

ESG Policy

Policy Governance	
Policy Tier	Tier 2
Policy Owner(s)	Group Head of ESG
Policy Sponsor	Group Chief Operating Officer
Policy Approver	Executive Committee
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Version Control			
Version	Review Date	Summary of Changes	Approver
1.3	15.8.22	<ul style="list-style-type: none"> • Updated 'Links to Principal Risks' section • Added cross-reference to "TCFD Notes" document • Updated job-title of Group Head of ESG • Added details of commitment to Science Based Target initiative • Updated 'Responsibilities Matrix' to include new roles 	Group Head of ESG
1.2	4.8.21	<ul style="list-style-type: none"> • Addition of Diversity Commitment 	ESG Manager

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POLICY STATEMENT AND PURPOSE

IG Group is a purpose-led business and is committed to operating in line with principles of sustainability and responsibility. This policy sets out how we put this commitment into practice by embedding matters of Environment, Social and Governance (“ESG”) into our decision making and daily operations.

Guidance and commitments are made directly in this policy, and links are made to other policies that embed our approach to being a sustainable and responsible business. Together, these policies make up our suite of ESG Policies.

Adhering to the principles set out in this suite of ESG Policies will help IG Group secure long-term viability and ensure that we operate in accordance with our corporate values to champion the client, to learn fast together and to raise the bar.

SCOPE

This policy applies to the whole IG Group and subsidiaries, including to all Board members, members of the Executive Committee, employees (including permanent staff and agency workers).

The scope of each policy referred to within this ESG Policy is stated at the beginning of each respective policy.

PRINCIPLES AND REQUIREMENTS

Four ESG Pillars

IG Group makes commitments in relation to four separate ESG pillars, each linked to the priorities and best interests of our key stakeholders and the UN Sustainable Development Goals (“UN SDGs”):

Pillar:	Products
Key stakeholders:	Our clients, our communities
UN SDGs:	4, 8
<i>Financial education</i> For everyone seeking to learn about the capital markets, we provide a wide breadth of educational content that is tailored to clients.	
<i>Onboarding and safeguards</i> We are conscious of the impact that unaffordable losses can have on wellbeing. We take steps to make sure our products are appropriate for each client and that they remain appropriate.	
<i>Security</i> Our clients trust us with their data and, in some cases, their funds. We take utmost care to ensure these are protected.	

Pillar:	People
Key stakeholders:	Our people, our communities
UN SDGs:	4, 5, 10
<i>Equality, diversity, inclusion</i> We strive to create an inclusive culture of equal opportunity free from discrimination, harassment and bullying. Equality, diversity and inclusion are embedded in our values and aligned to our business strategy and are key to our business' future success.	
<i>Talent development</i> We strive to bring people with the right skills, experience and behaviours into IG. Retaining people like this and developing their skills is vital to our success.	
<i>Wellbeing</i> We are dedicated to creating an environment in which our employees can thrive, being mindful of their mental, physical, social and financial wellbeing.	

Pillar:	Partnerships
Key stakeholders:	Our people, our communities, our suppliers
UN SDGs:	4, 10, 12, 13, 17
<i>Educational equality</i> We amplify our ESG impact through collaboration with like-minded partners. This includes focusing on challenges around educational equality.	
<i>Environment</i> We are a lifetime carbon neutral organisation and champion responsible environmental stewardship.	
<i>Suppliers</i> We strive to ensure that our suppliers operate in a way that meets the high standards that we set through our company values.	

Pillar:	Best practice
Key stakeholders:	Our shareholders, our regulators, our people, our clients, our communities
UN SDGs:	5, 17
<i>Business ethics</i> We follow best in class policies and procedures and our decision making structures champion our clients and our employees.	
<i>Accountable leadership</i> Our leadership teams reflect our commitments to equality, diversity and inclusion, and take ownership of our ESG Strategy.	

Open & transparent

We are consistent, open and clear in our communications and reporting.

Embedding ESG in our business practices

The commitments made across these four ESG Pillars are embedded into our business practices by the policies set out in this section. These are supplemented with an Environmental Policy Statement and a Human Rights Policy Statement set out below.

Products

- Vulnerable Client Policy
- Financial Promotion Policy
- Product Governance Policy
- Complaints Handling Procedure
- Data Protection Policy
- Information Backup and Retention Policy
- Vulnerability Management Policy
- Information Security Policy

People

- Equality, Diversity and Inclusion Policy
- Diversity Commitment
- Transitioning at Work Policy
- Home Working Policy
- Parental Policy for the UK
- Shared Parental Leave UK
- Primary Parental (Maternity) Leave UK
- Health and Safety Policy
- Whistleblowing Policy
- Recruitment Policy

Partnerships

- Travel Policy
- Group Vendor Management Policy
- Vendor Management Code of Conduct
- Statement on anti-modern slavery
- PAS2060 statement of carbon neutrality
- TCFD Notes

Environmental Policy Statement

IG is a Carbon Neutral company in line with PAS2060, offsetting our entire carbon footprint from Scope 1, 2 and 3 emissions. We first attained carbon neutrality in 2020. In 2021 we also calculated and offset our historic Scope 1 and 2 emissions to become lifetime carbon neutral. Our main emission sources are listed in Appendix

1.

We recognise that offsetting is one way to reduce our environmental impact. In addition, we are committed to implementing measures that will deliver an ongoing and long-term reduction in our overall footprint. We have made a public commitment to the Science Based Target initiative to have an approved pathway to net zero in place by 2024. This will include commitments relating to our procurement. Pending the pathway to net zero being finalised, we have a rolling commitment to reduce our scope 1, 2 and 3 emissions by 2.5% annually. We have also implemented the recommendations of an IG Recycling Improvement Plan that followed an audit of our head offices in London.

IG offsets are verified by either the Gold Standard or UN CDM mechanism. These link to projects that promote sustainable economic livelihoods and clean technology development.

Our carbon footprint is quantified by reviewing all IG premises' and employees' activity data in line with the GHG Protocol standard and applying the most relevant emission factors sourced from DEFRA's 2019 UK GHG Conversion Factors for Company Reporting and other equivalent data sources for our emissions outside of the United Kingdom.

When staff laptops are decommissioned we work with Dell to see that they are either recycled or resold. Proceeds of resale are used to purchase new laptops that are donated to members of our communities that need them the most.

Best Practice

- IG Group Anti-Bribery Policy (including statement on political donations)
- IG Group Gifts and Hospitality Policy
- IG Share Dealing Code
- IG Personal Account Dealing Policy
- Group Market Abuse Policy
- Group Conflicts of Interest Policy
- PEPs and Sanctions Policy
- Client Risk Categorisation Policy
- Group Global Anti-Money Laundering (AML) (including Counter Terrorist Financing)

Human Rights Policy Statement

At IG Group we conduct our business in an ethical manner, protecting the principles of human rights in all of our operations. Our approach is guided by the UN Guiding Principles on Business and Human Rights, respecting those rights set out in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. This Human Rights Policy Statement is embedded in policies including but not limited to:

- Statement on anti-modern slavery
- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy

- Diversity Commitment
- Transitioning at Work Policy
- Vendor Management Policy
- Vendor Management Code of Conduct
- Information Security Policy
- Complaints Handling Procedure
- Data Protection Policy

ESG Governance

Acting in a sustainable and responsible manner is the responsibility of everyone at IG Group. Our Executive Committee has overall responsibility for the ESG Strategy, sponsored by the Chief Operating Officer and supported by the ESG Manager. The Board has oversight of the ESG Strategy, as delegated to the ESG Board Committee and other Board Committees as appropriate.

Responsibilities matrix:

OVERSIGHT	IG Group Board of Directors		
	ESG Committee Chair: Sally-Ann Hibberd		
	Board Committees (see below)		
RESPONSIBLE	IG Group Executive Committee Sponsor: Jon Noble		
DELIVERY	Group Head of ESG: Ben Hemington		
	ESG Officer		
	Brighter Future Champions	Enterprise Leadership Group	IG Employee Networks

Board Committee Oversight:

Pillar	Commitment	Board Committee
Products	Financial education	ESG Committee
	On-boarding and safeguards	Board Risk Committee
	Security	Board Risk Committee

People	Equality, diversity and inclusion	ESG Committee
	Talent development	ESG Committee
	Employee wellbeing	ESG Committee
Partnerships	Educational equality	ESG Committee
	Environment	ESG Committee
	Suppliers	ESG Committee
Best Practice	Business ethics	ESG Committee
	Accountable leadership	Remuneration Committee, Nomination Committee
	Open & transparent	ESG Committee and Audit Committee

LINK TO PRINCIPAL RISKS

In accordance with IG's risk taxonomy, the principal risks mitigated by this policy are:

Risk	Description
Conduct and Operational risk	Information security
Conduct and Operational risk	Employee working conditions
Conduct and Operational risk	Threats to employees and assets

FREQUENCY OF REVIEW AND UPDATE

This policy will be reviewed on an annual basis or earlier in the event of significant changes to regulation or operations of IG Group.

APPENDIX 1

IG Group's main carbon emissions sources:

- mains gas and electricity consumption
- transmission and distribution losses
- water consumption
- wastewater leaving the premises for treatment, as well as waste
- fuel used in generators
- refrigerant emissions
- air travel
- rail travel
- other forms of travel including taxis, as well as hotel stays
- staff commuting including by car, rail, underground and taxi
- purchasing of goods and services