



acuitykp.com

Compliance Manual

COMPLIANCE MANUAL

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Distribution list

All employees of Acuity Knowledge Partners

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Introduction

This Compliance Manual (“Manual”) summarizes the general compliance policies and procedures that employees of Acuity Knowledge Partners need to comply with in carrying out business activities of the company so as to ensure Acuity Knowledge Partners complies with its legal, regulatory and contractual obligations.

The Manual does not detail every aspect of laws, regulations or internal policies and procedures that apply to Acuity Knowledge Partners business operations. It does provide, wherever necessary, references to various documents which describe the applicable compliance concepts and guidelines in detail.

This is the entire and exclusive Manual for all entities within the Acuity Knowledge Partners group.

1. Scope

This Compliance Manual shall apply to all Acuity Knowledge Partners personnel including, without limitation, full and part time employees. In addition, Acuity Knowledge Partners shall, through its contracts of engagements, ensure that any third party contracted personnel who render their services to or on behalf of Acuity Knowledge Partners from time to time shall comply with the requirements set forth in this Manual.

The term “Acuity Knowledge Partners” is used in this Manual to collectively refer to all companies, including subsidiaries and affiliates, operating under the “Acuity Knowledge Partners” names.

2. Commitment to Compliance

2.1. Overview

- 2.1.1. Acuity Knowledge Partners is committed to full compliance with all applicable laws, regulations and contractual requirements.
- 2.1.2. Our commitment to compliance and ethical business conduct depends on our Employees. Acuity Knowledge Partners has policies and procedures in place that describe how Employees must perform their duties and obligations. Employees are required to know, understand and comply with such policies and procedures as may be applicable. In addition, all Employees need to be aware of additional compliance requirements that may be imposed by particular clients or when dealing in particular jurisdictions and, where such additional policies and procedures are applicable, comply with both Acuity Knowledge Partners and client policies.
- 2.1.3. Adherence to compliance and ethical standards is part of the job performance evaluation criteria for all Employees. Failure to comply with these requirements is viewed seriously, and will subject Employees to disciplinary action, up to and including termination of employment.

2.2. Acting in the Best Interests of our Customers

Integral to Acuity Knowledge Partners mission and core values is to do what is best for our customers. Acuity Knowledge Partners endeavours to maintain excellent business relationships with all its customers by providing quality service and ensuring integrity in its business dealings.

- 2.2.1. While seeking opportunities for innovative and creative solutions for our customers, transparency and integrity must be at the core of all of our business dealings.
- 2.2.2. Acuity Knowledge Partners has a duty to act in the interests of the customers we serve. This includes deploying measures to help minimize and resolve potential conflicts (for example, information barriers around certain business areas or providing customers with appropriate disclosures).
- 2.2.3. We value our customers’ confidential and personal information by making sure the collection, use, retrieval and transfer of such information complies with Acuity Knowledge Partners policies, applicable data protection laws and any contractual obligations.
- 2.2.4. We take complaints or concerns from our customers seriously and deal with them fairly and promptly.

2.3. Code of Ethics for Executive Committee

Whilst all Employees must adhere to the principles of honesty, integrity, accountability, responsibility, fairness, and respect for others, Acuity Knowledge Partners Executive Committee in particular, have the following additional individual obligations:

- 2.3.1. To act in the best interest of Acuity Knowledge Partners and not to pursue personal interests in his/her decisions which would be detrimental to the interests of Acuity Knowledge Partners or use business opportunities intended for the enterprise for their personal benefit.
- 2.3.2. To endeavour to avoid situations that present or may lead to a conflict of interest between personal and professional relationships. If such a conflict occurs, it has to be disclosed to the members of the Acuity Knowledge Partners Executive Committee. Actual and apparent conflicts of interest are to be handled in an ethical manner.
- 2.3.3. Not, in connection with their work, to demand or accept from third parties payments or other advantages for themselves or for any other person or grant third parties unlawful advantages.
- 2.3.4. To ensure that legal requirements and Acuity Knowledge Partners Policies regarding the company's financial statements and other public disclosure and communications are fulfilled, so that investors and regulators are provided with full, fair, accurate, timely, and understandable information, in all material respects, about Acuity Knowledge Partners financial condition and results of operations.

3. Compliance Program

3.1. Overview

3.1.1. The Acuity Knowledge Partners Compliance Program is an integral part of the operations of all business units and corporate functions. The program includes the following key elements:

- Roles and Responsibilities
- Policies and Procedures
- Training and Education
- Internal Monitoring and Auditing
- Open Lines of Communication
- Deficiencies and Violations
- Enforcement of Disciplinary Standards
- Annual Certification of Compliance

3.2. Roles and Responsibilities

- 3.2.1. Overall responsibility for oversight of the Compliance Program lies with Executive Committee.
- 3.2.2. The Compliance department is responsible for the day-to-day management and operationalization of the Compliance program, subject to the supervision of directors and senior operating staff of Acuity Knowledge Services ("Senior Management").
- 3.2.3. Employees in Supervisory roles are responsible for instituting reasonable measures to facilitate and promote compliance with this Manual within their respective teams.
- 3.2.4. All Employees are responsible for acting and conducting themselves in conformity with the provisions of this Manual.

3.3. Policies and Procedures

- 3.3.1. This Manual contains references to other relevant policies and procedures that Employees need to comply with in carrying out the business activities of the company.
- 3.3.2. Employees are required, on commencement of employment, to sign a Personal Declaration acknowledging the receipt, understanding and agreement to abide by the Compliance Manual and supporting policies.
- 3.3.3. The latest version of the Compliance Manual and such related policies can be obtained from the intranet portal or from the Compliance department.

3.4. Training and Education

- 3.4.1. Acuity Knowledge Partners is committed to providing ongoing compliance training and education to all Employees.
- 3.4.2. The purpose of the training and education program is to:

- Make Employees aware of the applicable laws, regulations, policies and procedures and any changes thereto;
- Ensure that Employees are fully capable of performing their job activities in accordance with the policies and procedures of the Compliance Program.

- 3.4.3. Attendance at and completion of compliance trainings is mandatory.

3.5. Internal monitoring and auditing

- 3.5.1. A vital component of the Compliance Program involves conducting internal assessments of the Program's design and operating effectiveness through:

- **Continuous monitoring:** Compliance has mechanisms designed to monitor and review compliance risks, adequacy of existing controls and on-going compliance with established policies and procedures.
- **Periodic auditing:** Compliance also conducts periodic audits to detect misconduct, non-compliance or failure to comply with applicable policies and procedures.

- 3.5.2. Employees must extend their full cooperation with all auditing and monitoring activities carried out by Compliance.

3.6. Open Lines of Communication

- 3.6.1. Acuity Knowledge Partners promotes an open and transparent culture where all Employees are encouraged to share concerns without fear of retaliation.
- 3.6.2. We are committed to providing a supportive environment that allows for the raising of questions and concerns.

3.7. Deficiencies and Violations

- 3.7.1. Any act of non-compliance with the provisions mentioned in this Manual, its supplementary documentation or with any other applicable client or regulatory requirements, would constitute a "Compliance Breach".
- 3.7.2. All Employees of Acuity Knowledge Partners are responsible for detecting and reporting actual or suspected Compliance Breaches. All such events should be reported to Compliance immediately upon detection.
- 3.7.3. Acuity Knowledge Partners is committed to responding consistently and decisively to detected deficiencies or Compliance Breaches detected during internal monitoring and audits, through reporting mechanisms, and other activities involved with the operation of the Compliance Program. Where such inadequacies are detected, corrective measures and disciplinary action will be decided in accordance with the severity of the breach.

- 3.7.4. Acuity Knowledge Partners will, where necessary, inform relevant agencies and clients of any incidents, control exceptions or Compliance Breaches. Notifications will be made immediately, or latest within 24 hours of detection.

3.8. Enforcement of Disciplinary Standards

- 3.8.1. The Compliance Program includes enforcement and disciplinary components to ensure that all Employees take their compliance responsibilities seriously.
- 3.8.2. Adherence to compliance and ethical standards forms part of the job performance evaluation criteria for all Employees.
- 3.8.3. In addition, Employees found violating compliance requirements including the duty to report suspected violations, will be subject to disciplinary action.
- 3.8.4. Disciplinary actions will be commensurate with the severity of the noncompliance, up to and including immediate termination.
- 3.8.5. Supervisors are required to work with the Compliance and Human Resources departments to ensure that each instance involving the enforcement of disciplinary standards is thoroughly documented and that disciplinary standards are enforced consistently across the organization.

3.9. Annual certification of compliance

- 3.9.1. All Employees will be required to sign a declaration of compliance with the terms of this Manual at the time of their joining and annually thereafter.

4. Standard of Conduct

4.1. Code of Business Conduct

- 4.1.1. Acuity Knowledge Partners expects every Employee to display the highest standards of professionalism and integrity in all matters relating to the company.
- 4.1.2. All Employees are bound by the *Acuity Knowledge Partners Code of Business Conduct* (the "Code") with an objective to deter wrongdoing and promote honest and ethical conduct.
- 4.1.3. The Code details the fundamental principles, values and framework for compliance within the organization, providing guidance on acceptable behaviour for Employees.
- 4.1.4. Employees must, at all times, while interacting with our customers, competitors, business partners, governmental authorities as well as with each other observe a high degree of ethical business conduct laid down in the Code.
- 4.1.5. Employees should contact the Compliance department if they have any questions about the Code, including in cases where there is a potential conflict between the Code and this Manual or any Acuity Knowledge Partners policy. Be advised that the provisions in those policies that are more restrictive will prevail.

4.2. Confidential Information

- 4.2.1. All Employees of Acuity Knowledge Partners should maintain absolute confidentiality of information they are entrusted with and are made privy to during their tenure at Acuity Knowledge Partners. This includes, but is not limited to, all information concerning Acuity Knowledge Partners business, Employees, employee compensation, clients, Acuity Knowledge Partners and clients' confidential information, communication between different segments of the client's organization and material, non-public information in relation to listed stocks.
- 4.2.2. Information acquired by an Employee while carrying out his/her responsibilities must not be used for any purpose other than for the proper performance of his/her duties and must not be disclosed to another Employee unless there is a business need to know. Information may be given to third parties only where it is necessary for the operation of the business and subject to approval by Senior Management.
- 4.2.3. Client confidentiality is of utmost importance at Acuity Knowledge Partners. All Employees owe a clear duty of confidentiality to all our clients. Employees must not discuss any aspect of any client's business or details of any services provided by Acuity Knowledge Partners with any client/third party unless specifically provided for by policies issued by Senior Management or with the specific permission of Senior Management.
- 4.2.4. Client confidential information can only be disclosed to another person if:
 - the client gives his prior consent or it is with the client's own appointed contacts
 - Acuity Knowledge Partners is required to disclose information to a regulator having jurisdiction over it or, if necessary, over one of its affiliates.

4.3. Personally Identifiable Information (PII)

- 4.3.1. Employees may be privy to PII during an assignment with a client. Such information may include name, date of birth, place of birth, genetic information, social security number, credit card details, etc. which may be used to uniquely identify, contact, or locate a single person or can be used with other sources to uniquely identify a single individual.
- 4.3.2. It is the responsibility of every Employee to treat such information with strict confidentiality. All breaches and suspected breaches should be reported to Compliance immediately upon detection.
- 4.3.3. All employees must take reasonable steps to protect Personal Data that Acuity Knowledge Partners receives in the course of conducting its business regarding its employees, candidates, customers, potential customers, third-party service providers, and any other third parties. The DATA

PROTECTION POLICY describe important obligations of Acuity Knowledge Partners employees to protect Personal Data.

4.4. Intellectual Property Rights

- 4.4.1. Acuity Knowledge Partners shall ensure that deliverables do not infringe the intellectual property rights of third parties including clients, data providers and third-party publishers. Employees should ensure that the work produced shows the correct and accurate attribution of third-party sources and that it complies with all applicable policies and rules including data distribution policies, subscription licenses and copyright notices.
- 4.4.2. The failure to comply with the applicable copyright and subscription license restrictions will amount to copyright infringement, a breach of license agreement and will result in serious legal and financial liability for Acuity Knowledge Partners and its clients and irreparable loss and damage to Acuity Knowledge Partners trade name and goodwill.

4.5. Use of disclaimers

- 4.5.1. Acuity Knowledge Partners is not an independent research provider and does not and is not authorized to provide investment advice or management. A deliverable would, therefore, be intended only to provide background information and would not, in any way, constitute investment advice.
- 4.5.2. Employees are responsible for ensuring that the appropriate disclaimers are attached to all deliverables and internally produced documents. Employees must also recognize the importance of ensuring consistency in the use of disclaimers in order to maintain their meaning, force, and validity.

4.6. Outside Business Interests

- 4.6.1. Acuity Knowledge Partners policy on "Outside Business Interests" (the "policy") aims to avoid any conflict of interest arising as a result of the involvement or proposed involvement of an employee of all entities within Acuity Knowledge Partners group, its subsidiaries, and other associates and affiliates ("Acuity Knowledge Partners") in an external business/professional engagement or activity outside the ordinary course of Acuity Knowledge Partners business (an "outside business interest"). The Acuity Knowledge Partners Policy on *Outside Business Interests* may be referred to for additional detail.

4.7. Prohibition of Sexual Harassment

- 4.7.1. Acuity Knowledge Partners will not tolerate any form of sexual harassment; this includes any unwelcome sexual advances, requests for sexual favours, intrusive questions about sexual activity, sexual assault, and other verbal or physical conduct of a sexual nature, whether explicit or implicit.
- 4.7.2. Each location will have documented policies and procedures on sexual harassment which will make provision for requirements imposed by local regulatory and labour related legislation.

4.8. Reporting of Criminal Charges or Convictions

- 4.8.1. Employees must immediately, but not later than 5 working days after an event, notify HR of any material events, either legal or financial, which may affect their ability to carry out duties in a proper and professional manner. Examples of such events include, but are not limited to,
 - any proceedings or judgments by a court of law,
 - bankruptcy proceedings,
 - deeds of arrangement with creditors,
 - conviction for criminal offences (including violence, theft or sexual crimes)
- 4.8.2. Convictions for traffic-related offences (e.g., speeding, dangerous driving, drunken driving) are not required to be reported under this policy unless driving is a required part of the Employee's regularly assigned job duties.

- 4.8.3. In case of any doubt as to whether an event should be reported, Employees should consult the Compliance or HR department.
- 4.8.4. If an Employee is charged with, or convicted of, a criminal offence (outside of employment) this will not normally in itself be considered a reason for disciplinary action.
- 4.8.5. In determining whether such events necessitate a disciplinary action against the Employee, due consideration to the relevance and effect the charge or conviction has over:

- The Employee's suitability to discharge his/her responsibilities, duties, or contractual obligations towards Acuity Knowledge Partners,
- Potential damage to reputation,
- Acuity Knowledge Partners contractual obligations to its clients.

4.9. Internet "Inappropriate" Use

Employees must use the Company's technology resources in accordance with company's IT Use Policy. In addition to the provisions covered under the *Acuity Knowledge Partners Code of Business Conduct*, Employees must not use Acuity Knowledge Partners computing facilities or equipment for:

- 4.9.1. Entering into contractual agreements via the Internet on behalf of Acuity Knowledge Partners unless approved explicitly, in advance, by Acuity Knowledge Partners Senior Management.
- 4.9.2. Using Acuity Knowledge Partners logos or materials in any web page or Internet posting unless it has been approved, in advance, by Acuity Knowledge Partners Senior Management.
- 4.9.3. Representing personal opinions as those of Acuity Knowledge Partners.
- 4.9.4. Posting blogs or opinions on companies and industries over social networking sites which disclose or make implicit use of proprietary information related to Acuity Knowledge Partners or its Clients.
- 4.9.5. Engaging in any online communications that defame Acuity Knowledge Partners, any of its Employees or any third party.
- 4.9.6. Disclosing any confidential information, client names, or any other information that could damage the company's reputation.
- 4.9.7. Participating in any Expert Networks, i.e., providing any kind of expert advice, professional guidance or consulting to other organizations irrespective of the nature of the business.
- 4.9.8. Attempting to gain illegal access to remote systems on the Internet or to falsely take on the identity of another person or entity.
- 4.9.9. Circumventing Acuity Knowledge Partners firewalls by using unethical means such as proxy sites.
- 4.9.10. Attempting to inappropriately Telnet to or port scan remote systems on the Internet.
- 4.9.11. Establishing Internet or other external network connections that could allow non-Acuity Knowledge Partners users to gain access into Acuity Knowledge Partners systems and information assets.

4.10. Whistle-blowing

- 4.10.1. A critical component of the Acuity Knowledge Partners Compliance Program is the provision of reliable mechanisms for reporting violations and mandating appropriate actions for misconduct.
- 4.10.2. Any concerns about violations of laws, rules, regulations or the foregoing provisions must be reported promptly to compliance@acuitykp.com.
- 4.10.3. Any actual or suspected compliance violations which could compromise the confidentiality, integrity or availability of information should be promptly reported to compliance@acuitykp.com.
- 4.10.4. Incidents involving actual or suspect frauds or other misconduct including Facilitation of Tax evasion by Employees also be reported to compliance@acuitykp.com.
- 4.10.5. In addition, the reporting procedures outlined in the Acuity Knowledge Partners Code are open to all Employees.

5. Communicating with the Media

5.1. Overview

- 5.1.1. For purposes of this section "media" shall include television, radio, newspapers and any other journalistic publications, whether in printed or electronic form.
- 5.1.2. "Media interactions" include press releases, advertisements, publicity or other promotional materials.
- 5.1.3. All official interactions with the media will be handled directly by the Executive Management of Acuity Knowledge Partners.
- 5.1.4. All Acuity Knowledge Partners employees must contact Acuity Knowledge Partners Marketing team for any social media related matters.

5.2. Client Confidentiality

- 5.2.1. As part of its media interactions, Acuity Knowledge Partners will not use or disclose the identity of its clients, either explicitly or implicitly, without prior written approval from the client, including a reference to the client's name, brand or logo.
- 5.2.2. Non-use and non-reference to the client's identity also extends to internet or intranet websites, in-house magazines or newsletters.

5.3. Guidelines for Employees

- 5.3.1. Under no circumstances should any Employee represent Acuity Knowledge Partners officially in media interactions, without the prior written approval of Executive Management.
- 5.3.2. Employees must not communicate directly or indirectly in any manner with the media or any agent of the media about the business, organization or finance of Acuity Knowledge Partners or its systems, techniques, knowhow or clients.
- 5.3.3. Employees who are contacted directly by the media must refer them immediately to Executive Management. Executive Management will designate a staff member to serve as the official spokesperson who will then coordinate all media interactions, if needed.
- 5.3.4. Employees who choose to voice their personal opinions in media interactions must indicate clearly that the position they take is an individual opinion. If an Employee identifies himself or herself as an Employee of Acuity Knowledge Partners, he or she must clearly state that the opinions expressed are his or her own and do not represent the opinion of Acuity Knowledge Partners.

6. Financial Crimes

6.1. Overview

6.1.1. Acuity Knowledge Partners is committed to maintaining effective controls to help detect, prevent and manage illegal and unethical business practices such as market abuse, fraud, bribery and corruption, money laundering and insider trading.

6.2. Market Abuse

Market abuse refers to conduct that adversely affects a financial market and falls below the standards expected by a regular user of such a market. The following are examples of prohibited market practices:

6.2.1. **False trading and market rigging:** Employees shall not do anything that is intended or is likely to create a false or misleading appearance of active trading in securities or with respect to the market or the price of the securities. A person is deemed to be engaging in creating a false or misleading appearance of active trading in securities if he/she:

- Enters into a sale and purchase transaction with no change of beneficial ownership,
- Offers to sell securities or futures at the same price as he/she (or an associate) has offered to purchase the securities, or
- Offers to purchase the securities or futures at the same price as he/she (or an associate) has offered to sell the securities.

6.2.2. **Manipulating the securities market:** Employees shall not enter into two or more transactions in the securities of a company with the intent of inducing another person to buy or sell or not buy or sell that security or its related securities, which by themselves or with other transactions would:

- Increase or are likely to increase the prices of the security with the intent of inducing another person to purchase or not sell that security or its related securities, or
- Reduce or are likely to reduce the prices of securities with the intent of inducing another person to sell or not purchase that security or its related securities, or
- Stabilize or are likely to stabilize the price of that security.

6.2.3. **Making false or misleading statements:** Employees shall not make a statement or disseminate information that he/she should have reasonably known is materially false or misleading and is likely to:

- Induce other persons to subscribe for securities,
- Induce the sale or purchase of securities by other persons, or
- Have the effect of raising, lowering, maintaining, or stabilizing the market price of securities.

6.3. Bribery and Corruption

6.3.1. Supplementing the provisions covered under the *Acuity Knowledge Partners Code of Business Conduct*, Acuity Knowledge Partners has adopted an elaborate *Anti-Bribery, Anti-Corruption and Anti-Facilitation of Tax Evasion Policy* prohibiting all commercial or public sector bribery.

6.4. Money laundering

6.4.1. Money laundering encompasses dealing in proceeds of crime, dealing in funds to facilitate crime, or concealing the source of illegally obtained money.

6.4.2. Acuity Knowledge Partners conducts necessary due-diligence on all customers and suppliers prior to a new relationship.

6.4.3. Cash transactions are conducted only when warranted by business considerations and must be duly authorized.

6.5. Insider Trading

- 6.5.1. Acuity Knowledge Partners has an elaborate *Personal Account Dealing Policy* for its Employees so that they do not misuse any confidential work-related information for their personal gain.

6.6. Engaging in Financial Crimes

- 6.6.1. An Employee will be construed as committing a financial crime even if s/he does not commit the crime, but instead requires or encourages others to do so (i.e., even where the Employee receives no financial gain).
- 6.6.2. In addition to being illegal, engaging in financial crimes is a compliance violation and will invite disciplinary action likely to lead up to termination of employment.
- 6.6.3. Additionally, instances of financial crimes may result in the Employee being called upon by a regulator to explain his/her transactions. Any infringement of regulatory principles can be considered as professional misconduct and in some cases be construed as criminal offence, exposing the person to sanctions and possibly imprisonment.

7. Human Rights

Acuity Knowledge Partners is committed to upholding human rights with respect to:

- upholding the rights of employees with respect to minimum wages, freedom of association, collective bargaining;
- refraining from using or dealing with businesses that make use of child, involuntary or forced labor;
- promoting equal opportunity, non-discrimination and anti-harassment;

8. Violations and Disciplinary Actions

8.1. Violation Classification

8.1.1. Compliance Breaches are categorized as follows:

- **High Severity:** Any Compliance Breach to the extent that it can cause devastating impact to the operations of the organization is classified as High Severity violation.
- **Medium Severity:** Any Compliance Breach to the extent that it can cause significant impact to the operations of the organization is classified as Medium Severity violation.
- **Low Severity:** Any Compliance Breach to the extent that it can cause nuisance impact to the operations of the organization is classified as Low Severity violation.

8.2. Disciplinary Procedure

8.2.1. An Employee will be fully informed of any complaint against him or her prior to any disciplinary action being taken and will be given an explanation of any penalty imposed. He/she will be given an opportunity to state his or her case before any decision is reached.

8.3. Disciplinary Action

8.3.1. Compliance Breaches will lead to disciplinary action, including but not necessarily limited to:

- Informal verbal warning (Informal coaching and discussion on the issue or concern);
- Formal verbal warning, which in serious cases may be made in writing. These warnings will set out the nature of the offence and the likely consequence of further offences;
- Final written warning containing a statement that any reoccurrence will lead to suspension or dismissal; or
- Suspension or dismissal

8.3.2. Although the precise disciplinary action taken in a particular circumstance will depend on the specific facts, below are examples of the disciplinary actions that may apply:

Severity Category	Possible Punitive Action
High	Suspension or dismissal
Medium	Final written warning or suspension
Low	Verbal or written warning

8.4. Gross Misconduct

8.4.1. Certain Compliance Breaches would likely be categorized as “Gross Misconduct” including the following:

- Fraud
- Dishonesty
- Theft
- Refusal to obey a lawful & reasonable instruction from the manager; gross insubordination
- Assault/violent or obscene behaviour
- Intentionally damaging company property
- Working under the influence of recreational drugs or alcohol
- Breach of confidentiality or copyright
- Competing with the business interests of Acuity Knowledge Partners
- Any form of bribery/ corruption
- Violation of provisions contained in the Acuity Knowledge Partners Code of Business Conduct
- Any form of workplace harassment, including sexual in nature

8.4.2. Any finding of Gross Misconduct could result in immediate termination from Acuity Knowledge Partners without notice.

9. Related Documents

- Acuity Knowledge Partners Code of Business Conduct
- Personal Account Dealing Policy
- Anti-Bribery Anti-Corruption and Anti-Facilitation of Tax Evasion Policy
- Covered Third party Anti-Corruption Due Diligence & Contracting Procedures
- Outside Business Interests Policy
- Outside Business Interests Procedures

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About Acuity Knowledge Partners

Acuity Knowledge Partners, formerly part of Moody's Corporation, is a leading provider of bespoke research, analytics, staffing and technology solutions to the financial services sector.

Headquartered in London, Acuity Knowledge Partners has nearly two decades of transformation experience in servicing over 600 clients with a specialist workforce of over 6,000 analysts and delivery experts across its global delivery network.

We provide our clients with unique assistance not only to innovate, implement transformation programmes and increase operational efficiency, but also to manage costs and improve their top lines.

Our expertise includes the following:

- Investment Banking: origination and trading support
- Investment Research support: covering all asset classes in terms of ideation, data science, and research support across the buy side and sell side
- Commercial Lending support: across origination, credit assessment, underwriting, and covenant and portfolio risk for all lending types
- Private Equity: origination, valuation and portfolio monitoring support
- Asset Management services support: across marketing, investment research, portfolio management/optimisation, risk and compliance
- Corporate and Consulting services: market and strategic research; survey work; treasury and counterparty risk support; and CEO office support, including M&A, FP&A and investor relations support
- Compliance support: AML analytics, KYC, counterparty credit risk modelling and servicing across banks, asset managers and corporates
- Data Science: web scraping, data structuring, analytics and visualisation These services are supported by our proprietary suite of Business Excellence and Automation Tools (BEAT) that offer domain-specific contextual technology.

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Acuity Knowledge Partners is assisted by Equistone Partners Europe, a leading private equity organisation that backs specialist growth businesses and management teams.