

## REGULATORY MATTERS

# Anti-corruption and anti-bribery

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Miller takes anti-corruption and anti-bribery extremely seriously and strives to comply with the statutory requirements of the Bribery Act 2010 and the Proceeds of Crime Act 2002 to the fullest extent possible. While we have a comprehensive anti-bribery and corruption policy in place, we do not provide this policy to third parties as it is for internal use only and it undergoes regular reviews and improvements as necessary. For your information, however, we are pleased to provide a summary of our internal policy as an indicative guide to our commitment to anti-corruption and anti-bribery:

1. We do not allow any bribes, inducements of any kind or any unauthorised payments, including facilitation payments. We apply careful due diligence of all third parties we deal with in order to ensure that payments are only made when justifiable and are commensurable with the nature and the extent of their involvement with Miller.
2. We seek to maintain the highest ethical standards, to provide good business practice, to minimise risk, and to comply with all statutory and FCA requirements.
3. Our policy sets out the meanings of corruption, bribery, and improper performance, and explains the key areas of concern in both the private and public sectors. Miller seeks to ensure that it cannot be used to effect the payments of bribes by maintaining controls over third party commission payments, and rigorous due diligence is undertaken on any new third party prior to entering into a new commercial relationship.
4. Our policy sets out the offences under the Bribery Act 2010 and defines Associated Persons. It considers how to deal with entertaining, hospitality, gifts and promotional expenditure so as to ensure that Miller is at all times acting within the remit of the Act.
5. Miller also takes particular care when operating in regions where there is considered to be a greater risk of corrupt practices, including within the context of any political or charitable donations and dealing with any foreign public officials.
6. Our policy sets out specific guidelines on how to report any suspicions of corrupt practices; it also operates a whistle-blowing policy to allow for reporting of matters where discretion is important.
7. Our policy sets out our related policies which work hand-in-hand with this policy, namely: Miller vision and values; due diligence and sanction screening policy; entity authorisation criteria; gifts and entertainment policy, hospitality and donations policy; and the whistle-blowing policy.
8. Miller is committed to exercising the highest standards of business and personal ethics. As such, any breach of the anti-bribery and corruption policy will be treated very seriously and may result in disciplinary action. If appropriate, Miller may bring the matter to the notice of the appropriate regulatory authority or the police.
9. Miller's commitment to anti-bribery and corruption extends beyond having this policy in place. We have an employee training programme in place on anti-bribery and corruption, we seek undertakings from our associated persons that they have similar policies in place, and we have involved external consultants in our anti-bribery and corruption regime in order to ensure that our standards remain at the forefront of business ethics.