



LSEG

London Stock Exchange Group PLC

OPEN MAKES MORE POSSIBLE

Modern Slavery and Human Trafficking Statement 2022



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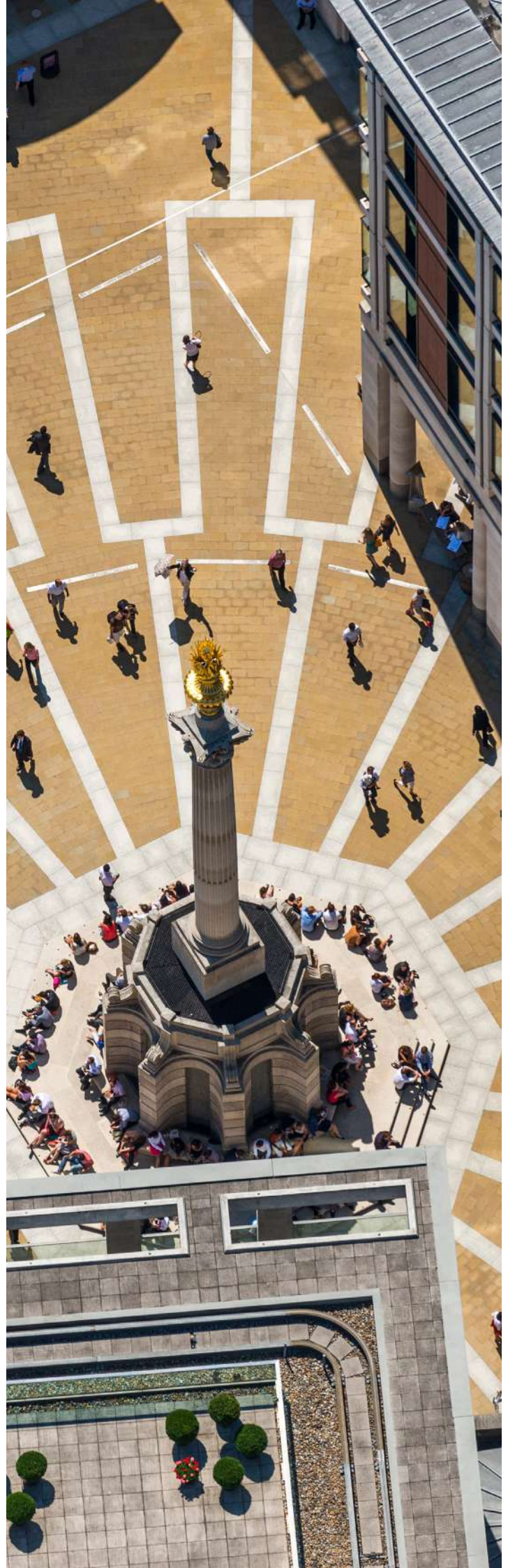


About LSEG

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.





Scope of statement

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.



Policy and regulatory landscape

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.

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.



Our commitments

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.



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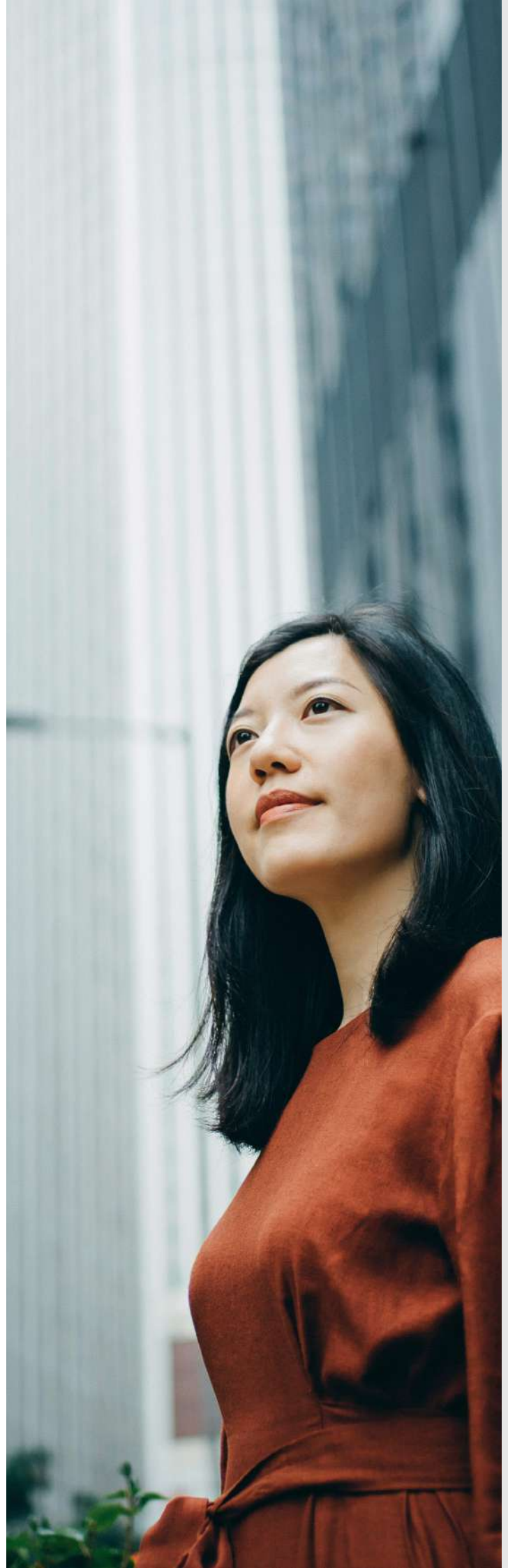


Our commitments

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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Our suppliers

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.

Governance and policies

LSEG has a number of policies and standards which support our approach to modern slavery. These include the following:

Procurement Policy

LSEG maintains a Group Procurement Policy that applies to all staff, contractors and officers. The policy requires risk assessment of suppliers and proportionate due diligence, including modern slavery risk, on all potential suppliers before their engagement as a supplier to LSEG. The policy also requires written contracts to be in place for suppliers we consider to be medium and high risk from a critical usage point of view, to leverage and embed our standard anti-slavery provisions. 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 suppliers. The policy has been approved by the boards of all LSEG entities and is sponsored by a member of the LSEG Executive Committee and it is available to staff at all times via LSEG's intranet.

Supplier Code of Conduct

Group Procurement is responsible for LSEG's Supplier Code of Conduct, which can be found [here](#). The code outlines LSEG's expectation that its suppliers should conduct themselves in a manner aligned to LSEG's standards. The Code includes commitments for suppliers to comply with all applicable laws, industry standards across topics such as labour, and the environment. It requires commitments from suppliers to avoid slavery in their own supply chains. It is agreed with new suppliers during procurement due diligence, and a non-negotiable provision in our standard contract templates and requirements. Considering breaches, the Supplier Code of Conduct encourages any parties with concerns about breaches of the code, slavery or any similar topics to disclose them by confidential email to LSEG. However, there were no such disclosures throughout 2022.

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.





Governance and policies

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.

Statement approval

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

