

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 2024.

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 with integrity in all its business dealings and relationships and to improving its practices to combat slavery and human trafficking.

## **OUR BUSINESS**

As one of the leading global providers 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, Singapore and the UK. As at 31 March 2024, the CMC Group has 1061 employees worldwide and has offices in various countries including the United Kingdom, Germany, Singapore and Australia.

## **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 Investments Nominee Limited (UK company, registration number 13765708);
- CMC Markets CFD Overseas Holdings Limited (UK company, registration number 14940138);
- CMC Markets Holdings Ventures Limited (UK company, registration number 14802277);
- CMC Markets Ventures Limited (UK company, registration number 14839454);
- CMC Markets Holdings Limited (UK company, registration number 9980788);
- CMC Markets Overseas Holdings Limited (UK company, registration number 5554641);
- CMC Markets UK Holdings Limited (UK company, registration number 5554639);
- Information Internet Limited (UK company, registration number 3149891);
- Opto Markets Limited (UK company, registration number 15039587);

- CMC Markets Bermuda Holdings Limited (Bermudan company, registration number 202302717);
- CMC Markets Bermuda Limited (Bermudan company, registration number 202302718);
- Opto Markets LLC (American company, registration number 7653348);
- 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 91310115MA1K3MNN8E);
- 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 low-risk nature of financial services, in addition to the global employment practices and skilled workforce it employs, 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 ongoing adverse media screening on vendors, inclusive of Modern Slavery related factors, on a quarterly basis. Our Procurement team will commence further refining the review process of all current and future suppliers for more specific modern slavery risks and we expect to have this completed within the financial year ending 31 March 2025. This process will continue to enhance our supplier monitoring at the due diligence stage of onboarding by screening all potential new

suppliers in order to establish their level of modern slavery risk. For those suppliers deemed inappropriate, we will conduct further investigation before determining whether to engage that supplier. We have also implemented a modern slavery notification flag into our supplier onboarding software which stakeholders are required to raise, if they identify any modern slavery concerns during the due diligence stage. This flag will escalate concerns to appropriate CMC Group stakeholders for assessment.

The CMC Group expects suppliers and other organisations with which it does business to adopt and enforce policies to comply with applicable modern slavery legislation and does not knowingly support or conduct business with companies that are either involved, or that we reasonably suspect are 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 processes in place, for instance, our Human Resources team monitor salary levels across all our offices to ensure we exceed minimum pay requirements for all our employees relevant to the jurisdiction. The CMC Group has a clear set of employment policies in place which also support our stance on modern slavery. These include, but are not limited to the Code of Conduct, Group Diversity and Inclusion Statement and Policy, Group Equal Opportunity Policy and Group Remuneration Policy. Failure to comply with these policies can result in disciplinary action against an employee under our Group Disciplinary Policy. 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 reviewed and assessed whenever there is a significant change to relevant regulations, best practice guidelines or business processes. When no such changes occur, the policy is reviewed at least every two years 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. Our policies and processes are carried out at a CMC Group level and this statement reflects the CMC Group's approach to modern slavery. The companies in the CMC Group consult each other and provide intra-group 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 continues to evolve. 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. In the past year, our cross-functional team of relevant business stakeholders, the MS Working Group, has continued to meet quarterly to develop and maintain a CMC Effectiveness of Modern Slavery Measures Assessment Framework (“MSAF”). As a key consideration under the MSAF, the MS Working Group have identified existing measures that have been implemented to combat and manage modern slavery risks and attached KPIs to each measure. The MS Working Group meet quarterly. Each quarterly meeting measures and tracks the effectiveness of the processes set out in the MSAF by assessing actions and outcomes for each KPI. Reporting on our procurement due diligence process will also be generated as further enhancements to process for the year ending 31 March 2025, so we can assess whether all potential new suppliers are being screened for modern slavery risks, in accordance with the relevant KPI. Any deficiencies identified in these processes will be considered and will inform further discussion on remediation. Aside 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 has deployed 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. This training forms part of the CMC Group’s mandatory annual training programme, which is supported by our Code of Conduct, and which had a 99% completion rate for the 2023/24 rollout.

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

Approved by the Board of Directors of **CMC Markets plc** on 24 July 2024.



Lord Peter Cruddas  
Chief Executive Officer  
CMC Markets plc