



DEUTSCHE NUMIS ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

Deutsche Numis has no tolerance for its employees, or third parties acting for or on its behalf, to engage in bribery or corruption and is committed to compliance with anti-bribery and corruption laws in the jurisdictions in which it operates. On an annual basis, Deutsche Numis undertakes an assessment of the inherent bribery and corruption risks and corresponding controls across its business. Deutsche Numis will continue to reduce its exposure to areas that present a higher inherent risk of bribery and corruption, such as the user of business development consultants.

Deutsche Numis continues to implement new and further enhance its existing controls in these key risk areas. These controls are both preventative and detective and include enhanced due diligence on clients, vendors and other third parties, contractual representations and warranties, monitoring of relevant payments flows, as well as the monitoring of client, vendor, and other third-party relationships.

Potential instances of bribery or corruption are independently investigated, and any employee determined to be engaged in such behaviour would be subject to disciplinary action, included red flags, up to and including termination of employment. All of Deutsche Numis' anti-bribery and corruption policies and procedures also apply to all temporary/contract employees. Identified instances of bribery and corruption would be reported to senior management and relevant legal or regulatory authorities.

Deutsche Numis has policies, procedures and controls that cover those areas that present an increased risk of bribery and corruption, the cornerstone of which is the Anti-Bribery and Corruption policy. These policies cover all key areas of Deutsche Bank's bribery and corruption risk exposure, including gifts and entertainment, charitable donations, hiring practices, joint ventures and strategic investments, vendor risk management books and records, and political contributions.

Deutsche Numis has also implemented a holistic fraud risk management framework across all lines of defence, defining governance and minimum standards, and establishing key controls to mitigate the risk of fraud, such as mandatory time away and fraud transaction monitoring. The Anti-Fraud Policy also sets out the applicable minimum requirements and defines the prohibition of fraud including internal fraud by employees against Deutsche Numis, its clients and other third parties, fraud by external parties against Deutsche Numis, the understanding and assessment of fraud risk, as well as the escalation of internal and external fraud.