

MODERN SLAVERY ACT TRANSPARENCY STATEMENT 2018

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Fidessa's slavery and human trafficking statement for the financial year ending 31 December 2018.

Fidessa is committed to acting ethically and with integrity in its business dealings and relationships. We all have a responsibility to be alert to the risks of modern slavery taking place in our particular business and supply chains. Fidessa staff are expected to report concerns and management are expected to act upon them. We have suitable channels to enable concerns in relation to our Anti-Slavery and Human Trafficking Policy to be reported confidentially.

About Fidessa

Fidessa is a financial markets software and services company. Fidessa delivers multi-asset class trading and investment management solutions to the world's financial markets community. You can read more about Fidessa here: www.fidessa.com.

Our Supply Chains

Neither Fidessa nor its subsidiary companies have complicated supply chains (or complex relationships with businesses) based in higher-risk regions of the world, where labour laws are non-existent or are not enforced.

Fidessa's supply chains include IT infrastructure, software and data service providers, facilities and waste management, consulting and advisory services.

Our Policies on Slavery and Human Trafficking

Fidessa is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. Fidessa's Human Rights Policy reflects Fidessa's commitment to acting ethically and with integrity in its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in its supply chains or in any part of its business.

Due Diligence Processes for Slavery and Human Trafficking

Fidessa takes its responsibilities very seriously and operates a risk based approach to supplier due diligence. As part of Fidessa's initiative to identify and mitigate risk Fidessa has systems and processes in place to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- monitor potential risk areas in our supply chains.

Fidessa has a processes and procedures in place to allow whistleblowers to raise concerns.

Fidessa performs risk assessments against new suppliers. Fidessa has a policy to include, where appropriate, certain contractual provisions in supplier agreements (for example, additional warranties and additional audit, notification and termination rights) to be used in arrangements we assess to be of higher risk. This may include requiring supplier employee's agreement to the terms of a Supplier Code of Conduct prior to working on a Fidessa site.

Fidessa has a supplier due diligence questionnaire that includes, amongst other things, questions relating to modern slavery, other labour standards, anti-corruption and environmental matters.

Suppliers deemed to be in a high risk category for the purposes of the Act are requested to complete the questionnaires as part of the due diligence process for new suppliers. The same assessment is undertaken on existing high risk suppliers on contract renewal.

Supplier Adherence to Our Values

Fidessa has a zero tolerance to slavery and human trafficking. Suppliers are expected to comply with Fidessa's values. Fidessa has a procurement team who are engaged with the on-boarding of new suppliers and who facilitate the Fidessa supplier assessment process.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in its supply chains and its business, Fidessa provides training and guidance to relevant staff.

Our Effectiveness in Combating Slavery and Human Trafficking

In order to ensure that slavery and human trafficking is not taking place in any part of Fidessa's business or supply chains, Fidessa carries out the following monitoring activities:

- that due diligence has been undertaken for suppliers deemed to be high risk;
- compliance with its policies and with the requirements of Act;
- suppliers' responses to its questionnaires and take appropriate action; and
- any adverse reports regarding Fidessa's suppliers and take appropriate action

Approved by the Board of directors and signed by Ashley Woods, director, pursuant to section 54(6)(a) of the Act:

[A Woods]

8 February 2019
Fidessa plc