are relevant to how Itiviti manages potential human rights related issues with regard to its employees, supply chains and business operations and include, *inter alia*:

- Procurement Policy
- Corporate Social Responsibility manual
- Work environment Policy
- Whistleblowing policy
- Corporate Risk Management Policy

Itiviti respects the United Nations Universal Declaration of Human Rights as well as adheres to and supports the UN Guiding Principles on Business and Human Rights and recognizes its responsibility to observe those rights that apply to its performance toward its employees and the communities.

Due Diligence for slavery and human trafficking

As part of Itiviti's ongoing initiative to identify and mitigate risk, processes and systems have been developed to:

- identify and assess potential risk areas in our supply chains
- mitigate the risk of slavery and human trafficking occurring in our supply chains
- monitor potential risk areas in our supply chains

Itiviti has processes and procedures in place to protect whistle blowers and uses an independent Service to enable its staff and relevant stakeholders to report concerns confidentially and anonymously.

Suppliers and Partners Adherence to Our Values

Itiviti has a zero tolerance approach to slavery and human trafficking. Itiviti expects its suppliers and partners to comply with local laws including, but not limited to, employment laws, anti-corruption laws and any other laws that regulate how people work.

Itiviti's procurement team is engaged with the on-boarding of, and performs risk assessments against, new suppliers.

Employees Awareness and Reporting

Although Itiviti does not regard any part of its business to be particularly at risk of modern slavery and human trafficking, Itiviti will not tolerate any acts or behaviours by its employees or suppliers that may constitute modern slavery or human trafficking under the Act. Itiviti's policies support this position.

Employees are able to report any occurrence or suspicion of slavery or human trafficking within Itiviti directly to management or via a confidential and anonymous whistleblowing channel.

Effective Actions taken to Combat Slavery and Human Trafficking

During the financial year 2020, Itiviti has taken the following steps to ensure that its supply chain is free from slavery and human trafficking:

- Contract templates have been reviewed to ensure compliance with applicable national and international laws and regulations, such as the UK Modern Slavery Act.
- A compliance training program has been made available to relevant staff. Where appropriate, the compliance training is followed up with a web-based test.

Name of Company: for and on behalf of Itiviti Group AB

Name of Company Director: Rob Mackay

Date: 18 March 2021

Signature: R MACKAY