

This statement is published by Quadrature Capital Limited (“**Quadrature**”) pursuant to Section 54 of the Modern Slavery Act 2015 (the “**Act**”). This statement outlines the steps that Quadrature has taken to detect and prevent modern slavery during the financial year ended 31 January 2021. The use of the term “modern slavery” in this statement includes slavery, servitude, any type of forced or compulsory labour, and human trafficking as defined by the Act.

Business activities

Quadrature is a technology company that trades financial markets.

Policies concerning slavery and human trafficking

Quadrature is committed to mitigating the existence of modern slavery within its supply chain or any part of its business. Quadrature has a zero-tolerance approach to slavery and human trafficking in any form and it expects its suppliers and service providers to comply with these standards. Quadrature will not intentionally procure products or services from, or enter into any agreement with, any business knowingly involved in modern slavery. The policies and procedures that Quadrature has implemented reflect its commitment to acting ethically and in compliance with all applicable laws in all areas of its business and in all jurisdictions. Quadrature has also implemented a whistleblowing policy and is committed to providing adequate protection for whistleblowers within its organisation. Quadrature regularly reviews its policies and procedures to maintain the highest standards of conduct. Its policies set out standards that all staff are expected to observe.

Supply chain

Due to the nature of its business, Quadrature’s supply chain is limited and the risk of modern slavery is low when compared to companies operating in other industries. The risk of modern slavery is highest in the third-party suppliers that form part of its indirect supply chain. Nonetheless, Quadrature is committed to mitigating the risks of modern slavery in its supply chain and has adopted due diligence procedures designed to assess and monitor potential risks.

If Quadrature identifies risks of modern slavery within its supply chain, it would take appropriate steps to investigate and remediate such risks. Such steps may include engaging with applicable suppliers, enhancing due diligence and monitoring procedures and improving procurement practices.

Risk mitigation

1. Employment standards
Quadrature confirms that staff have the right to work in the UK and are aware of their rights and responsibilities that are associated with working in the UK. Quadrature’s employment contracts detail aspects of the employment relationship between Quadrature and staff to make them aware of their contractual rights.
2. Due diligence
Quadrature has due diligence procedures in place to mitigate the presence of modern slavery within its supply chain, including its indirect supply chain.
3. Training
Quadrature requires all staff, including new hires, to complete training on the risks of modern slavery in its supply chain and its business. Such training includes materials explaining the provisions of the Act, the definitions of various forms of modern slavery including servitude, human trafficking and forced labour, and the action that staff should take if they become aware of or suspect modern slavery.

Effectiveness

Quadrature assesses the effectiveness of its anti-modern slavery processes, procedures, documentation, and training periodically against the following indicators:

1. staff training levels;
2. due diligence procedures; and
3. any action taken in response to reports of actual or suspected modern slavery.

Review and approval

This statement will be reviewed and, where required, updated, annually.

This statement has been approved by Greg Skinner, in his capacity as a director of Quadrature Capital Limited, on behalf of the Board of Directors.