

StoneX Financial Ltd

SFL Anti-Bribery and Corruption (ABC) Statement

Introduction

This document summarises the key principles followed by StoneX Financial Ltd ("SFL", "the firm") with respect to Anti-Bribery & Corruption (ABC) policies and procedures.

Applicable Laws and Regulations:

- The UK Bribery Act 2010
- Financial Conduct Authority (FCA) and SYSC 6.3.11 and The Principles [1, 2, 3, 6 and 8]

Policies and Procedures

The firm's ABC policy and procedures have been approved by the Board of Directors and are overseen on a day-to-day basis by the Financial Crime Prevention Department.

The firm's ABC policy forms part of the firm's systems and controls for the prevention of Financial Crime risk, which includes the risk of corruption as well as bribery, and is supplemented by the StoneX Group Inc. Code of Ethics Policy. The Code of Ethics Policy outlines the standards and behaviours that StoneX upholds as a group of companies, to ensure that the highest standards of honesty and integrity are maintained.

The Anti Bribery Officer

The Anti-Bribery Officer is Sarah Bray. She is also the Chief MLRO, EMEA and the Head of Financial Crime Prevention.

The Firm's Stance

SFL operates a zero tolerance approach to making or receiving bribes or corrupt payments and indeed financial crime in any form. This type of conduct is absolutely prohibited. Adherence to the provisions of the firm's ABC policy is mandatory and forms part of the contract of employment for all employees and is also applied to the firm's agents, subsidiary and other associated persons.

It is recognised that any involvement in bribery or other unethical behaviour will have an adverse effect on the firm's reputation, which will result in decreased customer confidence and loss of business.

Even where SFL is not held responsible for the action of its employees, incalculable damage can be done to the reputation of SFL itself. The firm is therefore committed to carry out business fairly, honestly and openly and has a zero tolerance towards bribery or any other form of unethical behaviour.

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Combating Bribery

- The firm performs regular risk assessments to assess any bribery and corruption risks in jurisdictions where the firm operates. The risk assessment is presented to the Board of Directors of SFL.
- The Gifts and Entertainment procedures, overseen by Compliance, clearly defines the approval and disclosure process and the limits applicable to Gifts & Entertainment.
- Vetting of potential employees is conducted on a risk-based approach.
- Client and counterparty relationships are subject to due diligence measures and ongoing monitoring.
- Third party relationships are subject to thorough due diligence (assessed on a risk based approach) and management oversight.

Gifts and Entertainment

The giving or receiving of cash or cash-convertible Gifts is specifically forbidden.

Employees are also prohibited from making or accepting a gift or entertainment where;

- It would be considered excessive or otherwise inappropriate generally;
- It would induce, or likely induce, the individual's behaviour for personal gain, business advantage or other benefit;
- It would likely be improper for the individual to accept;
- It is contrary to the individual local laws; or
- It would otherwise breach The Bribery Act 2010 or any of the firm's policies for the prevention of Financial Crime.

Any gift or form of entertainment (whether or not of nominal value) involving a regulatory or Public Official must be pre- approved by Compliance.

Compliance maintains Gifts & Entertainment procedures to monitor and review Gifts & Entertainment related matters.

Training

Anti-Bribery training is provided for all employees as part of their induction and on a periodic basis thereafter.

Reporting

A protected and confidential procedure for reporting suspicious activities is easily accessible for all employees. The firm has in place Whistleblowing procedures.

Sarah Bray

Chief Money Laundering Reporting Officer, EMEA