

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

31 MARCH 2021

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”).

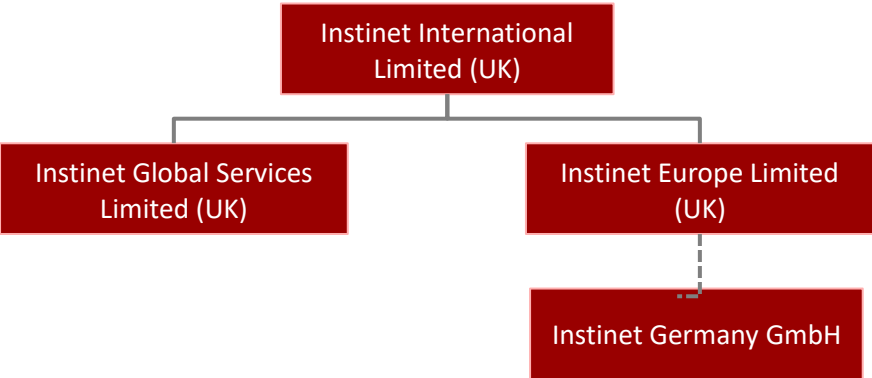
At Instinet, we believe we have a responsibility to ensure that our business is conducted in an ethical way and we actively address social issues. As part of this process, we have in place a Modern Slavery and Human Trafficking Standard (the “MSA Policy”) which seeks to identify and manage slavery and human trafficking risk in our business and supply chains.

In 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 Ethics Policy.

Organisation’s Structure, Nature of Business and Supply Chains

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

The Instinet International Limited Group is made up of 4 legal entities:



Instinet International Limited is a holding company, incorporated in England and Wales.

Instinet Europe Limited (“IEL”) is a financial services company, incorporated in England and Wales and is authorised by the Financial Conduct Authority. Instinet Germany GmbH (“IGG”) is a financial services company, incorporated in Germany and is authorised and regulated by the BaFin and Deutsche Bundesbank. Both IEL and IGG provide agency brokerage services to institutional clients in the UK and Europe, respectively. Both provide clients with access to multiple global stock markets/

trading venues through their memberships and relationships with global affiliates and local brokers. In addition, both entities provide agency trading services, including algorithms, crossing networks, agency sales trading, global portfolio trading and commission management services, as well as access to third-party research.

Instinet Global Services Limited (“**IGSL**”) is a services company, the main purpose of which is to support the regulated entities, IEL and IGG. In doing so it supplies a range of services to IEL and IGG, including, without limitation, technology, accountancy, HR, audit and legal/regulatory services.

IEL, IGG and IGSL receive services from a variety of vendors (which may include affiliate companies). These include, without limitation, the following:

- Banking and Custody Services
- Execution Services in markets where Instinet is not a direct member
- Technology Services and Products
- Advisory/Consultancy Services
- Recruitment Services
- Facilities/Disaster Recovery Services
- External Audit Services

Risk of Slavery and Human Trafficking Occurring in Supply Chains

Instinet’s supply chains are relatively simple and the nature of goods and services provided there is a limited opportunity for slavery and human trafficking and the risk of slavery and human trafficking is therefore considered to be low risk. However it is important that Instinet monitors this continually. Given the risks posed, in the year to 31 March 2021, we support our commitment to anti-slavery and human trafficking by having the following framework in place:

- The MSA Policy, this 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.
- 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 sets out the framework of the firm’s approach to compliance with Anti-Money Laundering and Anti-Bribery and Corruption legislation and regulations and each employee’s responsibilities in ensuring the firm remains vigilant to the risks of financial crime.
- On-Boarding Procedures – these procedures include “Know Your Client” due diligence and sanction screening.
- Code of Ethics – as a Nomura Group company, staff must adhere to principles which cover good corporate governance and corporate social responsibility.

- Code of Conduct Policy – this sets out the firm’s expectation of staff members’ conduct and sets out the need for compliance with the applicable legal and regulatory obligations that are relevant to IEL’s business activities.
- Recruitment Policy – this sets out the recruitment policy including the use of preferred recruitment agencies, approval processes for the recruitment of staff etc.
- New Business Initiative/Material Business Change Process – this process ensures that any new business initiative or changes to current models are considered by all business functions, including legal, compliance and risk functions. This ensures appropriate consideration can be given to applicable laws, such as the Modern Slavery Act 2015, and of appropriate systems and controls to ensure compliance.
- Fit & Proper Assessment of certain staff – as a FCA regulated firm, Instinet is subject to the Senior Managers & Certification Regime which requires the firm to undertake fitness and propriety assessments of staff in certain roles on a periodic basis.

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
- Using our internal Compliance, Risk and Internal Audit function that is functionally independent from the business to ensure compliance with requirements, where necessary

Training

On a periodic basis, Instinet will provide staff with a copy of the MSA Policy and ensure they attest to having read and understood the MSA Policy.

Further Steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Review current process for on-boarding of suppliers and consider appropriate enhancements to the process
- Review the annual risk assessment process to consider the risks posed by modern slavery and human trafficking
- Consider what monitoring, KRIs and KPIs are appropriate for modern slavery and human trafficking given the risks posed by modern slavery and human trafficking

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 2021. It was approved at a Board Meeting held on 27th April 2021.

Paul Spanswick

Instinet International Limited

A handwritten signature in black ink, appearing to read 'Paul Spanswick', written in a cursive style.

27 April 2021