



## Modern Slavery Act 2015

**Slavery and Human trafficking statement (“Statement”) as required under s54 of the Modern Slavery Act 2015 (“the Act”) for the financial year ended 31 December 2018 (“Financial Year”). This statement applies to all companies within Intercontinental Exchange, Inc. (“ICE”) that are required to have a modern slavery statement in accordance with the Act (“the Relevant Companies”).**

### Introduction

Intercontinental Exchange (NYSE:ICE) is a Fortune 500 company formed in the year 2000 to modernize markets. ICE serves customers by operating the exchanges, clearing houses and information services they rely upon to invest, trade and manage risk across global financial and commodity markets.

Our regulated, liquid and transparent markets span nine asset classes, and comprise twelve exchanges and six clearing houses in Europe, North America and Asia.

ICE is a global leader in market data. ICE Data Services offers end-to-end solutions for real-time data, analytics, evaluated pricing, reference data, feeds and connectivity across global markets and virtually all asset classes.

ICE is home to global benchmark contracts in energy, agriculture, interest rates, FX and equity derivatives, and is host to nearly 50% of the world’s traded crude and refined oil futures contract volume.

ICE has six clearing houses serving key derivatives asset classes across the US, UK, Europe, Canada and Singapore, driving strong risk management practices and supporting reduction in systemic risk.

As the parent company of the New York Stock Exchange, ICE is the premier venue for raising capital in the world, driving economic growth and transforming markets.

### Our policies and controls

ICE and the Relevant Companies are committed to ensuring that there is no modern slavery or human trafficking in their supply chains or in any part of their business.

The ICE Modern Slavery Policy reflects this commitment to acting ethically and with integrity in all ICE business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. ICE is committed to maintaining systems and processes that protect its employees and avoid any issue that can be perceived as a human rights violation. ICE implements policies related to non-discrimination, equal opportunity and non-harassment. This financial year has seen the continuation of compulsory anti-workplace harassment and anti-sexual harassment training for all employees across the ICE Group.

ICE believes that its approach to professionalism, respect and integrity has served ICE well, and continues to ensure that the rights of employees and applicants are protected around the world. ICE complies with all applicable laws and regulations on forced or child labor, and the rights of employees to organize a union. The ICE Global Code of Business Conduct is designed to ensure compliance with our core values that focus on professionalism and integrity.

## **Assessment of Modern Slavery Risk**

It is ICE's view that it operates within an industry where the risk of modern slavery is low, based on the nature of the relevant products and services as well as the location of significant operations.

Notwithstanding this, ICE unequivocally supports the drive to eradicate modern slavery and fully supports the requirements of the Act. Relevant Companies are undertaking their third broad "Modern Slavery Risk" review of their current vendor base, focusing on the vendors that make up the top 75% of spend and identified relevant third parties.

The Relevant Companies use the ICE Vendor Management Policy, in place since October 2015 to categorise vendors, based on a defined criteria, into High, Medium or Low risk categories. As part of the third annual Modern Slavery Risk review, these vendors and relevant third parties are evaluated for Modern Slavery risk using the guidance published by the Walk Free Foundation (and other sources)<sup>1</sup> on tackling modern slavery in supply chains. This review will categorize relevant entities as low, moderate or high risk in terms of their likely involvement in and/or connection to modern slavery. The Relevant Companies are committed to sending out the Modern Slavery Statement and Policy to all Relevant Company vendors that make up the top 75% of spend, as well as the relevant third parties that have been identified.

Any vendors or relevant third parties that receive a rating of medium or higher in the third annual Modern Slavery Risk review will also receive a mid-year review aimed at identifying if any further information about the vendor or relevant third party concerning modern slavery has been made available since the previous review. The category of relevant third parties has also been expanded.

## **Vendor Due Diligence Processes**

As part of ICE's initiative to identify and mitigate relevant risks, the ICE Vendor Management Policy framework comprises two main elements: (i) Due Diligence and (ii) Risk Assessment. These procedures include but are not limited to:

### **1. Due Diligence and Initial Risk Assessment**

All vendors must complete a vendor profile. The Vendor Management Office ("VMO") performs an initial qualification of the vendor to generate the relevant risk assessments (including but not limited to factors such as Info-sec, HR, Financial, BCP, physical security and compliance with applicable law which includes modern slavery legislation). The depth of the assessments is driven by the criticality, scope of engagement as well as the initial risk qualification. Reviews entail inquiry into legal, regulatory and reputational public and non-public records. Each vendor is evaluated using the vendor rating scorecard as defined within the Vendor Management System ("VMS").

ICE continues to review the vendor risk assessment process with the aim of ensuring that it can identify vendors that may be affected by modern slavery practices.

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<sup>1</sup> "The Global Slavery Index 2018" available here:

<https://www.globallslaveryindex.org/resources/downloads/#gsi-2018> the Freedom in the World, available here: <https://freedomhouse.org/report/countries-world-freedom-2019> the US Department of State's Trafficking in Person's Report 2018, available here: <https://www.state.gov/j/tip/rls/tiprpt/> and the US Department of Labour List of Goods and Services, available here: <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>.

## **2. Risk Assessment**

Each vendor will be evaluated and VMO is responsible for evaluating vendors based on a defined criteria and assigning vendors to an appropriate risk class. Risk ratings are reviewed when a material change in the vendor relationship is identified or if the vendor's ability to provide services to ICE is impacted by an external or internal event. The VMO updates the data in the VMS and a recalculation of the tier is automatically generated. If a recalculation results in the change of a risk tier, a communication is sent to the business owner and respective risk partners notifying them of the change in frequency with which VMO assesses the vendor relationship.

ICE's UK legal department is working with the Group's Vendor Management Team to further establish a process whereby any vendors identified as potentially being affected by modern slavery practices by the vendor risk assessment can be referred to the UK legal department for further assessment and to determine if any and what further action may be required.

The VMO and business units will periodically consider and review vendors in the highest risk category no less than annually. This takes into account various considerations, including but not limited to changes with the vendor, industry-wide changes (regulatory, legal, or other industry wide change) or changes within ICE VMO (for example information security, BCP, KPI changes).

### **Complaint Reporting Procedures**

Complaints or concerns related to ICE accounting, auditing, internal controls or financial reporting can be submitted anonymously and confidentially, or with full disclosure. Our employees around the world have access to a hotline that can be easily found on the company's internal website and is part of ICE's Global Reporting and Anti-Fraud Policy. For external parties wishing to access the hotline, they can refer to the Global Code of Business Conduct policy.

### **Vendor adherence to our values**

ICE has zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and vendors comply with our values, we ensure when entering into a contract with a vendor, our standard terms and conditions require vendors to adhere to all applicable laws, which will include relevant anti-slavery legislation.



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### Introduction

Intercontinental Exchange (NYSE:ICE) is a Fortune 500 and Fortune Future 50 company formed in the year 2000 to modernize markets. ICE serves customers by operating the exchanges, clearing houses and information services they rely upon to invest, trade and manage risk across global financial and commodity markets.

Our regulated, liquid and transparent markets span 9 asset classes and comprise 12 exchanges and 7 clearing houses in Europe, North America and Asia, within major assets classes: energy, interest rates, agriculture, metals, FX, credit and equity derivatives, cash equities and equity options.

ICE is a global leader in market data, ICE Data Services offers information and connectivity solutions across global markets and virtually all asset classes with exchange data, evaluations and indices, reference data, analytics and connectivity.

ICE also offers global benchmark contracts ranging from interest rates to crude oil and soft commodities, and is home to ~50% of the world’s traded crude oil and refined oil futures volume.

ICE has seven clearing houses driving strong risk management practices and supporting reduction in systemic risk.

ICE is a global leader in capital raising through the New York Stock Exchange and a leader in equity, ETF and equity options markets by traded volume globally with a comprehensive and growing portfolio of traded and cleared credit default swap (CDS) instruments.

### Our policies and controls

ICE and the Relevant Companies are committed to ensuring that there is no modern slavery or human trafficking in their supply chains or in any part of their business.

The ICE Modern Slavery Policy reflects this commitment to acting ethically and with integrity in all ICE business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. ICE is committed to maintaining systems and processes that protect its employees and avoid any issue that can be perceived as a human rights violation. ICE implements policies related to non-discrimination, equal opportunity and non-harassment. This financial year ICE has rolled out compulsory anti-harassment training for all employees across the ICE Group.

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## **Assessment of Modern Slavery Risk**

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Notwithstanding this, ICE unequivocally supports the drive to eradicate modern slavery and fully supports the requirements of the Act. Relevant Companies are undertaking their second broad "Modern Slavery Risk" review of their current vendor base, focusing on the vendors that make up the top 75% of spend and identified relevant third parties.

The Relevant Companies use the ICE Vendor Management Policy, in place since October 2015 to categorise vendors, based on a defined criteria, into High, Medium or Low risk categories. As part of the second Modern Slavery Risk review these vendors and relevant third parties are evaluated for Modern Slavery risk using the guidance published by the Walk Free Foundation (and other sources)<sup>1</sup> on tackling modern slavery in supply chains. This review will categorize relevant entities as low, moderate or high risk in terms of their likely involvement in and/or connection to modern slavery. The Relevant Companies are committed to sending out the Modern Slavery Statement and Policy to all Relevant Company vendors that make up the top 75% of spend, as well as the relevant third parties that have been identified.

## **Vendor Due Diligence Processes**

As part of ICE's initiative to identify and mitigate relevant risks the ICE Vendor Management Policy framework comprises three main elements: (i) Due Diligence, (ii) Risk Assessment, and (iii) Performance Management and Oversight. These procedures include but are not limited to:

### **1. Due Diligence and Initial Risk Assessment**

All vendors must complete a vendor profile. The Vendor Management Office ("VMO") performs an initial qualification of the vendor to generate the relevant risk assessments (including but not limited to factors such as Info-sec, HR, Financial, BCP, physical security and compliance with applicable law including in relation to modern slavery). The depth of the assessments is driven by the criticality, scope of engagement as well as the initial risk qualification. Reviews entail inquiry into legal, regulatory and reputational public and non-public records. Each vendor is evaluated using the vendor rating scorecard as defined within the Vendor Management System ("VMS").

ICE continues to review the vendor risk assessment process with the aim of ensuring that it can identify vendors that may be affected by modern slavery practices.

### **2. Risk Assessment**

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<sup>1</sup> "Tackling Modern Slavery in Supply Chains" A Guide 1.0, available here: <https://www.walkfreefoundation.org/news/resource/tackling-modern-slavery-in-supply-chains-a-guide-1-0/>; the Freedom House List, available here: <https://freedomhouse.org/report/freedom-world/freedom-world-2018>; the US Department of State's Trafficking in Person's Report 2017, available here: <https://www.state.gov/j/tip/rls/tiprpt/> and the US Department of Labour List of Goods and Services, available here: <https://www.dol.gov/ilab/reports/child-labor/list-of-goods/>.



impacted by an external or internal event. The VMO updates the data in the VMS and a recalculation of the tier is automatically generated. If a recalculation results in the change of a risk tier, a communication is sent to the business owner and respective risk partners notifying them of the change in frequency with which VMO assesses the vendor relationship.

ICE's UK legal department is working with the Group's procurement team to further establish a process whereby any vendors identified as potentially being affected by modern slavery practices by the vendor risk assessment can be referred to the UK legal department for further assessment and to determine if any and what further action may be required.

The VMO and business units will periodically consider and review vendors in the highest risk category no less than annually. This takes into account various considerations, including but not limited to changes with the vendor, industry-wide changes (regulatory, legal, or other industry wide change or changes within ICE VMO (for example information security, BCP, KPI changes).

### **3. Performance Management and Oversight**

ICE Vendors are subject to evaluations by VMO and may be required to provide performance metrics in order to continue their partnership with ICE. The risk and partnership classification of the vendor will dictate the cyclical frequency for each vendor performance evaluation.

#### **Complaint Reporting Procedures**

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