Modern Slavery and Human Trafficking Statement 2022
## Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>About LSEG</td>
<td>01</td>
</tr>
<tr>
<td>Scope of statement</td>
<td>02</td>
</tr>
<tr>
<td>Policy and regulatory landscape</td>
<td>03</td>
</tr>
<tr>
<td>Our commitments</td>
<td>04</td>
</tr>
<tr>
<td>Our suppliers</td>
<td>06</td>
</tr>
<tr>
<td>Governance and policies</td>
<td>07</td>
</tr>
<tr>
<td>Statement approval</td>
<td>10</td>
</tr>
</tbody>
</table>
LSEG is a leading global financial markets infrastructure and data provider. We play a vital social and economic role in the world’s financial system. With our trusted expertise and global scale, we enable the sustainable growth and stability of our customers and their communities.

LSEG is headquartered in the United Kingdom, with significant operations in 65 countries across EMEA, North America, Latin America and Asia Pacific. We employ 24,000+ people globally.

Our purpose is driving financial stability, empowering economies and enabling customers to create sustainable growth.
Human rights are universal. This means that every person around the world deserves to be treated with dignity and have their interests considered equally. Governments have the duty to protect individuals against human rights abuses. The UN Guiding Principles for Business and Human Rights also outline the responsibility of businesses to respect human rights.

While not all entities in LSEG are required to publish a statement, LSEG is committed to ensuring all Group entities operate in a consistent and effective way regarding modern slavery and human trafficking risk. The 2022 Statement covers all the companies controlled directly or indirectly by LSEG, including the following companies that are required to publish a statement: London Stock Exchange Group plc, London Stock Exchange plc, LCH Limited, FTSE International Limited, Financial & Risk Organisation Limited, LSEG Business Services Limited, LSEG Employment Services Limited, Refinitiv Limited, Refinitiv Transaction Services Limited, LCH SA, LSEGH Inc., Frank Russell Company, The Yield Book Inc., Financial & Risk Transaction Services Ireland Limited, and Refinitiv Australia Pty Limited.
We welcome the increased focus of governments around the world on the issues of modern slavery and human trafficking. The international community rightfully expects businesses to focus on supply-chain risks in keeping with the UN Sustainable Development Goals and other international commitments. We acknowledge the measures to strengthen reporting requirements under the UK’s Modern Slavery Act, including embedding modern slavery risks and human trafficking throughout procurement process, and the introduction of a public registry of modern slavery statements. As a global business, we especially welcome international coherence and mutual recognition of different reporting requirements and standards, to help mobilise global efforts.

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LSEG has a vital economic and social role in enabling companies to access funds for growth and development. As such, integrity as well as trust in our markets and in LSEG, are at the core of what we do. We regard all forms of modern slavery and human trafficking as a crime and a violation of fundamental human rights. We are committed to implementing and promoting practices which combat modern slavery in all its forms. Our updated risk assessment conducted in 2022 indicated that LSEG operates in an industry where the risk of modern slavery and human trafficking is inherently low. However, we operate globally and acknowledge the complexity of supply chains. We recognise the risks of partnering with a broad spectrum of global suppliers and the possibility of modern slavery occurring deeper in those complex supply chains.

LSEG is a member of United Nations Global Compact (UNGC). As part of our participation, LSEG commits to the UNGC’s Ten Principles, which include Principle 4: the elimination of all forms of forced and compulsory labour. Our Human Rights Statement provides an overview of how we endeavour to meet our responsibility with respect to human rights, in addition to the principles and requirements within our LSEG Code of Conduct, which apply to all LSEG employees.

Our updated risk assessment conducted in 2022 indicated that LSEG operates in an industry where the risk of modern slavery and human trafficking is inherently low. However, we operate globally and acknowledge the complexity of supply chains.
LSEG adheres to the UN Guiding Principles on Business and Human Rights, together with the International Labour Organization Conventions and Recommendations within our working environment in each location where we operate.

Our Supplier Code of Conduct requires that suppliers pay wages in line with prevailing market conditions or at least the minimum wage required by applicable laws and regulations and without unauthorised deductions. LSEG is a Living Wage Foundation-accredited employer in the UK and encourages everyone we do business with to consider implementing the Living Wage. Our contracts with suppliers that have employees working on LSEG premises in the UK including temporary and contract workers includes a clause mandating the payment of the Living Wage or London Living Wage as applicable.

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As part of the supplier-onboarding process, a risk segmentation is carried out with a determination of low, medium or high risk based on a range of factors. Due diligence is conducted based on the segmentation to ensure the appropriate assessment is carried out.

Our suppliers are additionally checked against LSEG’s Country Risk List, which has been formed from external indices and data such as the Corruption Perception Index and the UK Foreign, Commonwealth and Development Office’s Human Rights and Democracy report. Countries on the risk list have a red, amber, green (RAG) status applied and are considered to pose elevated risks from reputational, geopolitical, economic and social lens.

LSEG asks its suppliers to sign up to our Supplier Code of Conduct before agreeing to onboard the supplier. We continue to screen suppliers’ modern slavery and human rights risks through LSEG’s World-Check Risk Intelligence database (World-Check). Specialist research analysts across the globe collate information from reliable and reputable sources - such as sanctions lists, government records, and media.

In 2022, we enhanced our processes and we are committed to continually refining our identification and assessment methods resulting in an improved prevention and remediation of any identified cases.

We are consistently evolving our Third-Party Risk Management and Supplier Relationship Management functions to play a key role in building a stronger partnership with our suppliers. Our ambition is to continue to be a leader in this space through facilitating open dialogues with suppliers on the criticality of managing Modern Slavery and Human Trafficking that aligns with our Risk Culture.
The policy requires risk assessment of and proportionate due diligence, including modern slavery risk, on all potential suppliers before their engagement as a supplier to LSEG.
Governance and policies

**Code of Conduct**

LSEG has in place a Code of Conduct, approved by the LSEG Board, which applies to all staff and contractors working for LSEG. It includes the expectation that all employees and all members of LSEG’s extended workforce act in accordance with our corporate commitment to avoid slavery in our organisation and business dealings. All employees, and other in-scope individuals, are required to complete mandatory training each year which reinforces the requirement to comply with the Code of Conduct at all times. The Code of Conduct is available to all staff at all times via our intranet.
Sustainability Policy
This Policy, approved by the LSEG Board, includes anti-slavery within its overarching commitments and is supported by a Human Rights Statement, both of which are available here. The Policy is available to employees at all times via the LSEG intranet site. The CEO is ultimately responsible for sustainability matters, supported by the Executive Committee. Our sustainability strategy is driven by the Sustainability Committee, on which a number of Executive Committee members sit. Delivery of the sustainability programme is carried out by the Group Sustainability team.

Whistleblowing Policy
We operate a Whistleblowing Policy, aimed principally at our employees but also available externally, including to those working in our supply chains in all LSEG locations. This policy encourages employees, customers, and other business partners to report any concerns about 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 and confidentially via a global 24/7 online portal and equivalent telephone hotline. The policy and disclosure procedures are available to all employees and other parties at all times via the intranet and external website.

Anti-bribery and Corruption Policy
A Group-wide policy covering anti-bribery and corruption is in place within the Group and is accessible by all staff via the LSEG intranet. All employees undertake mandatory training on this topic annually.
LSEG’s approach to reporting under the Modern Slavery Act was developed by the Group Sustainability team, drawing on resources from all functions, businesses and geographies. The Statement has been considered and accepted by the Sustainability Committee, Executive Committee and approved by the LSEG Board. Executive responsibility rests with the Group Executive Committee, which has primary accountability for the businesses and functions relevant to particular human rights issues, including modern slavery and human trafficking.

David Schwimmer  
Chief Executive Officer  
London Stock Exchange Group PLC

Date: 01 March 2023
LSEG is more than a diversified global financial markets infrastructure and data business.

We are dedicated partners to our customers, with an open model and commitment to excellence. With extensive experience, deep knowledge and global presence across financial markets, we enable businesses and economies around the world to fund innovation, manage risk and create jobs. It’s how we’ve contributed to supporting the financial stability and growth of communities and economies globally for more than 300 years.

Discover more at lseg.com