

## ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

31 MARCH 2025

### **Introduction**

This statement applies to Instinet International Limited and its group companies, Instinet Europe Limited, Instinet Global Services Limited and Instinet Germany GmbH (collectively “**Instinet**”).

At Instinet, we believe we have a responsibility to ensure that our business is conducted in an ethical way, and that we actively address social issues. As part of this process, we have in place a Modern Slavery and Human Trafficking Standard (the “**MSA Policy**”) which seeks to identify and manage slavery and human trafficking risk in our business and supply chains in accordance with the principles and goals promoted by the United Kingdom’s Modern Slavery Act 2015 and related guidance.

In addition to the MSA Policy, we are subject to the Global Policies of our ultimate parent company, Nomura Holdings, Inc, in particular, the Nomura Corporate Social Responsibility and Code of Conduct which consider social and human rights responsibilities.

The statement is published in line with the United Kingdom’s Modern Slavery Act 2015 and is made in respect of the financial year ending 31 March 2025. References to “we”, “us” or “our” are to Instinet.

### **Organisation’s Structure**

Instinet is within the Nomura Group, so its ultimate parent company is Nomura Holdings, Inc which has its head office in Tokyo, Japan.

Instinet provides financial services to institutional clients and provides them with access to multiple global stock markets/ trading venues through its memberships and relationships with global affiliates and local brokers. In addition, Instinet provides agency trading and post trade services, including algorithms, crossing networks, agency sales trading, global portfolio trading and commission management services, as well as access to third-party research.

### **Supply Chain and Supplier Due Diligence**

Instinet supply chains are relatively simple, and the nature of goods and services provides limited opportunity for modern slavery and/or human trafficking practices. However, it is important that Instinet continues to monitor this.

In addition, as part of our initiative to identify and manage slavery and human trafficking risk:

- we are continuing to build and improve our systems to better (i) identify, assess and monitor potential higher risk areas in our supply chains; (ii) mitigate the

risk of slavery and human trafficking occurring in our supply chains through enhanced contract term controls where appropriate; (iii) train relevant employees as to these risks and the need to manage them; and (iv) protect whistle blowers;

- we build relationships with reputable suppliers and ensure that expectations of business behaviour are both clear and consistent; and
- (i) we expect our direct suppliers to have suitable anti-slavery and human trafficking policies and processes; and (ii) we will communicate our expectation that those suppliers must prohibit modern slavery and human trafficking in their supply chains and that they should work with their suppliers at each stage in their supply chains to manage slavery and human trafficking risk.

### **Policies**

Instinet has in place a number of policies that support our commitment to operating in an ethical manner:

- The MSA Policy outlines our key objectives in this area, including the steps taken in relation to our supplier diligence practices. Instinet's directors have overall responsibility for this policy. Nomura's Code of Conduct Policy (the "**Code**") – outlines our commitment to uphold the highest ethical standards. This Code applies to all directors, officers and employees and underpins other internal rules and regulations, including this statement.
- Reporting Misconduct & Whistleblowing Procedures – the procedure sets out the procedures for reporting misconduct, confirms protection for staff reporting misconduct and has been specifically updated to include procedures for reporting concerns regarding modern slavery and human trafficking.
- Anti-Money Laundering and Anti-Bribery and Corruption Policy - This policy outlines Instinet's commitment to compliance with Anti-Money Laundering and Anti-Bribery and Corruption applicable laws.

### **Implementation**

The Board of Directors of IIL, IEL, IGSL and IGG respectively shall have overall responsibility for the MSA Policy and this statement. Instinet's senior management shall be responsible for implementing the MSA Policy and the objectives considered in this statement.

### **Effectiveness**

We monitor our performance against the following in order to ensure effectiveness of the MSA Policy:

- On a periodic basis, provide staff with appropriate training given the nature, scale and size of Instinet.
- Issuing of MSA Policy to all staff.
- Ensuring that employees are paid a minimum wage and appropriate benefits.
- Ensuring vendor procurement processes are designed to mitigate the risk of slavery and human trafficking practices.

## ***Training***

Instinet continues to provide training to educate relevant employees on the importance of implementing and enforcing effective systems to mitigate the risk of slavery and human trafficking taking place within our business or supply chains. Periodic training is provided to employees where appropriate with information on anti-slavery and human trafficking legislation, mitigation measures, incident reporting and further details on this MSA statement.

## ***Monitoring and Reporting***

If issues are identified in relation to modern slavery and/or human trafficking, these must be reported in accordance with Instinet's Reporting Misconduct & Whistleblowing Procedures.

More general issues in relation to the running of Instinet's MSA Policy will be reported back to the Human Resources Department and / or Instinet's Legal Department.

## ***Approvals***

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Instinet International Group's slavery and human trafficking statement for the financial year ending 31 March 2025. It was approved at a Board Meeting held on 8 May 2025.

Jonathan Lewis

Instinet International Limited

8 May 2025