

Meridiem Investment Management Limited Anti-bribery and Corruption Policy

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Introduction

This policy sets out the arrangements that Meridiem Investment Management Ltd (“MIM Ltd”) has established to ensure compliance with its legal obligation under the UK Bribery Act 2010 to establish and maintain systems and controls designed, as far as possible, to prevent and mitigate the risk of bribery and corruption in our business.

Regulatory Requirements

Principle 1 in PRIN 2.1 states that a firm must conduct its business with integrity.

Principle 3 in PRIN 2.1 states that firms must take reasonable care to organise and control their affairs responsibly and effectively, with adequate risk management systems.

The UK Bribery Act 2010 makes it an offence for a UK national or person located in the UK to pay or receive a bribe, either directly or indirectly. Companies and partnerships can also commit an offence for failing to prevent bribery.

Meridiem Approach

Our approach is that we conduct business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We conduct business on the basis that we uphold all laws relevant to countering bribery and corruption and remain bound by the laws of the UK, including the Bribery Act of 2010, in respect to our conduct both at home and abroad.

The MIM Ltd Risk and Control Self-assessment (“RCSA”) identifies and records key controls relating to the Money Laundering and Financial Crime risk area. Bribery and Corruption is one of the key risks specified in the RCSA and is currently classified with the likelihood of “rare”, due to the nature of our business as discretionary investment managers and our client base. The firm’s conduct policies, staff training and attestations reduce the risk of bribery and corruption further.

Our Controls Framework

MIM Ltd has policies in place designed to prevent bribery and corruption. The following policies contribute to the wider control framework in place to effectively manage the risk of bribery and corruption, and to ensure that our business and our clients’ best interests are duly protected.

Gifts and Hospitality

This policy includes general disclosure and pre-approval requirements for gifts and hospitality.

Charity Donations

The firm commits an annual budget for this purpose which is managed and overseen by the Charity Committee.

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All donations are made through the firm's Charity CAF account. The policy details the approach and controls for donations.

Whistleblowing

Safe and confidential procedures are in place for employees to report and discuss incidents and situations where suspicions of bribery and corruption arise. These standards are detailed in the firm's Whistleblowing Policy.

Code of Conduct

The Code of Conduct summarises the firm's commitment to operating with integrity. It provides the principles that define our culture and how we run our business. The Code applies to all staff and Directors at group level. It also applies to some third parties such as Consultants or Sub-Contractors working on our behalf.

Outsourcing

Due diligence is performed on the firm's Critical Outsourced Providers at onboarding and periodically thereafter. There are other preventive measures in place to avoid acts of bribery and corruption, including payment approvals, vendor vetting and contract reviews.

Monitoring and Oversight

Any allegation of bribery or corruption involving a MIM Ltd business area or one of its employees must be promptly reported to the firm's Money Laundering Reporting Officer. The process for escalation is outlined within the firm's Whistleblowing Policy.

The Compliance team provides advice and guidance, as well as independent challenge and oversight to the firm on financial crime.

Policy Ownership

The Compliance Officer is responsible for implementing and monitoring the requirements outlined within this policy. This policy is reviewed annually, and any updates will be approved by the Compliance Committee. Policy changes are disseminated throughout the company when they occur.

Training

New joiners receive and must attest to this policy as part of their Induction.

Bribery and Corruption is included as a standard topic in the periodic Anti-Money Laundering and Financial Crime training to raise staff awareness and to ensure all staff fully understand what is required of them.

Record Keeping

In accordance with SYSC 9.1, all records described in this policy are retained for the appropriate period, as per legal and regulatory guidelines.

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