

## ETHICAL STANDARDS

Professionals within the securities and investment industry owe important statutory duties to their clients. However, finnCap believes we have a wider duty of care to our stakeholders and to society at large.

Following the financial crisis of 2008, public confidence in the financial services sector sank to an all-time low. finnCap, founded shortly after this crisis, recognised the need for high standards of integrity to be at the centre of the way it engaged in business and with its wider community and stakeholders.

Our internal policies require us to uphold the highest personal standards that assure the reputation of finnCap Group and our associated businesses.

Our internal policies include standards related to:

Conflicts of interest; personal dealing: insider deal and market abuse; gifts and entertainment; bribery and corruption; Anti money laundering procedures; information management and data privacy; facilitation of tax evasion; relationships with and funding of governments and political bodies; discrimination; Health and Safety; Personal Conduct.

Registered office as listed herein.