



## **Jump Trading International Ltd**

### **Modern Slavery Statement**

#### **Introduction**

This statement covers the financial year 2023 of Jump Trading International Limited's (the "**Firm**") and represents the steps the Firm has taken to ensure that modern slavery and human trafficking do not take place in its business or its supply chain. This statement supports the Firm's commitment to comply with both the spirit and letter of the Modern Slavery Act 2015 ("the **Act**").

#### **Our Business**

The Firm is based in the United Kingdom and is part of a global group of companies headquartered in Chicago, USA. The Firm provides research and development services to affiliate entities.

#### **Our Supply Chain**

Whilst the overall risk of modern slavery and human trafficking within the Firm's business and supply chains is low, it continues to ensure strict controls are in place to maintain early warning detection and mitigation of any risks which may emerge. The Firm's supply chain primarily consists of exchanging research and development services (such as technology, digital and business process services) with other members of the group. The procurement categories which present potentially higher levels of risks due to the prevalence of low-paid and migrant workers within those industry sectors and potential use of conflict minerals, are:

- Technology; and
- Workplace services.

The Firm also utilizes other suppliers of products and services such as cleaners, caterers, maintenance workers, security providers, business travel operators and recruitment agencies, on a customer basis, to maintain office facilities and meet business needs.

#### **Our Policies Concerning Modern Slavery**

The Firm strongly condemns any form of slavery and human trafficking in any circumstance. As a responsible employer, each employee is made aware of the Firm's expectations concerning fair working conditions and safe working environments during their mandatory new hire orientation training.



New employees are also introduced to the Firm's human resources policies, including the Open-Door Policy, Whistleblowing Policy, and Code of Business Conduct and Ethics (the "**Policies**") which further demonstrate the Firm's zero-tolerance approach towards unlawful or unfair treatment of its employees and commercial partners. The Policies actively encourage employees to speak freely with management, without fear of reprisal, about any questions or concerns they may have concerning their role, the Firm's conduct, or a supplier. All Firm employees can easily access the Policies in the Employee Handbook, which is located on the Firm's intranet, as well as a copy of this statement, which is available on the Firm's website ([www.jumptrading.com](http://www.jumptrading.com)).

### **Our Vendor Due Diligence Process and Supplier Code of Conduct**

Each potential supplier is carefully evaluated through a pre-contractual due diligence process performed by the Firm's Purchasing, Legal, Accounts Payable and Finance teams. The collaborative nature of this process ensures that any potential risks are identified and assessed at an early stage and corrective action implemented to reduce the potential for illegal practices or unethical conduct associated with the Act or otherwise.

To further demonstrate the Firm's commitment to eradicating modern slavery and human trafficking in the workplace, the Firm has established a Supplier Code of Conduct (the "**Code**"). Both existing and new suppliers will be required to acknowledge the Code as a condition to entering or continuing any contractual relationship with the Firm. Additionally, the Firm's template documents and agreements include a contractual term to ensure adherence to relevant laws and regulations.

### **Looking Ahead**

The Firm remains committed to maintaining strong policies and procedures to identify and prevent modern slavery and human trafficking in its business and supply chains and will continue to review and enhance these policies and procedures over the course of the financial year.

### **Approval**

This statement has been reviewed and approved by the Firm's board of directors.

A handwritten signature in black ink, appearing to read 'Colleen Hickey', is written over a horizontal line.

For and on behalf of Jump Trading International Ltd.  
Colleen Hickey, Director