

MODERN SLAVERY STATEMENT OF STONEX FINANCIAL LTD

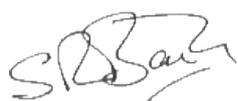
StoneX Financial Ltd (“SFL”) is a wholly owned subsidiary of StoneX Group Inc. (StoneX).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the steps that SFL has taken and is continuing to take to ensure modern slavery or human trafficking is not taking place within our operations and supply chain during the financial year ending 30 September 2020. Responsibility for the preparation and publication of this statement resides with the Money Laundering Reporting Officer

This is our third annual statement and it contains a summary of progress undertaken during the financial year ended 30 September 2020.

The SFL Board of Directors have considered and adopted the 2021 Modern Slavery Statement.

The 2020 statement was approved by the Board of Directors of SFL on 25 January 2021.



Stephen Bailey

Chief Financial Officer



MODERN SLAVERY STATEMENT OF STONEX FINANCIAL LTD 2021

1. Overview

We live in a world full of opportunities in the financial markets, but not a world of full access to those markets.

StoneX believes in connecting every company, every organization, every trader and every investor to every advantage they need to succeed in today's global markets ecosystem.

We operate a global financial services network that enables our clients to pursue trading opportunities, make investments, manage market risk and achieve their business goals. We believe that no one should have a monopoly on opportunity, and we believe that providing access to opportunity in an ethical way is one of our most important values. We recognise that modern slavery such as forced labour and human trafficking are a growing global concern, and therefore outline the steps we are taking across SFL to mitigate the potential risk of modern slavery occurring in our business and supply chain.

2. Organisation structure and supply chain

a. Organisation structure

SFL is a wholly owned subsidiary of StoneX, a Fortune 100 company with its head office in the United States of America that focuses on select international and domestic financial markets. SFL provides financial services specifically in the foreign exchange and commodities sector.

- The global payments division delivers 140+ currencies to more than 170 countries for international aid and development organizations, UN agencies, government agencies, NGO's, religious entities, multinational corporations, and financial institutions.
- As a Category 1 member of the London Metal Exchange, we provide hedging services for customers in base metals, soft, agricultural and other commodities.
- As a full member of London Bullion Market Association and an associate member of the London Platinum and Palladium Markets Association, we provide hedging and physical trading services in precious metals.
- Acts as broker in foreign exchange, oil and precious metals, acting as principal and intermediary.
- Provide hedging advice to clients in agricultural, energy, and dairy sectors.

We have over 320 employees and operate primarily in Europe, Middle East, Asia and Australia through other subsidiaries of StoneX. Our annual turnover is approximately \$235 million.

b. Supply Chain

Most of SFL's the activities do not involve physical delivery of commodities. However, for the businesses where physical delivery is involved, SFL holds business relationships with companies



situated at various levels of the supply chain and include banks, financial institutions, mines, refineries or intermediaries.

3. Our Policy in relation to slavery and human trafficking

SFL is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy, which is available on request, reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

4. Due diligence processes

It is important that our suppliers share our commitment to human rights, as part of our initiative to identify and mitigate modern slavery we verify our clients such that we can easily identify possible risks that may be associated with proposed clients or relationships. We have in place systems and controls to:

- Identify and assess potential risk areas in our supply chains: all precious metals suppliers are subject to additional reviews during onboarding which include questionnaires designed to identify and assess the risks of modern slavery supplier relationship activities. SFL analyses working conditions, environmental standards, CSR initiatives, etc. for mines & refineries.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains with ongoing annual reviews and checks to ensure ethical behaviours and industry codes of practice are followed.
- Monitor potential risk areas in our supply chains.
- Allow staff and others to report any instances or suspicions of slavery, human trafficking, or other unethical behaviour, for example via the whistleblowing hotline. Whistle-blowers are protected from being treated unfairly or losing their job.

5. Risk assessment and management

The principal area of risk we face, related to slavery and human trafficking, relates to the trading of physical precious metals where there is an increased risk that metal traded may have been produced using slave labour.

We work with all relevant stakeholders to understand these risks and inform our risk assessment.

6. Key performance indicators to measure effectiveness of steps being taken

We use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Level of communication and personal contact with the next link in the supply chain and review of their compliance with our expectations.



- Integrating slavery and human trafficking considerations into our client due diligence reviews and supplier engagement processes.

7. Training on modern slavery and trafficking

SFL's Anti-slavery Policy is refreshed annually and its integration into the business is supported by mandatory training for all staff to ensure that employees are aware of and understand the content.

Bespoke training for key staff, such as those working in businesses where physical delivery is involved, is delivered to supplement annual training on an ongoing basis.

