

## **Modern Slavery Statement**

### **Introduction**

We endeavor to respect human rights and aim to ensure that our business operations and supply chain are free from modern slavery, exploitation and discrimination. There have been no reported incidences of modern slavery in our supply chain, and we remain vigilant.

This statement confirms and repeats our commitments on this issue. We take our responsibility to be alert to the risks of modern slavery very seriously and take action where we can do so. We actively raise awareness of the issue with our colleagues, and ensure we have the correct procedures in place to play our part in combatting this deplorable and unlawful practice.

### **Our Business**

R.J. O'Brien Limited (R.J. O'Brien) is a multi-asset broker and clearer in London, regulated by the Financial Conduct Authority, that offers electronic and high touch voice brokerage services on futures, CFDs, equity CFDs, equities and single stock options. Our key assets are our people and our service to our clients. We have extensive expertise in the futures industry and our longevity and success is attributed to our continual focus on three guiding principles: family, stewardship, and integrity.

### **Our Supply Chains**

Our supply chain is made up predominately of software service providers that we utilise for client services, back office support, and Human Resources (HR) to support our core services. We have undertaken work to review our vendor management and contracting practices over the past year, with a view to adding greater transparency and consistent processes. This transparency will help raise awareness of any instances of modern slavery or human trafficking concerns within our supply chain.

### **Our Policies**

R.J. O'Brien is committed to ensuring that modern day slavery does not take place anywhere within our business. Slavery and human trafficking has no place in the culture we continue to foster that is built on respect for individuals. R.J. O'Brien has an established Code of Conduct which defines the high standards of ethics and business conduct that we expect from our employees. Through our whistleblowing processes, all employees are encouraged to report any workplace malpractices which includes, but is not limited to: a commission of a criminal offence or breach of civil law; an occurrence of a miscarriage of justice; and the endangerment of the health and safety of any individual. We have additional policies which are relevant to the operation of R.J. O'Brien and address modern slavery and human trafficking risks, including: Anti-Bribery and Corruption Policy and our Health and Safety Policy. We undertake regular reviews of these policies to ensure they are in line with updated requirements. Expectations for colleague behaviour are communicated as part of the new starter induction process, in our employment handbook and as part of on-going training, as well as embedded in our corporate values and supported by relevant staff.

### **Due Diligence and Risk Assessment**

In light of our values, employment practices and policies, and the way we support our colleagues, we have assessed that we are at low risk of slavery or human trafficking occurring within the business.

We are committed to preventing acts of modern slavery and human trafficking within our business and strive for our supply chain to support a zero-tolerance approach to modern slavery. To achieve this goal, we aim to do business only with counterparties and clients who respect the human rights in all their business activities and prohibit the use of forced labour.

The nature of the business reduces many of the risks many businesses may be exposed to, however we take our responsibility towards the prevention of slavery and human trafficking very seriously. We will not engage with a supplier or third party if we believe any workplace practices are unlawful or in conflict with our internal policies.

### **Effectiveness of Measures**

As at the date of this statement we have had no reports of modern slavery or human trafficking in any part of our business or supply chain. We will continue to monitor our supply chain and intend modern slavery to be an agenda item included in the discussions with our suppliers, in order to ensure that the measures we are putting in place are, and remain, effective.

### **Training**

We are committed to ensuring our colleagues are aware of the issue of modern slavery and can identify its indicators and risk factors. We will continue to educate colleagues by offering training focused on creating awareness for both firm management and employees regarding modern slavery and its potential impacts on customer organisations. The training introduces the countries, industries and types of workplaces where modern slavery risks are known to be high, as well as the legislation intended to protect individuals.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2020.

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Emre Degirmenci

Managing Director, EMEA

R.J. O'Brien Limited