



IPC Anti-Bribery Statement

IPC maintains a zero-tolerance approach to bribery and corruption. We are committed to conducting all our business activities with integrity, honesty, and transparency. This commitment applies to all directors, employees, business partners, and third parties acting on IPC's behalf.

IPC has established, implemented, and continually improves its Anti-Bribery Management System (ABMS) in accordance with ISO 37001:2025. In line with the requirements of the Standard, IPC's Anti-Bribery Policy:

- a) Prohibits all forms of bribery, whether direct or indirect, including offering, giving, requesting, or accepting bribes.
- b) Requires compliance with all applicable anti-bribery and anti-corruption laws in every jurisdiction where IPC operates.
- c) Reflects IPC's nature, purpose, and context as a global provider of financial communications and trading infrastructure to the financial services industry.
- d) Provides a framework for setting, reviewing, and achieving anti-bribery objectives.
- e) Includes a clear commitment to meet all relevant legal, regulatory, and ISO 37001 requirements.
- f) Requires the application of risk-based due diligence for employees and business partners, proportionate to the level of bribery risk.
- g) Mandates that all personnel receive appropriate anti-bribery training and awareness.
- h) Encourages employees and external stakeholders to raise concerns in good faith or based on reasonable belief, and ensures they may do so confidentially and without fear of retaliation.
- i) Affirms the authority, independence, and autonomy of the Anti-Bribery Compliance Function to perform its duties objectively and free from undue influence.
- j) Requires the reporting and investigation of all suspected breaches and ensures that disciplinary or remedial actions, including termination of employment or contract and potential legal consequences, are taken where violations are confirmed.
- k) Commits IPC to continual improvement of the ABMS and the effectiveness of its anti-bribery controls.

All IPC directors, employees, business partners, and third parties are expected to uphold the highest standards of integrity and comply with IPC's Anti-Bribery Policy. Any suspected bribery, attempted bribery, or unethical conduct must be reported through IPC's Whistleblowing Channel via the IPC Ethics Hotline, available under the Support section of IPC's official website, or by contacting the IPC Corporate Risk team at IPCRisk@ipc.com. All reports made in good faith will be treated seriously, investigated appropriately, and handled in a manner that protects the reporting individual from retaliation.

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