

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (UK) and Part 2 of the Modern Slavery Act 2018 (Commonwealth of Australia) and sets out the approach taken by CMC Markets plc (registration number 05145017) and all its subsidiaries and branches, including CMC Markets UK plc (registration number 02448409), CMC Spreadbet plc (registration number 02589529) and CMC Markets Group Australia Pty Ltd (registration number 128 774 890) (the “CMC Group”), to understand all potential modern slavery risks related to our business and the actions undertaken to mitigate any such risks for the financial year ending 31 March 2022.

The CMC Group is not aware of any slavery or human trafficking in any part of its business or supply chain, and we remain dedicated to ensuring that our business and supply chains are free of slavery and human trafficking. The CMC Group is committed to acting ethically and with integrity in all its business dealings and relationships and to improving its practices to combat slavery and human trafficking.

## **OUR BUSINESS**

As a leading global provider of online retail trading, the CMC Group offers clients the opportunity to trade the financial markets via contracts for difference (CFDs), financial spread betting (UK & Ireland only) and countdowns (professional clients only). The CMC Group also offers a stockbroking service in Australia and the UK. The CMC Group has around 920 full-time employees worldwide and has offices in various countries.

## **OUR STRUCTURE AND SUBSIDIARIES**

CMC Markets plc is the parent company of the CMC Group. The following entities are direct or indirect subsidiaries of CMC Markets plc and are covered by this statement:

- CMC Spreadbet plc (UK company, registration number 02589529);
- CMC Markets UK plc (UK company, registration number 02448409);
- CMC Markets Investments Limited (UK company, registration number 12816952);
- CMC Markets Germany GmbH (German company, registration number HRB 114199);
- CMC Markets NZ Ltd (New Zealand company, registration number 1705324);
- CMC Markets Canada Inc (Canadian company, registration number 430307-5);
- CMC Markets Singapore Pte. Ltd (Singapore company, registration number 200605050E);
- CMC Markets Singapore Invest Pte Ltd (Singapore company, registration number 202217639M);
- CMC Markets Middle East Ltd (Dubai company, registration number 3039);
- CMC Business Services (Shanghai) Limited (Chinese company, registration number 41000002201702280102);
- CMC Markets Group Australia Pty Ltd (Australian company, registration number 128 774 890);

- CMC Markets Asia Pacific Pty Ltd (Australian company, registration number 100 058 213);
- CMC Markets Stockbroking Ltd (Australian company, registration number 081 002 851);
- CMC Markets Stockbroking Services Pty Ltd (Australian company, registration number 623 114 009);
- CMC Markets Stockbroking Nominees Pty Ltd (Australian company, registration number 081 424 375); and
- CMC Markets Stockbroking Nominees (No.2 Account) Pty Ltd (Australian company, registration number 081 440 128).

## **OUR SUPPLY CHAINS, DUE DILIGENCE, AND RISK ASSESSMENT PROCESSES**

Given the nature of its business, the CMC Group assesses that the risk of modern slavery and human trafficking in its business and supply chain is low. We understand that our largest exposure to possible modern slavery or human trafficking concerns would be in our supply chain, and we continue to uphold a stringent set of internal processes to ensure that we effectively identify, manage and minimise that potential risk exposure.

As part of our initiative to identify and mitigate risk exposure, we carry out due diligence on all new suppliers, agents, consultants and contractors throughout our supply chain. This is to ensure the potential for modern slavery and human trafficking is significantly reduced within our business. Our due diligence process requires multi-level credential checks for all new suppliers in our supply chain. Our dedicated Financial Crime Team conducts at a minimum, annual reviews on our increased risk suppliers and reviews of all our standard risk suppliers every two years. We have categorised our suppliers according to their risk level, which is defined by the country of incorporation of the supplier, or the value of the contract (amongst other factors). We also have a process in place to review suppliers on an ad hoc basis based on the needs of the business.

The CMC Group expects suppliers and other organisations with which it does business to adopt and enforce policies to comply with the legislation and does not knowingly support or conduct business with a company involved in modern slavery or human trafficking.

## **OUR POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING**

Our Group Anti-Slavery Policy reflects our zero-tolerance approach to modern slavery and human trafficking. It confirms our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our business or supply chains.

The CMC Group has clear employment policies and processes in place, and employees' failure to comply with these can result in disciplinary action. CMC Group also has a Group Whistleblowing Policy in place,

which encourages employees to report any concerns about any form of actual or suspected wrongdoing including those related to modern slavery and human trafficking, without fear of reprisal.

The CMC Group Anti-Slavery Policy is regularly reviewed and assessed to ensure it addresses risks identified during the procurement due diligence process in place.

### **CONSULTATIONS WITH OUR SUBSIDIARIES AND ASSOCIATED ENTITIES**

All companies within the CMC Group are committed to identifying and mitigating modern slavery and human trafficking risks within the business. The companies in the CMC Group consult each other and provide support as and when required.

### **KEY PERFORMANCE INDICATORS TO MEASURE EFFICACY OF STEPS TAKEN (“KPIs”)**

CMC Group’s processes to address modern slavery and human trafficking risk in our operations and supply chain has evolved over time. Although the risk of modern slavery and human trafficking in our business and supply chain is low, we have continued to work on developing frameworks and processes to assess the effectiveness of our modern slavery and human trafficking measures taken in our operations and supply chains. CMC has established a cross functional team of relevant business stakeholders (“MS Working Group”) with responsibility over developing and maintaining a CMC Effectiveness of Modern Slavery Measures Assessment Framework (“MSAF”). As a key consideration under the MSAF, the MS Working Group will identify existing measures that have been implemented to combat and manage modern slavery risks, and attach KPIs to each measure. The MS Working Group will meet quarterly. Each quarterly meeting will be a forum to measure and track the effectiveness of the measures and processes set out in the MSAF by assessing actions and outcomes for each KPI. Any deficiencies identified in this process will be considered and will inform further discussion on remediation. Apart from considering cross-departmental internal feedback based on an identification of any such deficiencies, consideration of the appropriate course of remediation will also be determined with reference to peer and industry initiatives in relation to assessing and mitigating modern slavery risks..

CMC Group continues to follow the updates and advice provided by notable organisations such as the Walk-Free Foundation.

### **ANNUAL REVIEW AND CONTINUOUS DEVELOPMENT**

The CMC Group is deploying training courses for its employees worldwide to ensure its staff are fully aware of, and educated about, the impact of modern slavery and human trafficking within our industry and worldwide.

CMC Group continues to review its policies and processes on an annual basis. CMC Group is currently in the process of revising its modern slavery and human trafficking screenings to bring in more regular and in-depth checks of existing suppliers.

The CMC Group will conduct an annual review of this statement.

Approved by the Board of Directors of **CMC Markets plc** on 27 July 2022.

Lord Peter Cruddas  
Chief Executive Officer  
CMC Markets plc