

BRITANNIA GLOBAL MARKETS LIMITED
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

Britannia Global Market Limited's Modern Slavery and Human Trafficking Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 for the financial year ending 31st December 2023.

Britannia Global Markets Limited is a UK incorporated entity and is authorised and regulated by the United Kingdom's Financial Conduct Authority. The main business is the provision of execution only services to institutional and professional clients in Over the Counter and Exchange listed securities based on a range of underlying instruments including commodities, indices, currencies, interest rates and equities. Britannia Global Markets Limited does not provide its services to Retail Clients.

ORGANISATION STRUCTURE AND SUPPLY CHAINS

Britannia Global Markets Limited operates in a highly regulated environment, and as a result of the business it carries out, the internal business activities are viewed as at low risk of exposure to modern slavery and human trafficking.

The Financial Crime Risk Appetite includes prohibitions to enter new relationships or continue a business relationship or facilitate transactions with across specific client types, industries and geographies.

POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Britannia Global Markets Limited strives to conduct its business honestly and is committed to the highest standards of conduct and ethics. Britannia Global Markets Limited acknowledges that all firms face risks and recognise the duty to take appropriate measures to identify such situations and attempt to remedy them and, by encouraging a culture of openness and accountability within the firm, aim to be proactive in preventing such situations occurring or to remediate them effectively. The Britannia Global Markets Limited employees are expected to maintain the highest standards in accordance with the Compliance Manual and to report any wrongdoing that falls short of these fundamental principles.

The Whistleblowing Policy sets out the responsibilities, of both firm and its employees (including permanent, fixed term, temporary staff, third party representatives, sub-contractors, agency workers, volunteers, interns and agents engaged with BGML in the UK or overseas) within the organisation and assists in ensuring that employees act in accordance with legal, regulatory, contractual and business expectations and requirements.

Employees are made aware of relevant policy documentation as part of the induction process and there is a requirement to provide an annual attestation to compliance. The failure of an employee to adhere to the guidance and objectives within the Policy, may lead to disciplinary action, including summary dismissal for negligence. The required right to work, appropriate age to work and valid work visa requirements are routine elements of the employee pre-induction process, and this standard is maintained throughout the employee lifecycle. The Building Evacuation, First Aid and Accident Reporting procedures ensure the safety and wellbeing of all employees.

DUE DILIGENCE PROCESSES

The intention is to introduce a consistent approach to due diligence procedures for suppliers during the onboarding process, with a view to terminate supplier's contract at any time should instances of modern slavery come to light.

RISK ASSESSMENT AND MANAGEMENT

Britannia Global Markets Limited has no risk appetite for customers and counterparties that fall outside of the acceptable risk parameters. Britannia Global Markets Limited will not engage with a supplier or third party if it is believed that any workplace practices are unlawful or conflict with internal policies.

KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN

Britannia Global Markets Limited is not aware of any recorded modern slavery incidents or complaints in our business during the period. Britannia Global Markets Limited remain vigilant and committed to improving our policies and procedures and adjusting our business practices where applicable, to reduce the risk of modern slavery; through the

simplification of supply chains, ensuring strong and long-term relationships with suppliers and the implementation of key performance indicators (KPIs) and standard operating procedures across the business.

TRAINING ON MODERN SLAVERY AND TRAFFICKING

Britannia Global Markets Limited utilises periodic self-certification to verify and affirm individual staff awareness and continued adherence with specific policy standards and requirements. The policies are accessible at all times to all employees on the Company's HR system.

The annual training includes a Modern Slavery and Human Trafficking module which is issued on an annual basis.

CLOSING REMARKS

Britannia Global Markets Limited recognises the important role they play in helping to identify, address and prevent modern slavery and human trafficking. Britannia Global Markets Limited welcomes your feedback.

This statement has been approved by the Board of Directors of Britannia Global Markets Limited on 29th July 2024 and is signed on their behalf by the Chief Executive Officer.

Steve Pettitt
Chief Executive Officer
Britannia Global Markets Limited