



BTIG Limited Modern Slavery Act Statement

March 2026

1. Introduction and scope

This statement is made on behalf of BTIG Limited (“**BTIG**”, the “**Firm**”, “we”, “our” or “us”) pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the “**Act**”). It sets out the steps we have taken during the financial year ended 31 December 2025 to assess and address the risks of modern slavery and human trafficking in our own operations and in our supply chains.

Modern slavery is a severe violation of fundamental human rights and includes slavery, servitude, forced or compulsory labour, and human trafficking. BTIG has a zero-tolerance approach to all forms of modern slavery and human trafficking and is committed to acting ethically and with integrity in all our business dealings and relationships.

This statement covers BTIG Limited and, where applicable, the activities carried out on its behalf within the UK.

2. Our structure, business and supply chains

BTIG Limited is a UK-regulated financial services firm and part of the global BTIG group, a mid-sized financial services provider headquartered in the United States. The Firm primarily serves institutional investors, public and private companies and other professional counterparties. Our core activities include:

- High-touch institutional and outsourced trading
- Electronic and portfolio trading
- Investment banking and capital markets services

BTIG Limited operates from offices in the United Kingdom and employs staff in front-office, operations, technology and support functions.

We are a provider of financial services and do not produce, manufacture or distribute physical goods. As a result, our direct operational footprint is relatively low-risk for modern slavery. However, we recognise that risks can arise, particularly in extended supply chains and in certain sectors and geographies.

Our key categories of suppliers include (but are not limited to):

- IT hardware, software, cloud and telecommunications providers
- Providers of trading, market data, analytics and news services
- Building, facilities management and office services (including cleaning, maintenance and security)
- Professional advisers (legal, accountancy, consultancy and other specialist services)
- Financial infrastructure and services (custody, clearing, settlement and other outsourced operational services)
- Recruitment agencies and other contingent workforce providers
- Travel, accommodation and corporate events suppliers

We acknowledge that certain categories – such as IT hardware manufacturing, facilities services, travel and hospitality – can have higher inherent modern slavery risks in their upstream supply chains, even where our direct supplier is a reputable and regulated business.

3. Policies and standards

BTIG's approach to combating modern slavery is underpinned by our broader culture and control framework, including policies that apply across the Firm and its supply chain. Relevant policies and frameworks include:

- **Code of Conduct and Ethics:** Sets expectations that all employees act with integrity, comply with applicable laws and regulations, and uphold high ethical standards in dealings with clients, colleagues and third parties.
- **Human Resources and Employment Policies:** Ensure fair recruitment and employment practices, including right-to-work checks, fair wages, non-discrimination, diversity and inclusion, and protection against harassment and bullying.
- **Whistleblowing / Speak-Up Policy:** Provides confidential channels for employees and other stakeholders to raise concerns (including concerns related to modern slavery or unethical labour practices) without fear of retaliation, and outlines how such concerns are investigated and escalated.
- **Supplier and Outsourcing Standards:** Set expectations that suppliers act consistently with BTIG's ethical standards, including compliance with the Act, and require suppliers to implement appropriate controls within their own supply chains.
- **Anti-Financial Crime Framework:** Our anti-money laundering, sanctions, anti-bribery and corruption and fraud prevention policies help reduce the risk that BTIG may be used to facilitate criminal conduct, including that associated with modern slavery.

Where appropriate, we are enhancing our supplier-facing documentation (such as standard terms and conditions, onboarding questionnaires and supplier codes) to more explicitly address modern slavery, human rights and labour practices.

4. Governance and accountability

The Board of Directors of BTIG Limited has overall responsibility for the Firm's approach to modern slavery risk and for approving this statement.

Day-to-day responsibility for implementing our modern slavery controls is shared across key functions, including:

- **Senior Management:** Oversight of operational resilience, outsourcing, and conduct risks, including modern slavery.
- **Compliance and Risk:** Advising on regulatory expectations, maintaining relevant policies, supporting risk assessments and monitoring, and escalating issues to senior management and the Board as appropriate.
- **Finance / Legal / Operations:** Managing supplier due diligence, contractual provisions and ongoing oversight of key third-party relationships.

- **Human Resources:** Ensuring our employment practices are consistent with our zero-tolerance stance on modern slavery and that relevant training is provided to staff.

Progress, emerging risks and material issues relating to modern slavery are reported to relevant governance forums (for example, Risk and/or Management committees) as part of broader third-party risk assessments.

5. Risk assessment and management

Based on our industry and the location of our operations, we assess the overall risk of modern slavery within our direct business to be low. However, we recognize that pockets of higher risk may exist within indirect supply chains, particularly in relation to **facilities management (cleaning, catering, and security)** and **IT hardware manufacturing**.

To mitigate these risks, we remain vigilant and apply risk-based due diligence to screen and monitor supplier relationships.

6. Looking Ahead

We understand that the risks associated with modern slavery are evolving. In the year ahead (2026), BTIG Limited will:

- Continue to review and enhance our internal procurement policies.
- Monitor regulatory developments, including emerging EU forced labor guidelines and potential UK legislative updates, to ensure our compliance framework remains robust.
- Maintain our zero-tolerance approach to modern slavery across all business operations.

Approval

This statement has been reviewed and approved by the Board of Directors of BTIG Limited.

Signed,



Luke Hodges
Director, BTIG Limited
Date: 3 March 2026



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