



Whistleblowing

Our commitments

Version 1.0, 28 March 2018



Whistleblowing

1.1 Introduction

1.1.1. The TP ICAP plc Board is committed to maintaining the highest standards of honesty, openness and accountability and recognises that all those who work with or within the Group have an important role to play in achieving this goal.

We take protecting our colleagues, customers and business very seriously. However, like any major organisation, there are occasions where we face the risk of things going wrong, or we are unaware of malpractice taking place.

To ensure we are aware of any wrongdoing we provide a confidential and secure service that enables our colleagues, suppliers and their staff to raise concerns.

We have global coverage through our whistleblowing policies, which apply to all entities within the TP ICAP Group.

The TP ICAP Board treats all malpractice and/or misconduct with the utmost importance, whether it is committed by senior managers, staff, suppliers or contractors.

1.2. Values led organisation

1.2.1. As TP ICAP is a Values led organisation, Employees must also be aware that TP ICAP's Values form part of the wider context that this policy operates in. TP ICAP's values are Honesty, Integrity, Respect and Excellence ("HIRE"). Above all else, we respect our clients and each other, without bias.

Whistleblowing is the disclosure of information which relates to suspected wrongdoing in relation to TP ICAP's activities. This may include, but is not limited to:

- criminal activity;
- failure to comply with any legal or professional obligation or regulatory requirement;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery;
- financial fraud or mismanagement;
- negligence;
- breach of TP ICAP's internal policies and procedures;
- behaviour that harms or is likely to harm TP ICAP's reputation or financial well-being;
- unauthorised disclosure of confidential information; and

- the deliberate concealment of any of the above.

1.2.2. The TP ICAP policy states that whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.