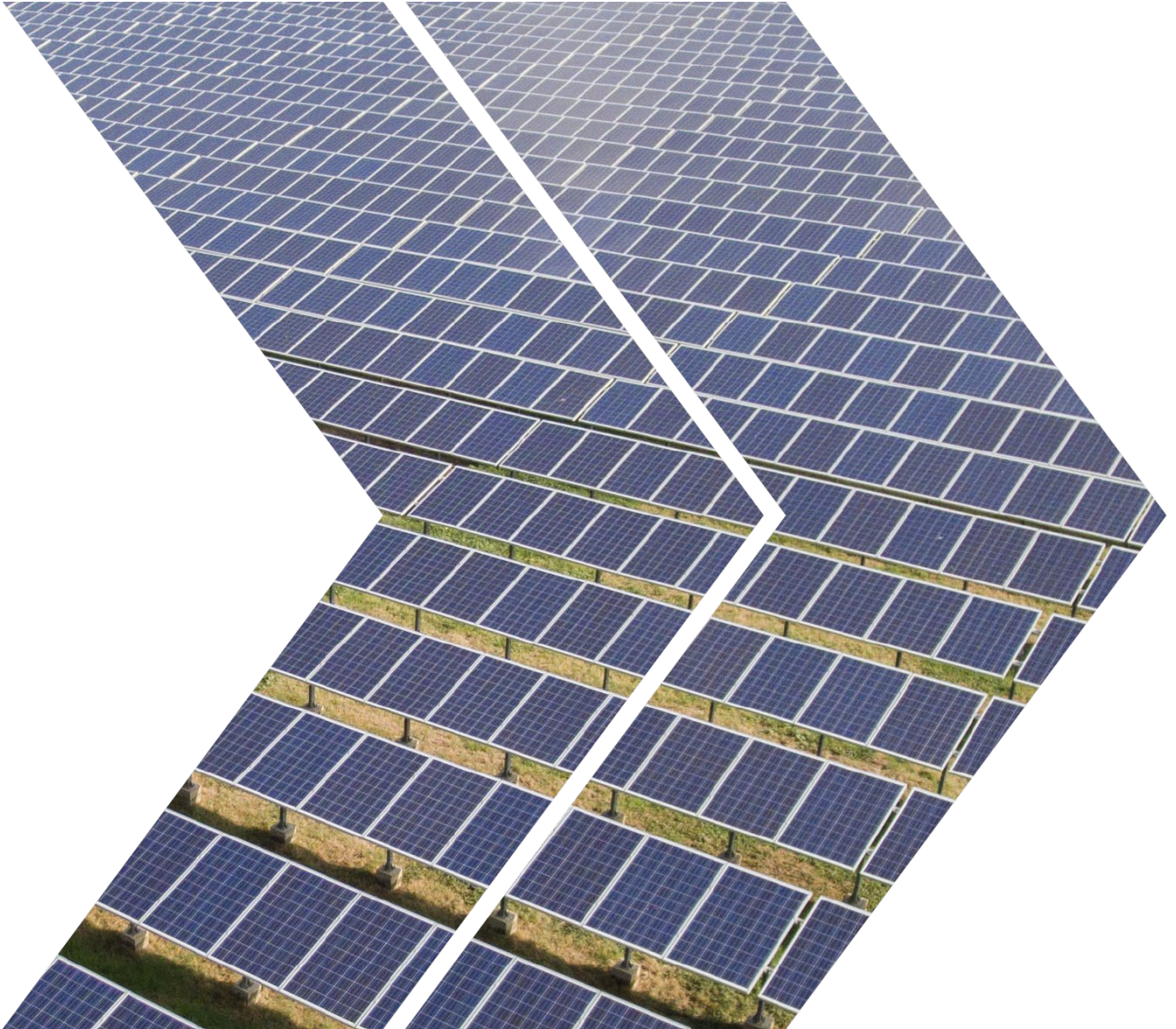


Commitment to Anti-Bribery and Corruption

May 2021



Commitment to Anti-Bribery and Corruption

Business integrity is a core aspect of our mission and informs all our operations and decision-making. British International Investment (BII) takes a 'zero-tolerance' approach toward bribery and corruption and our commitment to business integrity is enshrined in our Code of Responsible Investing. We comply with all applicable laws, both in the UK and the jurisdictions where we invest and believe our efforts to identify and mitigate integrity risks help ensure the success and sustainability of our investment strategy.

BII has detailed compliance policies and procedures that are informed by the key principles of the UK Bribery Act. These aim to ensure that all staff members follow the company's commitment to integrity and legal compliance. This includes conducting appropriate risk assessments at all stages of the investment cycle and thorough due diligence on all investments to avoid associating with individuals or entities against whom credible allegations of corruption have been made.

All BII staff members also receive training on anti-bribery and corruption on an annual basis to enable them to recognise and report identified risks and help protect BII from such risks.

BII staff, agents and third parties acting on BII's behalf will not offer, promise or give any advantage to any individual to induce an improper function or action; will not reward any person for performing any improper function or action; and will not request, agree to receive or accept any bribe, facilitation or other forms of corrupt payments. Not only are such payments in violation of the law and BII's investment code but are also wholly incompatible with BII's mission to build businesses, create jobs and make a lasting difference to people's lives in developing countries.


BII's commitment to integrity extends not only to BII's own staff members but is a requirement of the fund managers and portfolio companies to which BII proposes to commit capital. A fund or portfolio company's commitment to integrity is one of the most important factors that BII will evaluate when deciding whether to select that entity for a potential investment. BII will take all reasonable steps to mitigate integrity risks, including by requiring investee companies and fund managers to strengthen their integrity controls in line with BII's Code of Responsible Investing. BII also continually monitors its portfolio and makes improvements where necessary to limit BII's exposure to integrity risks stemming from bribery and corruption.



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