

## **Numis Anti Bribery and Corruption Policy Statement**

It is the policy of Numis Corporation plc, and its affiliates, to conduct business in an honest way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

*“Bribery blights lives. Its immediate victims include firms that lose out unfairly. The wider victims are government and society, undermined by a weakened rule of law and damaged social and economic development. At stake is the principle of free and fair competition, which stands diminished by each bribe offered or accepted.... Addressing bribery is good for business because it creates the conditions for free markets to flourish.” - Kenneth Clarke – Secretary of State for Justice March 2011*

An anti-bribery policy has been developed in accordance with the terms of the UK Bribery Act 2010 and has been adopted by the Board of Numis Corporation plc and that of its UK affiliate Numis Securities Ltd. The Board attaches the utmost importance to this policy and applies a ‘zero tolerance’ approach to acts of bribery and corruption.

The Board has conducted a review of Numis’ anti-bribery and corruption policies and procedures. A copy of the policy is available to staff on the Numis Intranet.

Our procedures include nominated Board level responsibility for this area, risk-based reviews of business activities and relationships, management reporting, staff training and the provision of an independent mechanism for whistleblowing.