

Modern Slavery Act

Statement on Modern Slavery and Human Trafficking for Financial Year ended 31 December 2019

We are committed to ensuring we have effective systems and controls in place to prevent slavery and human trafficking in our business and in our supply chains.

Organisational structure

We are a global provider of online trading services to retail clients in the financial services sector. We operate in the UK through GAIN Capital UK Limited, a private limited company which is part of the GAIN Capital group of companies (the “Group”). Our ultimate parent company is GAIN Capital Holdings, Inc., which has its head office in the U.S. and is listed on the New York Stock Exchange. The Group has over 800 employees worldwide and operates in North America, the UK, Europe, the Middle East, Asia and Australia.

The Group has a global annual turnover of \$233.9million.

We are regulated in the UK by the Financial Conduct Authority and by the appropriate regulatory body in each jurisdiction in which we provide licensed services.

Our supply chains

We provide online trading services on a global basis. The supply chain that supports our business is broad. It comprises a wide range of suppliers, from small and medium sized enterprises to global corporates and encompasses products and services such as IT hardware and software, marketing services, recruitment services and temporary staff provision, office design, fit-out and maintenance, and cleaning services. That said, we believe that, given the

nature of the services we provide, the risk of modern slavery in our supply chain is low.

The supply chain that supports GAIN Capital UK Limited is primarily based in the UK, where the risk of forced labour is considered low. However, due to the global reach of our services, we procure certain products and services from jurisdictions where there is a marginally higher risk of modern slavery, such as Central and Eastern Europe.

Due diligence processes

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We have in place systems to:

- identify and assess potential risk areas in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

We have incorporated provisions into most of our standard templates for supplier contracts to require suppliers to manage and reduce the risk of forced labour. We also retain the ability to terminate contracts where the supplier has failed to deal adequately with any such risks.

Our employees

Our employees are subject to and benefit from a wide range of policies including a disciplinary and grievance policy, a diversity and inclusion policy, a non-discrimination policy, a remuneration policy and numerous compliance

policies. The policies and frameworks that we have in place limit the risk of modern slavery in the workplace and encourage all staff to work ethically. We also operate a global whistleblowing policy to provide the ability for employees to raise any concerns they have in the workplace and for those concerns to be investigated.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide periodic training to relevant staff. This training provides an introduction to the risks of forced labour with specific reference to how those risks may manifest within our industry and the policies and processes we have in place to avoid those risks.

Annual review

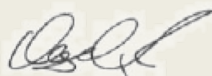
We will conduct an annual review of this Statement.

Further steps

As the Group has grown, we have decided to formalise our buying processes and prepare a robust procurement policy and associated process. In doing so, we hope to make our procurement process simpler, safer and more efficient. The new process will include more effective and robust processes to identify and address the risks of modern slavery and human trafficking in our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2019. It was approved by the board on 26th May 2020.

[NAME AND SIGNATURE OF DIRECTOR]



Nigel Rose

GAIN CAPITAL UK LIMITED

Date: 29th May 2020