

How we do business

# Code of Conduct



## 1. The purpose of this Code of Conduct

- This Code of Conduct supports Intertrust Group in providing tech-enabled corporate and fund solutions to clients operating and investing in the international business environment by setting out how we will do business. It helps us to make the right decisions that support us in building a strong and sustainable business.
- It outlines Intertrust Group's fundamental purpose, corporate values and guiding principles that govern how we operate across all our jurisdictions globally.
- Our Code of Conduct guides us in how we interact with our colleagues, clients, regulators, business partners, competitors, suppliers and the broader stakeholder community in which we live and work.
- It is also supported by additional policies and procedures governing Intertrust Group's activities.

## 2. Our purpose

In a complex and volatile world, we help keep our clients a step ahead by providing innovative solutions which promote risk & compliance, business ethics and transparency.

- **We're enablers.** By helping our clients with their administrative challenges, we enable them to grow their business sustainably;
- **We're navigators.** In an increasingly complex global environment, we implement solutions for our clients to operate their business efficiently and responsibly;
- **We're gatekeepers.** Focusing on compliance, business ethics and transparency, we take care of our clients' legal, administrative and regulatory duties in international business.

### 3. Scope and application

All Intertrust Group employees must adhere to this Code of Conduct as a mandatory requirement of our contract of employment.

A local addendum to this Code of Conduct may apply in your jurisdiction if additional requirements are necessary, for example in order to meet the requirements of local law or regulation.

- If you don't comply with the provisions of this Code of Conduct you may be subject to internal enquiry and disciplinary measures including, but not limited to, administrative sanctions and termination of your contract.

### 4. Corporate values and guiding principles

**Our corporate values, on which this Code of Conduct is based, are:**

We're responsive: We're ambitious and proactive in our thinking. We anticipate change so we can stay ahead. In everything we do, we always go the extra mile;

- We're excellent: We're driven to succeed. We support each other and our clients to achieve their goals. Each of us takes pride in delivering first-class results;
- We're innovative: We welcome new ways of working. We embrace and challenge, to do better. Thinking of the bigger picture, we spot new opportunities;
- We're connected: We're collaborative. We share knowledge and expertise to achieve the best results. Our aim is to build trust and relationships for the long term.

**Intertrust Group's guiding principles are:**

- Integrity: Acting responsibly and with integrity as part of our DNA. We adhere not only to the letter but also the spirit of the law, regulations and professional standards. We deal with our regulators and law enforcement agencies in an open and transparent way;
- Governance: Internal governance, supported by global policies, procedures, systems and regular training programmes, mean that we can make informed, risk-appropriate decisions about the clients we accept, processes we execute on and the services we provide;

- Prudence: We take advice when we need it and record our decision-making processes with a supporting rationale. Only people of appropriate experience, qualification and ability make decisions, supervise other employees and control client assets: the more complex, risky or legally binding, the more experienced the employee that deals with it;
- Independence: Our first responsibility is always to act on our independent, professional judgement in accordance with the applicable laws and regulations and in the best interest of the customers.
- Three lines of defence: We act in line with the three lines of defence model, as described in Intertrust Group's Global Compliance Manual.

## 5. Relations

### 5.1 Clients

- We pay specific attention to the information needs of our clients and communicate to them in a clear, fair, straightforward and truthful way. Advertisements and other marketing materials contain relevant and comprehensible information and avoid creating unjustified expectations.
- We seek insight into our clients' requirements and resources so we can provide a high quality level of service to them and we treat the information we receive with the highest degree of confidentiality.
- We are always transparent with our clients about our terms and conditions of service.
- We make every reasonable effort to investigate and resolve client complaints in line with the Complaints Policy published on our website and we will take appropriate measures to prevent the same events from arising again.
- We have a zero tolerance approach to engaging client organisations or individuals engaged in, or suspected of having engaged in, illegal or unethical activities. We accept new clients in accordance with all applicable laws, rules and standards on money laundering and terrorist financing, abiding to both the letter and the spirit of those regulations. We adhere to our Anti-Money Laundering, Counter Terrorism Financing and Anti-Tax Evasion Policy.

## 5.2 Employees

- Our reputation as a quality service provider depends on our employees observing the highest degree of personal and professional integrity. Employees must comply with Intertrust Group's policies, procedures and control measures at all times. Our corporate values are an integral part of the performance management process.
- Respect, openness and cooperation characterise relations between Intertrust Group and our employees as well as relations between employees. Knowledge sharing and exchange of best practice are key habits. Intertrust Group employees are honest and fair, share credit when credit is due and avoid public criticism of one another and of Intertrust Group. Intertrust Group has a zero-tolerance policy towards discrimination, bullying and sexual harassment.
- Intertrust Group is a trusted employer and we treat our employees in a non-discriminating manner, with dignity and respect. This relates to providing adequate remuneration, providing opportunities for personal development and facilitating a fair balance between work and private life.

## 5.3 Regulators

- We deal with our local regulators in an open, transparent and cooperative way.
- All non-standard correspondence with the regulator will always be reviewed by the relevant Compliance function prior to submission.
- Notifications concerning a proposed visit by a regulator will always be referred to the relevant Compliance function. Correspondence relating to a regulatory visit will always be reviewed by the relevant local Managing Director (or delegate). On-site regulatory examinations will always be planned for and supervised by the relevant Compliance function and the Local Managing Director (or delegate).
- Our employees are bound by the principles and rules of any competent regulatory or supervisory authority and by any code of practice to which Intertrust Group may subscribe. This includes maintaining any qualifications or minimum continuing professional development (CPD) that may be required by the relevant regulator.
- These principles and rules are vital to protect our clients' interests and our own reputation.

#### 5.4 Professional service providers

- The relationships we have with professional service providers, such as the legal and accounting firms that provide professional services to a client entity or to which we delegate services, are governed by our corporate values.
- We will select any professional service providers to which we delegate services or recommend for appointment to our clients with due care and attention.

#### 5.5 Communities

- Intertrust Group aims to create a culture that supports and encourages community involvement through our Environmental, Social and Governance framework.
- We strive to be the preferred provider of services by providing the appropriate services and acting in line with our corporate values. We do not engage in unfair practices as regards to competitors or markets.

#### 5.6 Queries

- Contact your Local Management and/or Human Resources team if you have any queries about your role or responsibilities in relation to this Code of Conduct.