

# BUSINESS ETHICS POLICY



## Preface And Document Control

This document is intended to provide information in respect of Origin Invest Ltd policy, procedure, standards or guidance and will be periodically updated to reflect any changes due to business requirements or infrastructure. This document MUST be reviewed and approved by the designated board approver(s) to ensure technical accuracy and business validity.

## Document Owner And Approver(S)

<b>Owner</b>	<b>Origin Invest Ltd Board of Directors</b>
<b>Approver(s)</b>	CEO; COO; CTO; CFO

## Version Control

<b>Version</b>	<b>Version Date</b>	<b>Document History</b>
1.0	12/05/2011	1st Formatted live document.
1.01	12/08/2011	Live document including amends relating to Bribery Act legislation.
2.0	01/05/2012	Live document. Annual review and updates to reflect new policies.
3.0	11/04/2013	Live document. Annual review and update to reflect new Human Rights Policy and Guidance.
4.0	01/05/2014	Live document. Annual review and updates to reflect new policies.
5.0	01/12/2015	Live document. Annual review.
6.0	01/05/2017	Live document with updates to reflect new policies.
7.0	01/05/2019	Close version 6 and revise with updates for Criminal Finances Act 2017.

## Internal Distribution List

- ▶ Top managers and all employees.
- ▶ Channel partners world-wide.

## External Distribution

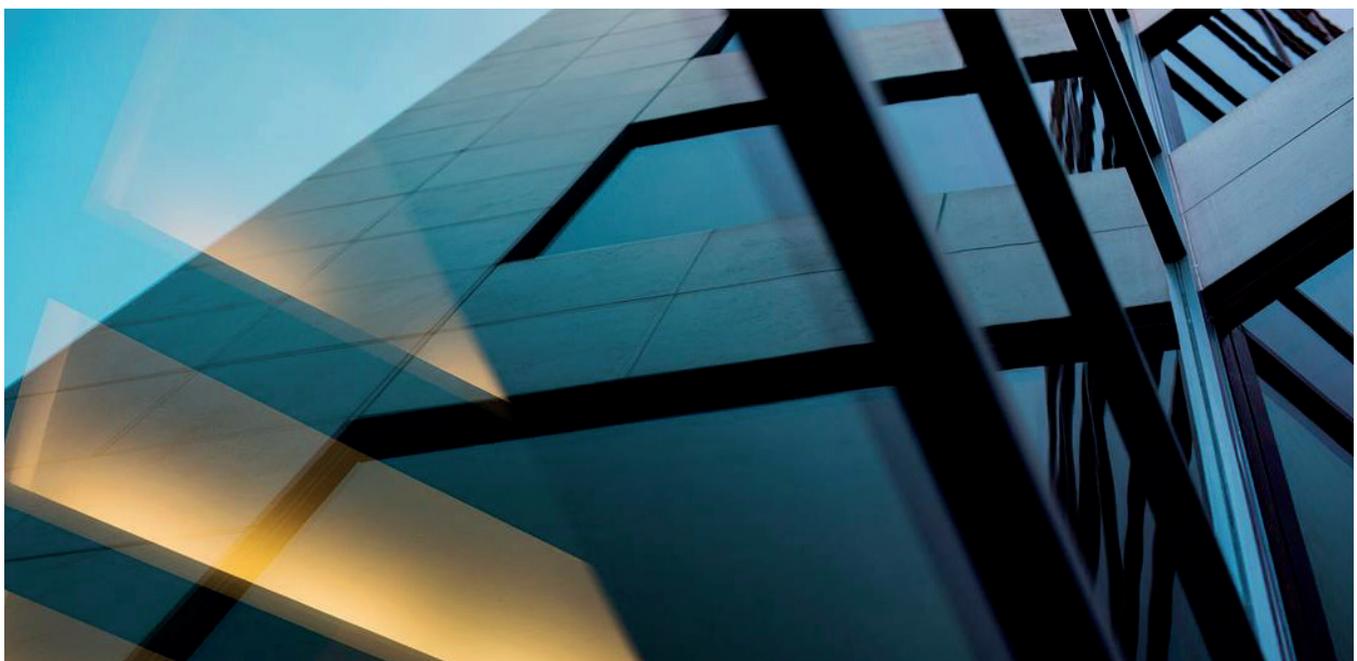
Documents classified as Confidential or Internal Use Only shall not be reproduced or released to an external party by the recipient without the express consent of the stated Origin Invest document owner. Consideration must be given to the content and classification of this document before authorisation is granted. The owner of this document must state the distribution format(s), copying permissions and procedures for document return or disposal.

# THE ORIGIN INVEST ETHICS CODE

The business philosophy of Origin Invest has been developed around a core set of values which are fundamental to the organisation’s development and success. One of these values is Integrity, which means we can always be trusted to do the right thing, and the Origin Invest Ethics Code below sets out how we expect all our employees to behave in order to live this core value.

Being Safe And Secure	Being Honest And Trustworthy	Being Fair And Considerate	Being Professional And Proud
<ul style="list-style-type: none"> <li>Putting health &amp; safety first.</li> </ul>	<ul style="list-style-type: none"> <li>Always following the law.</li> </ul>	<ul style="list-style-type: none"> <li>Showing respect and consideration for others.</li> </ul>	<ul style="list-style-type: none"> <li>Doing the best job you can.</li> </ul>
<ul style="list-style-type: none"> <li>Protecting the security of our customers, the public and those in our care.</li> </ul>	<ul style="list-style-type: none"> <li>Reporting any Wrongdoing.</li> </ul>	<ul style="list-style-type: none"> <li>Treating people Fairly.</li> </ul>	<ul style="list-style-type: none"> <li>Looking smart and professional.</li> </ul>
<ul style="list-style-type: none"> <li>Carefully following company rules and procedures.</li> </ul>	<ul style="list-style-type: none"> <li>Never offering or taking a bribe.</li> </ul>	<ul style="list-style-type: none"> <li>Considering our local communities.</li> </ul>	<ul style="list-style-type: none"> <li>Being a good role model.</li> </ul>
	<ul style="list-style-type: none"> <li>Avoiding any conflict of interest.</li> </ul>	<ul style="list-style-type: none"> <li>Thinking about the environment.</li> </ul>	<ul style="list-style-type: none"> <li>Safeguarding the Origin Invest name.</li> </ul>

All Origin Invest management are required to ensure the Ethics Code is cascaded throughout the business and brought to the attention of all employees.



# THE BUSINESS ETHICS POLICY

In support of this code, the purpose of this Business Ethics Policy is to ensure that managers and employees have a detailed understanding of the company's minimum standards of operation and the expectations of our customers and stakeholders.

It is essential that the ethical business standards set out in this policy are applied throughout our countries of operation. Our senior managers are therefore asked to show their personal commitment by regularly endorsing this policy and confirming compliance within their own areas of responsibility.

We are committed to these standards and routinely monitor compliance across the organisation, taking necessary action in the unlikely event that they are not being met.

## By Authority Of Origin Invest Ltd Ethics Board

**Mr.**  
CEO - Origin Invest

**Mr. Andy Byng**  
CFO - Origin Invest

**Mr. Julius Lewis**  
COO - Origin Invest



# CONTENT

---

## 1. Our Approach To Being A Good Corporate Citizen.

- 1.1. Human rights.
- 1.2. The environment.
- 1.3. Local communities.

## 2. Standards Of Business Practice.

- 2.1. Bribery and corruption.
- 2.2. Political contributions.
- 2.3. Treatment of customers.
- 2.4. Internal suppliers.
- 2.5. External suppliers.
- 2.6. Competition.

## 3. Our Approach To Corporate Governance.

- 3.1. Compliance with the law.
- 3.2. Accounting standards and records.
- 3.3. External reporting.
- 3.4. Policies and procedures.
- 3.5. AML / TF Policies and procedures.

## 4. Our commitments to our employees

- 4.1. National regulation and guidelines.
- 4.2. ILO Declaration on Fundamental Principles and Rights at Work.
- 4.3. Harassment.
- 4.4. Equal opportunity.
- 4.5. Health & safety.
- 4.6. Terms of employment.
- 4.7. Pre-employment screening.

## 5. Employee Commitments To Origin Invest

- 5.1. Confidential information.
- 5.2. Conflicts of interest.
- 5.3. Social networking.

## 6. Implementation

- 6.1. Staff complaints, confidential reporting hotlines and suggestions.
- 6.2. Compliance monitoring.
- 6.3. Adherence to policy.

# 1. OUR APPROACH TO BEING A GOOD CORPORATE CITIZEN

Origin Invest is committed to being a good corporate citizen, taking account of the economic, social and environmental impact of our business and aiming to maximise the benefits and minimise any negative impact of our global operations.

## 1.1. Human Rights

Origin Invest is committed to fulfilling its responsibilities on human rights around the world by applying the United Nations Guiding Principles on Business and Human Rights (2011).

The Guiding Principles affirm four international standards that have achieved broad international consensus as a human rights baseline for all businesses:

- ✓ The Universal Declaration of Human Rights (1947)
- ✓ The International Covenant on Civil and Political Rights (1966)
- ✓ The International Convention on Economic, Social and Cultural Rights (1966)
- ✓ The International Labour Organisation Declaration on Fundamental Rights at Work (1998)

The Origin Invest Human Rights Policy demonstrates our commitment to respect human rights and embodies our particular understanding of their significance. It also sets out expectations for the conduct of all companies, their employees and those with whom they do business.



## 1.2. The Environment

Origin Invest will conduct our business with respect and consideration for the environment. We will strive actively to reduce the group's overall impact on the environment by targeting annual reductions in our carbon intensity and the management of waste, water, vehicle emissions and energy consumption.

## 1.3. Local Communities

Origin Invest is fully committed to supporting and assisting the communities in which we operate through a variety of means including charitable fund-raising, sponsorship of community projects and voluntary work by employees. We conduct our business with respect and consideration for the good of local communities, taking steps to minimise any disturbance as a result of our operations. We will also serve local interests by providing good employment opportunities and effective services and products.

## 2. STANDARDS OF BUSINESS PRACTICE

Origin Invest is committed to high ethical standards in our business dealings to ensure the integrity of our employees and our organisation is maintained.

### 2.1. Bribery And Corruption

Origin Invest is resolutely opposed to bribery and corruption in whatever form it may take.

Any payments, gifts or inducements made by or on behalf of Origin Invest and which induce or are intended to induce someone to act improperly and payments, gifts or inducements to public officials to influence them in the performance of their duty (other than payments, fees etc which they are entitled to demand by written law) are matters which are likely to result in disciplinary action, including summary dismissal, against employees concerned.

Gifts or entertainment may only be offered to a third party if they are consistent with customary business practice in the relevant territory, are modest in value and cannot be interpreted as inducements to trade.

Sales of the company's services and products and purchases of products and services from suppliers will be made solely on the basis of quality, performance, price, value and/or for the benefit of the company, and never on the basis of giving or receiving inducements in the form of payments, gifts, entertainment or favours or in any other form.

Employees should not accept gifts, money or entertainment from third party organisations or individuals where these might reasonably be considered likely to influence business transactions. Gifts, other than trivial ones with a low value, should be returned. In a culture where such an action might cause offence, the gift should be declared to the company and, if practical, donated to an appropriate charity.

### 2.2. Political Contributions

Origin Invest does not make contributions to political parties, political candidates or organisations which are politically active and this policy should be followed worldwide. The only exceptions to this might be in countries where there is a legal requirement to do so or where there is an established, lawful and generally accepted practice to do so. Even in such circumstances, any payment must be approved in advance by the full Origin Invest board.

Approval from the shareholders of Origin Invest at a General Meeting would be required for any significant payment. Since obtaining such approval would be difficult, time consuming and expensive, payments of any more than token amounts are unlikely to be permitted.

### 2.3. Treatment Of Customers

Mutual trust and confidence between Origin Invest and our customers is vital. All employees should strive to consistently deliver service excellence and value for money, meeting customer's expectations and anticipating their changing requirements.

## 2.4. Internal Suppliers

Any business transactions between Origin Invest subsidiaries for the supply of goods or services should be based on normal 'arm's length' business principles. These principles should cover pricing and other contractual terms and must be as defensible as those to which independent parties might be expected to agree.

## 2.5. External Suppliers

All suppliers are entitled to fair treatment and all potential suppliers should have a reasonable opportunity to win Origin Invest business. It is our policy to pay suppliers on time in accordance with agreed terms of trade. We set high standards for our suppliers in the context of our own ethical policy.

## 2.6. Competition

Origin Invest will always compete vigorously, but in a fair and ethical way. Competitive success is built on providing good value and service excellence. Competitors should not be disparaged. When in contact with competitors, employees will avoid discussing confidential information and no attempt will be made to improperly acquire competitors' trade secrets or any other confidential information. Employees must not publicise, discuss or share with competitors (even indirectly) pricing strategies or undertake any arrangements or practices which would conflict with the laws applicable to the business concerned.



## 3. OUR APPROACH TO CORPORATE GOVERNANCE

Origin Invest is committed to protecting the interests of our shareholders and our organisation through compliance with the relevant legal and regulatory environments and careful management of business risks.

### 3.1. Compliance With The Law

Origin Invest will comply fully with all relevant national and international laws and will act in accordance with local guidelines and regulations, including those which are industry specific, governing our operations.

It is the responsibility of all managers to ensure, by taking legal or other expert advice where appropriate, that they are aware of all local laws and regulations which may affect the area of the business in which they are engaged, including tax and exchange controls.

### 3.2. Accounting Standards And Records

All accounting documentation must clearly identify the true nature of business transactions, assets and liabilities in conformity with relevant regulatory, accounting and legal requirements. No record or entry may be false, distorted, incomplete or suppressed.

All company reporting must be accurate and complete and in compliance in all material respects with accounting policies and procedures. Employees must not materially mis-state or knowingly misrepresent management information for personal gain or for any other reason.

### 3.3. External Reporting

Origin Invest may be required to make statements or provide reports to regulatory bodies, government agencies or other government departments. Care should be taken to ensure that such statements or reports are correct, timely and not misleading. Senior management must be made aware of any sensitive disclosure before it is made.

Care must also be taken when making statements to the media that information given is correct and not misleading. Information which, if made public would be likely to have material effect on the Origin Invest share price or about transactions such as mergers, acquisitions or disposals (no matter how small) is subject to specific rules. Such matters should be referred to the relevant Senior Executive. Enquiries from the media should be referred to company media relations experts and statements should only be made by designated spokespersons.

Origin Invest will provide, through the Origin Invest corporate web-site ([www.origininvest.com](http://www.origininvest.com)) and through the published annual report and accounts and other statements, appropriate information to enable shareholders to assess our business performance.

### 3.4. Policies And Procedures

Origin Invest recognises that there are risks associated with carrying out any business activity. Management is responsible both for ensuring that policies and procedures are in place to manage risks and for complying with those policies and procedures. Employees should ensure that they are aware of the risks associated with their activities and that they comply with policies and procedures in place to manage those risks.

### 3.5 AML / TF Policy

#### 1. Introduction and Policy Statement

Regulation 19 of The Money Laundering Regulations 2017 require supervised firms to “establish and maintain policies, controls and procedures to mitigate and manage effectively the risks of money laundering and terrorist financing identified in any risk assessment undertaken by the relevant person under regulation 18(1)”.

Origin Invest Ltd. is committed to adherence to the UK legislation enacted to combat money laundering and to the prevention of criminals from being able to use this firm to help them launder money, or to finance terrorism. References to money laundering (ML) in this document should be taken to mean Money laundering or Terrorist Financing (ML/TF).

UK Legislation enacted to combat money laundering is as follows: -

- ✓ The Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 (SI 2017 No. 692).
- ✓ The Proceeds of Crime Act 2002 (as amended by the Crime and Courts Act 2013 and the Serious Crime Act 2015).
- ✓ The Terrorism Act 2000 (as amended by the Anti-Terrorism, Crime and Security Act 2001, the Terrorism Act 2006 and the Terrorism Act 2000 and Proceeds of Crime Act 2002 (Amendment) Regulations 2007).
- ✓ The Criminal Finances Act 2017

Origin Invest Ltd. understand that these policies and procedures are to be read with and should operate alongside the guidance provided in **AML Guidance for the Accountancy Sector (AMLGAS)**.

This document and the guidance set out in AMLGAS are applicable to all clients taken on by Origin Invest Ltd. and applied as required throughout the business relationship and afterwards.

## 2. Risk Based Approach

Adopting a risk-based approach implies the adoption of a risk-management process for dealing with ML and TF.

This encompasses:

- ✓ Recognising the existence of the risks.
- ✓ Undertaking an assessment of the risks.
- ✓ Developing control strategies to mitigate and monitor the identified risks.

**Note:** procedures must be based on assessed risk, with higher risk areas subject to enhanced control procedures.

The ML/TF risk assessment for this firm is available separately and this document takes into account the risks identified in relation to this firm.

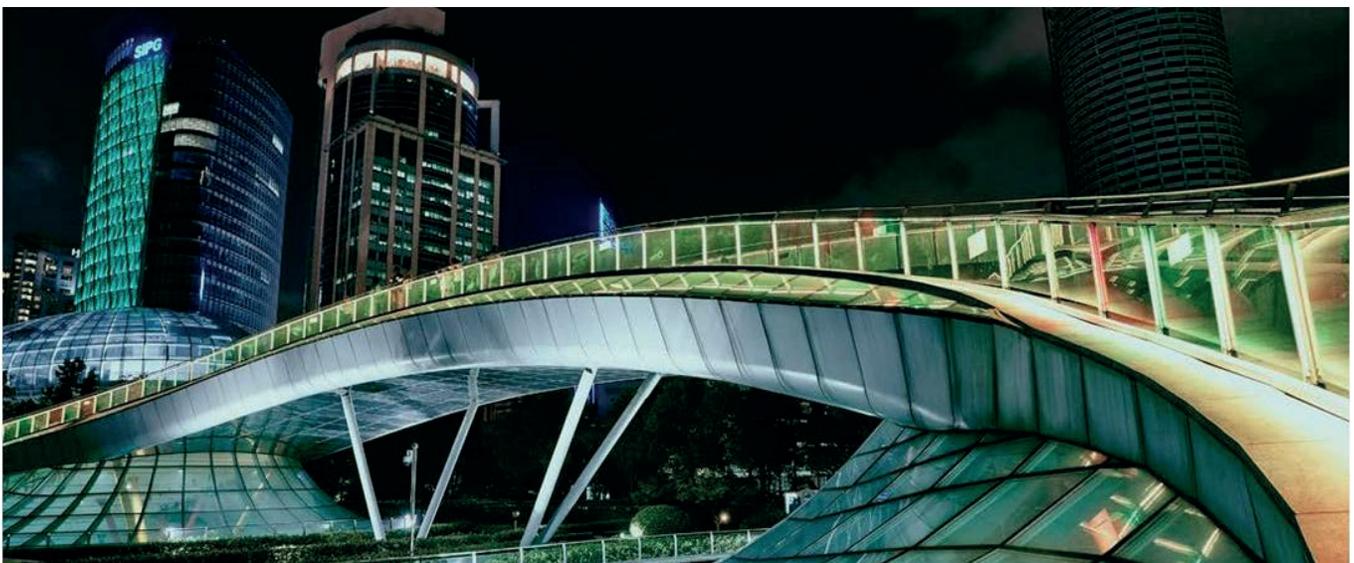
The policies and procedures set out below and included in this document aim to manage and mitigate ML risk. Resources are dedicated to areas of greatest risk.

## 3. Client Acceptance Criteria

Origin accepts client categorisation as a professional client ONLY. Professional clients may be either per se professional clients or elective professional clients as in clause 3 of the Terms.

When we categorise you as a retail client you may request to be categorised as an elective professional client. Our approval of any request to be treated as an elective professional client will be at our discretion and will be subject to an assessment of your expertise, experience and knowledge of financial matters which influence your instruction.

If you have been categorised as a per se professional client or as an elective professional client and propose to nominate a person as an Account Representative to give instructions in relation to your Account(s), we will assess the expertise, experience and knowledge of investment matters of the proposed Account Representative. If we conclude that the proposed Account Representative does not satisfy the criteria to be categorised as a per se professional client or as an elective professional client, we will re-categorise you as a retail client level for which we provide NO service..



## 4. Client Due Diligence (“CDD”) and Enhanced Due Diligence (“EDD”)

A client is required to complete documents and submit supporting documentation as part of the KYC. An account opening form, the tax form, including details of beneficial owners of businesses, sources of funds and wealth and a CDD and, in some cases, EDD shall be performed.

As part of the due diligence procedure, the client(s) together with and ultimate beneficial owner(s) of business clients/trusts must be checked against the following lists:

▶ **Financial sanctions lists.**

- ▶ Lists of organisations and individuals subject to financial sanctions can be accessed on the Treasury website <https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets>.
- ▶ The Home Office’s proscribed terrorist groups or organisations <https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2>.

Where clients are based overseas and outside the EU, the procedure is that the lists of high risk third countries must be consulted to determine if the client is resident in any of the relevant countries. These lists are as follows: -

- ▶ Countries identified by **Financial Action Task Force** as being high-risk jurisdictions.
- ▶ **European Union’s High Risk Third Country List**, amended in **March 2017** and **October 2017** In addition a new list was adopted on 13th February 2019 and the relevant details can be accessed [here](#).

As part of the CDD process Origin Invest Ltd. is aware of the need to identify and scrutinise:

(i) Any case where—

(aa) a transaction is complex and unusually large, or there is an unusual pattern of transactions.

(bb) the transaction or transactions have no apparent economic or legal purpose.

(ii) any other activity or situation which I regard as particularly likely by its nature to be related to money laundering or terrorist financing.

Origin Invest Ltd. Is also aware of the need to take additional CDD/EDD monitoring measures, where appropriate, to prevent the use for money laundering or terrorist financing of products and transactions which might favour anonymity. [All staff employed must bring to the attention of the MLRO [Mr Tont Tse] details which they come across of transactions or arrangements of the pattern outlined or any new ML/TF risks they identify in the business].

## 5. Risk Management

The ML/TF risk in relation to each client will be assessed at the time the client is taken on and noted on the [Account Opening Form /the spreadsheet record/OriginCloud (tailor based record in place within Origin Invest)].

In relation to risks specifically identified and set out in the practice risk assessment the following additional

RISK FACTORS	ADDITIONAL PROCEDURES TO MITIGATE AND MANAGE ML/TF RISK
<b>Our Clients</b>	
<i>professional client ONLY</i>	<i>AML Ethics Policy Terms and Conditions</i>
<b>Countries or geographic areas in which the firm operates</b>	
<i>EMEA APAC AMER</i>	<i>AML Ethics Policy Terms and Conditions</i>
<b>Our products or services</b>	
<i>International Project Finance Brokerage</i>	<i>AML Ethics Policy Terms and Conditions</i>
<b>Transactions</b>	
	<i>Fee schedule AML Ethics Policy Terms and Conditions</i>
<b>Delivery channels</b>	
<i>Channel Partners</i>	<i>Channel Partner Agreements AML Ethics Policy</i>

Origin Invest Ltd. will ensure that when new technology is adopted by the firm, appropriate measures are taken in preparation for, and during, the adoption of such technology to assess and if necessary mitigate any money laundering or terrorist financing risks this new technology may cause.

## 6. Ongoing Monitoring

Client due diligence, periodic reviews and risk assessments should be conducted on an ongoing basis and any additional information identified should be dealt with and further information obtained from clients where necessary.

A note of the review and the results, such as an updated risk rating, should be indicated on the [Account Opening Form /the spreadsheet record/OriginCloud (tailor based record in place within Origin Invest)].

## 7. Internal Controls and Communication

The control both ML and TF risk in accordance with this policies and associated procedures document which are communicated to all staff through [staff meetings]/[email] on a regular basis. All staff are required to acknowledge receipt of the policies and procedures document and to confirm that they have read it and will adhere to it.

## 8. Record Keeping

Record keeping shall be undertaken in accordance with the requirements of MLR 2017 and based on the guidance included in chapter 7 of AMLGAS.

Records of CDD/EDD are kept on [Account Opening Form /the spreadsheet record/OriginCloud (tailor based record in place within Origin Invest)].

Record retention is agreed with clients through the engagement letter in place between the firm and that client and/or our privacy notice in the account opening form and terms.

This firm does not enter into reliance agreements with other firms in relation to reliance on CDD undertaken by other firms.



## 9. Reporting - Declaration

It is a requirement that where the MLRO knows or suspect (or has reasonable grounds for knowing or suspecting) that a person is engaged in money laundering or terrorist financing as a result of information received in the course of the business or otherwise through carrying on that business then they must comply with:

- i. Part 3 of the Terrorism Act 2000(a); or
- ii. Part 7 of the Proceeds of Crime Act 2002(b); and make a Suspicious Activity Report.

This will be considered by Origin Invest Ltd. by reference to the guidance in Chapter 6 and appendix D of AMLGAS.

Reports should be made to the NCA online and the relevant link providing advice on the SAR online system is:

**[https://www.ukciu.gov.uk/\(pti1v145322oty55ufu1b43u\)/SARonline.aspx](https://www.ukciu.gov.uk/(pti1v145322oty55ufu1b43u)/SARonline.aspx)**

All staff must report, every instance where they have knowledge or suspicion of ML/TF to report this matter, to MLRO without delay.

**Note:**for security reasons reports must be made in writing by using the internal form and must not be emailed but hand delivered directly to the MLRO.

An email acknowledgement of receipt of the form will be provided by the MLRO to the member of staff. This should provide minimal information about the incident reported for security reasons]

Under no circumstances should the client or any of their representatives be advised that a report has been considered internally or that a suspicious activity report (SAR) has been made by the MLRO.

## 10. Training

It is a requirement of MLR 2017 that regular AML/CTF Training is undertaken and that a written record of the training delivered is maintained.

Arrangements for training are recorded on the training file.

**Julius Lewis**  
Origin Invest Ltd  
Date : 04/11/2019



## 4. OUR COMMITMENTS TO OUR EMPLOYEES

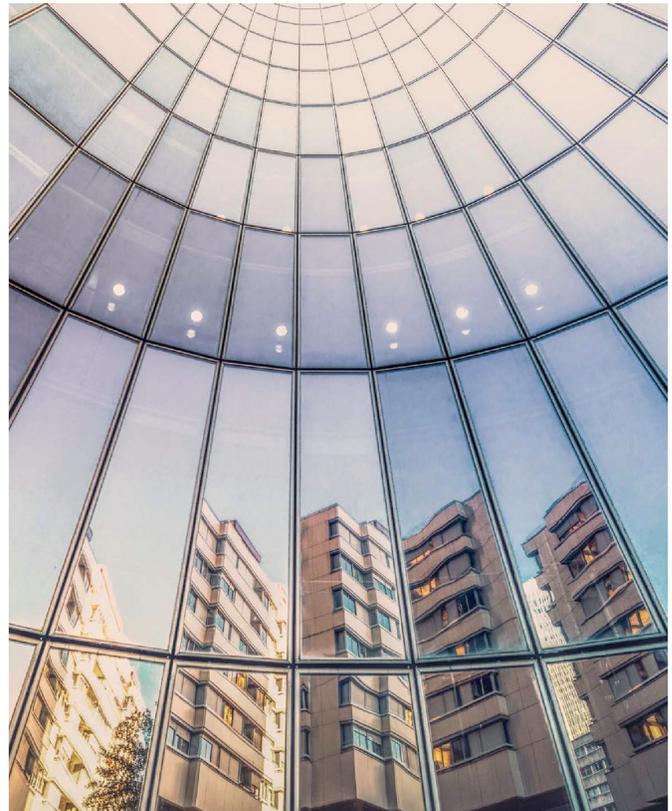
Origin Invest is committed to optimising individual and business performance through employing the best people at all levels and creating an environment in which they want to and are able to contribute fully to the company's success. To achieve a working environment in which team spirit and commitment to the goals and values of Origin Invest are maintained, the Company will ensure that individual employees are treated fairly and with dignity and respect.

### 4.1. National Regulation

In dealing with its employees, Origin Invest will act in compliance with national regulatory requirements and employers' obligations to employees under labour or social security laws and regulations must be respected.

### 4.2. Ilo Declaration On Fundamental Principles And Rights At Work

Origin Invest supports the four fundamental principles in the ILO Declaration. Thus, in accordance with local legislation and practice we will respect freedom of association and the right to collective bargaining, employment will be freely chosen with no use of forced or child labour, and we will not discriminate on the basis of gender, colour, ethnicity, culture, religion, sexual orientation or disability and will abide by all anti-discrimination legislation in every jurisdiction where Origin Invest operate.



### 4.3. Harassment

Harassment can be defined as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. Conduct involving the harassment (racial, sexual or of any other kind) of any employee is unacceptable. Should an employee believe that he or she has been harassed the matter should be raised with the relevant Human Resources Manager who will arrange for it to be investigated without delay, impartially and confidentially. If the employee feels more comfortable with reporting to a principle director, Origin Invest have an 'open door' access to any employee requiring to speak directly to any of its principle directors.

### 4.4. Equal Opportunity

Origin Invest values all of its employees for their contribution to the business. Opportunities for advancement will be equal and will not be influenced by considerations other than their performance, ability and aptitude. Employees will also be provided with the opportunity to develop their potential and, if appropriate, to develop their careers further with the company.

## 4.5. Health & Safety

Origin Invest places the highest priority on promoting the health and safety of employees whilst at work. In particular, we will constantly review the effectiveness of our methods of operation to best protect those who work in a high-risk environment.

## 4.6. Terms Of Employment

The businesses and their employees will work towards creating permanent long-term relationships. Employees will be paid for and work hours at least as favourable as the terms established by national legislation or agreements or industry standards.

## 4.7. Pre-Employment Screening And Selection

In order to protect the interests of its employees and customers and because of the nature of its business, Origin Invest will apply rigorous pre-employment screening and selection techniques.

# 5. EMPLOYEE COMMITMENTS TO ORIGIN INVEST

Employees must avoid situations where appearance of business impropriety exists, even though the circumstances might not otherwise specifically violate this code of conduct or where specific laws or regulations do not apply.

## 5.1. Confidential Information

Employees must not make use of confidential information obtained through their employment for personal gain. The disclosure of confidential information to any third party during or after employment is not permitted unless the disclosure has been appropriately authorised, is for a legitimate business reason and the information is being securely communicated. 'Confidential information' is either information that has been specifically described as being confidential or is otherwise obviously confidential from the surrounding circumstances.

The term 'confidential information' does not include information in the public domain or information which the individual concerned is required by law to disclose.

## 5.2. Conflicts Of Interest

Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the Company, or which divides his or her loyalty to the Company. Any activity which even appears to present such a conflict must be avoided or terminated unless, after disclosure to the appropriate level of management, it is determined that the activity is not unethical or improper, does not compromise integrity and is not detrimental to the reputation and standing of the company.

## 5.3. Social Networking

Employees who engage in social networking on websites or in groups which show any association with, or make reference to, 'ORIGIN INVEST' are expected to behave in ways that are consistent with Origin Invest values and policies. Employees must therefore ensure that the company is not exposed to legal or reputational risks and the safety and security of employees, customers and the general public are not undermined.

## 6. IMPLEMENTATION

This Business Ethics Policy is widely published by Origin Invest including on the global intranet ([www.origininvest.onlyoffice.eu](http://www.origininvest.onlyoffice.eu)), and corporate website ([www.origininvest.com](http://www.origininvest.com)). The Policy is a minimum standard and issued to all managers and relevant specialists. Ethics training will be provided and an annual sign off implemented.

For frontline/administration staff an Ethics Code (including relevant elements of the Business Ethics Policy) is to be promoted by business units and management with content reflected where appropriate in training and other internal communications channels.

For all new staff, employment contracts or written statements include the Business Ethics Policy or Ethics Code as appropriate. These should be signed, retained on file and be auditable.

Implementation and adherence to the Business Ethics Policy is monitored as part of Origin Invest compliance processes. The policy will be reviewed annually.

### 6.1. Staff Complaints, Concerns And Suggestions

Staff can expect that the Company will give due consideration to their constructive suggestions and will provide a considered and objective review of genuine concerns and complaints. Such concerns include fraud, misrepresentation, theft, harassment, discrimination and non-compliance with regulations, legislation, policies and procedures.

Concerns must be investigated impartially so that the employee's rights are protected. Employees who have concerns about potential unethical behaviour should advise the Finance Director in the first instance. Employees may do this anonymously if they so wish. To ensure that confidentiality is maintained, employees should not discuss such concerns with colleagues or other third parties, unless specifically authorised or unless it is a legal requirement.

If the employee is dissatisfied with the response to the concern which he or she has raised, or if the concern relates to a matter of exceptional gravity or sensitivity, he or she can use a confidential reporting hotline: +44(0)7092070202

### 6.2 Compliance Monitoring

We monitor, on a regular basis, compliance with this ethics policy, using information reported via the confidential reporting hotline facility, internal/external audit and ongoing management reporting.

### 6.3 Adherence To Policy

Since Origin Invest aims to maintain high ethical standards in carrying out its business activities, practices of any sort that are incompatible with the company's principles and policies are not tolerated. Strict adherence to these principles and supporting policies is a condition of employment in Origin Invest. Any action by an employee, which deliberately or recklessly breaches this ethics policy, may result in disciplinary action and where appropriate, criminal proceedings will be instituted.





**EMAIL**

[info@origininvest.com](mailto:info@origininvest.com)

**PHONE**

+44 20 3150 0263

**WEB**

[www.origininvest.com](http://www.origininvest.com)