



ANTI-BRIBERY POLICY STATEMENT

Delff Management Ltd (the “Firm”) is committed to ensuring that it, its directors, employees, agents and anyone contracted to it comply with the requirements of the UK Bribery Act 2010.

The Firm is committed to conducting its business fairly, honestly and openly, and has a zero- tolerance approach towards bribery and corruption.

The Firm has implemented a risk-based approach to identify areas where it may be at risk to bribery and has put in place systems and procedures to reduce and manage this risk. It reserves the right not to deal with other entities that do not make the same commitment.

The Firm has adopted and implemented a number of policies and procedures which are intended to prevent the Firm, its directors/partners, staff or agents being involved in bribery. These are reviewed regularly to ensure they remain effective.

For further information on the Firm’s bribery risk policies and procedures please contact the Compliance Officer, to whom the directors have given day-to-day responsibility for ensuring that the Firm’s anti-bribery policies and procedures are adhered to.