



# Cboe Europe Limited

## Modern Slavery and Human Trafficking Statement

# Statement on Modern Slavery and Human Trafficking

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The UK Modern Slavery Act 2015 (the “Act”) requires commercial organisations supplying goods or services and with an annual turnover greater than £36 million to prepare a slavery and human trafficking statement for each financial year. This statement sets out the steps Cboe Europe Limited (“Cboe”) has taken and is taking to ensure that slavery and human trafficking are not taking place within its business and supply chain.

## CBOE'S BUSINESS

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Cboe is a stock exchange that offers trading in more than 6,000 securities across 18 European markets. It is a Recognised Investment Exchange (“RIE”) and is regulated by the Financial Conduct Authority. As an RIE Cboe is able to operate a Regulated Market and Multilateral Trading Facility.

## POLICY ON SLAVERY AND HUMAN TRAFFICKING

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Cboe is committed to ensuring there is no modern slavery or human trafficking in its business and supply chains. This statement is reviewed annually by Cboe management and is available to all staff. Cboe is committed to acting ethically and with integrity in all its business relationships.

## SUPPLY CHAINS

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Cboe has firm-wide vendor management procedures which are to be adhered to by all staff regarding the management and oversight of third-party providers. These procedures provide details for implementing the Vendor Management Policy. Cboe does not tolerate slavery or human trafficking in any form and will not knowingly work with vendors who engage in these practices.

Cboe performs a vendor risk assessment on each vendor or new service provided by an existing vendor, followed by a thorough due diligence to address qualitative and quantitative aspects of potential vendors.

Once vendors are onboarded, Cboe maintains adequate oversight of the third-party activities and quality control over those products and services provided through vendors to minimise exposure to potential

significant loss, reputation damage and regulatory action. Cboe expects its vendors and their supply chain to wholly comply with all relevant laws and regulations in the conduct of their business.

## **RISK ASSESSMENT**

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Given the nature of its business, Cboe believes it operates within an industry with an innately low risk of modern slavery and human trafficking. As Cboe is a global business, it understands and recognises the potential risk when utilising vendors and has policies and procedures in place that require third parties to adhere to all relevant laws and the standards of Cboe.

## **EMPLOYEES**

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Cboe is committed to creating a workplace that protects its staff from unfair treatment and promoting a fair and inclusive work environment. Cboe also seeks to ensure that any interaction its staff has with participants, vendors and other business parties is consistent with the relevant regulations and laws in the jurisdictions in which it operates.

Cboe ensures its staff are educated on our business values and culture so applicable policies and procedures can be employed. These are a reminder to staff to report any behaviour that does not comply with Cboe's internal policies and procedures as well as external laws.

## **CONTINUING COMMITMENT**

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Cboe will continue to engage with its staff and vendors to promote awareness and to take additional steps to ensure that slavery and human trafficking are not taking place within its business and supply chain.

At group level, Cboe Global Markets has a [Human Rights policy](#) which explicitly takes into account the Act.

This statement is made pursuant to section 54(1) of the Act and constitutes Cboe's modern slavery and human trafficking statement for the financial year ending 31 December 2024. It shall be reviewed annually and updated in accordance with the Act.