

## **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 2015 (“Financial Year”). This statement applies to all companies within Trayport (“TRAYPORT”) that are required to have a modern slavery statement in accordance with the Act (“the Relevant Companies”).**

### **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 GlobalVision<sup>SM</sup> software is used by the world’s largest trading companies in high profile markets that include derivative and cash instruments. Founded in 1993, Trayport has offices in London, New York and Singapore. Trayport is a wholly-owned subsidiary of Intercontinental Exchange, Inc. (NYSE:ICE).

### **Our policies and controls**

TRAYPORT and the Relevant Companies 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 Modern 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 committed 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 around the world. TRAYPORT complies with all applicable laws and regulations on forced or child labour. The TRAYPORT Global 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.

### **Vendor Due Diligence processes**

As part of TRAYPORT’s initiative to identify and mitigate relevant risks the TRAYPORT Vendor Management Policy framework comprises three main elements: (i) Due Diligence, (ii) Risk Assessment, and (iii) Performance Management and Oversight.

These procedures include but are not limited to:

#### **1. Due Diligence and Initial Risk Assessment.**

All vendors must complete a vendor profile. An initial qualification of the vendor is undertaken to generate the relevant risk assessments (including but not limited to factors such as Info-sec, HR, Financial, BCP, physical security and compliance with applicable law including in relation to modern

slavery). The depth of the assessments is driven by the criticality, scope of engagement as well as the initial risk qualification.

Reviews entail inquiry into legal, regulatory and reputational public and non-public records. Each vendor is evaluated using the vendor rating scorecard as defined within the Vendor Management System.

## **2. Risk Assessment**

Each vendor will be evaluated on a defined criteria and assigning vendors to an appropriate risk class. Risk ratings are reviewed when a material change in the vendor relationship is identified or if the vendor's ability to provide TRAYPORT is impacted by an external or internal event.

## **3. Performance Management and Oversight**

TRAYPORT Vendors are subject to evaluations and may be required to provide performance metrics in order to continue their partnership with TRAYPORT. The risk and partnership classification of the vendor will dictate the cyclical frequency for each vendor performance evaluation.

### **Complaint Reporting Procedures**

Complaints or concerns related to TRAYPORT accounting, auditing, internal controls or financial reporting can be submitted anonymously and confidentially, or with full disclosure.

### **Vendor adherence to our values**

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