

Anti-bribery and corruption group policy statement

Scope

This group policy statement applies globally to all Currie & Brown entities. Compliance with the statement is required by all employees, joint venture companies, subsidiaries, business partners and third parties who undertake work for or on behalf of Currie & Brown.

| Policy statement

It is our policy to conduct our business in an honest and ethical manner. Currie & Brown takes a zero-tolerance approach to bribery, corruption and other forms of financial crime. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, and implementing and enforcing effective systems to counter bribery, wherever we operate.

We will uphold all laws relevant to countering bribery, corruption and other forms of financial crime in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct in any global location.

We require all employees and any other persons working for or on behalf of Currie & Brown, including those working within our supply chain or within partner companies, to uphold these high standards of conduct and compliance.

| Implementation arrangements

The board of directors has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The group risk and compliance director has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

Signed

Alan Manuel

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Group Chief Executive Officer