

StoneX Financial Limited

SFL Responsible Sourcing Statement

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

This statement is made pursuant to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD guidance) and the London Bullion Market Association Responsible Sourcing Programme (LBMA Guidance), including the Responsible Gold Guidance (RGG) and associated assurance requirements. It constitutes the steps that SFL has taken, and continues to take, to ensure that minerals within our operations and supply chain are sourced responsibly, ethically, and in a manner consistent with internationally recognised due diligence expectations for the financial year ending 30 September 2025. Responsibility for the preparation and publication of this statement resides with the Chief Money Laundering Reporting Officer, EMEA.

The 2026 statement covering the financial year ended 30 September 2025 was approved by the Board of Directors of SFL on 18 March 2026.

Justin van Wijngaarden

Chief Financial Officer

18 March 2026.

StoneX Financial Limited

SFL Responsible Sourcing Statement

1. Overview

SFL is committed to ensuring that all minerals within our supply chain are sourced responsibly, ethically, and transparently. Our due diligence practices are designed to prevent the contribution of minerals to conflict, human rights abuses, financial crime, and environmental harm. We recognise the unique risks associated with gold and other precious metals supply chains, such as their high value, ease of transport, and vulnerability to illicit trade, money laundering, and human rights abuses.

This statement outlines the principles, frameworks, and operational standards under which SFL manages supply chain due diligence for minerals.

2. Organisation structure and supply chain

a. Organisation structure

SFL is the main non-US 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 has over 1,181 employees and 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 and provides customized payment services 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, Norexco 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 a 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 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

- It 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 securities products, clearing and execution in all major futures and securities exchanges globally, and prime brokerage in securities 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. Exposures to risk are managed continually to ensure that such exposures are within risk limits and risk appetite defined by the Board of the Company.

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 related flows from Bermuda; and
- delivers operational trade support and central hedging for precious metal trading activity to Singapore and Dubai affiliates.

SFL's annual turnover is approximately \$408 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 responsible sourcing

SFL is committed to ensuring that all minerals within our supply chain are sourced ethically, sustainably, and with full transparency. Our policy is aligned with the OECD Guidance, which establishes a five-step framework to identify, assess, mitigate, and report supply chain risks associated with minerals from conflict-affected or high-risk areas.

The LBMA Guidance, which requires Good Delivery refiners to implement robust due diligence, comply with AML/CFT and KYC expectations, and undergo annual independent audits

Our policy prohibits sourcing from suppliers linked to human rights abuses, conflict financing, corruption, money laundering, or illegal mining activities.

4. Due Diligence Process

Our due diligence procedures follow the OECD guidance five-step risk-based framework, and the relevant precious-metal standards, including the LBMA Responsible Gold and Silver Guidance and

the LPPM Responsible Platinum and Palladium Guidance, ensuring full alignment with responsible sourcing expectations for minerals from conflict-affected and high-risk areas.

These processes include:

- Establishing strong internal management systems to govern supply chain oversight.
- Conducting supply chain due diligence and obtaining full documentation from our suppliers — and, where necessary, from their upstream suppliers
- Implementing traceability and documentation checks to ensure material origin is understood and accurately recorded.
- Conducting enhanced due diligence on suppliers in conflict-affected or high-risk regions.
- Maintaining auditable records in line with LBMA's annual third-party assurance requirements.

5. Risk Assessment and Management

We operate a structured risk assessment framework that identifies supply chain risks including human rights abuses, money laundering, terrorist financing, smuggling, corruption, and illegal mining activity all of which are recognised as significant risks in supply chains.

Risk management actions include:

- Categorising suppliers and supply chains into risk levels based on OECD and LBMA guidance.
- Applying enhanced scrutiny to Conflict Affected High Risk Areas (CAHRA), high-risk geographic areas, counterparties, and transaction patterns.
- Implementing corrective action plans where risks are identified, in line with LBMA expectations for continuous improvement.
- Disengaging responsibly from suppliers where material risks cannot be mitigated.

We also ensure that no minerals are sourced from World Heritage Sites or regions associated with human rights abuses, as required under LBMA guidance.

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 we adhere to the responsible sourcing of minerals.

- Measures the effectiveness of internal responsible-sourcing systems, including timely completion of tasks, escalation of risks, and adherence to internal policies.
- level of communication and personal contact with the next link in the supply chain and review of their compliance with our expectations.

7. Training on responsible supply chain

SFL's Responsible Sourcing Policy is refreshed periodically and all relevant employees and agents, where applicable will be trained time to time on how to recognise and deal with adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas.