

## **StoneX Financial Ltd**

### **SFL Modern Slavery Statement**

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

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 did not take place within our operations and supply chain during the financial year ending 30 September 2024. Responsibility for the preparation and publication of this statement resides with the Chief Money Laundering Reporting Officer, EMEA.

This is our seventh annual statement and it contains a summary of progress undertaken during the financial year ended 30 September 2024.

The SFL Board of Directors have considered and adopted the 2025 Modern Slavery Statement.

The 2024 statement covering the financial year ended 30 September 2023 was approved by the Board of Directors of SFL on 26 March 2024.

Justin van Wijngaarden

Chief Financial Officer

18 March 2025

## StoneX Financial Ltd

### SFL Modern Slavery Statement

#### 1. Overview

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

We believe in connecting every company, every organisation, 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 the main non-USA operating entity of StoneX Group Inc. (Group) offering regulated as well as unregulated financial products and services to customers in the European, Middle Eastern and African regions from London. SFL operates a branch in Poland, and has a wholly owned subsidiary in Germany, StoneX Financial GmbH.

SFL is authorised and regulated by the Financial Conduct Authority (FCA).

SFL provides a range of services as follows:

- the payments services division delivers 140 currencies to more than 180 countries for banks and commercial businesses as well as charities, non-governmental and government organisations;
- it is a category 1 member of the London Metal Exchange (LME), and a member of LME Clear, ICE Futures Europe, ICE Clear Europe, LCH Enclear, Euronext, the European Energy Exchange, Eurex, Norexeco and FIA Europe. Through its affiliates, SFL provides customers with access to various other global exchanges, focusing on providing hedging services for customers in base metals, soft, agricultural and other commodities;
- it provides hedging and physical trading services in precious metals, being a member of the London Bullion Markets Association and the London Platinum and Palladium Markets Association;
- it facilitates hedging services to clients in the agricultural, energy and dairy sectors;
- it acts as broker in foreign exchange, oils and precious metals;

- it is a member of the London Stock Exchange and the Association for Financial Markets in Europe, providing institutional clients execution services in equities and fixed income securities;
- the self-directed/retail division is a provider of trading services and solutions in the financial markets, including spot foreign exchange and contract for differences (CFDs) offering CFDs on currencies, commodities, indices, individual equities, cryptocurrencies, bonds, options and interest rate products; and
- provides institutional clients with a complete suite of equity trading services to help them find liquidity with best execution, consistent liquidity across a robust array of fixed income products, clearing and execution in all major futures and securities exchanges globally, and prime brokerage in equities and major foreign currency pairs and swap transactions.

In providing these services SFL makes markets in currencies and certain financial instruments but does not actively take proprietary risk as a matter of policy.

SFL operates for its clients with Group entities especially in New York, Chicago, Singapore, Bermuda, Dubai, and Hong Kong. Specifically, it mainly:

- provides clearing services for clients of USA, Latin American, and Far Eastern affiliates;
- receives trading services from New York, Chicago, Singapore and Hong Kong affiliates;
- receives hedging services for its self-directed/retail related flows from Bermuda; and
- delivers operational trade support for precious metal trading activity to Singapore and Dubai affiliates.

SFL has over 1,093 employees and operates primarily in Europe, Middle East, Asia and Australia through other Group subsidiaries. SFL's annual turnover is approximately \$421 million.

## **b. Supply Chain**

Most of SFL's 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, producers, refineries and 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 Modern 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.

SFL is also committed to ensuring that there is no child labour in our supply chains, or in any part of our business. Please see our SFL Child Labour Statement for more information.

## **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 and human trafficking 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 and 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. Whistleblowers 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 Modern 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 from time to time, to supplement annual training on an ongoing basis.