INGLEBY

ANTI-MONEY LAUNDERING & ANTI-CORRUPTION POLICY

THIRD PARTY STATEMENT

Ingleby expects and requires all of its suppliers, consultants, agents and other parties with whom Ingleby conducts business ("Ingleby Partners") to act at all times in a professional and ethical manner in carrying out their services and contractual obligations. To that end, Ingleby Partners shall:

- a) Comply with all country laws, regulations, rules and policies, including, but not limited to anti-corruption, and anti-money laundering and terrorist financing laws (the "Applicable Laws").
- b) Refrain from using money or other consideration for any unlawful purposes, including any purposes violating the Applicable Laws, and, in particular, making direct or indirect payments to any of the following:
 - government officials (including any person holding an executive, legislative, judicial or administrative office, or an office of any international organisation, or wholly or partly publicly owned business).
 - political parties, party officials or candidates for political office.
 - any other person, while knowing that all or a portion of such payment will be offered, given or promised, directly or indirectly, to any of the above-identified persons or organisations.
- c) Ingleby Partners shall be required to have their own subcontractors, consultants, agents or representatives execute a similar written anti-corruption and anti-money laundering statement, and, upon request, confirm to Ingleby that such action has been taken.

Ingleby retains the right to terminate any contracts with Ingleby Partners upon written notice, without any penalties, if Ingleby believes in good faith that any of the Ingleby Partners have breached any elements of this policy.

Dated:

Company