

IFL Statement of Commitment- Criminal Finances Act 2017

INTL FCStone Ltd. (“IFL”, “we”, “us”) has a zero-tolerance approach to tax evasion, facilitation of tax evasion and to any form of criminal financing. We expect our personnel, partners, introducing agents, clients and stakeholders to have the same stance towards financial crime.

As a regulated entity IFL has several policies and procedures in compliance with laws and regulations and internationally adopted standards which include mitigating measures against tax evasion and financial crime.

Risk Based Due Diligence

IFL is regulated by the Financial Conduct Authority (“FCA”) and has a risk-based approach when onboarding or reviewing our contractual relationships. Our existing policies and procedures are reviewed regularly and consider tax evasion risks and how to mitigate those. IFL Senior Management reviews and approves these policies and procedures.

- As part of Due Diligence procedures, where a client or connected parties are located or linked to a jurisdiction that is recognised as a “tax haven”, risk profile will be raised to “High-Risk” and Enhanced Due Diligence procedures will be applied. Also in such circumstances IFL may decline to transact any business with an account.
- Should the High-Risk client be accepted, it will be subject to additional monitoring and regular reviews.
- IFL has strict procedures to monitor payments/transfers to prevent fraud and any sort of illegitimate money transfers. Any changes to payment instructions require several levels of authorisation, which includes Anti Money Laundering officers’ approval.
- IFL does not provide Tax advice nor Tax related referrals

Company Culture

IFL is committed to providing regular financial crime and tax evasion awareness to all its employees, tied agents and branches.

Employees are made aware of the implications for our business, their potential liabilities and their obligations to report any suspicions of tax evasion or any illegal activity taking place. Our whistleblowing policy supports employees raising concerns.