

## **UK Modern Slavery Act Statement**

### **Introduction**

The United Kingdom Modern Slavery Act 2015 requires firms to provide disclosure as to how they address the issues of slavery and human trafficking. This statement applies to BCS Prime Brokerage Limited (referred to in this statement as 'the Company') and includes the information for the financial year 2018.

### **Organisational structure**

The Company is authorised and regulated by the Financial Conduct Authority ("FCA") (firm reference number 586463 and 805008) to provide investment and payment services. The Company's Head Office is based in London, United Kingdom, and it operates a branch located in Moscow, Russia.

The labour supplied to the Company in pursuance of its operation is carried out in London and Moscow.

### **Definitions**

The Company considers that modern slavery encompasses:

- human trafficking;
- forced work, through mental or physical threat;
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- being dehumanised, treated as a commodity or being bought or sold as property;
- being physically constrained or to have restriction placed on freedom of movement.

### **Commitment**

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its employees and, additionally, clients and customers.

The Company has not, to its knowledge, conducted business with any Company, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. The Company undertakes appropriate due diligence internal processes when considering taking on new suppliers, and instances of non-compliance may lead to the termination of contract/business relationship.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company commits itself to respecting human rights and strictly adheres to the standards required in relation to its responsibilities under relevant legislation in the United Kingdom and the Russian Federation, including employment law.

Due to the nature of our business, and owing to the stringent approach to corporate governance and adherence to corporate cultural values, the Company's assessment is that there is a low risk of slavery and human trafficking. The Company undertakes periodic reviews of its policies and procedures to ensure it meets its obligations on an ongoing basis.

**Policies**

The Company's position on modern slavery is embedded through its Policies and Procedures, including the Employee Handbook and the Recruitment Policy. The Company's obligations in this regard are included as part of the induction process for all staff.

The Company takes a zero tolerance approach to modern slavery and unethical conduct. All concerns regarding modern slavery can be addressed directly to the Chief Regulatory Officer, or through the Company's existing whistleblowing channel.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year. The statement was approved by the Company's Board of Directors on 10th April 2019 and has been signed on behalf of the Board by Wendy Langridge, Director/Chief Regulatory Officer.

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

**Wendy Langridge**  
**Director**  
**10th April, 2019**