

StoneX Financial Ltd

SFL Sanctions Statement

StoneX Financial Ltd (SFL or the Firm) authorised and regulated by the Financial Conduct Authority (FCA), has established a Sanctions Compliance Program consisting of the following elements:

- Procedures, systems, and internal controls designed to comply with applicable sanctions;
- Senior Management oversight;
- A designated person responsible for the day-to-day implementation and operation of the sanctions policy (designated person); and
- An ongoing training program.

SFL complies with the sanction laws and regulations of the United Kingdom (UK) and other applicable sanction regimes, including those from the European Union (EU), United Nations (UN) and United States (US) as a minimum.

SFL and its employees are prohibited from engaging in, directly or indirectly, a relationship with, or conducting a transaction involving, sanctioned individuals or entities that would violate SFL's Sanctions Policy. SFL does not conduct business with sanctioned individuals or entities.

Senior Management Oversight and Responsibilities

SFL's Sanctions policies are approved by the Board of Directors and are subject to regular review. The designated person is Sarah Bray, the Chief Money Laundering Reporting Officer EMEA.

Procedures, Systems, and Internal Controls

SFL screens all prospects and their beneficial owners against a list of national, international and supranational sanctions/watchlists, prior to onboarding.

All clients are screened on an ongoing basis during the client lifecycle. SFL also pre-screens all transactions made by the Payments business.

SFL is subject to periodic Internal and External Audit reviews.

Ongoing training program

Sanctions training and awareness is provided to all relevant employees and renewed regularly, with specialist training provided for certain employees such as Compliance and Financial Crime Prevention (FCP) personnel.

Sarah Bray
Chief Money Laundering Reporting Officer, EMEA