

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 2023 ("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 is 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.

Our Supply Chain

Trayport's supply chain largely consists of cloud services, IT infrastructure, software services, and data provision. Trayport also uses professional services providers such as consultants, accountants, as well as suppliers of office equipment, facilities management, digital print production and publication distribution.

Assessment of Modern Slavery Risk

Given the nature of Trayport's business, we believe there is minimal risk of practices that support, facilitate or are complicit with modern slavery, within either Trayport or our supply chain. Notwithstanding this, Trayport unequivocally supports the drive to eradicate modern slavery and fully supports the requirements of the Act.

Trayport has 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 Modern Slavery 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.

Due Diligence and further steps

Trayport has determined that the majority of its suppliers operate in areas considered to be at a low risk of supporting or being complicit in forced labor or human trafficking. We ensure clear and effective communication with new and existing vendors regarding our commitment to compliance with the Modern Slavery Act and our zero-tolerance approach towards forced labor and continue to promote an environment that encourages reporting concerns and protects whistleblowers.

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.

Those suppliers who have been assessed as medium risk and above 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.

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 publicized in the company's intranet.

This statement was approved on 21 May 2024 by the organisation's CEO, Peter Conroy and will be reviewed and updated annually.

Peter Conroy
CEO
Trayport