

## Strachan Partners Anti-Bribery Policy

Strachan Partners is committed to conducting its business to the highest ethical standards and in compliance with all laws. The Firm rejects all forms of bribery and corruption, and will not resort to nor will it entertain or allow corruption by any member of the Firm or any other person working for or with it for the sake or gaining or retaining business or for any other purpose.

Our Code of Conduct is designed to control effectively, the risks of bribery and corruption and is efficient in the mode of required training for each member of its staff.

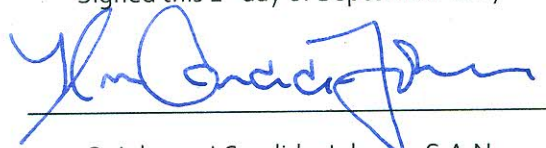
SP has and will continue to communicate its Anti-Bribery Policy to its clients and relevant third parties in the course of its business. Staff are encouraged to report any misconduct or potential misconduct, through a direct email to the Senior Partner. This information will be treated in the strictest confidence and the "whistle blower" shall be protected from any reprisals or retaliation.

All Staff of SP are required to conduct themselves with the highest decorum and abide by the highest standards of integrity and accountability, apply exemplary judgment in all their business dealings / relationships. No member of staff shall use his/her position or information derived from that position, for personal gain or for the benefit of others and must seek to uphold and enhance the standing and good name of Strachan Partners in all that they do and in all circumstances.

This Policy and the SP Code of Conduct will be subject to regular review, to confirm that they continue to be fit for purpose and to make necessary adjustments where they fall short.

A breach of this SP Policy will immediately invoke the Firm's disciplinary process.

Signed this 1<sup>st</sup> day of September 2017



C. Adeyemi Candide-Johnson S.A.N.