

ANTI-BRIBERY & CORRUPTION POLICY

1) Introduction

The purpose of this Policy Statement is to set out for all employees and workers, including directors, and business partners of the Company the aim of limiting Sycomore AM's exposure to bribery (in compliance with the UK Bribery Act) by:

- Setting out a clear anti-bribery policy;
- Encouraging our employees to be aware and to report any suspicion of bribery, in a manner which provides them with a safe and reasonable assurance of sensitive handling;
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resultant prosecution;
- Instigating disciplinary action against any individual(s) involved in bribery and informing the appropriate authorities.

2) The Policy

This Policy defines clear principles which outline Sycomore AM's position on Bribery & Corruption.

The key requirements of our Anti-Bribery and Anti-Corruption Policy are that Sycomore employees are:

- Prohibited from offering, promising, giving, requesting, accepting or agreeing to receive a bribe of any kind in any form, directly or indirectly;
- Prohibited from making facilitation or "grease" payments
- Prohibited from offering, promising or transferring anything of value to a public official in order to influence the public official and obtain or retain business or an advantage for the benefit of Sycomore AM.

3) Further clarification

This policy statement prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

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- Corporate hospitality

This policy is not meant to prohibit the practice of corporate hospitality providing this is customary, proportionate and properly recorded, nor is this policy intended to prevent the giving of a gift of an appropriate value at a time of seasonal festivities.

- Business gifts

The provision of small promotional gifts whose value is under 200€ are regarded as acceptable however if there is any doubt please refer to the compliance team.

Business gifts, accepted or proposed, and whose value is more than 200€ should be provided to the compliance team.

4) Further Information

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Company. A failure by any employee to comply with the policy requirements may lead to disciplinary action.

Any questions relating to this policy or the Bribery Act should be referred to the compliance team

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