

## Code of Business Conduct

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Mourant is a leading international law firm and a provider of specialist governance services. We strive for excellence and the highest standards of professionalism, ethics and integrity in every aspect of our business. We are committed to complying with the laws and professional rules that apply to our business and to upholding the highest standards of propriety. Our people understand that they must:

**Support the fight against financial crime:** comply with all applicable laws and regulations relating to money laundering and the financing of terrorism and weapons of mass destruction proliferation.

**Reject bribery and corruption:** not offer, promise or give any financial or other advantage to anyone (including a public official) on behalf of the firm, a client of the firm or any other person, for any improper purpose or to influence any public official in the exercise of his or her duties. Furthermore, they must not request or accept any such advantage.

**Oppose the facilitation of criminal conduct:** not aid, assist or enable another person to commit a criminal offence, including fraud and tax evasion.

**Protect and secure confidential and personal data:** keep all confidential and personal data secure, protect it from loss, damage or destruction and take steps to avoid the risk of the unauthorised or unlawful access or processing of such data.

**Promote diversity and inclusion:** not discriminate on the grounds of sex, race, religion or belief, gender or gender identity, sexual orientation, marital status, disability or age and promote equality, diversity and an open and inclusive work environment. Comply with applicable laws and internal policies prohibiting discrimination, victimisation or harassment of any kind.

**Not deal in financial instruments with inside information:** observe the firm's rules limiting dealing in shares and securities to eliminate the risk of insider dealing and avoid any perception of impropriety.

**Avoid personal conflicts of interest:** report actual or potential personal conflicts of interest internally at the earliest opportunity so that steps can be taken to avoid any perception of personal bias and to preserve objectivity.

**Avoid being compromised:** not accept gifts or entertainment in breach of applicable laws and not knowingly breach any internal policies that apply to the giver or receiver of the gift or entertainment.

**Respect employment protections:** respect all applicable employment rights and protections, including those aimed at combatting modern slavery and human trafficking.

**Build trusted relationships:** build open and honest relationships with others (including clients, referrers, suppliers and other third parties) and deliver clarity on terms and pricing.

**Speak up:** adhere to the firm's internal policies on reporting concerns or illegal or improper conduct, including whistle-blowing and suspicious activity reports.

**Support the firm's social responsibility initiatives:** support the firm's initiatives to promote greater environmental responsibility (and comply with all applicable environmental laws and regulations) and to make a positive contribution to the communities in which we operate.

We expect our key suppliers to adhere to similar standards. All our people have access to this Code through the Mourant intranet. The principles within it will be reinforced through periodic training and the induction of new joiners. The operation of the Code and the related policies and procedures will be monitored and reviewed on an annual basis by our Management Committee.