



# ETHICS HR ENVIRONMENT

## I. ETHICS

Ensure a clear and formal ethical framework about the way we conduct our business, manage our clients' data, and engage with our employees and partners.

smartTrade has formalised and implemented a Code of Conduct and Business Ethics, committed to respecting high ethical standards and moral conduct while taking pride in our honesty, integrity, and accountability. We are a fair employer and believe in equality of chances. Our human resources department always aims to make any employment-related decision based on an applicant's professional qualification and merit. smartTrade is strictly against engaging in discriminatory actions. smartTrade Technologies' commitment to respect human rights in the workplace is set out in global policy. Our anti-slavery policy reflects our commitment to acting ethically and with integrity and to having effective systems and controls to do what we can to ensure slavery and human trafficking does not occur anywhere in our business.

At smartTrade we made equality a business priority. One of the essential ways to better balance gender equality is by offering the same careers opportunities and equal pay to both women and men. We measure our progress and commitment for instance thanks to the official professional gender equality index. smartTrade reached an excellent score of 83.3/100.

Besides our commitments towards our employees, we are also required to maintain the highest level of professionalism when it comes to our clients. To illustrate this engagement, we commissioned McGladrey LLP in 2015 to review the security level of the various controls that we had put into place regarding our operations. This SOC2 (Service Organisation Control) audit examined the description of our technologies and the suitability of the design of the controls and enabled us to identify potential areas of improvement.

smartTrade Technologies adheres to the FX Global Code, a set of principles recognised by the Financial Conduct Authority as good practice in the wholesale foreign exchange market. smartTrade acts as a Market Participant as defined by the Code, and is committed to conducting its FX Market activities in a manner consistent with its principles.

We pride ourselves on the conduct of each of our employees and of our organisation as a whole. Employment contracts include good behaviour clauses concerning confidentiality and loyalty to ensure that newcomers behave ethically and responsibly.

We maintain a professional environment, devoid of any discrimination, harassment, or violence. Instead, we aim to cultivate trust, excellence, creativity and innovation amongst our employees, clients and relevant stakeholders. Respect and integrity represent the very foundation of all of our interactions.

## II. HUMAN RESOURCES

Offer a dynamic working environment, including a favourable quality of life at the heart of the company and the opportunity for each member of the staff to grow.

smartTrade's teams spread across six locations worldwide, namely: Aix en Provence, London, New York, Tokyo, Singapore, Milan and Geneva. We are currently in a phase of rapid growth, be it in terms of activities, client portfolio, workforce and even geography. In order to cater to this expansion, the company has to continually adapt its HR policy.

### A) RECRUITMENT

Our strategic HR objectives are based on one ambition: targeting and recruiting high potential. smartTrade's employees are integrated into closely knit teams which promote proximity and the efficient transfer of knowledge. We offer a stimulating environment, whereby our staff are passionate about R&D, and look to acquire specific technical skills. Moreover, in our objective to optimise our recruitment process, smartTrade has partnered with universities in order to be in a better position to attract and nurture young talent.

## B) WELL-BEING

We have identified employees' satisfaction to be a key concern for the good functioning of our business and have therefore signed up with "Happy Trainees" which would enable us to formalize an evaluation process of determining our trainees' satisfaction. Indeed, it is essential for us to make sure that our young recruits master smartTrade's way of doing business and enjoy their experience whilst doing so. Team building events and other activities are regularly organized to maintain a good communication and ensure friendly moments within the company. Our new building has been organized to take into account the quality of life of our employees. We believe practicing a sport contributes to the improvement of health and general wellbeing. We have recently set up a gym on our premises to promote this message and encourage our employees to adopt a healthier lifestyle.

## C) TRAINING

Our employees are key to smartTrade's technological development and competitive advantage. Therefore, we offer a range of training sessions to ensure their efficient integration and skill improvement. We consider in-house training to be a top priority as it aims to equip our workforce with the essential skills required by our business activities. The smartTrade Academy has also been established whereby trainers, who are also smartTrade's employees, have the responsibility of providing a first round of training to new employees. Newcomers are consequently better integrated within smartTrade's work structure as they have been equipped with basic theoretical and practical skills.

# III. ENVIRONMENT

Ensure our responsibility regarding our impacts, both in the daily activities of our business and its operations.

We strongly commit to carrying out our operations with a minimum impact and risk on the environment. We are particularly engaged in the protection of biodiversity and the reduction of waste, energy utilisation, water consumption and gas emission.

This commitment is also reflected through the selection of our partners. Indeed, we work with green data centres' suppliers, whereby we have opted for the use of green servers which consume less energy.

### About smartTrade Technologies

smartTrade Technologies is a leading global provider of multi-asset electronic trading platforms, helping customers achieve business growth through our cost-efficient, technologically advanced secure private SaaS end-to-end solution. smartTrade in-house hosted solutions support Foreign Exchange, Fixed Income, Crypto and Derivatives asset classes with connectivity to 130+ liquidity providers, enabling tailored aggregation, smart execution, risk management, order management, analytics, payments, and multi-channel distribution. smartTrade supports a variety of regulated and un-regulated Financial Institutions.

To learn more, visit [www.smart-trade.net](http://www.smart-trade.net).

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