DEALOGIC ANTI-SLAVERY AND HUMAN TRAFFICKING

STATEMENT 2016

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 2016.

Deallogic is committed to acting ethically and with integrity in all our business dealings and relationships. We all have a responsibly to be alert to the risks of modern slavery taking place in our particular business and supply chains. Our people are expected to report concerns and management are expected to act upon them. We have suitable channels to enable our staff and any external third parties to report any concerns in relation to our Anti-Slavery and Human Trafficking Policy confidentially.

About Deallogic

Deallogic is a financial markets platform company. We provide products and services that power the financial markets. Whether working in banking, capital markets, sales and trading, or institutional investing, firms rely on Deallogic. With more than 30 years' experience and a deep understanding of financial markets, Deallogic is a trusted global partner. You can read more about us here:


We are a part of the Deallogic Group. We have over 800 employees worldwide and operate in nine countries. The Deallogic Group has a global annual turnover of over $150 million.

Our Supply Chains

Our supply chains include IT infrastructure, software and data service providers, facilities and waste management, consulting and advisory services. Our supply chains are generally geographically focused in the USA and UK, although we have operations in Hong Kong and Hungary.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we are developing our processes and systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- monitor potential risk areas in our supply chains.

We have processes and procedures in place to protect whistle blowers. Dealogic uses an independent service to enable both its staff and any concerned third parties to report concerns confidentially.

We perform risk assessments against all new suppliers. We have included certain contractual provisions in our sourcing templates and are developing screening questionnaires and additional contractual protections (for example, additional warranties and additional audit, notification and termination rights) to be used in arrangements we assess to be of higher risk.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. Suppliers are expected to comply with our values and we specifically reference our policy in our template agreements. We have a procurement and compliance team who are engaged with the on-boarding of new suppliers.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are making training available to our staff, as appropriate.

Our Effectiveness in Combating Slavery and Human Trafficking

We use certain key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains, including but not limited to the following:

- completion of scheduled screening spot checks against suppliers to reveal any adverse publicity or reports;
- completion of internal audits; and
- assessment of level of communication/personal contact/engagement with next link in the supply chain and their understanding of, and compliance with, our expectations.

Randall Winn, Chairman
Diamond Topco Ltd

26 October 2016