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Anti-Bribery & Corruption Policy

6 January 2025

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Control Page

Date	Amended by	Comments
6 January 2025	DSK	General amends, removal of PMR etc

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NORTHEDGE CAPITAL LLP – ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

STATEMENT FROM CHARLIE PAGE, RISK MANAGER AND CFO

NorthEdge Capital (the Firm) is committed to preventing bribery and corruption and has a zero-tolerance policy to it. It is the Firm's policy to comply with the Bribery Act 2010 (UK) (**Act**). We conduct our business in accordance with the highest business standards and do not act in any way which might reflect adversely upon the integrity and goodwill of the Firm.

Violation of the Act could subject the Firm, its directors and / or employees to severe penalties, including fines and imprisonment. It could also be very damaging to the Firm's business and reputation. It is therefore very important that this Policy is read, understood and observed by **everyone**, irrespective of role or location.

No imagined gain, whether personal or for the Firm, is worth the risk of breaching the Act.

In creating this Policy, the Firm's Management Committee (**Board**) considers that the main areas of risk are:

- failure to carry out thorough due diligence of customers, potential customers, agents, suppliers or intermediaries and our understanding of the purpose or objective of transactions and contracts;
- carrying out work in jurisdictions which are perceived by organisations such as Transparency International as having high levels of corruption and bribery such as Nigeria, Russia, Indonesia and Angola;
- the receipt and giving of gifts and hospitality in the circumstances set out in this Policy;
- unusual payments or benefits requested by persons with whom we do business which are not required to be paid under the terms of contracts approved by the Board;
- customer and supplier contracts especially where independent checks or audits are either not currently carried out or not contractually possible;
- unapproved or unauthorised charitable donations or sponsorship and political donations of any kind; and
- failure to comply with and understand the Firm's policy and guidelines contained in this Policy in relation to bribery and corruption.

This Policy addresses those issues and other matters which require your attention and consideration.

There are some important messages to which I would like to draw employee's attention.

- You must ensure that you read, understand and comply with this Policy.
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- You must notify the Anti-Bribery and Corruption Officer (see below) or make a disclosure under the Firm's Whistle-blowing Policy as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future; and.
- Any person covered by this Policy who breaches it will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with you if there is a breach of this Policy.

No partner or employee will suffer demotion, penalty, or other adverse consequences for refusing to pay bribes or be involved in anything which you consider to be corruption, even if such refusal may result in the Firm losing business. The same is true for whistleblowing in connection with bribery or corruption in accordance with the Firm's Whistle-blowing Policy.

Partners, employees and those persons/entities associated with the Firm are required to seek advice from the Firm's Anti-Bribery and Corruption Officer, Charlie Page, with respect to any business activities, whether existing or proposed, that could raise an issue under the Act. If you have any questions or concerns, then please speak to the Anti-Bribery and Corruption Officer in the first instance or, in his absence, the Deputy Anti-Bribery and Corruption Officer, Ray Stenton.

Your careful attention and co-operation in complying with this Policy will help to protect the Firm, your colleagues, and you.

Charlie Page, Risk Manager & CFO

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1. Introduction

The objective of this Policy is the prevention, identification and earliest possible detection of any potential bribery or corruption issues for the Firm.

Directors and individual employees with supervisory responsibility have a duty to ensure that not only they but also those under their supervision are aware of and comply with these guidelines.

1.1 What is bribery and corruption?

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is improper or a breach of trust. Payments made, gifts, hospitality or other advantages offered, given etc. in these circumstances are likely to constitute **bribes.** Bribes can be paid by an individual; through a third party, such as an agent or adviser; or directly by the Firm itself.

Corruption has been defined by Transparency International as the misuse of entrusted power for private gain. It usually involves two or more people entering into an agreement to give a financial or other advantage to a public official in the UK or overseas, or to an employee or agent in the private sector, to induce that individual to behave improperly.

1.2 Who is covered by the Policy?

This Policy applies to all individuals working at all levels including: partners, employees (whether permanent, fixed-term or temporary), consultants, contractors, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with the Firm, or any entity connected with the Firm or their employees, whether located in the UK or elsewhere.

2. Behaviour that could break the law

Although some of this is of a technical nature, the importance of the subject means you must be familiar with – and understand parts of the legislation. The Act creates four offences.

The three main offences are described broadly below. You must ensure that you do not engage in any behaviour that could be considered to amount to one of these offences:

- an offence of <u>promising</u>, <u>offering</u> or <u>giving</u> a bribe (financial or otherwise) either directly or through a third party (section 1 of the Act);
- an offence of <u>requesting</u>, <u>agreeing to receive</u> or actually <u>receiving</u> a bribe (financial or otherwise) either directly or through a third party (section 2 of the Act); and
- a separate offence of bribing a foreign public official with the <u>intention</u> to <u>obtain</u> or to <u>retain</u> business or an advantage in the conduct of business (section 6 of the Act).

There is also a further offence under the Act for which the Firm could be prosecuted if it fails to prevent bribery by persons performing services on its behalf (including employees, agents and subsidiaries) in connection with the Firm's business (section 7 of the Act, the Corporate Offence) even if the act of bribery takes place outside the UK.

Breach of the Act is a criminal matter. The consequences of failing to comply with the Act are extremely serious for the individuals and organisation involved. Further details of those consequences are set out in the appendix to this Policy.

3. Global effect

The Act has broad scope and extra-territorial reach, meaning that any of the Firm's partners or employees can be prosecuted under English law for bribery offences committed anywhere in the world. You may also be liable for bribery offences under applicable local law.

4. Examples of behaviour to look out for

The Serious Fraud Office has published a list of "corruption indicators". The following indicators do not constitute an exhaustive list but are some of those which you may come across during your work for the Firm:

- abnormal cash payments;
- avoidance of independent checks on tendering or contracting processes;
- invoices being agreed in excess of contract without reasonable cause;
- abnormally high commission percentage being paid to a particular agency;
- lavish gifts being given or received;
- Firm procedures or guidelines not being followed; or
- bypassing normal tendering/contractors procedures.

5. What should you do if you suspect bribery or corruption?

You should contact the Anti-Bribery and Corruption Officer, Charlie Page if:

- you come across any of the corruption indicators listed at section 4 above;
- a customer or business contact wants to discuss potentially non-legitimate issues; or
- you have any other concerns that bribes (including facilitation payments) are being solicited, offered, promised, paid or received.

The Firm also has a Whistle-blowing Policy under which disclosures of any criminal offences, including corruption and other impropriety, may be made.

6. Key risk areas

The Board considers that there are six key areas of risk where directors and employees may encounter instances of bribery and corruption. These are:

- gifts and corporate hospitality with customers, intermediaries, suppliers and other business contacts;
- dealings with agents, suppliers and other third parties;
- facilitation payments and "kickbacks";
- overseas travel to high risk jurisdictions;
- dealings with foreign public officials; and
- political or unusual charitable contributions, sponsorship and advertising.

The Firm's policies in relation to those areas of risk are set out in the following sections.

7. Gifts and corporate hospitality

The Firm recognises that a reasonable and appropriate level of gifts and hospitality are a legitimate part of creating or building upon existing business relationships. However, gifts and hospitality can be employed as a bribe and such acceptance or expenditure may fall foul of the Act.

Guidance relating to the Act indicates that promotional expenditures are permissible where they are transparent, proportionate, reasonable and bona fide. The difficulty in providing guidance on what can and cannot be done results from a lack of definition in the Act as to what is justifiable.

In addition, it is paramount that you:

DO NOT have any discussions with customers, contacts etc. about any gift, hospitality or consideration of any kind which could act as an inducement or reward to any person for:

- doing or not doing (or for having done or not done) any act in relation to the obtaining, retention or execution of any business in relation to which the Firm is involved;
- showing or not showing favour or disfavour to any person in relation to any business in relation to which the Firm is involved.

DO NOT accept from or provide to any customers, contacts etc. of the Firm any gift or hospitality without obtaining any appropriate approval or disclosure in accordance with the Firm's Gifts and Entertainment Policy.

DO NOT accept any gift or hospitality from any customers, contacts etc. if it places on you an inappropriate or excessive level of obligation or could require you to behave improperly or be perceived as imposing such obligation or requirement on you. (Be aware that such conduct could also lead to criminal liability under local law in other jurisdictions).

DO record any gift or hospitality provided or received in the Gifts and Entertainment Register if you are required to do so under the Firm's Gifts and Entertainment Policy.

DO consider the timing of any gift or hospitality provided or received and how that may be perceived by a third party. Accordingly, **do** check with the Anti-Bribery and Corruption Officer, Charlie Page before:

- making or receiving any gift of significant value; or
- accepting or giving hospitality of a significant value.

The Firm considers a gift or hospitality to be of significant value if it requires the approval of the Anti-Bribery and Corruption Officer in accordance with the Gifts and Entertainment Policy.

8. Associated persons - dealing with agents / suppliers / third parties etc.

The Firm may be liable for any acts of bribery committed by an "associated person"; the obvious ones being its partners, employees, agents, intermediaries. However, an "associated person" of the Firm is any person who performs services for or on behalf of the Firm and the scope is wide. The question as to whether a person (an individual or an organisation) performs services on behalf of the Firm will be decided by reference to all the relevant circumstances – no formal written contract needs to be in place. <u>For this reason, it is essential that the Firm knows with whom it is doing business.</u>

Due diligence is essential when appointing agents, suppliers or working with intermediaries etc. and needs to be repeated at regular intervals.

DO NOT enter into any discussions or agreements with any existing or prospective agents, suppliers of the Firm without ensuring that the appropriate director responsible for such approach has given approval to do so.

DO, as a responsible director, ensure that adequate due diligence is undertaken in relation to customers, suppliers, agents etc.

DO contact the Anti-Bribery and Corruption Officer if you are aware of any instances where business is being conducted with customers, suppliers, agents, etc. and either you have concern or suspicion regarding such dealings and/or have knowledge that it is inappropriate for such business to be conducted with the supplier, agent, etc.

DO ensure that any customer, agency or supply agreement with the Firm contains appropriate anti-corruption clauses and that the counterparty is made aware of our Anti-Bribery and Corruption Policy. This will include making it clear that offering or accepting bribes could lead to termination of the contract and that we may be required to report such conduct to the relevant regulatory body and relevant authorities without the customer's agent's or supplier's consent. Please refer to the Anti-Bribery and Corruption Officer for further guidance.

DO NOT agree any additional terms regarding the level of payment or commission with suppliers, agents etc. which are not already contained in the customer, agency or supply agreement without the agreement of the Anti-Bribery and Corruption Officer.

DO NOT accept any invoices from an agent etc. in respect of commission payments due, which do NOT contain:

- details of the customer and the contract to which the commission relates;
- details of the calculation of the commission payable to the supplier, agent etc.;
- details of any VAT or other tax payable by the Firm in respect of the commission; and
- a certification from the supplier, agent etc. that in carrying out the duties specified in the customer, agency or supply agreement that it has acted in accordance with that agreement.

DO NOT make payments to third parties but only to the customer, supplier, agent etc. who provided the services under the terms of the customer, agency or supply agreement.

DO notify the Anti-Bribery and Corruption Officer if any charges from a customer, supplier, agent etc. appear to be inconsistent or unreasonable.

DO contact the Anti-Bribery and Corruption Officer if you identify any unusual payments or expenses (e.g. payments made to or from unusual addresses or offshore bank accounts or to individuals or to or from persons who are not customers or suppliers approved by the Board).

9. Facilitation payments and kickbacks

Facilitation payments are typically small, unofficial payments made to secure or expedite a service and typically a routine Government or civil service action to which you are already entitled. They are not commonly paid in the UK, but are common in some other jurisdictions. Section 10 (High risk jurisdictions) below provides guidance in relation to facilitation payments and what to do in cases of duress.

If you are asked to make a payment on the Firm's behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided and whether it appears legitimate. For example, in the UK an additional fee is payable to renew a passport on the "fast-track" service. You should always ask for a written receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Anti-Bribery and Corruption Officer immediately.

10. High risk jurisdictions

There will be occasions when it will be necessary for partners and employees to travel for business purposes and work overseas to jurisdictions where there is a high risk of bribery and corruption occurring. Countries in the high risk category can be identified using the Transparency International Corruption Perceptions Index at https://www.transparency.org/en/cpi/2021 .

Often, the risk of corruption will present itself in the form of a request from a local public official for a small cash payment to secure or speed up routine actions (e.g. issuing permits, immigration controls, providing services or releasing goods held in customs, or alleging that a vaccination book is not in order), to induce or reward them to give preferential treatment or to encourage them to perform a task improperly.

In order to avoid the commission of an offence under the Act, you should adhere to the following:

DO check the Transparency International Corruption Perceptions Index (at https://www.transparency.org/en/cpi/2021) before travelling to another jurisdiction on business to establish whether it is a high risk jurisdiction.

DO discuss the risk of corruption with the Anti-Bribery and Corruption Officer if you are due to travel to a high risk jurisdiction.

DO ensure that your travel itinerary is arranged to accommodate any delays (e.g. at customs) caused by a refusal to pay.

DO NOT make a payment if requested to do so if you have any doubts about a payment and suspect that it might be considered a facilitation payment, unless the official or third party can provide a formal receipt of written confirmation of its legality. No partner or employee of the Firm will suffer any adverse consequences from the Firm even if refusing to pay bribes results in loss of business for the Firm.

DO, if practicable, obtain prior approval from the Anti-Bribery and Corruption Officer for the payment.

11. Dealing with foreign public officials

The Firm's policy is that the giving of gifts or hospitality to a foreign public official (FPO) should be avoided wherever possible.

The Act makes it an offence to bribe an FPO. This is a stand-alone offence. A person will be guilty of this offence if they offer, promise or give a financial or other advantage to an FPO directly or indirectly with the intent to influence the FPO in the performance of his / her official functions and to obtain or retain business or an advantage in the conduct of business.

An FPO includes any person, whether elected or appointed, who performs public functions in any branch of foreign national, local or municipal government. It includes officials holding a legislative, administrative or judicial position of any kind, whether appointed or elected. It also covers a person who exercises a public function, such as professionals working for public health agencies and officers in state-owned enterprises. An FPO can also be an official or agent of a public international organisation, such as the United Nations or the World Bank.

Gifts and corporate hospitality to FPOs (or another person at the FPO's request or with the FPO's assent or acquiescence) may easily fall foul of the Act as it is not necessary to prove that it was offered or provided to the FPO for an improper performance of its function. It would be sufficient to bring a prosecution if the gift or hospitality was provided with the intent to influence the FPO and to obtain or retain business or a business advantage. There may be occasions where it is lawful to do so (i.e. where the FPO is permitted or required by **written law applicable to the FPO** to be influenced in this way). The Firm expects you to exercise great care when you interact with an FPO and to ensure that you act with the highest level of integrity.

DO discuss any concerns regarding the Firm's dealings with an FPO with the Anti-Bribery and Corruption Officer.

DO review the Gifts and Entertainment Policy prior to making any gift or providing any hospitality (including travel or accommodation expenses) to an FPO.

DO obtain prior approval from the Anti-Bribery and Corruption Officer for the making of any gift or the provision of any hospitality to an FPO, regardless of its value. The Anti-Bribery and Corruption Officer will assess whether the gift or hospitality is appropriate, reasonable and bona fide.

DO NOT provide any gifts or hospitality to FPOs (whether here or abroad) without first ensuring that it is permitted or required under **written law applicable to the FPO**. Plan ahead if you anticipate that you will have dealings with FPOs. You may need legal advice on what is required or permitted by applicable written foreign law; by the written rules of a public international organisation; or, if dealings take place here, to establish whether the FPO's functions are subject to UK law.

Remember, dealings with FPOs are also caught by the general offences which are detailed in section 2 of this Policy.

12. Political and charitable contributions, sponsorship and advertising

Political or charitable contributions can fall foul of the Act when they are used to disguise a bribe paid to retain or obtain a business advantage (e.g. to win a contract, obtain a permit or licence, or to influence legislation to the business' advantage).

Fees paid to politicians to retain them as advisers might also be construed as an advantage if related to retaining or obtaining business.

Political contributions are defined as any gift, subscription, loan, advance or deposit or money or anything of value made to a candidate or political party for the purpose of influencing any election for office or subsequent period in office. The Firm will not reimburse any partner or employee in any way or form for making political contributions.

Certain charitable contributions can be used for undue influence such as donating to or sponsoring the favoured cause of a political decision-maker or a potential provider of business.

Similarly sponsorship of certain events or agreeing to pay for advertising can be used for undue influence in relation to a favoured interest of a political decision-maker or a potential provider of business.

DO exercise care when dealing with politicians as they may exercise significant influence over FPOs.

DO notify the Anti-Bribery and Corruption Officer of you become aware of or are asked to make any political or unusual charitable contributions where you are concerned that such request or contribution is inappropriate or a cover for a bribe or pressure is being applied to make it.

DO consider whether there may be a potential conflict of interest in providing sponsorship or a donation that could affect a material transaction (e.g. where someone who could influence the decision has a familial connection to the organisation receiving the sponsorship and how that may be perceived).

13. Other offences

An offence under the Act can create criminal property which in turn will trigger a separate offence and/or reporting obligations to the Serious Organised Crime Agency under the Proceeds of Crime Act 2002. This is relevant not only to money received as a bribe but also to any value received from a contract entered into as a result of a bribe. Proceeds of crime can be confiscated and receipt of such proceeds can lead to money laundering issues and potential reporting obligations for the Firm.

14. Your responsibilities

14.1 You must ensure that you read, understand and comply with this Policy.

14.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

14.3 You must notify the Anti-Bribery and Corruption Officer or make a disclosure under the Firm's Whistle-blowing Policy as soon as possible if you believe or suspect that a conflict with this Policy has occurred, or may occur in the future.

14.4 Any person covered by this Policy who breaches it will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with you if there is a breach of this Policy.

15. Record-keeping

15.1 The Firm must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

15.2 You must declare and keep a written record of all hospitality or gifts accepted or offered as required in the Gifts and Entertainment Policy.

15.3 You must provide the Anti-Bribery and Corruption Officer with a copy of any written confirmations given to a customer or other third party contact in connection with the Firm's anti-bribery and corruption measures (see section 17.3 of this Policy) once they have been agreed with Anti-Bribery and Corruption Officer.

16. Protection

Anyone who refuses to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Board encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. No one will suffer demotion, penalty, or other adverse consequences for refusing to pay bribes even if such refusal may result in the Firm losing business.

17. Training and communication

17.1 Training on this Policy forms part of the induction process for all new employees and other members of the Firm. All existing members of the Firm and employees will receive regular, relevant training on how to implement and adhere to this Policy.

17.2 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of the Firm's business relationship with them and as appropriate thereafter.

17.3 Occasionally you may be asked by a customer or other third party contact to confirm that the Firm has policies and procedures in place to comply with the Act or to give other confirmations in connection with anti-bribery and corruption measures. If you receive such a request, please refer to the Anti-Bribery and Corruption Officer which will assist you with formulating an appropriate response.

18. Monitoring and review

18.1 The Anti-Bribery and Corruption Officer will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

18.2 All directors and employees are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.

18.3 The Anti-Bribery and Corruption Compliance Officer will make regular reports to the Board on bribery and corruption issues if they arise.

18.4 You are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Anti-Bribery and Corruption Officer.

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Appendix A

Consequences of failure to comply with the Act

1 Introduction

The consequences of bribery and corruption are several: political, economic, social and environmental:

- politically, bribery and corruption can be major obstacles to democracy and the rule of law;
- economically, bribery and corruption can distort competition, thereby deterring investment;
- socially, bribery and corruption undermine people's trust in the political system, its institutions and leadership; and
- environmentally, bribery and corruption can prevent the enforcement of environmental regulations, creating pollution and environmental degradation.

The Act applies to any individual ordinarily resident in the UK (whether or not a British national) and all commercial organisations (irrespective of their jurisdiction of incorporation or establishment) which do business in the UK whether or not the act of bribery was committed in the UK. These rules apply wherever the Firm's partners, employees or persons associated with the Firm are working on the Firm's behalf. Many countries also have their own anti-bribery and corruption laws and partners and employees may be subject to those laws for the duration of their visit.

2 Failure to comply with the Act

The consequences of failing to comply with the Act are serious:

- individual employees and partners may be prosecuted in the criminal courts and if convicted, may face imprisonment of up to 10 years and a personal unlimited fine;
- the Firm may also be prosecuted in the criminal courts and made subject to an unlimited fine;
- in order to avoid prosecution for bribery or corruption, the Firm may be obliged to enter into a settlement agreement with the regulatory authorities under which it would be required to pay a fine, pay further costs or reparations, and be made subject to independent monitoring;
- third parties that have been harmed by the breach of the Act may seek to recover damages from the Firm;
- the Firm, its partners and employees could find themselves involved in lengthy legal proceedings defending a criminal investigation or prosecution and/or a civil claim from a third party, requiring a great deal of time and expense;
- involvement in an investigation can seriously damage the Firm's reputation;
- the Firm may be debarred from tendering for any public procurement contracts and
- partners or individual employees involved in bribery or corruption will face disciplinary action from the Firm, including dismissal.

The criminal authorities which combat bribery and corruption in the UK include the Serious Fraud Office and the Police, both of which have wide powers of investigation. They could:

- require the Firm to produce records and information;
- come into the Firm's offices or enter on to other premises or a person's home without notice and seize documents;

- copy documents including downloading information from computers (and reconstructing deleted e-mails and documents), mobile phones and other communications devices;
- conduct intrusive and covert surveillance (e.g. bugging telephones, homes, hotel meeting rooms, tailing individuals, etc.);
- compel individual employees to provide information (and / or attend interviews in the case of the Serious Fraud Office);
- arrest and interview suspects;
- bring criminal prosecutions for breaches of the law;
- exercise these powers of investigation with criminal authorities overseas by way of mutual legal assistance.
- The Firm will investigate all instances of alleged bribery and assist the Serious Fraud Office, the Police and any other relevant authorities in any resulting prosecution.

Appendix B

NORTHEDGE CAPITAL LLP - ANTI-BRIBERY POLICY STATEMENT ON THE FIRM'S WEBSITE

NorthEdge Capital LLP is committed to apply the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on behalf of NorthEdge Capital LLP is responsible for conducting business honestly and professionally.

NorthEdge Capital LLP benefits from carrying out business in a transparent and ethical way and by helping to ensure that there is honest, open and fair competition in our sectors. Where there is a level playing field NorthEdge Capital LLP can lead the market through innovation and by delivering excellent services to its customers.

NorthEdge Capital LLP does not tolerate any form of bribery by, or of, its employees or any persons or companies acting for it or on its behalf. The Partners and senior management are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

NorthEdge Capital LLP has issued an Anti-Bribery policy in order to prevent and prohibit bribery and corruption. The Anti Bribery policy applies to all employees and they are required to familiarise themselves and comply with the policy.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of NorthEdge Capital LLP are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments. As part of its Anti-bribery measures, NorthEdge Capital LLP is committed to engage only in transparent, proportionate, reasonable and legitimate hospitality and promotional expenditure.

A breach of the NorthEdge Capital LLP anti bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct and immediate dismissal. Employees and other individuals acting for NorthEdge Capital LLP should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for NorthEdge Capital LLP.

NorthEdge Capital LLP will not conduct business with service providers, agents or representatives that do not support the firm's anti-bribery and corruption objectives.

The success of NorthEdge Capital LLP's anti-bribery measures depends on everyone playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of NorthEdge Capital LLP are encouraged to report any suspicious activity to the Whistle Blowing Officer Charlie Page. NorthEdge Capital LLP senior management will support any individuals who make such a report in good faith. NorthEdge Capital LLP does not hold any responsibility for contractors or agents whom act on their own initiative and do not comply with the firm's anti bribery policy despite agreeing to do so, and reserves the right not to deal with any persons or firms who do not agree to the firm's anti bribery policy. Acceptance of our policy is deemed as acceptance of compliance with the firm's policy.