

Human Rights Statement

Jefferies's commitment to upholding human rights is a core value in our company, shaping how we do business worldwide. Respect for human rights is much more than meeting customer and investor expectations or legal obligations. As vital as those aspects are, managing human rights risks is the right thing to do, and is good for our business.

Human rights are the fundamental rights, freedoms and standards of treatment to which all people are entitled. We focus on respecting labor rights, treating all people with dignity and respect, enabling healthy and safe work environments, promoting ethical behavior and respecting privacy. We believe respect for human rights is integral to advancing sustainability.

Jefferies strives to uphold the relevant fundamental rights and freedoms to all people across our business, in line with the [United Nations \(UN\) Universal Declaration of Human Rights \(UDHR\)](#), the [UN Guiding Principles on Business and Human Rights](#), and the [OECD Due Diligence Guidance for Responsible Business Conduct](#).

Jefferies aims to act as a role model for the business community by following our [Corporate Social Responsibility Principles](#) to act with integrity, consider the environment, respect people and improve our communities. We are committed to responsible and ethical business practices in our operations and with our partners, clients and vendors around the world.

I. Scope

This policy applies to Jefferies Financial Group Inc. and all of its subsidiaries, herein referred to as "Jefferies" unless otherwise specified.

II. Respecting People

One of our core principles is respecting people. We do this by:

- Observing the fundamental tenets of human rights, safety and non-discrimination in the workplace
- Enriching our workforce through active recruitment of individuals from diverse backgrounds with wide ranging experience and academic achievement
- Maintaining a safe working environment and respecting the richly individual characteristics of our employees while encouraging their autonomy, creativity and diversity
- Observing applicable safety and occupational health management policies

Our people receive training on a variety of human rights related issues, including but not limited to equal employment, harassment, anti-discrimination, anti-money laundering, anti-bribery and anti-corruption.

The Culture and Community Committee of the Board has oversight of human rights, corporate social responsibility, sustainability and corporate culture, and is incorporated in the [Culture and Community Committee Charter](#).

III. Integrity with Clients and Vendors

We consider human rights risk when performing due diligence prior to business transactions. At a minimum, Jefferies expects suppliers and partners to comply fully with all applicable laws and regulations in the conduct of their business.

Jefferies applies a risk-based approach to assess the likelihood of the existence of modern slavery or human trafficking within our supply chain, this includes issuing modern slavery enquiries to in scope suppliers to enhance our supplier vetting process. We have concluded that there continues to be a low risk of modern slavery and/or human trafficking

within our supply chain, however, it is important that we continue to monitor this risk. In the event that we should become aware of a case of modern slavery or human trafficking occurring within our supply chain, we would take appropriate action which may include terminating the contract with the supplier.

In the UK and Australia, Jefferies is subject to the Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 respectively. More information on our approach to combatting human trafficking in our supply chain is outlined in our [Slavery and Human Trafficking Statement](#).

IV. Reporting a Concern

In our [Code of Business Practice](#), we outline the procedure for reporting violations or concerns on any ethics matters. In our comprehensive [Whistle Blower Policy](#), we provide information for a toll-free, independent, third-party Action Line for employees, stakeholders, or investors to report any violations or concerns. Jefferies' Board established and adopted the policy, and escalation of activity goes directly to our General Counsel and the Director of the Audit Committee of the Board. We encourage employees to raise concerns and be alert to possible violations and report them without fear of retaliation.

V. Our Continuing Commitment

Our goal is to continue to enhance our standing as a company that our customers trust to be their partner and that wins the right way. In developing this statement, we engaged internal teams, investors, our executive leadership team and external consultants. We will continue to work with them to improve our diligence and disclosure to ensure transparency and reduce risk.