

ANTI-MONEY LAUNDERING & ANTI-CORRUPTION POLICY

This policy applies to all employees of the Ingleby group (“Ingleby”) as well as all directors of Ingleby companies.

The purpose of this policy is:

- > To ensure that all Ingleby companies comply with international and relevant domestic anti-money laundering (“AML”) and counter terrorist funding (“CTF”), as well as anti-corruption legislation in all jurisdictions in which they operate.
- > To protect Ingleby, its employees, contracted staff and third party agents from inadvertently committing money laundering, terrorist financing or supporting corruption.
- > To avoid reputational damage to Ingleby.

ANTI-MONEY LAUNDERING AND TERRORIST FUNDING POLICY

It is Ingleby’s policy to comply with international and relevant domestic AML and CTF legislation in all jurisdictions in which it operates. However, Ingleby realises that as a non-financial company currently in many jurisdictions, it will not be subject to AML or CTF laws or regulations.

Irrespectively, Ingleby will follow at all times best practices including:

- > Verifying the identity of customers, suppliers and agents.
- > Obtaining additional know-you-customer information, such as information about beneficial ownership and the origin of funds, if this seems appropriate under the circumstances of the transaction.
- > Refraining from accepting any funds if the above-mentioned information cannot be obtained or if the information provided is unsatisfactory.
- > Reporting of suspicious activity to relevant law enforcement bodies.
- > Maintenance of appropriate records.
- > Training of relevant employees.

ANTI-CORRUPTION POLICY

It is Ingleby’s policy to comply with international and relevant domestic anti-corruption legislation in all jurisdictions in which it operates (the “Applicable Legislation”). This includes compliance with both the specific legal requirements and the spirit of all relevant laws and regulations.

In particular, Ingleby will not use money or other consideration for any unlawful purposes, including any purposes violating the Applicable Legislation, and will not make 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.

AGREEMENTS WITH THIRD PARTIES

Ingleby shall, to the extent feasible, require its subcontractors, consultants, agents or representatives to execute a written anti-corruption and AML statement.

Dated:

The Ingleby Company Ltd