



Numis Anti Bribery and Corruption Policy Statement

Numis Corporation Plc and its UK subsidiaries (Numis Securities Limited and Numis Asset Management Limited) are committed to conducting business in accordance with the highest ethical standards and in full compliance with all applicable anti-bribery and corruption laws and regulations, including the UK Bribery Act and US Foreign Corrupt Practices Act where applicable.

It is Numis's policy to conduct all business in an open, honest and ethical manner. Numis takes a zero tolerance approach to bribery and is committed to acting professionally, fairly and with integrity in all business dealings and relationships; as such Numis has implemented effective systems & controls to counter bribery, which are supported and approved by the board and reviewed on a regular basis.

The *'Anti-Bribery and Corruption Compliance Program'* includes: oversight and governance; a risk assessment process; communication and training; review and pre-approval processes; due diligence on third party relationships, business transactions/deals, and new products; monitoring and confidential reporting; financial controls and record-keeping; and independent testing processes.

Numis expects all of its agents and suppliers to act at all times in compliance with applicable anti-bribery and corruption laws and regulations.

Employees who engage in or facilitate bribery, or who fail to comply with all applicable anti-bribery and corruption laws, regulations, and Numis's anti-bribery and related policies, may be subject to disciplinary action, up to and including termination. Numis reserves the right to terminate immediately any business relationship that violates our high ethical standards and our commitment to responsible business practices.

