

MODERN SLAVERY ACT 2015: SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDED 31 DEC 2017

Purpose and Background

This statement is made on behalf of DTCC Derivatives Repository PLC (“DDRL”), DTCC Europe Limited (“DEL”), and The Depository Trust & Clearing Corporation (“DTCC”), (together, the “Company”), pursuant to section 54 of the Modern Slavery Act 2015 (“Act”) in respect of the steps taken to combat modern slavery and human trafficking occurring within supply chains in relation to the financial year ended 31 December 2017.

Introduction

The Company recognises its obligations to combat slavery and human trafficking and remains strongly committed to preventing such human rights abuses from occurring internally and within its supply chains. The Company recognises the seriousness of such crimes and it is committed to take appropriate steps and enforce such measures that will aid the prevention, identification and reporting of such abuses.

The Company’s Core Business Services and Organisational Structure

Through its subsidiaries, DTCC (a U.S. holding company) provides a post-trade market infrastructure for the financial services industry, advancing the automation, centralization, standardization and streamlining of processes critical to the market’s safety and soundness. Through DTCC’s trade repository and swap data repository subsidiaries, DTCC also serves as an industry provider of choice for global over-the-counter (OTC) derivatives reporting to the global derivatives market. Through its subsidiaries, DTCC operates in more than 15 countries, including the U.K., and has in excess of 4,000 employees worldwide. DDRL is a registered trade repository incorporated in England and Wales, providing a suite of post-trade record-keeping and trade reporting services for listed and OTC equity, credit and interest rate derivatives to the global derivatives market. DDRL operates principally from the United Kingdom. DTCC Europe Limited (an affiliate of DTCC Derivatives Repository PLC (“DDRL”)) is a company organized under the laws of England and Wales, whose principal activity is to act as a service company to affiliated subsidiaries of DTCC.

The Company’s Supply Chain

The Company’s supply chain is structured to support the provision of the foregoing services and largely consists of the following infrastructures and services required to do so:

- **Offices Space:** includes the offices leased by the Company or any affiliates which its employees, or affiliate employees that provide any services to the Company, occupy from time to time. It also includes the services procured to maintain the daily operation of such spaces including cleaning and security.

- **Professional services:** includes any professional advisory services the Company sources in relation to matters such as accounting, applicable rules and regulations and tax.
- **Technology:** the ecosystem of software, systems and hardware that comprises the Company's technology infrastructures.

Steps and Measures Taken During the Financial Year Ended 31 December 2017 to Combat Slavery and Human Trafficking

The Company abides by several policies and procedures that are pertinent to mitigating the risk of slavery and human trafficking occurring within the Company's business or in any part of its supply chains. In particular, the Company has implemented the following policies, which are the policies of DTCC as the ultimate parent and which apply to all subsidiaries:

- **Code of Conduct**

The Company's Code of Conduct for Employees, as well as its Code of Conduct for Contingent Workers underscores the Company's continued commitment to integrity and the highest ethical standards in all business engagements undertaken by its employees and contingent workers. The Codes of Conduct promote awareness of the dangers of modern slavery as well as the need for the Company to comply with the requirements of the Act. The Codes of Conduct direct employees and contingent workers to report any instances of suspected noncompliance with the Act, and instruct as to the mechanism for such reporting.

- **Reporting Mechanisms of Compliance Concerns**

The Company maintains policies which require staff to report any compliance concerns or compliance queries through applicable internal and external reporting mechanisms. The mechanisms include hotlines for anonymous reporting of any compliance concerns.

- **Equal Employment, Non-Discrimination and Anti-Harassment Policy**

The Company's policy on Equal Employment, Non-Discrimination and Anti-Harassment underscores its commitment to providing a work environment that promotes equal employment opportunities, prohibits discriminatory practices including harassment, and ensures all individuals are treated with respect and dignity.

- **Purchasing Policy**

The Company has a formal purchasing policy and program that requires vendors to comply with all applicable laws relating to the services they perform, and to procure and maintain such licences, permits and insurances required to perform the services concerned.

- **Standard Contractual Obligations**

The Company imposes standard contractual obligations on its vendors requiring compliance with all applicable laws; submission to vendor risk assessments by the Company; and compliance with the Company's health, security and safety requirements, equal employment opportunity, non-discrimination, and anti-harassment policies and procedures.

- The Company does not use unpaid interns or apprentices and all employees, regular or contract, are remunerated.

Further Steps and Measures

While the Company does not consider that it currently operates in high-risk sectors or locations for modern slavery, it recognises that modern slavery and human trafficking issues are complex and continuously evolving. As such, the Company is committed to periodically reassessing its practices as they relate to human rights, and determine the effectiveness of the existing policy framework as well as any need for additional action to support the efforts already taken.

Preparation of this Statement

This statement was jointly produced and drafted by members of the Company's legal and compliance departments with input from human resources and corporate procurement services. The statement was subsequently reviewed and approved by the Board of Directors of DTCC on 20 June 2018, and shared with the Directors of DEL and DDRL on May 1, 2018 and May 9, 2018 respectively.

Signed on behalf of The Depository Trust & Clearing Corporation by **Michael Bodson**, Chief Executive Officer and Director of the Company.

