



1. DOCUMENT CONTROL

Policy Owner :	Group Compliance	
Approved By :	Policy Steering Group	Date : 2 February 2016
Ratified By :		Date :
Last Updated :	February 2016	
Frequency of Review:	Annually	
Next review Date :	January 2017	

2. POLICY STATEMENT AND PURPOSE

Modern slavery is a complex crime and a violation of fundamental human rights. It covers four activities: (i) slavery, (ii) servitude, (iii) forced and compulsory labour, and (vi) human trafficking. Each of these activities deprives a person of their liberty in order to exploit them for personal or commercial gain.

CMC Markets Plc and all its subsidiaries, associated entities and branch offices ("CMC Markets") have a zero-tolerance approach to modern slavery. CMC Markets are committed to acting ethically and with integrity in all our business dealings and relationships, and to protecting our workforce and reputation. This Group Anti-Slavery Policy ("Policy") sets out our approach for ensuring effective systems and controls are implemented and enforced to prevent modern slavery taking place anywhere in our own business or in any of our supply chains.

CMC Markets are also committed to ensuring there is transparency within our own business and with our contractors, suppliers and other business partners, consistent with our disclosure obligations under the Modern Slavery Act 2015. CMC Markets expects the same high standards from all of our contractors, suppliers and other business partners, and expects that our suppliers will hold their own suppliers to the same high standards.

This Policy does not form part of any employee's contract of employment and it may be amended or departed from, including in respect to time limits, at any time at CMC Markets' discretion.

3. SCOPE

This Policy applies to all persons working for or on behalf of CMC Markets in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, business partners, sponsors, or any other person associated with CMC Markets, in any jurisdiction in which CMC Markets operates.

The Group Head of Compliance has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

All employees should make sure they read and understand this Policy as they are expected to comply with it. Non-compliance with this Policy may result in disciplinary action pursuant to the Group Disciplinary Policy.

4. STANDARDS

CMC Markets will carry out due diligence on all new contractors, suppliers and other business partners to ensure the potential for modern slavery and human trafficking is significantly reduced.

The prevention, detection and reporting of modern slavery in any part of CMC Markets' business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or be considered, a breach of this Policy.

We may terminate our relationship with contractors, suppliers, business partners and other organisations working on our behalf if they breach this Policy.

5. REPORTING

You must notify your manager, the Group Head of Compliance or the local Compliance Manager as soon as possible if you believe or suspect that any modern slavery, exploitation or human trafficking within any part of our business or with our contractors, suppliers and other business partners has occurred, or may occur in the future. You can also make a report in accordance with the Group Whistleblowing Policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any part of our business or with our contractors, suppliers and other business partners constitutes any of the various activities of modern slavery, raise it with your manager, the Group Head of Compliance or the local Compliance Manager.

CMC Markets aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our contractors, suppliers and other business partners.

6. POLICY COMPLIANCE

There are specific procedures which must be followed where an area cannot comply with the mandatory requirements of the policy, whether authorised (an Exception to Policy) or unauthorised (a Policy Breach).

EXCEPTIONS TO POLICY (ETP)

An Exception to Policy (ETP) is formal approval given to authorise an area not to comply with the mandatory requirements of the Group Anti-Slavery Policy. An ETP must be requested when, as a one-off event, or on a more general or recurring basis, any area of the business:

- wishes to undertake an activity which would not be permitted by the policy,
- proposes not to do something which is required by the policy.

ETP REQUESTS

ETP requests must be submitted to the Policy Owner as soon as an area identifies that an exception to policy may be required.

ETPs should be reviewed by the relevant Policy Owner and tabled at the requisite governance forum for approval and to be minuted to provide a record of decisions made.

POLICY BREACHES

A policy breach is a failure by an area of the business to adhere to the mandatory requirements of the policy, where prior consent has not been obtained through an approved Exception to Policy.

All Policy Breaches must be reported to the Policy Owner promptly and as a minimum, the following information must be included:

- Business area where the breach has occurred,
- Policy section breached,
- Cause and impact,
- Date the breach occurred,
- Details of remedial action taken and the date by which the issue is to be resolved,
- Issue owner and contact details.

7. WHERE TO GO FOR HELP

For further information regarding the Group Anti-Slavery Policy, please contact Compliance.