

MODERN SLAVERY ACT TRANSPARENCY STATEMENT FOR SUNRISE BROKERS LLP (this “Statement”)

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement required under UK legislation for the entity listed above, (the “Entity” or “we”), for the financial year ended 31 December 2019. This Statement has been approved by the Board for the Entity.

Back ground

Modern Slavery is a crime and violation of fundamental human rights. It takes various forms such as slavery, servitude and forced compulsory labour and human trafficking all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

Organisation

We are a leading global brokerage firm providing a wide range of services, including trade execution, broker-dealer services and other services to a broad range of financial and non-financial institutions. Our customers include many of the world’s largest banks, broker-dealers, investment banks, trading firms, hedge funds, governments, corporations, and investment firms.

We consider that given the nature of our business the risk of involvement in modern slavery and human trafficking is low.

Our commitment

We are strongly opposed to modern slavery and human trafficking and will not knowingly support or conduct business with any organisation involved in such activities. We maintain a reputation for conducting our business activities in the highest ethical and professional manner. We are committed to collaborating with stakeholders to improve transparency and address incidents of modern slavery or human trafficking identified.

We have a robust recruitment and onboarding process with checks built in to ensure that individuals have the right to work in the UK and are paid a fair salary in compliance with all relevant rules and regulations.

All members of staff are expected to comply with our Code of Business Conduct and Ethics which sets out basic principles designed to guide staff and provides mechanisms to report unethical conduct; and foster a culture of honesty and accountability.

Our Anti-Slavery and Human Trafficking Policy further reflects our commitment to act ethically and with integrity in all our business relationships to ensure slavery and human trafficking is not taking place in anywhere in our business or supply chains.

Our supply chains

As a financial services group our supply chains are relatively simple and we consider the risk to modern slavery and human trafficking to be very low. Our suppliers provide services such as IT, communication technology and professional services. Nevertheless, we require the highest professional standards and ethics throughout our business and we expect the same high standards from the parties we work with as well as their compliance with all local and national laws and regulations.

We aim to identify and assess key risk areas in our supply chains. Should we ascertain modern slavery or human trafficking activities in our supply chains we will work to remediate that through appropriate and proportionate action in accordance with our legal and moral obligations.

Our policies

Our policies are key tools to meet our Modern Slavery Act commitments and our working practices respect and uphold internationally recognized human rights for all our staff.

We have a number of policies which aim to minimise the risk of modern slavery within our business and supply chain. These include:

- Our Employee Handbook which aims to cultivate a workplace environment that is fair, open and respectful, and one that promotes and protects the rights and dignity of all staff;
- Our Code of Business Conduct and Ethics which sets the standards that are expected to be maintained at all levels of our business;
- Our Anti-Slavery and Human Trafficking Policy which applies to staff at all levels including employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants and third-party partners;
- Our Global Procurement and Vendor Management Policy which defines the principles under which the procurement of goods and services is conducted within the group; and
- Our Whistleblowing Policy which encourages staff to report any suspected concerns regarding unethical behaviour.

This statement was approved by our Entity's Board of Directors in August 2020 pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our anti-modern slavery and human trafficking statement for the financial year ended 31 December 2019.

Signed by

A handwritten signature in black ink, appearing to read 'Robert Sevens', is written over a light grey rectangular background.

Robert Sevens

Board Member

For and on behalf of Sunrise Brokers LLP

17 September 2020