

## Marex Spectron Statement of Commitment - Criminal Finances Act 2017

Marex Spectron unequivocally condemns tax evasion. As a global enterprise, Marex Spectron is rightly held to high standards in all that we do and is committed to conducting its business with the utmost integrity. This statement sets out the measures that have been taken to prevent the business from being used for the purpose of facilitating tax evasion in compliance with the Criminal Finances Act 2017.

### OUR VALUES AND POLICIES

While we consider the nature of Marex Spectron's business and transactions make it at a low risk of being used for the criminal facilitation of tax evasion, we nonetheless have in place robust preventative and detective measures in accordance with our zero tolerance approach to tax evasion and the facilitation of tax evasion.

Marex Spectron's Anti-Tax Evasion policy and procedures detail the risk based approach that has been adopted. This includes:

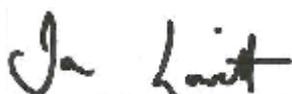
- Enhanced 'Know Your Customer' due diligence where a client is based, or linked to a jurisdiction that is recognised as a 'tax haven';
- Enhanced monitoring measures for high risk clients that are based, or linked to jurisdictions recognised as 'tax havens';
- Strict procedures regarding the transfer of client funds into client accounts. Marex Spectron uses standard settlement instructions to transfer funds into approved customer accounts. In exceptional circumstances, a third party payment may be approved, subject to our internal approval process;
- Internal tax specialist for Marex Spectron's own tax payments and tax related matters; and
- Not providing tax advice or making any tax related referrals.

In addition, employees are made aware of their obligations to report any suspicions pertaining to tax evasion and as per our existing whistleblowing policy, we actively support employees in raising concerns if they believe that anything illegal or unethical (including, but not limited to a breach of our policies) is taking place.

In the event that you become aware of circumstances that suggest Marex Spectron and/or any other person for, with or through whom we conduct business, may have engaged in tax evasion or have been used for the purpose of facilitating tax evasion, please contact the Chief Risk Officer without delay, so it can be investigated fully and promptly.

Marex Spectron reserves the right to terminate an employee, client or other business relationship should any instance of tax evasion come to light and will cooperate fully with relevant authorities.

Marex Spectron's Anti-Tax Evasion policy and procedures are periodically reviewed by senior management and this statement has been approved by Marex Spectron's board of directors.



Ian Lowitt,  
Chief Executive Officer Marex Spectron Group Limited