

Anti-Bribery and Corruption Policy

反贿赂及反腐败政策

Stratos Group International LLC

Stratos Anti-Bribery and Corruption Policy

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The **Anti-Bribery and Corruption Policy** (“ABC Policy” or the “Policy”) sets out the responsibilities of the Stratos group of companies (“Stratos”)¹, Stratos employees, and anyone who performs services for or on behalf of Stratos (collectively “Associated Persons”)² in observing and upholding Stratos’ position on bribery and corruption. Stratos recognises that bribery and corruption are damaging to its legitimate business interests. More broadly, bribery undermines the rule of law and poses serious threats to sustained economic progress in developing and emerging economies and to the proper operation of free markets. Stratos conducts business across the globe and is committed to doing so with fairness, honesty, openness, and integrity. Through this Policy, and underlying procedures, systems and controls, Stratos aims to effectively prevent, detect, and deter bribery and corruption at Stratos.

反贿赂及反腐败政策（“反贿赂政策”或是“政策”）规定了 Stratos 公司集团（“Stratos”）¹、Stratos 员工以及为 Stratos 或代表 Stratos 提供服务的任何人员（统称为“相关人员”²）在遵守和维护 Stratos 反贿赂和反腐败立场方面的责任。Stratos 认为贿赂和腐败损害其合法的商业利益。更广泛地说，贿赂破坏了法治，并对于发展和新兴经济体的持续经济发展以及自由市场的正常运作构成了严重威胁。Stratos 致力于以公平、诚实、开放和正直的方式于全球开展业务。通过本政策以及相关的程序、系统和控制措施，Stratos 旨在有效预防、发现和遏制 Stratos 中的贿赂和腐败行为。

Stratos has a zero tolerance approach to bribery and corruption and expects all Associated Persons to exhibit the same approach. Stratos is committed to implementing and enforcing effective systems and controls to counter, monitor for, and prevent bribery and corruption by:

Stratos 对于贿赂和贪污采取零容忍措施，并期望所有关联人员采取相同的措施。Stratos 致力于通过以下方式实施及执行有效的制度以打击、监视以及防止贿赂和腐败：

- Upholding all laws relevant to countering bribery and corruption in every jurisdiction in which it operates. In particular, Stratos will uphold applicable provisions of the Financial Action Task Force Guidance and Recommendations, Basel Committee on Banking Supervision Guidance, The Wolfsberg Group Anti-Bribery and Corruption Compliance Programme Guidance, the United Kingdom Bribery Act 2010, the Cyprus Criminal Code, Cap. 154, the Cyprus Prevention of Corruption Law, Cap. 161, the Criminal Law Convention on Corruption of the Council of Europe and the Additional Protocol to the Convention, as ratified by Law 23(III)/2000 and amended by Law 22(III)/2012, Relevant Cyprus Securities and Exchange Commission Circulars, the Australian Criminal Code Act 1995, the South African Prevention and Combating of Corrupt Activities Act 2004, the Polish Criminal Code 1997, the Seychelles’ Anti-Money Laundering Act 2006, and the United States Foreign and Corrupt Practices Act 1977; 遵守其经营地司法辖区所有打击贿赂和腐败相关法律条款。特别指出，Stratos 遵守金融行动特别工作组指导和建议、巴塞尔银行监管委员会指导、沃尔夫斯堡集团反贿赂和腐败合规计划指导、《英国 2010 年贿赂法》、《塞浦路斯刑法典》第 154 章、《塞浦路斯预防腐败法》第 161 章、《欧洲委员会反腐败刑法公约》及其《附加议定书》（经第 23(III)/2000 号法律批准并经第 22(III)/2012 号法律修订）、相关塞浦路斯证券交易所委员会通函、《澳大利亚 1995 刑法典》、《南非预防和打击腐败活动法》（2004 年）、《波兰刑法典》（1997 年）、《塞舌尔反洗钱法》（2006 年）以及《美国 1997 年海外反腐败法》的适用法规；
- Setting out a clear ABC Policy and proportionate and effective anti-bribery and corruption procedures; 制定明确的反贿赂政策以及相对应和有效的反贿赂反腐败程序；
- Carrying out appropriate due diligence on third parties that conduct business with Stratos; 对与 Stratos 有业务往来的第三方机构展开合理尽职调查；

¹ The Stratos group of companies includes: Stratos Group International LLC (“Stratos Group”), formerly FXCM Group, LLC; Stratos Group subsidiaries; all affiliates, branches, and representative offices of Stratos Group and its subsidiaries; and any other firms under Stratos Group and its subsidiaries. The subsidiaries of Stratos Group include: Stratos Markets Limited (“Stratos UK”), formerly Forex Capital Markets Limited; Stratos Europe Limited (“Stratos Europe”), formerly FXCM EU LTD; Stratos Trading Pty. Limited (“Stratos Australia”), formerly FXCM Australia Pty. Limited; Stratos South Africa (PTY) Ltd (“Stratos South Africa”), formerly FXCM South Africa (PTY) Ltd.; Stratos Light Limited (“Stratos Israel”), formerly FXCM Trading Ltd.; Stratos Systems Limited (“Stratos Systems”); Stratos Global LLC (VC) (“Stratos Global”), formerly FXCM Markets LLC; Stratos Technologies Sp. z.o.o. (“Stratos Poland”); and Stratos Tech Limited (“Stratos Tech”). The abovementioned companies trade as “Stratos” and/or “Tradu”.

Stratos 集团公司包括：Stratos Group International LLC（“Stratos Group”），前称为 FXCM Group, LLC；Stratos Group 的子公司；Stratos Group 及其子公司的所有附属公司、分支机构和代表处；以及 Stratos Group 及其子公司旗下的任何其他公司。Stratos Group 的子公司包括：Stratos Markets Limited（“Stratos UK”），前称为 Forex Capital Markets Limited；Stratos Europe Limited（“Stratos Europe”），前称为 FXCM EU LTD；Stratos Trading Pty. Limited（“Stratos Australia”），前称为 FXCM Australia Pty. Limited；Stratos South Africa (PTY) Ltd（“Stratos South Africa”），前称为 FXCM South Africa (PTY) Ltd.；Stratos Light Limited（“Stratos Israel”），前称为 FXCM Trading Ltd.；Stratos Systems Limited（“Stratos Systems”）；Stratos Global LLC (VC)（“Stratos Global”），前称为 FXCM Markets LLC；Stratos Technologies Sp. z.o.o.（“Stratos Poland”）；以及 Stratos Tech Limited（“Stratos Tech”）。上述公司以“Stratos”和/或“Tradu”的名义经营业务。

² An “Associated Person” is anyone who performs services for or on behalf of Stratos.

“相关人员”是指为 Stratos 或代表 Stratos 提供服务的任何人。

- **Training employees and other relevant persons on internal and external anti-bribery and corruption obligations so that they can recognise and avoid the use of bribery or corruption by themselves and others;**
培训员工及其他相关人员关于内外部的反贿赂反腐败义务，使其能识别并避免自己和他人的贿赂或腐败行为；
- **Requiring employees to be vigilant and to report any suspicion of bribery or corruption, providing them with suitable channels of communication, and ensuring sensitive information is treated appropriately;**
要求员工保持警觉及举报任何涉嫌贿赂或腐败的行为，向其提供适当的沟通渠道及确保敏感信息得到适当处理；
- **Rigorously investigating instances of alleged or confirmed bribery or corruption, notifying the relevant authority regarding potential or confirmed instances of bribery or corruption (as appropriate), and assisting the police and other relevant authorities in any resulting prosecution; and**
严格调查涉嫌或已确认的贿赂或腐败情况，将可能或已确认的贿赂或腐败事例（酌情）通知相关机构，并协助警方及其他有关当局进行起诉；及
- **Taking a firm and vigorous action against any Associated Persons involved in bribery or corruption or who do not support anti-bribery and corruption requirements.**
对于任何牵涉贿赂、腐败或不支持反贿赂反腐败要求的任何关联人员采取强而有力的行动。

Applicability

适用范围

This Policy applies to all Associated Persons. The Policy is applicable globally across Stratos and in line with applicable global rules and regulations.

本政策适用于所有关联人员。本政策适用于 Stratos 全球范围，并符合适用的全球规则和法规。

Requirements & Compliance

要求及合规

All Associated Persons are prohibited from directly or indirectly:

所有关联人禁止直接或间接：

- **Offering, promising, giving, requesting, accepting, or agreeing to receive a bribe of any kind, in any form;**
提供、承诺、给予、要求、主动接受或同意收取任何种类和形式的贿赂；
- **Offering, promising, or transferring anything of value to a public official in order to influence the public official and obtain or retain business, or to obtain or retain an advantage for any Associated Person including offers, promises, or transfers to any third party, such as a family member, agent, or legal entity, in order to influence a public official;**
向公职人员提供、承诺或转让任何有价值的物品，以影响公职人员来获得或维持业务，或为关联人员获取或保留某项利益，包括要约、承诺或第三方交易，如家庭成员、代理人或法人实体，以影响公职人员；
- **Making a payment, offer, request, acceptance, or promise of anything of value to:**
支付、提供、要求、接受或承诺以下人员任何有价值的物品：
 - a) **public officials;**
公职人员；
 - b) **political parties or party officials;**
政治党派或党派官员；
 - c) **candidates for political office;**
政治职位候选人；
 - d) **any other person while knowing that such person will pass the payment, offer, or promise to any of the above;**
or
任何得知此人将传递贿赂款项、要约或者对于以上任何形式的承诺的其他人员；或
 - e) **private individuals or legal entities**
个人或法律实体。

With or without corrupt intent for the purpose of:

无论以下行为是否带有腐败意图:

- a) **influencing an official or private individual's (or legal entity's) act or decision;**
影响一名官员或个人（或法律实体）之行为或决定;
- b) **inducing a person to do or omit to do acts in violation of his or her official duty;**
引导某人违反其公职，以执行或不执行某项行为;
- c) **inducing that person to use his or her influence with a government to affect or influence any government decision or action; or**
引导某人利用其政府影响力来影响任何政府决策或行为；或
- d) **securing an improper advantage**
争取某项不正当利益。

To assist in obtaining or retaining business; and

为了协助获取或维持业务；以及

- **Aiding, abetting, or counselling of any of the above prohibited payments.**
协助、煽动或咨询上述任何禁止的款项。

It is important to note that a corrupt act does not need to succeed in its purpose to violate this Policy.

请注意，腐败行为无论是否达到其目的都违反了本政策。

All Associated Persons are required to adhere to this Policy and any reporting requirements herein. Additionally when adhering to this Policy, Associated Persons should take into consideration and abide by all applicable anti-bribery and corruption legislation and regulations including but not limited to those in their local jurisdiction.

所有关联人员必须遵守本政策及其中公布的要求。遵守本政策的同时，关联人员需顾及并遵从包括但不限于其所处司法辖区现行反贿赂反腐败法律法规。

Reporting 报告

Stratos encourages all Associated Persons who have serious concerns about any aspect of Stratos' business, to come forward and voice those concerns openly, confidentially, or anonymously.

Stratos 鼓励所有对 Stratos 业务的任何方面有严重疑虑的关联人员，以公开、保密或匿名的方式表达这些疑虑。

Should an Associated Person select to voice their concerns or find themselves in a situation of a possible breach of this Policy, the Associated Person should contact Stratos at whistle@tradu.com, or in writing to Tradu, c/o Audit Committee, 125 Old Broad Street, 9th Floor, London EC2N 1AR, United Kingdom; or depending on the affected jurisdiction, externally to one of the regulators or other appropriate body, details of which can be found in the **Global Whistleblower Policy**.

若关联人员选择表达相关疑虑或认为自己可能会违反本政策，该人员应通过发电邮至 whistle@tradu.com 联络 Stratos，或致函 Tradu: c/o Audit Committee, 125 Old Broad Street, 9th Floor, London EC2N 1AR, United Kingdom；或根据受影响的司法管辖区，联系外部监管机构或其他适当机构，详情可参见《全球举报人政策》。

Recordkeeping 记录保存

In accordance with this Policy, and all relevant laws and regulations, Stratos maintains detailed, accurate, and proper books, records, and financial reporting, which properly reflect the substance of corporate payments and transactions.

根据本政策以及所有相关法律和法规，Stratos 保留详细、准确和适当的账簿、记录和财务报告，以正确反映公司付款和交易的内容。