



Anti-Bribery and Corruption Policy Statement

Version 2.0
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1 Introduction

1.1 Statement on the Global 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.

1.2 The TP ICAP Global ABC Policy requires that employees:

- Are prohibited from accepting, or offering a bribe in any form;
- Must not accept or provide "anything of value" with the purpose of persuading or incentivising an unfair business advantage;
- Must ensure risk-based due diligence is conducted on all third-party relationships, with particular focus on Associated Parties;
- Must ensure that Gifts and Entertainment are not used as a subterfuge for bribery;
- Must be aware of the inducement risk of Charitable Giving and ensure that any such donations follow strict internal guidance/procedures;
- Must be aware of the blanket ban on all Political Giving;
- Must not make Facilitation Payments unless there is a perceived threat to life, limb or liberty;
- Must disclose any potential Conflicts of Interests for management awareness and oversight;
- Must understand the higher risk of Public Officials and the internal processes in place to manage this risk;
- Must ensure the inducement and conflicts risk of the recruitment process is understood and managed as per internal procedures; and
- Must report any suspicions of bribery and corruption as detailed in the Group ABC Policy.

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.

2 ABC Programme

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

- Locally documented Policies/Procedures to implement the Global Policy requirements as well as local regulatory requirements;
- Ongoing communication to employees explaining relevant legal regimes, prohibited behaviours, employees' responsibilities and the duty to report;
- A firm commitment to the Group's zero tolerance approach toward bribery and corruption in any form;
- Communication on Gifts and Entertainment policies and processes;
- Practical guidelines including examples to staff;
- Regular ABC training;
- Periodic ABC Management Information;
- Periodic monitoring and review of key risks; and
- Periodic ABC Risk Assessments.