Stratos Markets Limited
Slavery and Human Trafficking Statement

This statement is made on behalf of Stratos Markets Limited ("Stratos" or "we") pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 ("Act") and relates to actions and activities for the financial year ending 31 December 2024. It outlines the measures Stratos applies to ensure that slavery and human trafficking are not taking place in any part of the group's supply chains or its own business.

The Act defines modern slavery as covering the following activities: slavery, servitude, forced or compulsory labour, and human trafficking. The Act consolidates current offences relating to trafficking and slavery and it criminalises aiding, abetting, or procuring forced labour or human trafficking, or being an accessory to such offences.

1. Stratos's Business

Stratos is a member of the Stratos group of companies, being Stratos Group International, LLC and its subsidiaries.

Stratos is a leading provider of online foreign exchange trading, CFD trading, spread betting, listed stocks and related services. The company's mission is to provide global traders with access to the FX and Stocks market by offering innovative trading tools, hiring excellent trading educators, meeting strict financial standards, and striving to deliver the best online trading experience for its clients. Stratos provides general financial markets commentary to its clients in relation to its offerings, which is not intended as investment advice and must not be construed as such advice. Stratos has more than 700 employees worldwide and has offices, partners, and affiliates in the major financial centres of the world, uniquely positioning Stratos to provide exceptional service to traders around the world.

2. Stratos's Supply Chain

Stratos's supply chain includes suppliers of services for its operational and information technology needs, as well as suppliers of products such as office supplies and equipment. Stratos constantly seeks to collaborate with suppliers who adopt strict standards in terms of preventing modern slavery and human trafficking and who operate fair and ethical workplaces.

3. Modern Slavery and Human Trafficking Risk Assessment

The nature of Stratos's business does not consist of the manufacturing of goods, agriculture, construction, or any other industry with high risk of modern slavery and human trafficking. Therefore, the risk of modern slavery existing in its business is considered to be low.

Most of Stratos's suppliers are regulated entities (banks, financial institutions, payment service providers, etc.). The majority of Stratos's service providers are not involved in the production of any physical goods. Therefore, the risk of modern slavery existing in its supply chain is considered to be low.

Nevertheless, we are committed to carrying out all necessary due diligence and preventive measures to combat modern slavery and human trafficking.

4. Due Diligence Processes

Stratos is committed to not doing business with suppliers, agents, consultants, or contractors throughout its supply chain which engage in modern slavery and human trafficking. Stratos continues to:

- Carry out due diligence (including negative media screening) on all suppliers and vendors, to ensure that the potential for modern slavery and human trafficking is significantly reduced;
- Carry out internal processes due diligence and negative media screening within its outsourcing service providers;
- Monitor of potential risks in our supply chains.

5. Our Policies

Stratos makes its Modern Slavery and Human Trafficking Statement accessible internally to all its employees. In addition to this statement, Stratos' employees are subject to a number of policies, which we consider relevant to the detection and prevention of modern slavery and human trafficking in its business and supply chains:

- Anti-Money Laundering and Counter Terrorism Financing Policy – Stratos sets out the responsibilities of the associated persons, observes and upholds its commitment to detecting and preventing money laundering and terrorist financing, and sets out Stratos' standards in complying with applicable sanctions, laws and regulations. The AML systems and controls in place aim to effectively prevent, detect, and deter ML/TF through or at Stratos.
- Anti-Bribery and Corruption Policy – Stratos addresses integrity risk relating to personal conduct by committing to conduct business in an honest and ethical manner and taking a zero-tolerance approach to bribery and corruption in all business relationships and business dealings where we operate.
- Outsourcing Policy - The Policy provides the framework for identifying, measuring, monitoring and controlling the risks associated with outsourcing and provides guidelines for fundamental areas related to the supervision of outsourcing, including management oversight, due diligence, contractual arrangements and education and training.
- Whistleblowing Policy – The Stratos' Whistleblowing policy provides a means for every employee to report a concern outside normal channels, including concerns related to modern slavery and human trafficking. This can be done anonymously. The policy establishes channels through which employees can report a vast array of wrongdoings and breaches of United Kingdom statutes, including breaches of the Act.
- Code of Conduct – The Stratos Code of Conduct is embedded within our organisation and serves to ensure that employees are aware of the responsibilities and assists them in making the right choices. It includes information on our company values, and human rights, which are closely aligned to the requirements of preventing modern slavery.

Stratos employees are protected by the applicable employment legislation, which Stratos complies with in order to create a safe, healthy, and inclusive workplace with a strong culture of collaboration and respect for others. The risk of modern slavery and human trafficking within Stratos is limited as a result of the Human Resources ("HR") policies and procedures, which are in line with the employment legislation currently in place.

6. Adherence to Our Values

Stratos has a zero-tolerance approach towards modern slavery and human trafficking and will not support or do business knowingly with a company involved in modern slavery or human trafficking. Neither we nor, to the best of our knowledge, our supply chains make use of any form of modern slavery or human trafficking. If any suspicion arises in this regard, Stratos will terminate its relationship with the contractors, suppliers, business partners, or other organisations in question.

To guarantee a high degree of understanding of the risks not only internally, but equally within our partners' operations, Stratos provides a tailor-made awareness training on modern slavery and human trafficking to all its Compliance, HR and Legal New Hire personnel and an annual refresher to existing staff within the same departments. The tailored training helps to ensure Stratos personnel are equipped to identify risk factors, aware of the indictors of possible slavery, and understand the implications of the act for our business in order to react appropriately.

Furthermore, Stratos has proven its desire to progressively improve its internal due diligence processes through the expansion of its pool of qualified employees performing monitoring roles and by implementing further controls in its due diligence framework.

7. Annual Review

Stratos conducts an annual review of the Slavery and Human Trafficking Statement.

8. Approval

The Slavery and Human Trafficking Statement has been approved by the Board of Directors of Stratos Markets Limited on 17 June 2025.



Brendan Callan
Chief Executive Officer