

# Vantage Global Prime LLP Modern Slavery Statement

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#### 1 Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain. At Vantage Global Prime LLP ('Vantage') we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain.

This statement is made pursuant to Section 54, Part 6, of the Modern Slavery Act 2015 and sets out the approach taken by Vantage Global Prime LLP (Company Registration Number OC376560) to ensure that effective systems and controls exist to mitigate the risk of slavery or human trafficking in any part our business or supply chain. It constitutes our modern slavery and human trafficking statement for the period 1<sup>st</sup> July 2022 to 30<sup>th</sup> June 2023.

## 2 Our business and supply chains

Vantage Global Prime LLP is authorised and regulated by the FCA. Vantage's registered office address is at 7 Bell Yard, London, England, WC2A 2JR. Vantage is listed in the Financial Services Register under Firm Reference Number 590299.

Vantage Global Prime LLP is a Forex broker and we uphold the highest standards of regulation and compliance, and offer its clients the ability to trade on financial markets using Contracts for Difference (CFDs). We aim to maximise our clients' trading experience through a unique mix of superior proposition, diverse product offering, competitive spreads and excellent customer service.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We have not been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Given the nature of our business, we consider the risk of modern slavery and human trafficking in our supply chain to be low. Our suppliers are typically operations and IT businesses.

#### 3 Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have reviewed our policies and procedures to assesses their effectiveness in identifying and tackling modern slavery issues.

Vantage operates the following policies for identifying and preventing slavery and human trafficking in our operations:

 Whistleblowing Policy - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers. • **Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

## 4 Supplier Due Diligence

Vantage conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- · Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

## 5 Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide training to all our employees. We will also seek to require that our business partners provide training to their employees, suppliers and providers.

#### 6 Annual Review

We will conduct an annual review of this statement and seek Board approval for each update.