



Original thinking... applied

Financial Crime Policy

Financial crime refers to all crimes committed by an individual or group of individuals that involve taking money or other property that belongs to someone else, to obtain a financial or professional gain. This includes fraud, theft, bribery, tax evasion and money laundering.

As a responsible business Fera has an important role in society to deter, detect and report financial crime. This policy explains how we protect our business, our people, our clients and their customers from being victims of financial crime and what you should expect from us.

Inside information in the case of an insider dealing prosecution refers to: Specific or precise information which has not been made public and is likely to have a considerable effect on the price of any securities if it were to be made publicly available.

We are committed to:

- Operating in accordance with all applicable sanction restrictions imposed by the UK HM Treasury, the European Union, the United Nations or other authorities as appropriate.
- Operating in accordance with all applicable laws and regulations.
- Taking all proportionate steps to deter, detect, report and investigate any form of financial crime, including:
 - Fraud against our clients and our business.
 - The use of any of our businesses activities to launder the proceeds of crime, to finance terrorism or to facilitate tax evasion.
 - The use of 'inside information' for personal or business gain or the illegal manipulation of the financial markets in which we operate.
 - The undertaking of active or passive bribery or failures to prevent such activity of any associated parties in jurisdictions we operate.

What you should expect from us:

Operating our business in a way which deters, detects, investigates and reports financial crime. This includes:

- Undertaking checks of our business and our business relationships (those who work with us).
- Ensuring that inside information about our company is protected and managed in a way to make sure it is controlled and limited to those who need to know it.
- Investigating and acting against any individual or group perpetrating financial crime against us, our people, or our clients.
- Working collaboratively with law enforcement and other appropriate authorities in support of investigations of financial crime and in pursuit of associated prosecutions.
- We reserve the right to search all company property and to review all data stored on our systems if there are reasons to suspect financial crime.

What we expect from our colleagues

- Demonstrate the commitments of this policy and the requirements of the standards and procedures which support it.
- Complete and record all financial crime training which you are requested to undertake.
- To immediately report any suspicion of financial crime being committed through the procedures established in the requirements of Standards which support this policy, or local suspicious activity reporting procedures, where these are in place.
- **NOT** to inform or "tip-off" anyone if:

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- o You have a suspicion that they may be committing a financial crime.
- o You are aware that suspicious transactions or activity has been reported.
- o You are aware a law enforcement investigation is intended or underway.
- To speak up if you face a situation where you are not sure what to do or have any concerns in relation to this policy.

What we expect from our managers

- To ensure this policy is promoted and applied in the divisional or functional area for which you are responsible.

How we will achieve this

- Our management teams are supported by the Finance Team who provide expert counsel and challenge to support decision making and the investigation of concerns raised in relation to this policy.
- We take policy non-compliance very seriously. Exceptions are reported and managed under our governance mechanisms, which ultimately includes the Risk and Audit Committee of Fera's Board of Directors.

A handwritten signature in black ink, appearing to read "AS", with a stylized flourish at the end.

Andrew Swift
Chief Executive Officer

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