

The logo consists of a white diamond shape with a black border, containing the letters 'TP' stacked above 'ICAP' in a bold, sans-serif font.

TP
ICAP

A photograph of four business professionals sitting around a table in a meeting. A woman with glasses is on the left, a woman with a grey turtleneck is in the center, a man in a blue shirt is on the right, and a woman with long blonde hair is in the foreground on the right. They are all smiling and engaged in conversation. A teal banner is overlaid at the bottom of the image.

Code of Conduct

CEO Message



Our company's Values are **Accountability, Adaptability and Authenticity.**

These Values underpin our reputation which influences our clients' decision to do business with us, whether new talent will join us and how we are perceived in our markets.

Our reputation is the foundation of our business. Your daily decisions and actions can positively or negatively impact this reputation. It is, therefore, up to all of us to protect and enhance this reputation. It is not enough to be the dynamic, expert, engaging professionals that our clients rely on. We must also ensure that we comply with the laws of the jurisdictions in which we operate as well as always maintaining the highest standards of integrity. Only by holding ourselves to the highest standards can we create and sustain an environment that we all are proud to work in.

This Code of Conduct reflects the Board's commitment to embedding and upholding high ethical standards and integrity in all aspects of our operations and business. The Code must be read in conjunction with your regional Employee Handbook, Compliance Manual, Written Supervisory Procedures, Conduct Management and Governance Framework, the Risk Management Handbook and any other policies or procedures applicable to your role. Taken together, these policies and procedures set forth the Group's expectations of acceptable conduct.

Everyone at TP ICAP has an obligation to be aware of, understand and follow the Code of Conduct.

If you become aware of facts or circumstances you believe may violate or lead to a violation of this Code, please follow the procedures described in the Raising Concerns section of the document or in the group's whistleblowing policies. If you have questions, please ask your manager for guidance.

NBreteau

Nicolas Breteau
Chief Executive Officer
TP ICAP Group plc

Contents

4 Our Cultural Framework

6 Our Triple A Values

10 Raising concerns

Our People	13	Diversity and Inclusion
	14	Conduct Expectations
	15	Duty to Cooperate
	16	Expectations for Managers
Our Firm	18	Risk Management
	19	Anti-Bribery & Corruption
	20	Anti-Money Laundering & Counter Terrorist Financing
	22	Sanctions
	23	Data Privacy
	24	Confidentiality
	25	Personal Account Dealing
	26	Recorded Media
Our Clients	28	Broker Confidentiality
	29	Inside Information
	30	Gifts & Entertainment
	31	Conflicts of Interest
Our Community	33	Charitable Giving
	34	Tax Affairs



Our Cultural Framework

TP ICAP Group's history dates to 1866. More than 150 years later, TP ICAP Group remains a world-leading provider of market infrastructure, specialising in connecting market participants to deliver superior liquidity and data solutions.

Our Purpose

To provide clients with access to global financial and commodities markets, improving price discovery, liquidity and distribution of data through responsible and innovative solutions.

Our Vision

To be the world's most trusted, and innovative, liquidity and data solutions specialist.

Our Mission

Through our people and technology, we connect clients to superior liquidity and data solutions.

Our People

Our people are our most valued asset. We thrive on offering an inclusive workplace for all, where people feel valued and respected and are recognised and rewarded for over-and-above, high performance. We also offer extensive career development opportunities, supporting employees in their career ambitions wherever possible. We all have a role in delivering our vision - to be the world's most trusted, and innovative, liquidity and data solutions specialist - by always being mindful of clients, costs and capital.

Our Definition of Conduct

The Group's objective is to ensure that its staff operate in accordance with very high standards of personal and professional conduct, recognising that negative behaviours and actions undertaken by its employees can have a significant adverse impact on a broad range of stakeholders, including the Group's clients, the markets in which it operates, other employees and on the Group itself.

TP ICAP employees are expected to undertake business and personally act in a manner consistent with what our stakeholders and society in general would typically regard as acceptable behaviours that reflect our Values. At all times demonstrating ethical business standards in decision making and personal practices.

Who does the Code apply to

The Code of Conduct applies to all employees and directors of TP ICAP Group plc and its direct and indirect subsidiaries. We also expect and encourage all consultants, contractors and temporary workers to adhere to our Code of Conduct. No one, at any level, has the authority to ask you to do something that is a breach of this Code.



Our Triple A Values aim to create a safe and welcoming environment where all colleagues feel comfortable and where trust, honesty and responsibility can thrive.

Our Triple A Values: **Accountability**

AAA Value

What does this mean

What does this look like



Accountability in the workplace is about building trust and staying committed to doing the right thing for the business consistently.

We want our people to take responsibility for their results, seek honest feedback and support one another in achieving our goals.

Accountability stems from a culture of honesty and integrity; when we are accountable to ourselves, our colleagues, and our clients, it improves performance.

We are **Accountable** to ourselves, our colleagues, and our clients.

- ✓ Act with urgency to achieve the best outcome.
- ✓ Seek feedback, understand the risks, and be decisive.
- ✓ Take personal ownership for results. Support one another in achieving our team goals.
- ✓ Empower others with the right authority at the right level.
- ✓ Speak up when things are not right.

Our Triple A Values: **Adaptability**

AAA Value

What does this mean

What does this look like



Adaptability is vital for any form of success, especially in the changing world we live in today.

When you're adaptable, you open your mind to new ideas, and we want our people to be flexible and innovative, seek out new efficiencies adopt an entrepreneurial spirit. It's also about being respectful to others and having empathy for one another; this helps relationships grow stronger and deeper, a key skill in business.

We are **Adaptable**, paving the way for innovation in all we do.

- ✓ Advance the interests of TP ICAP and our clients with an entrepreneurial spirit.
- ✓ Find ways to create efficiencies.
- ✓ Encourage healthy competition to achieve greater results.
- ✓ Learn and improve in every way, every day. Learn from our mistakes.
- ✓ Be agile and resilient and deliver.

Our Triple A Values: Authenticity

AAA Value

What does this mean

What does this look like



Authenticity is the premise of being genuine, living and leading in your truest form, communicating openly and stripping down layers to build strong, trusting foundations.

We want our people to bring their best selves to every interaction. Again, this boils down to embodying a culture of trust and honesty, where people seek honest conversations, feedback and progress. After all, people perform better when they can be themselves, leading to better results for TP ICAP.

We are **Authentic**, bringing our best selves to every interaction.

- ✓ Be honest, lead by example, and play by rules.
- ✓ Live with integrity. Keep your promises.
- ✓ Listen. Communicate clearly and with purpose.
- ✓ Treat each other with kindness and respect. Have fun and be can-do.
- ✓ Welcome and consider diverse points of view.

Raising concerns

All TP ICAP employees are also encouraged to question or escalate concerns of suspected wrongdoing, potential misconduct or unethical behaviour, and be confident that they will be heard and acknowledged without the risk of retaliation.

How to raise a concern:

1. You may contact your manager, regional head of Compliance, local HR contact, Employee Relations or the Legal Department.

2. If there is a good reason not to raise the issue with senior management directly involved with the business, you may raise the matter via one of the following confidential methods:

- You may also escalate concerns on an anonymous or disclosed basis through the firm's Speak-Up channels. These hotlines and web form are managed through by an independent third-party and are available in multiple languages 24 hours a day, seven days a week:

United Kingdom: [0800 915 1571](tel:08009151571)

United States: [866 901 3295](tel:8669013295)

Singapore: [800 448 1773](tel:8004481773)

Freephone contact numbers for other jurisdictions can be found here:

[Freephone international numbers](#)

Web reporting form:

<https://www.safecall.co.uk/file-a-report/>

- Escalate directly to the Chair of the Audit Committee via post:, TP ICAP Group plc, Level 9, 135 Bishopsgate, London, EC2M 3TP, United Kingdom

Whilst TP ICAP encourages you to raise concerns internally first, you are also able to raise concerns directly with TP ICAP's regulators. Raising concerns with TP ICAP's regulators is not conditional on you reporting the concern to TP ICAP first. You are also able to report concerns to both TP ICAP and the regulator, if you wish.

Details of the TP ICAP's regulators can: be found in the Whistleblowing Policies, be sought from your local compliance officer, or by consulting the regulator's website.



Resources:

- [Compliance](#)
- [Human Resources](#)
- [Legal](#)
- [Whistleblowing](#)
- [Employee Handbooks](#)



What types of issues should I report?

Example of issues you should report are; suspected violation of this Code, our values, or any law, regulation, firm policy.

What if the conduct involves a senior team member and I am concerned about retaliation?

All reports are investigated confidentially. You may also choose to report anonymously, if you wish. In any event, the firm strictly prohibits retaliation for reporting concerns in good faith, regardless of who the report involves.



At TP ICAP, we foster an inclusive culture where every employee is empowered to grow and excel, taking pride in our collective journey.

Key to our success is a robust framework designed to develop and support our team.

- Diversity & Inclusion
- Conduct Expectations
- Duty to Cooperation
- Expectations for Managers

Our People



Diversity & Inclusion

TP ICAP is committed to being an employer of choice. Our inclusive culture attracts and retains the best talent and enables everyone to flourish.

We know that the best innovation happens when diverse people with different perspectives and skills work together in an inclusive atmosphere. This underpins the execution of our strategy, our ability to continue to innovate and our relevance to our clients.

We are working hard to build a culture where everyone feels safe, visible and valued, and able to behave in an Accountable, Adaptable and Authentic way – in line with our Triple A Values.

Whoever you are and however you got here, we understand your contribution is one of a kind and we value it.



Resources:

- [Diversity and Inclusion](#)
- [Our Triple A Values](#)



Contact:

- [Human Resources](#)

Conduct Expectations

The way we conduct ourselves as individuals and as an organisation is as important to us as the products and services we deliver.

Discrimination, harassment, bias, or prejudice based on any characteristic protected by law, is prohibited. This applies whether it is committed by or against an employee, client, vendor, or visitor, whether it occurs on or off premises, at work-related events or after work. This includes retaliation.

All employees have a day-to-day responsibility for ensuring that behaviours are appropriate, and that Company guidelines and associated policies are followed.

Where you see behaviour which does not meet these standards then you have a responsibility and obligation to speak up and report such conduct.



Resources:

- [Employee Handbooks & HR Policies](#)
- [Legal & Compliance Policies \(inc. Compliance Handbooks\)](#)
- [Triple A Values](#)
- [Whistleblowing](#)



Contact:

- [Human Resources](#)
- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)

Duty to Cooperate

The Company receives regulatory and administrative inquiries which require us to conduct internal investigations. The Company also has a duty to investigate matters raised by our employees and those we do business with.

It's our responsibility to fully and honestly cooperate with those conducting investigations which may include members of our Compliance and Employee Relations teams, outside counsel, regulators, auditors and other parties.

Your cooperation in these matters will uphold our integrity and reputation. Failure to do so may result in necessary disciplinary actions, up to and including termination.



Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)
- [Employee Handbooks & HR Policies](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)
- [Legal](#)
- [Human Resources](#)

Expectations for Managers

Managers are accountable for the actions of their teams, for reinforcing the Company culture and leading by example.

All people managers are responsible for coaching and developing their people, communicating clear expectations, helping their people to set and achieve goals and providing timely and actionable feedback.

Managers also play a critical role in creating an inclusive work environment and are expected to role model excellence and integrity, especially in challenging situations.

The expectation is that all managers at TP ICAP embody this Code and our core values in how they show up for our clients, their people, and the Company.

What if one of my direct reports informed me of a potential violation of the Code?

Contact Compliance or Employee Relations for guidance. You should not investigate the concern on your own.



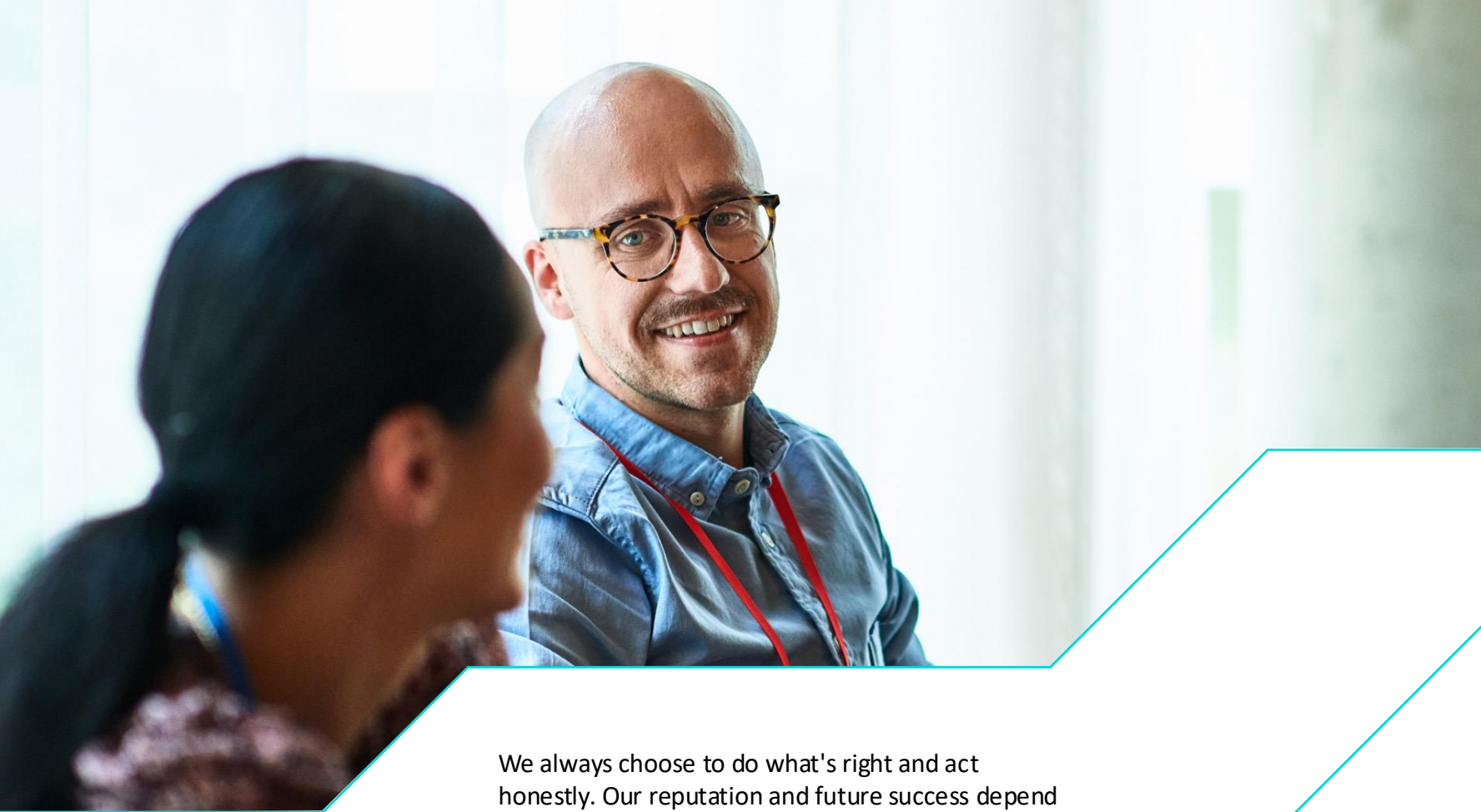
Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)
- [Employee Handbooks & HR Policies](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)
- [Legal](#)
- [Human Resources](#)



We always choose to do what's right and act honestly. Our reputation and future success depend on everyone working together and applying the highest ethical standards.

- Risk Management
- Anti-Bribery and Corruption
- Anti-Money Laundering & Counter Terrorist Financing
- Sanctions
- Data Privacy
- Confidentiality
- Personal Account Dealing
- Recorded Media

Our Firm



Risk Management

Risk management is a key component of our culture. All employees have a day-to-day responsibility for ensuring behaviours are appropriate, and that Company guidelines and associated policies are followed.

The Group defines the management of risk within its Enterprise Risk Management Framework (“ERMF”). It mandates that Risks are managed through a three lines of defence (“3LOD”) model as follows:

- **First Line of Defence** – do Risk Management – All staff in front office business units and support functions holds primary responsibility for identifying and assessing risks arising from their activity.
- **Second Line of Defence** – do Risk Oversight – Comprises the Risk and Compliance functions. Responsible for overseeing and challenging first line of defence in its identification, assessment and management of risks.
- **Third Line of Defence** – conduct Independent Assurance – Internal Audit function provides independent assurance over TP ICAP’s risk management, control and governance processes, covering both the first and second lines of defence.

Collectively, the firm’s risk management activity is overseen by a formal risk committee structure which has overall responsibility for ensuring that the Group manages its risk profile within risk appetite.

A range of risk management processes and activities identify, assess, manage and monitor all the types of risks faced by the Group (including Operational, Financial Risk Management and Business and Strategic risks).

- We all have a responsibility to implement an effective risk culture, understand our risk responsibilities, raise concerns or seek advice when needed.
- We are all held individually accountable for discharging our risk management responsibilities.



Resources:

- [Risk Framework and Policies](#)



Contact:

- [Group Risk](#)

Anti-Bribery & Corruption

TP ICAP has a zero-tolerance approach towards bribery and corruption. The Firm prohibits bribery and corruption in any form, whether direct or indirect, and will not tolerate Employees or third parties being involved in bribery, whether by offering, promising, soliciting, demanding, giving or accepting bribes or behaving corruptly in the expectation of a bribe.

Our people are strictly prohibited from improperly providing anything of value to anyone to obtain or retain business or any improper business advantage. This includes: public officials, candidates for office, employees, or officers of state-owned enterprises; employees or officers of counterparties; clients/customers or suppliers; any agent of the aforementioned parties; or any other person with whom the firm does or anticipates doing business. Our people are also prohibited from receiving or accepting bribes.

Facilitation payments are prohibited by TP ICAP, any requests for a payment to secure or speed up the performance of a routine or necessary action must be referred to Compliance.

A client inquired about an internship for their child. What can I do?

You are welcome to refer the resume to Human Resources. At that point, you must step away from the process and may not play a role in the recruitment process.



Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)

Anti-Money Laundering & Counter Terrorist Financing

The Group is committed to:

- **Not being used by criminals to launder the proceeds of crime, by terrorists for the financing of illicit activities or by criminals to enable proliferation financing;**
- **Protecting the integrity and the stability of the financial markets and national economies;**
- **Complying with applicable laws, legislation and regulation; and**
- **Preventing the facilitation of tax evasion.**

All staff must comply with their responsibility as set out in the Global Anti Money Laundering & Counter Terrorist Financing Policy, and promptly report any unusual or potentially suspicious activity that could involve money laundering, terrorist financing, violations of law or regulation, or any other activity that has no apparent legitimate business purpose or is outside of the ordinary course of a client's business activity. To report suspicious activity, or if you have any questions about whether any activity constitutes suspicious activity, contact Compliance, or escalate in accordance with the escalation guidance provided within the Policy.

The law imposes obligations on Employees personally and a breach could lead to dismissal, imprisonment and/or monetary fines.



Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)
- [Legal](#)



What if I am not sure whether a client's actions are suspicious?

If there is any doubt, escalate. There can be significant ramifications for failing to identify and report suspicious activity.

May I inform my client I am reporting their activity as suspicious?

No. Discussing this with your client may expose you and the firm to legal and or regulatory sanction.

Sanctions

TP ICAP is committed to comply fully with applicable Sanctions Laws. The Firm will not conduct business, maintain relationships with clients or engage in any transactions or dealings that could result in a violation of applicable Sanctions Laws, including activity that could constitute evasion or attempted circumvention of applicable Sanctions Laws. Violations of Sanctions Laws can result in potentially significant monetary penalties and reputational harm.

Employees are required to follow regional/local sanctions policies to meet their obligations and responsibilities arising from Sanctions Laws applicable to them. If you find yourself involved in activity that appears to raise sanctions concerns, you should immediately escalate to Compliance.



Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)
- [Legal](#)

Data Privacy

Data Privacy is concerned with the proper handling of personal data, in particular sensitive information relating to individuals known as “data subjects”.

Our Global Data Privacy Framework consists of a range of measures, which provide the framework for the TP ICAP Group to comply, both with overarching best practice Data Protection principles (for example to keep any personal data that we hold or process in a safe manner and to use it fairly) and, where applicable, with specific data protection laws and regulations.

If any member of staff becomes aware of a Data Breach, or potential Data Breach, they must escalate it immediately to Global Data Privacy mailbox, and your line manager.



Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Data Privacy](#)

Confidentiality

The Group and its staff will frequently be privy to private and confidential information in carrying out its business – this could include information about clients and their trading activity, information about the Group or information relating to its staff. All information obtained in the course of business must be treated in the strictest confidence. This not only protects the Group and its staff against regulatory sanction but is also critical to maintaining our reputation.

Staff must regard all information obtained in the course of employment as confidential and take all appropriate steps to maintain the confidentiality and security of such information. In addition, staff must be aware of, and adhere to, specific TP ICAP rules in place to protect confidentiality of information.



Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)
- [Legal](#)

Personal Account Dealing

The Group maintains controls around Personal Account Dealing (PAD) to minimise the risk of insider dealing and other forms of market abuse. PAD covers any trading in financial instruments undertaken by staff for their own account or undertaken for any account where the staff member could influence the transaction. Staff may undertake PAD activities during work hours, but it must not distract from professional responsibilities or conflict with the interests of the Group.

All staff must disclose and seek pre-approval for all PAD in relevant financial instruments.

All staff are required to adhere to their local requirements in respect of PAD which can be found in the regional Compliance Manuals.

Do junior ISAs held for my child require pre-approval for trades in financial instrument?
Yes, the PAD rules cover all transactions in in-scope products conducted by accounts under the influence of TP ICAP staff.

Do open-funded funds need pre-approval?
No, only funds that are priced by the supply and demand of the fund itself are in-scope. For example, an investment Trust would require approval, whereas an open-ended investment company or a unit trust would not.



Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)

Recorded Media

The Group mandates recording all business telephone lines and other electronic communications when carrying out certain types of business activity, such as discussing, receiving or transmitting orders in financial instruments.

Communications of any nature relating to the three categories above must be undertaken on a recordable medium that is subject to the Group's normal recording, record retention and back-up procedures. This may include a corporate device or personal device that has been properly configured with the appropriate recording applications by the Group for regulated activity.

All persons involved in maintaining records or reporting of information must not knowingly misrepresent or omit material facts. Concerns regarding the integrity of our recordkeeping or reporting of information must be escalated to Compliance.

Our communications should be clear, concise, accurate, and appropriate for the professional environment. Business communications must only be conducted through firm-approved communications systems.

I am a heavy social media user. Do I need to stop?

No, but you need to consider that you are not anonymous on-line and therefore use good judgement. You should not post views which could negatively impact the Company.



Resources:

- [Corporate Affairs Policies](#)
- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)



Our clients' trust is our most important asset. We're proud they choose to do business with us.

- Broker Confidentiality
- Gifts & Entertainment
- Inside Information
- Conflicts of Interest



Our Clients

Broker Confidentiality

The unlawful disclosure of non-public information relating to client trading activity could amount to a breach of market abuse laws and exchange rules as well as seriously damage the Group's reputation.

Brokers must ensure that they treat all non-public information received in relation to client trading activity in the strictest confidence.

Brokers are expected to comply with the confidentiality requirements dependent on the method of execution and the market within they operate.

If there is any doubt as to client confidentiality requirements, please contact Compliance.

I observed a colleague discussing client activity with a third party who is not party to the transaction. What should I do?
Escalate to Compliance right away.



Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)

Inside Information

As a part of our commitments to our clients and the integrity of the firm and the markets within which we operate, we do not share, intentionally or not, inside information with anyone who does not have a need to know such information.

You must not inappropriately share or deal upon inside information. 'Dealing' for these purposes includes acquiring or disposing of a financial instrument, cancelling or amendment orders in a financial instrument, or encouraging another person to do so. Misuse of inside information may constitute a criminal offence.

You must inform Compliance immediately if you believe any such activity has taken place, whether by other employees of the Group or by another third party such as a client.



Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)

Gifts & Entertainment

TP ICAP encourages its staff to engage with clients and third parties outside of the office to strengthen relationships and better serve our clients' needs.

All staff must, however, be aware of and comply with the Group's policies for any entertainment or gifts.

The Group and its staff cannot be seen to unduly influence others through the giving (or receiving) of entertainment or gifts. TP ICAP prohibits the offering or accepting of entertainment or gifts unless reasonably justifiable in all circumstances. Staff must comply with any local policy and administrative requirements for entertainment and gift expense approval and processing.

Am I allowed to take a prospective clients out to dinner?

Yes. The firm encourages appropriate business meals as a means of developing relationships with clients. You must, however, be aware of the pre-approval requirements that depend on the recipient and value of the spend.



Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)

Conflicts of Interest

Confidence in TP ICAP's integrity to act on behalf of its customers is central to the relationship of trust we have with our customers. This means that when providing services, TP ICAP will always act in the customer's best interests, putting customers' interests ahead of its own.

TP ICAP has robust internal policies and procedures in place which require all staff to identify and escalate any identified conflicts of interest in accordance with a formal escalation process. Such internal obligations enable the Group to continually identify new conflicts of interest which arise in its business and to implement those measures required to adequately monitor, manage and control the potential impact of those conflicts on its customers.

In order to discharge their responsibilities with regards to potential and actual conflicts, staff must ensure that they:

- Act honestly and in good faith, and be alert to the risk of conflicts of interest;
- Act in the clients' best interests and put clients' interests ahead of their own; and
- Disclose the existence of any potential or actual conflicts of interest to their line manager and Compliance in a timely manner.

Staff must be alert to personal conflicts of interest, including close personal relationships and outside business interests. You must disclose any close personal relationship with another employee and/or outside firm business contact, as well as any outside business interests such as external directorships or other roles with firms. If you are unsure whether a relationship or role requires approval, please contact Compliance.



Resources:

- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)



What we do, both as a team and individually, can shape how people see our firm and positively impact the communities we serve.

Our Communities

- Charitable Giving
- Tax Affairs



Charitable Giving

Through charitable donations, whether monetary or in-kind, the Group seeks to serve and strengthen the wider community in which it operates.

The Group offers volunteering and fundraising schemes for colleagues wishing to support charities and good causes their communities, including:

Paid volunteer days; Matched giving; Community Giving grants.

The entertainment of clients (or employees) at charitable events is subject to strict pre-approval, reporting and monitoring procedures. These are set out in the Group Expenditure Control Policy. All donations made to charities are subject to pre-approval checks, and the charitable giving criteria set out in the Charitable Giving Policy.

Charitable contributions must never be made if the intent or effect is to influence inappropriately the business judgement of any person, including a public official, client, or potential client. Contact Compliance if there are any questions about a charitable contribution.

TP ICAP has a blanket ban on all direct and indirect Political Giving in the name of the Group, and in an employee's capacity as a TP ICAP employee.

The Company does not make donations to charities whose main aim is to engage in political activism, or support the work of a single religious faith, on grounds of independence and impartiality.



Resources:

- [Corporate Affairs Policies](#)
- [Finance Policies](#)
- [Legal & Compliance Policies \(inc. Compliance Manuals\)](#)



Contact:

- [Corporate Affairs](#)
- [Americas Compliance](#)
- [APAC Compliance](#)
- [EMEA Compliance](#)

Tax Affairs

The Group seeks to manage its tax affairs efficiently and is committed to complying with all its tax obligations in the jurisdictions in which it operates within the spirit of the tax legislation applicable to those jurisdictions.



Resources:

- [Group Tax Strategy](#)
- [Finance Policies](#)



Contact:

- [Group Finance & Tax](#)



March 2026
Version 7.2 EXT



TP
ICAP