



## MODERN SLAVERY ACT STATEMENT

### Introduction

This statement is made by Virtu Financial LLC, (the “**Company**”) pursuant to section 54 of the UK Modern Slavery Act 2015 (the “**Act**”) in respect of the financial year ended 31 December 2021.

### Business Description

The Company and its European affiliates represent the European subsidiaries of Virtu Financial, Inc. (“**Virtu**”), a US-based entity quoted on the Nasdaq Exchange. Virtu is a global financial technology company that helps leading brokers and asset managers improve returns for investors around the world.

The Company is headquartered in New York, United States. The Company has a number of subsidiaries which operate in the UK. This statement covers all UK subsidiaries of the Company:

- **Virtu Financial Ireland Limited (“VFIL”)** - is authorized by the Central Bank of Ireland as an investment firm under the Markets in Financial Instruments Directive 2014/65/EU (as amended, supplemented or replaced from time to time) (“**MiFID II**”). VFIL also operates a branch in London.
- **Virtu ITG Europe Limited (“VIEL”)** - is authorized by the Central Bank of Ireland as an investment firm under MiFID II. VIEL also operates a branch in London (‘Investment Technology Group Europe Limited ((London Branch) “**ITGEL**”).
- **Virtu ITG UK Limited (“VIUK”)** – is authorized by the Financial Conduct Authority as an investment firm under MiFID II (as onshored into UK domestic law).
- **VFSS (UK) Limited** – provides information technology services to the Virtu Group.
- **KCG Europe Limited** – is in the process of winding down following its acquisition by the Virtu Group having previously been authorized as a broker dealer by the Financial Conduct Authority.

### Risk Assessment and Due Diligence

The Company and its subsidiaries operate in the financial services sector and do not have a complex supply chain. We believe that the nature of our business and the countries in which we operate mean that the risk of modern slavery or human trafficking in our supply chain is low. For example, the Company’s supply chain mainly consists of:

- Professional services (lawyers, accountants and other professional advisors);
- Services provided by other financial services firms and market participants;
- Data services (market data);
- Telecoms, software and software and hardware maintenance and support services;
- Office facilities services (cleaning, catering, security);
- Hotels and restaurants (including event spaces for conferences);
- Travel etc.

The Company does not knowingly support or do business with any suppliers who are involved in slavery or human trafficking. Notwithstanding, the Company is committed to ensuring that its supply chain is free of slavery and human trafficking. The Company’s business contractual arrangements are subject to a due diligence process conducted before the business relationship commences and on an ongoing basis. This includes a risk assessment that takes account of the type of service to be provided, the jurisdiction of the counterparty and its regulatory status, if appropriate. We may also use third party



screening services with links to global sanctions and watch lists, Politically Exposed Persons databases and adverse media screening facilities.

All employees who join us are subject to checks to ensure that they are genuine applicants, including verification of identify, references, evidence of qualifications and criminal record checks.

In the event that the results of the Company's due diligence in relation to any business contractual arrangement are determined to be unsatisfactory, the Company will seek to terminate its relationship with the person or Company as soon as practical and take all such other steps as are required by applicable law.

### **Staff Awareness**

Our global Code of Business Conduct and Ethics sets standards and expectations for all staff in upholding the highest level of ethical conduct. Staff are required to affirm their understanding of the Code on an annual basis. In addition, our Whistleblower Policy provides a framework for staff to report any allegations of impropriety without fear of recrimination. To ensure a thorough understanding of the particular risks of modern slavery and human trafficking and our obligations under the Act, we will provide supplementary training to key staff identified by our Legal and Compliance function, as necessary.

This statement has been approved by the Board of Directors of the Company and its subsidiaries. This statement will be reviewed annually and updated as necessary.

For and on behalf of THE VIRTU GROUP