

Modern Slavery Act 2015

Slavery and Human trafficking statement (“Statement”) as required under s54 of the Modern Slavery Act 2015 (“the Act”) for the financial year ended 31 December 2018 (“Financial Year”). This statement applies to Trayport Limited (“Trayport”) which is required to have a modern slavery statement in accordance with the Act.

Introduction

Trayport is a leading provider of energy trading solutions to traders, brokers and exchanges worldwide. It develops, deploys and supports quality, resilient software for trading in multiple asset classes worldwide in cleared or OTC markets. Trayport’s software and services are used by the world’s largest trading companies in high profile markets that include derivative and cash instruments. Trayport is a wholly-owned subsidiary of TMX Group Limited.

Our policies and controls

Trayport are committed to ensuring that there is no modern slavery or human trafficking in their supply chains or in any part of their business. The Trayport Anti - Slavery Policy reflects this commitment to acting ethically and with integrity in all Trayport 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.

Trayport is dedicated to maintaining systems and processes that protect its employees and avoid any issue that can be perceived as a human rights violation. Trayport implements policies related to non-discrimination, equal opportunity and non-harassment. Trayport believes that its approach to professionalism, respect and integrity has served Trayport well, and continues to ensure that the rights of employees and applicants are protected. Trayport complies with all applicable laws and regulations on forced or child labour. Trayport’s Global HR Policies document is designed to ensure compliance with our core values that focus on professionalism and integrity.

Assessment of Modern Slavery Risk

It is Trayport’s view that it operates within an industry where the risk of modern slavery is low, based on the nature of the relevant products as well as the location of significant operations. Notwithstanding this, Trayport unequivocally supports the drive to eradicate modern slavery and fully supports the requirements of the Act.

Trayport have considered the actions the business will take to ensure compliance with the Act. The primary focus of Trayport is the business which is managed from the London office. It is intended that Trayport will progressively build each year on the work which has been done in prior years.

We have developed a risk- based approach to the assessment of the possibility that Modern Slavery exists within Trayport’s supply chain. Those undertaking the assessment have reviewed all suppliers. For each supplier information has been collected as to the identity of the actual supplier, the services or goods provided to Trayport, and the contract value. When undertaking the assessment a number of factors were then considered which are broadly (1) location where the service or goods are supplied and the ranking of each supplier in accordance with the Global Slavery Index; <https://www.globalslaveryindex.org/index/>, (2) the industry sector from which the services or goods is provided, and (3) the labour practices specific to the industry and the location from which the particular services or goods are supplied. The result of the exercise was that, we reviewed all suppliers and allocated each supplier with a risk rating according to our policy.

Those suppliers who have been assessed as medium risk will be subject to enhanced due diligence. Consideration will be given as to whether any requirements should be imposed on any supplier or termination of contract with such supplier in order to ensure compliance with the Policy.

Trayport has zero tolerance to slavery and human trafficking. To ensure all those in our supply chain comply with our values, we ensure when entering into a contract with suppliers, they adhere to our standard terms and conditions and to all applicable laws, which include relevant anti-slavery legislation.

Staff Training

Our focus has been on raising awareness as to the obligations contained in the Act and the presence of slavery and human trafficking throughout the world. Information regarding what Modern Slavery is and how it may impact our business was sent to all who work for Trayport when the policy was launched, as well as having been publicised in the company's intranet.

This statement was approved on 30 January 2019 by the organisations President, Peter Conroy and will be reviewed and updated annually.

Peter Conroy
President
Trayport