

StoneX Financial Ltd

SFL Anti-Money Laundering and Counter Terrorist Financing Statement

StoneX Financial Ltd (SFL, the Firm) is committed to ensuring all regulatory legislation and guidelines to prevent Money Laundering (ML) and Terrorist Financing (TF) are adhered to.

SFL has established Anti-Money Laundering (AML) and Counter Terrorist Financing (CTF) policies and procedures, which have been designed and implemented to mitigate and manage the risk of ML and TF across the Firm.

SFL's AML and CTF Policy and Procedures are informed by applicable laws, regulations and industry guidance from the UK. This includes but is not limited to the following:

- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR) (as amended);
- The Proceeds of Crime Act 2002 (POCA);
- The Terrorism Act 2000; and
- The Joint Money Laundering Steering Group (JMLSG) guidance.

SFL has implemented systems and controls in relation to AML and CTF, these include the following components:

- The appointment of an SMF17 Money Laundering Reporting Officer (MLRO)¹.
- An implemented customer risk rating methodology based on a number of differing factors, which all prospective and existing clients are subject to.
- Customer Due Diligence processes, including ongoing Due Diligence during the lifecycle of the customer relationship, applied to customers on a risk sensitive basis.
- Enhanced Due Diligence processes for those customers deemed higher risk e.g. Politically Exposed Persons (PEPs).
- The screening of prospective customers and associated parties at onboarding and throughout the customer relationship lifecycle to detect any related sanctions, PEPs or adverse media.
- The monitoring of transactions for the purpose of identifying suspicious activity.
- A Suspicious Activity Reporting (SAR) process to ensure the escalation, investigation and reporting (where appropriate) of any suspicious activity to the relevant governing bodies by the MLRO.
- Compulsory periodic AML Training to all relevant employees.
- Record keeping, processing of personal data and information sharing.
- A framework for the regular review of SFL's AML and CTF Policy².

¹ The MLRO holds the prescribed responsibility for the Firm's policies and procedures for countering the risk that the Firm might be used to further financial crime under the Senior Managers and Certification Regime (SMCR). The MLRO is the Firm's Nominated Officer under the Proceeds of Crime Act and is responsible for making reports to the relevant UK Authorities regarding Suspicious Activity Reports (SARs).

² SFL's policies and procedures are subject to regular review by the Financial Crime Prevention department, Senior Management and Audit to ensure continued adherence to the local rules and regulations.