



# INTEGER WEALTH GLOBAL

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## Policy on Personnel and Management Code of Conduct

Date: 26 January 2023

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### Policy Statement

At Integer Wealth Global, we are committed to maintaining the highest standards of integrity, professionalism, and ethical behaviour. This Code of Conduct outlines the principles and expectations for all personnel and management to ensure we uphold our values and responsibilities in creating and managing alternative investment funds for our corporate clients in Europe.

#### 1. Core Values:

- 1.1 **Integrity:** We act with honesty and transparency in all our dealings.
- 1.2 **Professionalism:** We maintain a high level of competence and strive for excellence.
- 1.3 **Respect:** We treat all individuals with dignity and respect.
- 1.4 **Accountability:** We take responsibility for our actions and their impact.

#### 2. Compliance with Laws and Regulations

All personnel must comply with applicable laws, regulations, and internal policies. This includes, but is not limited to, financial regulations, anti-money laundering laws, and data protection regulations.

#### 3. Confidentiality

We respect the confidentiality of our clients' information and ensure it is protected from unauthorized access or disclosure. Personnel must not use confidential information for personal gain or share it with unauthorized parties.

#### 4. Conflicts of Interest

Personnel must avoid situations where personal interests conflict, or appear to conflict, with the interests of Integer Wealth Global or its clients. Any potential conflicts must be disclosed to management immediately.

#### 5. Fair Dealing

We are committed to fair dealing with our clients, suppliers, competitors, and employees. Personnel must not take unfair advantage through manipulation, concealment, abuse of privileged information, or any other unfair practice.



## **6. Insider Trading**

Personnel must not engage in insider trading or share non-public information that could influence the investment decisions of others. All trading activities must comply with relevant securities laws and regulations.

## **7. Anti-Bribery and Corruption**

We have zero tolerance for bribery and corruption. Personnel must not offer, give, solicit, or accept any form of bribe or kickback, whether directly or indirectly.

## **8. Equal Opportunity and Non-Discrimination**

We are committed to providing a work environment free from discrimination and harassment. All employment decisions are based on merit, qualifications, and business needs.

## **9. Reporting Violations**

Personnel are encouraged to report any violations of this Code of Conduct or any unethical behaviour. Reports can be made confidentially and without fear of retaliation to [hr@integerwealth.global](mailto:hr@integerwealth.global)

## **10. Disciplinary Actions**

Violations of this Code of Conduct may result in disciplinary action, up to and including termination of employment. Each case will be reviewed individually, and appropriate action will be taken based on the severity of the violation.

## **11. Continuous Improvement**

We are committed to continuous improvement and regularly review and update our policies and procedures to ensure they remain effective and relevant.

## **12. Contact Information**

For further inquiries or detailed explanations regarding this policy, clients are encouraged to contact our Chief Liaison Officer at [info@integerwealth.global](mailto:info@integerwealth.global) or the legal officer at [legal@integerwealth.global](mailto:legal@integerwealth.global).