

SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION FROM THE HEAD OF HUMAN RESOURCES EMEA – OPENLINK FINANCIAL LLC

We believe we are compliant with ethical standards and laws in every location in which we do business, in relation to combatting slavery and human trafficking. We are committed to ensuring that compliance continues at the highest standard throughout our organisation.

ORGANISATION'S STRUCTURE

We are the global leader in trading, treasury and risk management solutions. We are a part of OpenLink Financial LLC with our head office in Long Island, New York, USA. We have over 1200 employees worldwide and operate in the Americas, EMEA and APAC regions.

We have a global annual turnover of USD 300M+.

OUR BUSINESS

Our business is organised into global functions and within the functions there are Professional Services staff (Consultants, Technical Consultants, Project Managers and Engagement Directors), Sales staff (Account Managers, Pre-Sales and Sales), Product teams, Development teams and support functions such as Finance, Legal, HR and IT. We are headed up by a CEO, with an Executive Leadership Team reporting into him and a Senior Leadership team below that.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Code of Ethics and Business Conduct reflects our commitment as an organisation to acting ethically and with integrity in all our business relationships and to ensuring proper dealings with all people and entities with whom we interact. Any potential violations of our Code are taken very seriously and to this end we have an Ethics and Compliance hotline and Online Reporting System for employees to report any incidents or behaviours that are not in accordance with our Code of Conduct and/or other policies without fear of retaliation. We believe that no business deal or strategic objective is worth sacrificing our reputation and integrity for.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking and to any other violation of our Code of Ethics and Business Conduct. To ensure all those in our supply chain and contractors comply with our values we have in place a dedicated compliance team, which consists of involvement from the following departments:

- Legal.
- Human resources.
- Procurement.
- Sales.

TRAINING

To ensure a high level of understanding of our Code of Ethics and Business Conduct, we provide training to all of our employees. Every member of staff must complete compliance certification on an annual basis to evidence that they have reviewed and understood OpenLink's Compliance Programme including the Code of Ethics and Business Conduct. We periodically send out to all employees the information on how to report any suspected breaches in a timely manner.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2017.

OPENLINK FINANCIAL LLC



Deborah Parsons, Head of Human Resources EMEA

Date: 22 June 2017