



Bribery and Corruption

Our commitments

Version 1.0, 28 March 2018



Bribery and Corruption

1.1 Introduction

1.1.1. Statement on Anti-Bribery and Corruption (ABC) Policy

TP ICAP does not tolerate bribery, whether active or passive, or corrupt behaviour of any kind. We also expect the same from any third parties providing services for, or on behalf of, TP ICAP globally.

1.1.2. The TP ICAP ABC Policy requires that employees:

- Are prohibited from accepting, or offering a bribe in any form;
- Must not accept or provide gifts or entertainment from suppliers during a tender process;
- Must not solicit business by offering any form of bribe;
- Must not offer employment, with the intention of receiving an improper business advantage;
- Must not make facilitation payments; and
- If suspicious that an act of bribery or corruption has been attempted or carried out, must report the matter immediately to Compliance, Legal or via the Whistle-blower hotline.

1.1.3. The TP ICAP ABC Policies and Processes are designed to:

- Protect the integrity and stability of financial markets and national economies;
- Comply with the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977 and other applicable legislation and regulations in all jurisdictions in which we operate; and
- Help combat bribery and corruption.

1.2 ABC Programme

1.2.1. As a minimum, the following controls are required under Policy:

- ABC Risk Assessment;
- Mandatory ABC training;
- ABC and Gifts and Entertainment Policies and Processes, including
- HR controls;
- Procurement controls;
- Expenses systems and controls; and
- Financial Crime Management Information

1.3 Governance

- 1.3.1. ABC and Gifts and Entertainment Management Information are presented to regional and group management committees on a regular basis.
- 1.3.2. TP ICAP's internal audit function carries out regular audits regarding the ABC control framework, which provide Senior Management with the necessary assurance regarding the operating effectiveness of the firm's policies and the related systems and controls.
- 1.3.3. TP ICAP also conducts periodic risk reviews in the business including using key risk indicators to identify any breaches.
- 1.3.4. Regular training is provided to all employees around anti-bribery and corruption to ensure that our employees are fully aware of their obligations in this area and employees are asked to sign off on these obligations. Compliance contact details and a dedicated whistleblowing hotline are available for employees to raise concerns in and anonymous way.