

MODERN SLAVERY STATEMENT OF INTL FCSTONE LTD

INTL FCStone Ltd ("IFL") is a wholly owned subsidiary of INTL FCStone Inc. (INTL).

The Board of Directors of IFL have considered and adopted the Modern Slavery Statement of IFL, a copy herewith attached.

This statement was approved by the Board of Directors of IFL on 18 November 2019.



Stephen Bailey

Chief Financial Officer



MODERN SLAVERY STATEMENT OF INTL FCSTONE LTD 2019

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the steps that IFL 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 2018.

1. Overview

We live in a world full of opportunities in financial markets but not a world of full access.

We believe that every company – regardless of size, regardless of industry, regardless of how long they've been in business – deserves access to the best advice, the best products, and the best, most efficient market access.

We're INTL FCStone – a pioneer in diverse, global financial services. We believe that no one should have a monopoly on opportunity and carrying it out 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 IFL to mitigate the potential risk of modern slavery occurring in our business and supply chain.

2. Organisation structure

IFL is a wholly owned subsidiary of INTL, a Fortune 500 company with its head office in the United States of America that focuses on select international and domestic financial markets. IFL provides financial services specifically in the foreign exchange and commodities sector.

- The global payments division delivers 146 currencies to more than 180 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 270 employees and operate primarily in Europe, Middle East, Asia and Australia through other subsidiaries of INTL. Our annual turnover is approximately \$199 million.

3. Supply Chain

Most of IFL's the activities do not involve physical delivery of commodities. However, for the business where physical delivery is involved, IFL holds business relationships with companies situated at various levels of the supply chain and include banks, financial institutions, mines, refineries or intermediaries.



4. Our Policy in relation to slavery and human trafficking

IFL 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 (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.

5. 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 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. In addition, for mines & refineries, IFL would analyse working conditions, environmental standards, CSR initiatives, etc.
- 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.
- Report any instances or suspicions of slavery, human trafficking, or other unethical behaviour via the whistleblowing hotline. Whistle blowers are protected from being treated unfairly or losing their job.

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 their compliance with our expectations.
- Integrating slavery and human trafficking into our client and supplier engagement processes.

7. Training on modern slavery and trafficking

IFL's anti-slavery policy is refreshed annually and its integration into the business is supported by a mandatory training module to ensure that employees are aware of and understand the content.

