

# SOVA CAPITAL ANTI-BRIBERY & CORRUPTION STATEMENT

We recognise that bribery and corruption are damaging to legitimate business interests. We conduct all our business, across all jurisdictions, in an honest and ethical manner and we want to ensure that all our associates and business partners do the same.

The Bribery Act 2010 governs not only our UK operations, but also travels with us when we work overseas.

We embrace robust policies and procedures to ensure we are transparent and ethical in all our business dealings.

We have a zero tolerance approach to financial crime. A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Our ethical principles are simple, but robust:

- We will carry on our business fairly, honestly and openly;
- We will not offer or make bribes so as to gain a business advantage nor will we condone the offering of bribes on our behalf;
- We will not accept bribes to influence business advantage nor will we condone bribes being accepted on our behalf;
- We will avoid doing business with others who do not accept our values or may harm our reputation;
- We will maintain processes, procedures and records that limit the risk of direct or indirect bribery; and
- We will take reasonable steps to ensure that all our staff and business partners are aware of our bribery policy.

We ask all who have dealings with SOVA Capital Limited, as employees, agents, trading partners or customers, to help us in our fight against corruption and to contact us immediately, if you have any concerns or suspicions we need to know about.

