

STONEX FINANCIAL LTD
(Together with the group entities listed below)
UK TAX STRATEGY

This UK tax strategy applies to StoneX Financial Ltd (the **Company**), and to certain other group entities listed below (together, the **UK Sub-Group, we, us** or **our**), and was published on 29 September 2023 on the Company's external website: [tax-strategy---sfl---2023.pdf \(stonex.com\)](https://www.stonex.com/tax-strategy---sfl---2023.pdf). The Company regards this publication as complying with the duties of the UK Sub-Group under paragraphs 19(2) and 16(2) of Schedule 19 to the Finance Act 2016 (the **Schedule**) in respect of the financial year commencing on 1 October 2022.

The UK tax strategy applies from the date of publication until it is superseded. References to "UK taxation" are to the taxes and duties set out in paragraph 15(1) of the Schedule which include income tax, corporation tax, amounts for which any member of the UK Sub-Group is liable under PAYE regulations, national insurance contributions and value added tax. References to "tax", "taxes", or "taxation" are to UK taxation and to any similar worldwide taxes in respect of which any member of the UK Sub-Group has legal responsibilities.

Governance in relation to UK taxation

- Ultimate responsibility for the UK Sub-Group's tax strategy and compliance in respect of UK taxation is vested in the Board of Directors of the Company (the **Board**).
- The Board has approved this tax strategy.
- Executive management of the UK Sub-Group's tax strategy in respect of each relevant member of the UK Sub-Group is delegated by the Board to the Chief Financial Officer (**CFO**), who has executive responsibility for tax matters, and is the designated Senior Accounting Officer (**SAO**)
- Day to day management of the tax affairs of each relevant member of the UK Sub-Group is delegated to an appropriately qualified individual, who has a reporting relationship to the CFO.
- The Board ensures that the UK Sub-Group's tax strategy is one of the factors considered in all material investments and significant business decisions taken.

Risk Management

- The UK Sub-Group operates a system of UK tax risk assessment and controls as a component of the overall internal control framework applicable to the UK Sub-Group's financial reporting system.
- The UK Sub-Group seeks to reduce the level of UK tax risk arising from its UK operations as far as is reasonably practicable by ensuring that reasonable care is applied in relation to all processes which could materially affect its compliance with its tax obligations.
- Business and UK legislative changes which may impact the UK Sub-Group's tax planning are considered as part of tax risk management.

StoneX[®]

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Attitude toward tax planning

The Company endeavors to conduct its affairs in a tax-efficient manner while complying with relevant tax requirements.

The UK Sub Group's tax planning is generally intended to support genuine commercial and economic activity.

Where necessary, the UK Sub-Group will engage external advisors to help us manage our tax position where there is significant uncertainty or complexity relating to a particular issue.

Level of tax risk accepted

The international environment in which we operate brings an inherent element of tax risk.

We believe that the UK Sub Group's risk appetite in terms of tax risk is generally low. In relation to any specific issue or transaction, the Board is ultimately responsible for identifying the risks (including tax risks) which need to be addressed, and for determining what actions should be taken to manage those risks, having regard to materiality of the amounts and obligations in question.

Relationship with HMRC

The UK Sub-Group seeks to foster good relationships with HMRC and to undertake all such dealings with HMRC in a professional, courteous, and timely manner.

When submitting tax computations and returns to HMRC, the UK Sub-Group endeavors to disclose to HMRC all relevant facts and identify transactions or issues where it considers that there is potential for the tax treatment to be uncertain.

Entities covered by this tax strategy

GAIN Capital UK Limited

GAIN Capital Holdings Ltd

Trade Facts Limited