

Modern Slavery Act Statement



Modern Slavery Statement for year 2022

This Modern Slavery and Human Trafficking Statement is made by Adenza Group, Inc. for the financial year ending 31 December, 2022.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and section 13 of the Modern Slavery Act 2018 of Australia. It sets out the specific actions taken by Adenza Group, Inc. ("Adenza") and its consolidated subsidiaries (together "Adenza Group") during the financial year ending 31 December, 2022 to prevent modern slavery and human trafficking in our operations and our supply chains. Although many Adenza Group companies are not subject to these acts, Adenza has undergone a group-wide approach to addressing modern slavery risks. This statement is a joint statement made by Adenza Group, Inc. on behalf of itself and all Adenza Group companies.

The Adenza Group companies operate in the same sector, have many shared suppliers, and use the same policies and processes as those identified in this statement and the statement describes these group companies' actions to address modern slavery risks.

Organization and Supply Chains

Adenza is a cloud-enabled provider of cross-asset front-to-back solutions as well as solutions in the regulatory and risk technology sector for financial markets. Adenza's customers operate in a diverse range of developed and emerging markets across the globe.

Adenza operates in a sector which is at relatively low risk of slavery, unlawful child labor or human trafficking existing within the business. Concurrently, we consider our main suppliers to be at low risk of engaging in practices of modern slavery and

 human trafficking, we remain committed to prevent the occurrence of any practices both in the business and in the supply chain.
(<https://adenza.com>)

Policies

Adenza expressly prohibits any participation in support of, or association with, the illegal and immoral practice of trafficking in persons, forced labor and slavery. Adenza expects its employees to operate ethically and with integrity. Relevant provisions are included, inter alia, in the following policies and processes:

- Adenza Code of Conduct
- Adenza Global Anti-Slavery and Human Trafficking Policy
- Adenza Supplier Code of Conduct
- Adenza Vendor Risk Management Policy
- Adenza Partner Due Diligence Process
- Adenza Whistleblowing Policy

Our Code of Conduct 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. Adenza has continued to formally adopt measures to assess its supply chain, including a Vendor Risk Management Policy.

Adenza employs a technically skilled, professional labor force and does not frequently use labor brokers or other third parties to obtain labor. Our sales include software and services, and our supply chain does not involve the purchase of a large volume of physical goods. Despite our low risk, we carry out a due diligence process for prospective suppliers during which we:

- review the supplier's reputation and background;
- conduct a risk-based assessment of both the location of the supplier and the proposed scope of work;
- require partners to accept obligations to comply with applicable laws, regulations and policies relating to slavery and human trafficking.

Suppliers that pose potentially higher risks of human trafficking and/or slavery are subject to more detailed risk assessments and additional oversight, if necessary, to help ensure compliance with our internal controls and applicable law.

Adenza continues to review and assess the effectiveness of the due diligence processes.

Training

 Adenza carries out regular staff training through online courses. We continue to review training options and content so as to ensure appropriate awareness of modern slavery and human trafficking issues.
(<https://adenza.com>)

All employees are required to complete the Code of Conduct training as part of their onboarding, and annually thereafter.

Approval

The content of this statement has been reviewed by senior management of the Adenza Group companies in consultation with Adenza.

This statement has been approved by the Board of Directors of Adenza on 11 April 2023.





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(<https://adenza.com/modern-slavery-act-statement-2021/>)

Chief Legal Officer

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Transformative journeys begin with a conversation.
Let's start one.

Contact Us


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