

# COI policy.

November 2023 V2.0

INSPIRED THINKING GROUP

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**ITG strives to maintain an ethical and balanced work place that considers all aspects of our employees lives and what could be considered a conflict of interest and to ensure all business decisions are made with the best intentions**

When competing interests impair our ability to make objective, unbiased business decisions we have a conflict of interest.

You may face a conflict of interest when your professional duties as an employee of ITG and your personal interests diverge. They may take the form of financial interests in a supplier's or customer's

business, recruiting a close family member or engaging in employment outside the Company.

This policy aims to guide all employees on the boundaries and their obligations to report any suspected conflict of interest and maintain a high ethical value across the group.



## Scope and objective of the policy

This policy applies to all employees, officers, consultants, interns, agency workers and contractors of the ITG Group, its subsidiaries, and associated companies worldwide and joint ventures.

The Board has overall responsibility for the Policy, and for reviewing the effectiveness of actions taken in response to concerns raised under the Policy. The day to day management of the policy will form part of the group ESG framework and be managed by the Group

Commercial Operations and Risk Director.

The objectives of the policy are:

- to communicate our requirements in respect of conflicts of interest;
- to advise all employees of their obligation to disclose conflicts of interest and maintain high ethical standards;
- to ensure that all business decisions are made in the best interests of the Company.

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## What are the expectations...

As our employee, you are expected to:

- maintain the highest possible standard of integrity in all your business relationships, both inside and outside the organisation in which you work.
- reject any business practice which might reasonably be deemed improper (including improper practices which might benefit the Company);
- never use your authority or position for personal gain;
- at all times, act with impartiality, independence, and integrity;
- avoid being, or giving the appearance of being, in a position which may result in an actual

## Procedure and reporting

It is not possible to define all situations or relationships which may create a conflict of interest, so each situation must be evaluated individually. However, some of the more obvious conflicts include:

- having any interest, dealings, or shareholdings in any business which either is a competitor, customer, supplier or ITG partner or is seeking to become one;
- a close family member having any interest, dealings, or shareholdings in any business which either is a competitor, customer, supplier or ITG partner, or is seeking to become one. Close family member means any spouse, domestic partner, parent, sibling, child or other relative who resides in the same household, and any other familial relationship that could create the appearance of a conflict;
- having a close or long-standing relationship/friendship with a business which either is a competitor, customer, supplier or ITG partner, or is seeking to become one.

In all cases, individuals have a responsibility to assess the potential conflict. Actual or perceived conflicts of interest must be disclosed. Disclosure should be made to your Line Manager in the first instance, if that is not

or perceived detriment to ITG's reputation and/or interests.

You must disclose or seek direction on any issues which may potentially conflict with your responsibilities to ITG.

You will not be permitted to engage in transactions on behalf of ITG with organisations or individuals with which you have an interest. All decision making and transactions with the organisation concerned will be handled and managed independently.

possible, you can report any potential conflicts to the People Team or the ESG Director on [ESG@teamitg.com](mailto:ESG@teamitg.com). Employees making positive disclosures will be asked on an annual basis to review conflicts of interest.

Actual conflicts of interest must be avoided and potential conflicts of interests carefully managed. Line Managers must review the disclosed interest, discuss it openly and manage it so that employees do not become involved in or influence situations where actual conflicts of interest occur.

If you wish to undertake other work while you are employed by ITG then you must obtain prior written consent from the People Team.

If you are in any doubt as to whether a conflict of interest exists discuss the situation with your Line Manager or the Group Commercial Operations and Risk Director - [ESG@teamitg.com](mailto:ESG@teamitg.com)

If you have any problems recording your conflict of interest, please inform your Line Manager.

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## Examples of "Conflict of Interest"

1

### Other financial interests

When you have an existing or potential financial or other significant interest that impairs or might appear to impair your judgment in carrying out your responsibilities to ITG.

2

### Family and ITG

When you or your family member receives a financial or other significant benefit from a third-party because of your position in ITG.

3

### Personal gain

When you can influence ITGs business, administrative, or other decisions in a manner that leads to personal gain or advantage.

### What happens if I don't report a potential conflict?

Failure to comply with ITG policy and procedures may result in disciplinary action and legal action being taken wherever appropriate.

If you have any doubts or questions please contact [ESG@teamITG.com](mailto:ESG@teamITG.com)

### Policy review and approval

This policy will be reviewed annually or with any major change in legislation or practice. It is approved and monitored at a board level and reported on through internal and external audits, where applicable. Any questions or queries should be send to:

[ESG@teमितg.com](mailto:ESG@teमितg.com)

Effective date	Version	Owner	Changes
November 2022	V1.0	Chris Egerton	New ESG Framework
November 2023	V2.0	Chris Egerton	Annual Update