

Modern Slavery and Human Trafficking Statement 2026 **The London Metal Exchange and LME Clear Limited**

Introduction from the CEOs of LME and LME Clear

Modern Slavery is a serious global issue and represents one of the worst forms of human rights violation. We at The London Metal Exchange (“LME”) and LME Clear Limited (“LME Clear”) take this very seriously. We all have a responsibility to be alert to the risks, however small, in our businesses and in the wider supply chain. Staff at the LME and LME Clear are expected to remain vigilant to potential risks, report concerns promptly and uphold our commitment to ethical and responsible business practices. Management is responsible for taking appropriate, timely action in response to any concerns raised.

We are further strengthening our approach by enhancing transparency, improving risk assessment processes, and embedding continuous improvement across our due diligence and reporting practices.

Organisations’ Structure

LME and LME Clear form the world centre for industrial metals trading and clearing and we are part of the Hong Kong Exchanges and Clearing Group. LME and LME Clear each have an annual turnover in excess of £36m and each organisation is therefore subject to the requirements of the Modern Slavery Act 2015.

Our Business

Our UK business consists of LME and LME Clear (collectively “LME Group”).

The LME is the world centre for industrial metals trading. The main activity of the Company is the provision of a marketplace to facilitate pricing and trading, administrative and other services to its members including the operation of a global physical warehouse network. The Company is a Recognised Investment Exchange under the terms of the Financial Services and Markets Act 2000 (the “Act”) and is regulated by the Financial Conduct Authority (“FCA”). The Company is required to maintain proper standards in accordance with its rules and with regulations made under the Act. LME Clear is a Recognised Clearing House under the Act and authorised in accordance with the European Market Infrastructure Regulation (“EMIR”) as transposed into UK law (“UK EMIR”). The Company acts as the central counterparty (“CCP”) for exchange contracts traded on the LME. The clearing service principally provides counterparty risk mitigation services for the Company’s Clearing Members.

Our Policy on Slavery and Human Trafficking

LME and LME Clear are committed to combatting the risk of modern slavery (including slavery, servitude, forced and compulsory labour and human trafficking) taking place in our business or in our supply chains. Our Modern Slavery Policy, which is reviewed annually by staff with oversight from committees of the LME and LME Clear Boards, is available to all staff and reflects our commitment to acting ethically and with integrity and to implement and enforce effective systems and controls to identify and reduce the risk of modern slavery within our supply chains.

The 2025 review of our Modern Slavery Policy confirmed that it remains fit for purpose and continues to provide an appropriate framework for guiding the development of our approach to identifying, preventing and managing the risks of modern slavery.

Internal Arrangements

Our policies establish the minimum requirements that must be followed across our business to ensure compliance with regulatory obligations, industry best practices, our risk appetite and our strategic objectives. The LME Group has implemented a suite of policies and standards that safeguard human rights and support our commitment to preventing modern slavery throughout our operations and/or supply chains. Each of the policies outlined below is subject to senior management review and formal approval by the appropriate Board-related committees.

LME Group Anti Bullying, Harassment and Sexual Harassment Policy – The LME Group is committed to providing a working environment for all staff that is comfortable and free from all forms of bullying and harassment. We have a zero-tolerance approach towards bullying and harassment. We value difference and diversity in our workforce. We expect employees to be polite, tolerant and respectful of difference. This policy applies to everyone who works for the Company or on our premises and it sets out the standards of conduct we expect from employees and all other staff members.

LME Group Migrant Workers Policy – The LME Group is committed to preventing illegal working in the UK. This policy applies to all employees, agency workers and contractors at all levels within the Company.

LME Group Background Screening Policy – The LME Group is committed to maintaining the security of their information and information systems, and protecting employees, participants, and members from illegal or damaging actions. The purpose of the Background Screening Policy is to outline employee-screening requirements which must be adhered to for the protection of LME Group information, information systems and personnel.

LME Group Grievance Policy and Procedure – The object of the grievance procedure is to provide a means of dealing promptly and fairly with any grievance which an employee may have relating to their employment and in order to foster a culture of fair treatment. The Company will not tolerate abusive or insulting behaviour from anyone taking part in a grievance procedure and will treat any such behaviour as misconduct under our disciplinary procedure.

Group Whistleblowing Policy – This policy ensures that staff can raise any concerns - including to external authorities without fear of reprisal. Our third-party operated whistleblowing platform provides a secure and fully anonymous reporting channel, offering additional assurance to any employee who wishes to make a disclosure without revealing their identity.

LME Group Outsourcing & Third-Party Risk Management Policy – This policy establishes the principles and requirements for effectively identifying, assessing and managing outsourcing and third-party risks. These measures align with our risk appetite, taking into consideration the risks faced not only by LME and LME Clear but also by the users of our systems and the market we serve. Due to its reliance on Third Parties, LME and LME Clear place great importance on robust procurement, risk management and delivery oversight.

Group Procurement Policy – The objective of the Group Procurement Policy is to set out the fundamental principles and best practices for conducting procurement for goods or

services from external parties.

LME and LME Clear operate internal pay bands aligned to external compensation data to ensure salaries are set at appropriate levels. All of our employees are paid above the minimum wage in all areas of the business. LME also publishes an annual Gender Pay Gap report – and voluntarily publishes information for LME and LME Clear combined, available on the LME website, which aligns with our commitment to transparency in our efforts to bring greater gender equality to our business and the wider industry.

Our Supply Chains

LME and LME Clear are not producers, manufacturers or retailers of physical goods. Our role is to provide market infrastructure by offering facilities for the trading and clearing of LME contracts for our members. As a result, our primary suppliers are service providers, including those delivering IT services, legal advice and financial information. With respect to modern slavery, the majority of our suppliers fall within categories generally assessed as low risk.

While other third-party organisations, such as exchange and clearing members, warehouse operators and metal producers play important roles within the wider market ecosystem, they do not form part of our supply chains due to the nature of our relationship with them.

Responsible Sourcing

In addition to our responsibilities under the Modern Slavery Act, we continue to actively support change in areas beyond our supply chain which can impact the global metals market by enabling greater transparency in relation to sourcing practices of LME brand producers.

Since the introduction of the LME's Responsible Sourcing Policy in October 2019, all LME-listed brands have been required to demonstrate implementation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance"), as well as to maintain ISO 14001 (environmental management) and ISO 45001 (occupational health and safety) certifications, or equivalents, at their own site(s).

In 2025, the LME published Notice 25/065 which announced what additional responsible sourcing information would be publicly disclosed going forward. As set out in Notice 25/065, responsible sourcing information including each brand's chosen track demonstrating implementation of the OECD Guidance, the required public disclosures, and relevant ISO certifications is available directly on [LMEpassport](#), enabling easier stakeholder access to brands' responsible sourcing related data. For brands following Track C, the LME will now publish attributed Red Flag Assessments from 2025 onwards.

To simplify reporting processes, the LME has also enabled producers to submit Track A audit reports and ISO certifications directly through LMEpassport. The LME believes the increased visibility into brand responsible sourcing information helps build market confidence, encourages robust due diligence practices, and allows industry participants to learn from best practices.

While the LME is proud of the steps it has taken to progress responsible sourcing standards within its market, ultimately the LME believes that additional progress may depend upon further industry consensus and agreed industry standards; the LME acknowledges this challenge and looks forward to ongoing collaboration with the industry for support, cooperation and progress.

To learn more about the LME's Responsible Sourcing Policy and its implementation, please visit: <https://www.lme.com/en/Sustainability-and-Physical-Markets/Sustainability/Responsible-sourcing>

Due Diligence Process in LME and LME Clear's Supply Chain

In 2025, LME and LME Clear established a dedicated Third-Party Risk Management ("TPRM") team to define and implement the principles and requirements necessary for effectively identifying, assessing and managing risks associated with third-party relationships. Supported by a robust and consistent TPRM Framework and Policy, the team enhances our overall governance of third-party engagements and strengthens our ability to detect and mitigate modern slavery risks amongst other third-party related risks within our extended network of suppliers.

LME and LME Clear conduct comprehensive due diligence on new suppliers, including a risk assessment undertaken prior to onboarding. This risk assessment considers the nature of the services provided, the geographical location of the supplier and any associated modern slavery risk factors. All new suppliers in scope of modern slavery due diligence are required to provide our TPRM team with a copy of their Modern Slavery Statement or, where the supplier is not subject to statutory reporting requirements under the Modern Slavery Act, to complete our Modern Slavery Questionnaire. This process ensures that we can assess the adequacy of each supplier's controls and commitment to preventing modern slavery before entering into a contractual relationship.

To enhance coherence and strengthen our overall risk-management framework, we are aligning our ongoing monitoring of third parties with the formal processes adopted by TPRM. By adopting TPRM's structured approach, we facilitate a more comprehensive and comparable assessment of third-party risk and support more informed and timely decision-making across the third-party lifecycle.

Suppliers where an ongoing relationship exists are enrolled for continuous monitoring through World Check. This ensures that any adverse information relating to these suppliers - including regulatory fines, sanctions, enforcement actions, or other risk indicators are automatically flagged and brought to our attention. This proactive screening process supports our commitment to effective due diligence and helps us identify and respond to potential risks in a timely manner. In 2025, we had no suppliers who presented a high risk of modern slavery and our overall supply chain risk continued to be low in relation to modern slavery.

Contracts with Suppliers

We seek to agree contracts with suppliers that align to our minimum standards. This includes the use of standard form contracts where appropriate and the adoption of robust policies governing contract review and approval. We also endeavour to ensure that suppliers are contractually obligated to comply with all applicable laws including modern slavery legislation.

Training

Our Modern Slavery Policy is kept up to date and made accessible to all staff via our intranet. As part of their induction, all new starters receive training in relation to modern slavery and are required to attest that they have read and understood the policy. This approach supports consistent awareness across the organisation and helps to reinforce the importance of identifying, preventing and addressing modern slavery risks.

To support a strong culture of compliance and continuous improvement, all staff are required to participate in ongoing training throughout the year. This is designed to keep all staff updated on current policies, regulatory expectations and best practices. Ongoing training ensures that employees remain confident in their roles, aware of their responsibilities and equipped to identify and manage potential risks effectively.

Key Performance Indicators 2025

Set out below are our Key Performance Indicators (KPIs) for the 2025 financial year. The KPIs are designed to provide a more objective means of measuring the effectiveness of our efforts to tackle the risk of modern slavery in our business.

Focus Area	KPI	2025 Result
Training and Awareness	Completion of new starter training to all new staff, which contains materials on modern slavery	All new starters in 2025 have attended new starter training which contains materials on modern slavery.
Risk Assessment of new suppliers	% of suppliers risk assessed for modern slavery as Low	68% of our suppliers have been assessed as low risk (64% in previous year)
	% of suppliers risk assessed for modern slavery as Medium	32% of our suppliers have been assessed as medium risk (36% in previous year)
	% of suppliers risk assessed for modern slavery as High.	No high risk suppliers.
Reports	# of Whistleblowing disclosures	We have received 0 Whistleblowing disclosures in relation to modern slavery
	# of incidents related to modern slavery identified	No incidents relating to human rights/modern slavery received in the 2025 financial year.
	# of incidents related to modern slavery addressed	N/A

Government’s Digital Registry

In addition to uploading the Modern Slavery Annual Statement on our website, LME and LME Clear will submit their Annual Statement to the Government’s digital registry.

 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2025.

Annual Review

This statement will be reviewed annually and updated as required. The Boards of LME and LME Clear have approved this statement.



Matthew Chamberlain

Chief Executive Officer, LME



Michael Carty

Chief Executive Officer, LME Clear