



Procurement and Modern Slavery

Our commitments

Version 1.0, 28 March 2018



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1.1 Introduction

1.1.1. With over 7000 companies from over 26 countries supplying TP ICAP we take the sustainability of our supply chain and procurement exceptionally seriously. We apply a set of standards to our suppliers through our Supplier Code of Conduct. In order to do business with TP ICAP, our suppliers must accept responsibility to be held accountable to our Supplier Code of Conduct. Any new supplier who is being on boarded must attest that they meet those standards. Where suppliers fail to meet our expectations, we work to remediate gaps.

1.2. Procurement

1.2.1. We take the sustainability of our supply chain and procurement exceptionally seriously, and in 2017 implemented a number of initiatives that support this including:

- Printing reduction via secure login and print management to reduce paper wastage;
- Introducing Corporate Uber to help us track our CO2 usage and a new global travel provider to give us better intelligence on our Co2 usage;
- Stopping the supply and usage of 14,500 plastic bottled water per week in the UK or 755,000 bottles a year in our London offices;
- Providing a new agreement with Equinix for TPICAP's core London Data Centre using the power supply from the Slough Heat & Power renewable energy station, which generates hot water and electricity by burning wood chips and fibre cubes made from used paper and cardboard. In addition to investing in more cloud-hosted products to reduce our global data centre foot print and power consumption including Icelandic Data Clouds);
- Conducting a top 10 vendor assessment every year, including monitoring their CO2 data, as well as modern slavery practices, and
- On-boarding processes for new suppliers, to assess the environmental impacts of their operations.

We continually look to improve our procurement processes to ensure that we are sector-leading in our approach and eliminating risk and improving the communities in which we operate.

1.3. Modern slavery

1.3.1. We take our obligations under the Modern Slavery Act (UK) extremely seriously. Any new supplier needs to declare that they strictly adhere to this Act. In 2017 we conducted an initial analysis of our top 30 direct suppliers concluding that they are all located in the US and EMEA and are, on balance, viewed as low risk. Many of our suppliers have comprehensive policies related to modern slavery.

As a first step towards gaining a better understanding of our supply chain, we wrote to our top 30 suppliers, communicating our principles for modern slavery and asking for information about their policies and processes for tackling forced labour and human trafficking.

To raise awareness of the risks of modern slavery and human trafficking in our business and in our supply chains, we provided specific modern slavery training to all employees who work directly with our suppliers in 2017.

Finally, we introduced new targeted spot checks across our supply chain, performing credit checks, checking delivery against contract and physical location checks to identify suppliers who are vulnerable and most at risk of employing forced labour or slavery. In 2018 we will launch a new Code of Conduct for our suppliers, including clear processes and obligations in relation to Modern Slavery. We will also communicate more widely through our global intranet, our Modern Slavery principles to all employees to ensure that employees at all levels in our business understand our obligations and duties on this issue. We will continue to conduct spot checks and on board new suppliers to our high standards and will look to introduce metrics to measure our performance in this area.