Slavery and human trafficking statement

Introduction

This slavery and human trafficking statement is made on behalf of Exane SA ("Exane"), pursuant to section 54 of the Modern Slavery Act 2015 (the "Act"), for the financial year ending on 31 December 2018. Exane SA has carried on the business of the Exane group of companies (the "Exane Group") in the UK since 29 March 2019, when it set up an Exane SA, London Branch ("Exane London"), which took over the activities of its subsidiary, Exane Limited, which previously operated its business in the UK. For the purposes of this statement, the financial year ending on 31 December 2018 is referred to but because of this organisational change, the business of Exane London in the UK was at that time carried out by Exane Limited.

Exane has a zero tolerance approach to slavery and human trafficking. We are committed to addressing the requirements of the Act and to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Organisational Structure

Exane is an authorised investment services provider headquartered in France. Exane carries on business in the UK through Exane London which is subject to limited regulation by the Financial Conduct Authority. Details of the extent of Exane London’s regulation by the Financial Conduct Authority are available from Exane London upon request. Details of the Exane Group’s office locations can be found on the company’s website.

Business and supply chain

We are committed to acting ethically and with integrity in all our business relationships and expect the same of our suppliers and those we work with.

Over the course of the last financial year, the service agreement for all contractors has been updated and includes a reference to the Act.

In addition, Exane has globally, where applicable, adopted similar measures. At an Exane Group procurement level, Exane has inserted language in its standardised tender offers stating its anti-slavery policy and expectations from future contractors to respect the same. This language is also inserted in contracts signed where applicable. The tender template used at Exane Group level states that any provider of the Exane Group is committed in all countries where it has operations to comply with international norms on modern slavery, including the rules in relation to the minimum working age, child labour, and the prevention of forced labour.

Exane London has given guidance through the HR Department to the business managers on the usage of interns and work experience students so as to comply with the Act.

We will continue to consider any further due diligence procedures or requirements which it would be appropriate to put in place to assist with and further this commitment.
Policies

An Anti-Slavery and Human Trafficking Policy was published by Exane Limited in 2017. This policy has been adopted by Exane London since it took over the business of Exane Limited in the UK. This policy applies to all employees, contractors and other individuals working for Exane London and provides further guidance on how to identify, manage and report such risks.

Exane London is subject to the Exane Group Whistleblowing Policy. The Whistleblowing Policy applicable to all employees of Exane London forms part of the Employee Handbook and is published on the company's intranet. Exane London also has a Whistleblowing Policy in its Compliance Manual that applies to all contractors and other individuals working for Exane London. Both of these policies enable genuine concerns about any wrongdoing or breaches of the law, including the Act, to be raised in confidence and without fear of disciplinary action.

Exane at Group level has implemented similar policies.

Training

The Exane Group also provides periodic and obligatory training to its relevant staff on related topics such as Anti-Money Laundering, Fraud, Bribery, Corruption and the Proceeds of Crime.

This statement will be reviewed annually and made available on our website.

B. Catherine
Director, Exane SA