

# London Stock Exchange Group plc

## Slavery and Human Trafficking Statement for the Financial Year ended 31 December 2019.

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**London**  
Stock Exchange Group

## 1.0 About us: our organisation and approach to anti-slavery

### 1.1 London Stock Exchange Group and its business

London Stock Exchange Group (LSEG) is an international markets infrastructure business. Its diversified global business focuses on capital formation, risk and balance sheet management and intellectual property. Headquartered in the United Kingdom, with significant operations in North America, Italy, France, Malaysia and Sri Lanka, we employ approximately 4,500 people. You can find out more about our organisational structure and operations at: <https://www.lseg.com/about-london-stock-exchange-group>

### 1.2 Scope of this Statement

The 2019 MSA Statement covers all the companies belonging directly or indirectly to LSEG, including the following companies that are required to publish a statement: London Stock Exchange plc, LCH Group Limited, LCH Limited, FTSE International Limited, LSEG Business Services Limited, LSEG Employment Services Limited, LSEGH Inc., Borsa Italiana S.p.A., MTS S.p.A., Monte Titoli S.p.A., Cassa di Compensazione e Garanzia S.p.A., LCH S.A., The Yield Book Inc. and Frank Russell Company.

Whilst not all entities within the Group are required to publish a Statement LSEG is committed to ensuring all its group entities operate in a consistent and effective way with regard to slavery and trafficking risk. As such, this 2019 MSA Statement describes our corporate and Group-wide approach applicable to all entities. This statement is published

### 1.4 What we have done this year

In 2019 we have:

- Completed a detailed risk assessment of our supply chain based on latest slavery guidance, best practice and data which has tiered our suppliers according to slavery risk [see section 3.0].
- Adopted an enhanced Supplier Code of Conduct into our 3<sup>rd</sup> party supplier on-boarding procedures placing more robust expectations on our suppliers in the area of modern slavery and human trafficking [see section 2.2]
- Enhanced our Group Country Risk methodology to incorporate specific modern slavery risk indicators, with support from third party expert providers, and incorporated this into our supplier

on LSEG's public website and the websites of any companies required to publish a statement, where such sites exist.

### 1.3 Our commitment to tackling modern slavery

The London Stock Exchange Group ("LSEG"/"LSE Group"/"us"/"we"/"our"/ the "Group") plays a vital economic and social role in enabling companies to access funds for growth and development. As such, integrity and trust in our markets, and in LSEG, are at the core of what we do.

**We have a very clear corporate view of modern slavery: we regard all forms of modern slavery and human trafficking as a crime and a violation of fundamental human rights.** It is fundamentally at odds with our own corporate values. We are committed to implementing and promoting practices which combat slavery in all its forms.

Our updated risk assessment and research in 2019 has once again indicated that LSEG operates in an industry where the risk of modern slavery and human trafficking is inherently low. However, **we operate as a global business and therefore recognise the risks of partnering with a varied spectrum of global suppliers** and of slavery occurring deeper in those complex supply chains.

As such, in publishing this our fourth Modern Slavery Act (MSA) Statement covering the financial year 2019 (the "2019 MSA Statement"), we have taken steps in 2019 to enhance our anti-slavery practices. You can read our statements for previous years [here](#). Within this 2019 MSA Statement we describe our anti-slavery action plan for 2020.

- on-boarding due diligence procedures [see section 2.2]
- Commenced a transformation of our Group Procurement function to enable more effective management of the supplier base across the Group, under a clear governance framework.
- Undertaken a review of our 500 most important supplier contracts, enabling us to identify where we have contractual commitments from suppliers around slavery and human trafficking, or need to take further action to agree this.
- Sought to obtain agreement to our enhanced Supplier Code of Conduct from our Tier 1, 2, and 3 suppliers (in addition to suppliers of Facilities Management services in our international office locations), in line with the actions proposed in our 2018 Statement [see section 4.0].
- Created an action plan to further enhance our slavery risk mitigation [see section 4.0].

**2.0 How do we prevent modern slavery and human trafficking?**

**2.1 Our understanding of modern slavery**

LSEG interprets all possible forms of slavery and trafficking (both legal concepts and commonly accepted terminology) as being included under the umbrella of “slavery”.

**2.2 Our approach**

**2.2.1 We have a multi-faceted approach to tackling slavery risk**

In response to the Modern Slavery Act coming into effect LSEG brought together members of staff from relevant functions across the Group including Legal, Procurement and Corporate Sustainability (the “working group”) to take action on our modern slavery risk.

The objectives of the working group are to ensure we implement appropriate practices within our business to manage and mitigate our slavery and human trafficking risk, review the actions taken during the year and progress against the things we committed to previously, and produce a compliant Modern Slavery Act Statement each year.

The working group ensures that we leverage a multi-faceted approach to managing our modern slavery risk, see Figure 1, right, by considering the different ways in which LSEG is exposed to,

and can tackle, slavery related risks. It has determined the approach to risk assessing our supplier base for slavery risk.

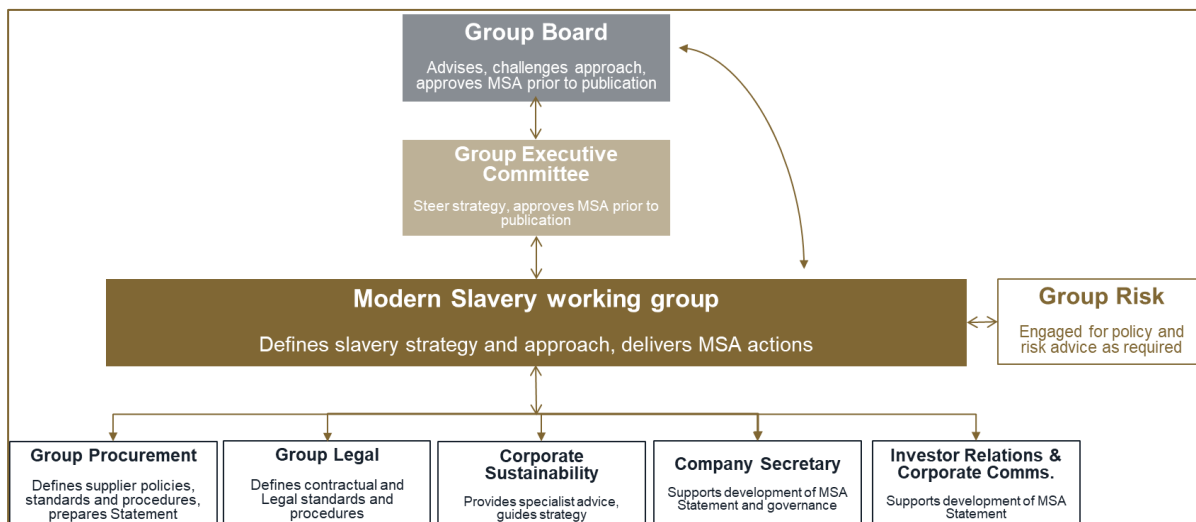
**Figure 1 LSEG's approach to managing modern slavery risk**



**2.2.2 We ensure governance of modern slavery risk up to a senior level**

The working group consults with, and obtains approval from, both the Executive Committee and the Board of LSEG in all slavery risk activity and in the preparation of this 2019 MSA Statement, see Figure 2 below.

**Figure 2 LSEG's slavery risk governance structure**



### 2.2.3 We provide training and communications to staff

As functions who are key to identifying and mitigating modern slavery risk day to day, our Group Procurement and Group Legal teams have been provided with tailored training on modern slavery in the form of internal briefings by their relevant working group members.

For Procurement teams these briefings focussed on slavery risk, risk assessment and due diligence procedures which underpin our anti-slavery approach, complemented by specific training for team members in how to complete risk assessment and due diligence.

In Legal the focus is on ensuring use of anti-slavery commitments in all supplier contracts. New joiners in both teams are also briefed, with detail provided on both slavery supplier risk and contractual standards below.

Our Executive Committee requested and received enhanced reporting on the subject of modern slavery risk during the preparation and review of the previous Statement for YE2018.

The Executive Committee, supported by David Warren as MSA Statement Executive Sponsor, were briefed on the Modern Slavery and Human Trafficking risks faced by LSEG to ensure the Executive Committee's commitment and strategic steer to this topic prior to submission of the 2019 MSA Statement to the Board for consideration.

The LSEG Code of Conduct, which applies to all staff, includes anti-slavery commitments and is available to staff at all times [see section 2.2.5].

### 2.2.4 We undertake slavery-specific risk assessments

We have now completed three separate risk assessments, specific to modern slavery risk, on our organisation and our supply chains:

- In preparation of the 2016 statement we completed a high-level risk assessment on our suppliers. Follow up actions from that review were completed in 2017.
- As part of our strategy review and preparation of the 2018 statement a completely new risk assessment was undertaken on our 3rd party supplier base. This leveraged better modern slavery best practice guidance and data [see Section 3.0].

- This risk assessment produced in 2018 has been updated and refreshed in preparation of this 2019 MSA Statement.

## 2.2.5 We have robust policies, frameworks and standards in place

### 2.2.5.1 What we have done this year

In 2019 we have:

- Reviewed our policies and procedures and found these to be fit for purpose to help achieve our anti-slavery strategy and objectives.
- Incorporated an updated Supplier Code of Conduct with more robust and specific provisions for modern slavery into due diligence procedures from Q1 2019.
- Enhanced our Group Country Risk methodology to incorporate specific modern slavery risk indicators, with support from third party expert providers, and included this into our supplier on-boarding due diligence procedures.

### 2.2.5.2 Procurement Policy

LSEG maintains a Group Procurement Policy for all staff (an equivalent policy applies in France). The policy requires risk assessment of and proportionate due diligence on all potential 3<sup>rd</sup> party suppliers prior to their engagement as a supplier to LSEG. It also requires written contracts to be in place for suppliers we consider Medium and High Risk, to leverage and embed our standard anti-slavery provisions. We describe these procedures later on in this 2019 MSA Statement.

The Group Procurement Policy (and local policies where relevant) applies in all geographies in which LSEG operates and to all staff or resources acting on our behalf in the engagement of 3<sup>rd</sup> party suppliers. The policy has been approved by the boards of all LSEG entities and is sponsored by a member of the LSEG Executive Committee; it is available to staff at all times via LSEG's intranet.

### 2.2.5.3 Supplier Code of Conduct

Group Procurement owns LSEG's Supplier Code of Conduct, which can be found [here](#) on LSEG's external website. The Code outlines LSEG's expectation that the suppliers it

chooses to do business with conduct themselves in a manner which aligns to LSEG's core values, beliefs and standards. The Code includes commitments for suppliers to comply with all applicable laws, industry standards across topics such as labour, the environment and other social responsibility concerns. It requires commitments from suppliers to avoid slavery in their own supply chains.

It is agreed with new suppliers during Procurement due diligence, and increasingly being accepted as a contractual commitment via inclusion in our standard contract templates.

**Breaches:** the Supplier Code of Conduct encourages any interested parties with concerns about breaches of the code, slavery or any similar topics to disclose those via confidential email to a central Procurement mailbox. There have been no such disclosures throughout 2019. Where breaches occur, these will be escalated by Procurement within the modern slavery working group to agree an appropriate response.

#### 2.2.5.4

##### Staff and whistleblowing policies

**Employee Code of Conduct:** LSEG has in place an Employee Code of Conduct, approved by LSEG Board, which applies to all staff and 3<sup>rd</sup> party resources working for LSEG. It includes the expectation that all staff and resources act in accordance with our corporate commitment to avoid slavery in our organisation and business dealings. All staff, contractors and commitments are required to complete mandatory training each year which reinforces the requirement to comply with the code at all times. It is available to all staff at all times via our intranet.

**Group Corporate Sustainability Policy:** this policy, approved by LSEG Board, includes anti-slavery within its overarching commitments. It is available at all times via the LSEG intranet site.

**Whistleblowing Policy:** we operate a Whistleblowing Policy, aimed principally at our employees but also available to others working in our supply chains in all LSEG locations. It encourages employees, customers and other business partners to report any concerns with LSEG activities, supply chains or business dealings that may give rise to an enhanced risk of slavery or human trafficking and other similar issues. This can be done anonymously, confidentially and without fear of retaliation via a global 24x7 whistleblowing system and equivalent telephone hotline. The policy and disclosure procedures are available to all staff and resources at all times via the intranet. **Internal awareness of the Whistleblowing Policy and these procedures was further enhanced in 2018 via a specific "Speak Up" campaign led by the Group CEO.**

A group wide **Anti-bribery & Corruption Policy** is in place within the Group and is accessible by all staff via the LSEG intranet.

**Living Wage:** LSEG is a Living Wage Foundation UK accredited employer and is committed to the London Living Wage for all employees and onsite contractors employed by third party suppliers. LSEG has been monitoring the establishment of similar accreditation schemes in other jurisdictions where LSEG has a significant employee base<sup>1</sup>, with a view to joining them in future.

## 2.2.6 Our procurement process considers slavery risk at key points

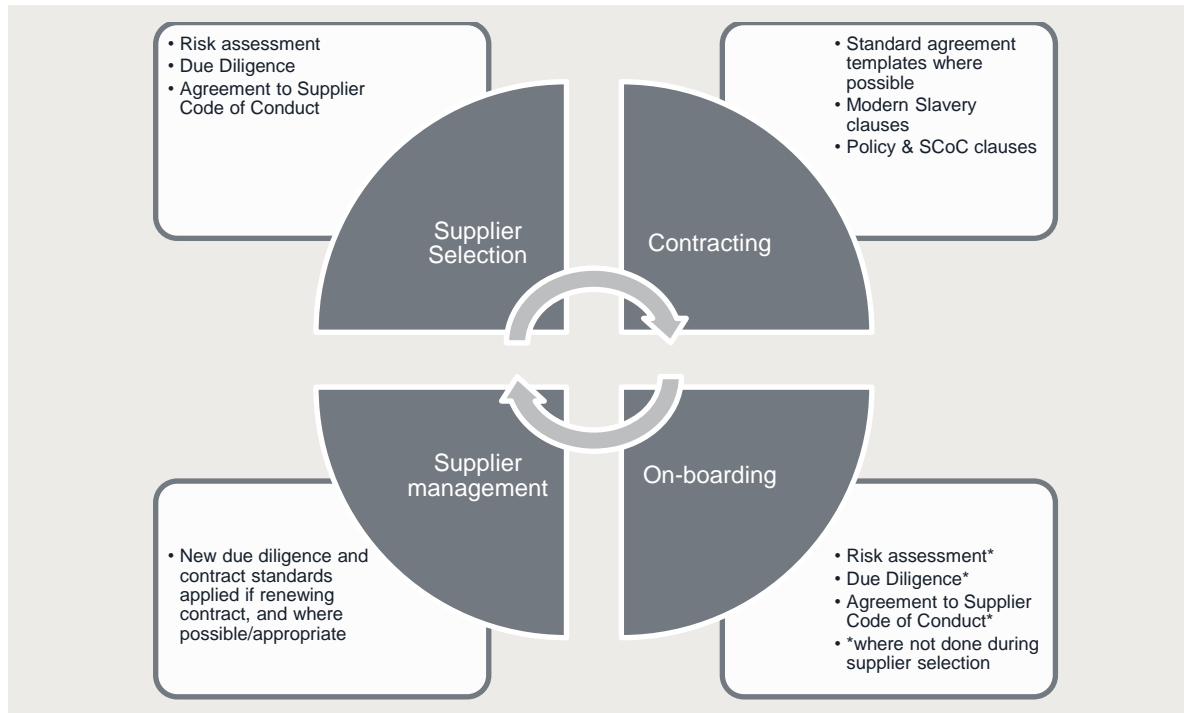
### 2.2.6.1 Overview – addressing slavery risk in our procurement process

We ensure modern slavery risk is considered during the whole Procurement and contracting lifecycle, see Figure 3 below.

The Group Procurement function – or, where established, a local Procurement team – supports the management of supplier risk in all geographies where LSEG operates.

<sup>1</sup> France, Italy, Malaysia, Sri Lanka and the US. In France and Italy collective bargaining agreements cover the employee base.

**Figure 3 Slavery considerations in LSEG's procurement lifecycle**



**2.2.6.2**

**Risk assessment procedure for new suppliers**

Procurement completes a risk assessment (“segmentation”) on all new suppliers prior to on-boarding, as required by the Group Procurement Policy. Suppliers are segmented as Low, Medium or High Risk based on range of risk factors. Different due diligence requirements apply and are conducted by Procurement based on the risk level.

- All suppliers are checked against LSEG’s “Country Risk List” during segmentation. This List provides LSEG’s view (based on external indices and data such as the Corruption Perception Index and the UK Foreign and Commonwealth Office’s (FCO) Human Rights & Democracy report) of countries which pose an elevated risk from a reputational, geo-political, economic and social responsibility perspective. Countries are rated as Red, Amber, Yellow, or Green based on determined risk factors, with Green being the lowest risk and Red being the highest. It is continually updated (minimum monthly) by Group Risk and was enhanced with slavery-specific risk indicators in 2019.

- Suppliers exposed to elevated geographic risk must be risk accepted by the business and be approved at a senior level, with referral to Group Risk.
- Countries with a prevalence of corruption, sanctions, money-laundering and human rights and democracy concerns are more likely to have a prevalence of slavery or human trafficking and will not be rated ‘Green’. As such they would require, at minimum, Group Risk review and senior business acceptance.

**2.2.6.3**

**Due diligence on new suppliers**

Our segmentation and due diligence procedures for new suppliers are centralised within Group Procurement. In 2019 we have incorporated the use of the enhanced Supplier Code of Conduct and Country Risk list into these due diligence procedures, with re-training provided to relevant Group Procurement resources to assist with identification of elevated slavery risks with new suppliers.



LSEG completes several types of due diligence on our Medium and High Risk suppliers which enables the identification of potentially elevated modern slavery risk: review against our Country Risk List, detailed Know Your Customer review (KYC), agreement to the Supplier Code of Conduct and checks for known supplier sanctions or conflicts of interest.

We have procedures in place for managing exceptions noted during due diligence including referral to Group Risk, mitigation where possible and risk acceptance by appropriate senior representatives. Supplier Code of Conduct exceptions/disagreements are managed by Group Procurement by seeking confidence that we share common ethical principles. In particular, this includes performing an equivalence check on the supplier's own code of conduct where one exists and clarifying their stance on slavery and human rights.

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### **2.2.7 We incorporate anti-slavery commitments into our supplier contracts**

LSEG seeks to agree contracts with suppliers which align to our minimum standards. We seek to use standardised contract templates and a key terms library to contract with our suppliers in all geographies and as standard practice. These terms include: cross-jurisdictional anti-slavery provisions such as the requirement for the supplier to comply with all applicable laws including the UK Modern Slavery Act 2015, agreement to the Supplier Code of Conduct, warranties that supplier staff and officers have not been involved in slavery or human trafficking and have sufficient procedures to ensure there is no slavery in any of its businesses or supply chains, and rights for LSEG to audit their operations and businesses.

These are supplemented by requirements in our recruitment, professional services and consultancy agreements that the suppliers must vet their staff to a high standard prior to working for LSEG (in countries where performing such a check is legally allowed). Exceptions to these minimum clauses must be reviewed and agreed with the Legal team in the first instance.

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### **2.2.8 We have procedures for handling slavery breaches and incidents**

Modern Slavery breaches, incidents and concerns can be raised by suppliers and staff through the Whistleblowing and Procurement

channels described earlier. Throughout 2019 there have been no whistleblowing complaints, breaches incidents or concerns regarding modern slavery and human trafficking raised through these channels.

### **2.2.9 We bring older suppliers in line with latest anti-slavery standards**

We have so far described the policies and procedures we have in place for mitigating slavery risk when establishing new supplier relationships.

We know that we engaged with a number of suppliers before some of the formal policies and procedures described throughout this 2019 MSA Statement came into effect and who may not have not been subject to our full current anti-slavery approach.

However, we are confident that we have robust "fix forward" procedures to deal with these historic suppliers at an appropriate time, by seeking to bring their contracts in line with latest anti-slavery standards at the point of renewal and to conduct risk assessment and due diligence on them at the same time.

Our Group Procurement function or our business divisions have influenced or addressed over 2/3rds of the Group's on-going discretionary third party spend, and this continues to increase through Group Procurement's ongoing objective to rationalise and extract commercial value from our suppliers.

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### **2.2.10 We apply this anti-slavery approach globally**

LSEG has operations located in countries which have elevated geographic and slavery risk. These include significant operations in Sri Lanka and Malaysia, but we also conduct business on a smaller scale in India, Mexico and China, for example.

Staff in these locations are subject to the same Group-wide policies and standards as in lower risk locations (or existing local equivalent versions) with regard to suppliers and modern slavery. The locations are supported by Group Functions (including Procurement, Legal and Risk) or in some cases – such as Sri Lanka – a local Procurement and Legal function is in place to better serve local business needs and manage local suppliers.

All plans to establish new business operations in high risk locations require significant prior review and senior approval including from the LSEG New Markets and Product Committee or equivalent committee, in line with our International Office Framework. All of our current international office locations have been through rigorous review and approval with all relevant geographic (including slavery) risks assessed and approved as such.

- understand the likelihood of slavery potentially occurring in our supplier base;
- understand how effectively some of our mitigating procedures and processes have been applied and
- use this information to formulate slavery strategies and actions for 2020 and beyond.

We excluded several categories of spend from this analysis which were non-discretionary or non-addressable e.g. regulatory fees, intercompany charges, settlement depositories and custodian banks for clearing activity.

### 2.3 Collaborating with our suppliers to tackle slavery

Section 4.0 describes our action plan with respect to further addressing slavery and human trafficking risk in our supply chain throughout 2020.

### 2.4 Measuring and reporting our progress

In line with our Group Corporate Sustainability policy, we take a zero-tolerance approach to issues such as modern slavery and human trafficking. Accordingly, **we have an overall objective of zero instances of modern slavery in our supply chain.**

We report relevant indicators from our slavery risk assessment (including proportion of agreement by suppliers to our Supplier Code of Conduct) to relevant Boards and Executive Committees during approval of our modern slavery act statement each year.

We submit metrics relating to acceptance of the Supplier Code of Conduct as part of our Carbon Disclosure Project submission each year. As a Group we submit information and relevant metrics to the Dow Jones Sustainability Index. More information on progress in those areas can be found in our Annual Corporate Sustainability Report, [here](#). We publish our modern slavery act statement on our website, via the Modern Slavery Registry and the TISReport Modern Slavery Act Compliance Tracker.

## 3.0 Our supply chain

### 3.1 What we have done this year

We have completed a refreshed assessment and analysis on our suppliers. The objective was to:

- understand and quantify the level of modern slavery and human trafficking risk in our supply chain by analysing our supplier base;
- use, where appropriate and possible, more slavery data and research than in previous assessments;

## 3.2 How we assess slavery risk

### 3.2.1 We leverage publicly available best practice and data

LSEG has referred to the following publicly available publications, indices, research and guidance documents in conducting the slavery risk assessment:

- “Tackling modern slavery in supply chains – a guide 1.0”; Chartered Institute of Purchasing and Supply in collaboration with the Walk Free Foundation; <https://www.cips.org/en-gb/knowledge/procurement-topics-and-skills/sustainability/modern-slavery1/#tabs-1>
- The Global Slavery Index 2018 (report and scoring data) <https://www.globalslaveryindex.org/> (including 2019 refreshed data set with additional G20 & fishing metrics)
- Minderoo Foundation’s Walk Free “Measurement Action Freedom” Report 2019
- Freedom House Country Scores List 2018: <https://freedomhouse.org/report/freedom-world-2018-table-country-scores>
- “FTSE 100 & the UK Modern Slavery Act: From Disclosure to Action”; Business & Human Rights Resource Centre: <https://www.business-humanrights.org/sites/default/files/FTSE%20100%20Briefing%202018.pdf>
- The Gangmasters and Labour Abuse Authority’s (GLAA) industry sector profiles and six key indicators to spot the signs of modern slavery.

### 3.2.2 We seek advice from internal and external experts

LSEG has also referred to the following non-public guidance or data in conducting the slavery risk assessment:



- “LSEG Group Audit Review and Memo: Responsible Disclosures (UK Modern Slavery Act)” dated September 2018; external auditor subject matter experts were engaged to review LSEG’s previous modern slavery statements and strategy. They assessed our previous statements using bespoke assessment criteria from the Business & Human Rights Centre FTSE 100 analysis, summarised in the report mentioned above and their own proprietary knowledge base. Recommendations were made across all areas of our slavery strategy, governance and statement content regarding how LSEG can improve in this area.
- LSEG’s own Country Risk List, enhanced in 2019 with slavery risk indicators.

### 3.2.3

#### **We used available data to risk assess our suppliers for slavery**

- We identified specific high risk slavery spend categories which we consider to have a greater risk of slavery occurring. These are categories which may involve manufacturing, use of labour and/or potential use of low skilled/paid labour including Facilities Management, Office Equipment & Maintenance, Office Construction & Fit-out and full managed office service locations, supply of Technology Hardware & consumables, Marketing Events Production, Marketing Promotional Goods and other professional services we considered more likely to use low skilled or low wage labour.
- We mapped suppliers and their countries to the Global Slavery Index 2018 and specifically to the GSI Overall Weighted Vulnerability Score. We considered this to be the most useful and appropriate score we identified in our research as it is a weighted score which incorporates many slavery related factors.
- We defined a Slavery Risk Tiering for suppliers – with Tier 1 the highest slavery risk and T4 the lowest - by applying this category and GSI data (separate from our usual Low-Medium-High risk segmentation).

### 3.3 What our slavery risk assessment has told us

We found that the risk assessment confirmed our view that we have an inherently low risk supply chain:

- 1. We have only 3 suppliers in slavery risk Tier 1: two fully managed offices (in higher risk countries) and local IT hardware provider in**

#### **Hong Kong, part of a global group of companies used to supply print hardware and services across the Group.**

- 2 of these have already committed to the Supplier Code of Conduct.

- 2. Our Tier 2 is made up of less than 40 suppliers in high risk countries but not high risk spend categories, including a number of other stock exchanges around the world with whom we have market data agreements, and many professional services companies.**

- We consider the likelihood of slavery occurring in these companies to be low given the high education and skills requirements for their employees. Over 90% of our Tier 2 suppliers (by spend) have agreed to our Supplier Code of Conduct.

- 3. Our Tier 3 (Low Risk) includes over 800 of our Facilities Management, Technology OEMs and resellers, and important services providers. They have low country risk but are in higher risk spend categories.**

- Many of high spend suppliers in Tier 3 were large UK or global companies who publish robust Modern Slavery Statements. This is a strong indicator of low slavery risk deeper in the supply chain. Approximately 80% of our Tier 3 suppliers (by spend) have agreed to our Supplier Code of Conduct.

- 4. Most of our suppliers are in Tier 4 (Very Low slavery risk). They make up over 80% of our suppliers by spend and over 70% by number of suppliers.**

- The majority are in either the UK, US, Italy or France – low risk countries from a slavery perspective – and approximately 60% of our Tier 4 suppliers (by spend) have agreed to our Supplier Code of Conduct.

- 5. We have good overall agreement to the Supplier Code of Conduct (64% of our total discretionary spend managed by Group Procurement, by value, is covered by an agreed code)**

- 64% coverage gives us confidence that our core suppliers share our anti-slavery commitment and are taking steps to mitigate slavery risk on our behalf.

## 4.0 Looking forward and taking action

### 4.1 Progress on actions planned for 2019

In publishing our 2018 MSA Statement we planned several follow up actions. An update on progress is provided below.

| Action   | Status  |
|--|---|
| <b>Seek to obtain Supplier Code of Conduct agreement from relevant Tier 1, 2 and 3 suppliers we expect to continue using.</b>  | <b>COMPLETE</b><br>Acceptance or equivalence obtained from all on-going Tier 1 and Tier 2 suppliers, and those on-going suppliers constituting >80% of Tier 3 spend, as identified from our previous risk assessment for 2018.  |
| <b>Look for opportunities to bring our Tier 1, 2 and 3 suppliers in line with our anti-slavery contract clauses where possible.</b>  | <b>ON-GOING</b><br>A contract review exercise – undertaken by a specialist procurement consultancy using trained legal resources - has identified where slavery related clauses are missing from our most important contracts (to be addressed at point of renewal). Robust fix forward procedures are in place to identify missing slavery clauses in new contracts or on renewal of existing contracts. |
| <b>Ensure our fix forward procedures for existing suppliers continues to operate effectively, including for the tail of lower value suppliers.</b>   | <b>COMPLETE</b><br>Procedures enhanced and operating effectively in 2019.   |
| <b>Look for opportunities, particularly with Tier 3 suppliers who represent some of our more important supplier relationships, to engage them directly and look deeper into their supply chains with an anti-slavery lens.</b> | <b>ON-GOING</b><br>Our Group Procurement function has re-organised around a Supplier Relationship Management model and is managing strategically important suppliers. This provides the necessary governance framework and engagement with suppliers through which to start to explore slavery and other CSR risks.   |
| <b>Continue evolving our anti-slavery approach by seeking guidance from experts and best practice publications</b>   | <b>COMPLETE</b><br>[Refer to section 3.0].  |

### 4.2 Themes arising from our risk assessment

In reviewing the analysis and assessment in detail the following themes stood out:

- Our risk assessment confirms that we continue to operate a low risk supply chain.
- We have an increasing global business (and physical) presence, now including a number developing market geographies where slavery risk continues to be a Group and public concern (such as a Group presence in India and China, for example, and through business dealings in other high-risk countries).
- We have the opportunity to go deeper into our supply chain in assessing and managing slavery risk.

#### **4.3 Building on this year's work**

The risk assessment and analysis, importantly, validate that our strategy for tackling modern slavery in our supply chain is robust, comprehensive and appropriate to the level of risk. But we do know more can always be done and are committed to continually improving our anti-slavery approach. These themes from the risk assessment lead to a clear action plan for the year ahead.

#### **4.4 Our action plan for the year ahead**

The actions below are what we plan to focus on in 2020. We will report our progress against these in next year's Modern Slavery Act Statement and internally to Executive Committee at appropriate intervals.

- Seek to obtain Supplier Code of Conduct agreement from the Tier 1, 2 and 3 suppliers identified from our most recent risk assessment and analysis, where we intend to continue using them as suppliers.
- Ensure our anti-slavery policies, frameworks and procedures continue to be effective; continue to evolve our anti-slavery approach, and leverage guidance from available best practice and experts where possible and appropriate.
- Ensure our approach to establishing new international office locations continues to consider the slavery and human trafficking risks associated with those locations as part of its governance.
- Leverage our Supplier Relationship Management governance framework to engage with our most important suppliers to understand their own slavery and human trafficking risks, their anti-slavery practices and approaches; seek to identify any potential residual risk to LSEG that requires proportionate action.

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## 5.0 Approval of the 2019 MSA Statement

The 2019 MSA Statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the Financial year ended 31 December 2019.

The 2019 MSA Statement was approved by the Board of Directors of London Stock Exchange Group plc at its meeting on 25<sup>th</sup> February 2020.



**David Schwimmer, CEO**

**London Stock Exchange Group plc**

**Date: 16<sup>th</sup> March 2020**

This 2019 MSA Statement has been approved by the boards of directors for the following companies and they delegated authority to David Schwimmer to sign this 2019 MSA Statement on their behalf:

- London Stock Exchange Group plc (February 2020)
- London Stock Exchange plc (March 2020)

Approval will be obtained from the boards of directors for the following companies after publication of this statement:

- LCH Group Holdings Limited
- LCH Limited
- LCH SA
- FTSE International Limited
- LSEG Business Services Limited
- LSEG Employment Services Limited
- LSEGH Inc
- Borsa Italiana S.p.A.
- MTS S.p.A.
- Monte Titoli S.p.A.
- Cassa di Compensazione e Garanzia S.p.A.
- The Yield Book Inc.
- Frank Russell Company





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