Sucden Financial Limited
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Authorised and regulated by
the Financial Conduct Authority

Registered in England no. 1095841

Modern Slavery Act Statement 2024/25

Sucden Financial Limited ("SFL") has produced this statement in order to fulfil its obligations under Section 54 of the Modern Slavery Act 2015 ("the Act"). It applies to SFL's business for the financial year ending 31 December 2024 and will continue to apply until amended. SFL's board of directors will review the statement at least once a year.

Our organisational structure

SFL operates in the financial services sector as an investment firm regulated by the UK Financial Conduct Authority ("FCA"). It predominantly acts as a broker in the regulated commodity, FX and fixed income derivatives markets, but it also offers unregulated commercial FX services. SFL has fewer than 200 employees in the UK. SFL has subsidiaries in the US (Sucden Futures Inc.), Hong Kong (Sucden Financial (HK) Limited) and Germany (Sucden Financial Hamburg GmbH). None of these subsidiaries carry on business in the UK.

SFL is part of the Sucden Group and its parent is Sucres et Denrees SA ("S&D") which is incorporated in, and operates from, France. For more information on the Sucden Group, please visit the "About Sucden Financial" section of SFL's website.

SFL's policies on slavery and human trafficking

SFL is committed to only working with third parties that do not represent a slavery or human trafficking risk. Accordingly, SFL will:

- act ethically and with integrity in the conduct of its business; and
- take all reasonable steps to ensure that SFL does not use the services of third parties that represent a slavery and/or human trafficking risk.

Our supply chains

As SFL is an investment firm it does not have supply chains as such. However, SFL uses vendors to provide a range of business services and technology systems. SFL has an onboarding process for vendors and will engage with reputable companies, who will be asked to identify their Modern Slavery statement, if applicable.

SFL does not engage in seasonal activities or provide seasonal work.

Organisational policies

Group Corporate Social Responsibility Programme

SFL participates in the Sucden Group's Corporate Social Responsibility Programme, details of which can be found on the websites of SFL and its parent company, S&D. The principles of this programme have a direct relevance to the combatting of slavery and human trafficking.

Third-party risk management framework

SFL has a third-party risk management policy and procedure in place, which includes assessment of vendors' compliance with Modern Slavery Act requirements, where applicable.

Client due diligence

SFL conducts due diligence on its clients before providing services. This involves:

(i) screening for evidence of criminal activity, adverse news history and against the sanction lists of international organisations and national governments; and

(ii) assessing the client's legal structure.

Using this information, SFL will assess the risk that a client represents from a slavery and human trafficking perspective.

Whistleblowing arrangements

SFL has appointed a whistleblowing officer who maintains the firm's whistleblowing policies and procedures on behalf of the board. These arrangements can be used by SFL's staff to escalate concerns relating to slavery and human trafficking in confidence, should they feel that this is necessary.

Training

As an FCA regulated firm, SFL requires that its employees regularly undertake training on financial crime, bribery, corruption and related topics. During the material period employees received training on these topics through a combination of e-learning and face-to-face training.

Remuneration

SFL has remuneration policies in place that are designed to promote good conduct. Compliance with applicable laws and regulations forms part of SFL's appraisal process which helps set the level of any variable remuneration that is awarded to staff.

Measuring the effectiveness of our policies

SFL's board of directors assess the effectiveness of its policies by:

- taking feedback from its staff on the effectiveness of training given; and
- receiving management information on the number of relationships rejected for not meeting SFL's standards.

This statement is made by SFL on behalf of itself and its subsidiaries. It was approved by SFL's board of directors at a meeting held on 28 March 2025.



Marc Bailey
Chief Executive Officer
Sucden Financial Limited