

Modern Slavery Statement for Financial Year Ending 2021

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that CLS UK Intermediate Holdings Ltd. and CLS Services Ltd. (respectively, “**CLS UKIH**” and “**CLS Services**” and collectively “**CLS**”) have taken, and are continuing to take, to ensure that modern slavery or human trafficking is not taking place within CLS’s business or supply chain.

The term “modern slavery” encompasses slavery, servitude, human trafficking and forced labour. CLS has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and where appropriate to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business.

We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. We are committed to promoting diversity, preventing discrimination and providing a supportive and inclusive working environment for our employees.

CLS is a provider of FX post-trade services. Both CLS UKIH and CLS Services operate in the UK and have an operating affiliate office (CLS Bank International) in the United States. CLS UKIH has a branch office and a representative office in Hong Kong and Tokyo respectively. CLS’s ultimate parent company, CLS Group Holdings AG, is registered in Switzerland.

CLS’s internal policies, at a group level, ensure that CLS conducts business in an ethical and transparent manner. Such internal policies include, but are not limited to:

- A whistle-blowing policy. We operate an anonymous whistle-blowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our organisation without fear of reprisals.
- A code of conduct policy. This code requires employees to act honestly, ethically, professionally, avoid conflicts of interest, potential or actual, and abide by all applicable laws and regulations.
- A third-party risk management and procurement process which is underpinned by a Third Party Risk Management Policy. We maintain an approved vendor list. We conduct due diligence, including financial, security and compliance checks on applicable vendors prior to onboarding an approved vendor. We have also enhanced our third-party risk management and procurement process by implementing a supply chain risk assessment specific to modern slavery whereby we seek assurance from our prospective suppliers that they have adequate policies and processes in place to identify and address the risk of modern slavery and also that they continue to remain compliant with all applicable modern slavery laws and regulations. For actual engagements with our vendor supply chain, our standard contract with suppliers has been amended to include appropriate modern slavery provisions.
- A financial crime policy. Following an update in 2021, this policy includes a specific reference to the Modern Slavery Act.

During 2021, we have promoted a modern slavery awareness campaign throughout all levels of our companies. Modern slavery was a listed agenda item discussed and addressed at the Board level of the CLS affiliates that are covered by the Modern Slavery Act.

As part of our modern slavery awareness campaign we have included detail and explanation of the Modern Slavery Act in our financial crime compliance training for all employees.



This statement was approved by the Board of Directors of CLS Services Ltd. on March 17, 2022 and the Board of Directors of CLS UK Intermediate Holdings Ltd. on March 21, 2022

CLS Services Ltd.

CLS UK Intermediate Holdings Ltd.

John Hagon

Sheryl Kennedy