



Anti-Bribery and Corruption Policy

July 2015

Purpose

The purpose of this Policy is to define clear principles which outline Aberdeen's position on Bribery and Corruption, the objective being to ensure that Aberdeen follows a globally consistent approach to managing Anti-Bribery and Corruption at all levels of the business and, in particular, in compliance with the UK Bribery Act (2010), US Foreign Corrupt Practices Act (FCPA) (1977), and other related legislation.

Scope

The Policy applies to all staff of Aberdeen Asset Management PLC and all of its subsidiaries. The application of the Policy extends to agents acting on, or providing services on, Aberdeen's behalf and partners in joint ventures. For Suppliers, Aberdeen requires the adoption of a Policy consistent with the standards set out in this document.

Availability

Internally

The Policy is available to all Staff on SharePoint.

Externally

This policy is publicly available on the Aberdeen website and can be issued to external parties such as Regulators, Auditors, Trustees, Depositaries, and Clients or potential Clients, on request. For the avoidance of doubt, no further approval is required to issue this Policy.

Variance

There are no variances applicable to this Policy.

Anti-Bribery and Corruption Policy

Policy

Aberdeen believes that the materialisation of Bribery and Corruption can stem from any number of root causes, but that poor transparency, poor controls, and poor standards, encourage their proliferation. This Policy defines clear principles which outline Aberdeen's position on Bribery and Corruption.

At all times Aberdeen:

- Conducts its business fairly, honestly, transparently, and with integrity
- Does not make or offer bribes, whether directly or indirectly, to gain business advantage
- Does not request or accept bribes, whether directly or indirectly, to gain business or other advantage
- Develops an evolving programme and procedures to implement and support these standards.

Staff must:

- Refuse any bribe or inducement in a manner which is not open to misunderstanding or which may give rise to false expectations
- Report any offers of bribes or inducements
- Report any suspicious behaviour
- Report any breaches of this Policy, related principles, or associated legislation.

NB Any proven instance of staff accepting or offering a bribe is considered an act of gross misconduct and the relevant authorities are informed.

Facilitation Payments

Facilitation Payments (otherwise known as 'grease payments') are not seen by many as being equivalent to large scale corruption and as such are not illegal in certain countries. However, the UK Bribery Act (2010) considers facilitation payments to be illegal. As a result, Aberdeen has a group-wide zero tolerance for this activity. All requests for facilitation payments must be reported to the Anti-Financial Crime team.

Political Contributions

Aberdeen does not make any donations to political parties, nor does it incur political expenditure.

Reporting Suspicions

All suspicions or evidence of another member of staff, or anyone acting for or on behalf of Aberdeen, who may have engaged in corrupt behaviour, must be reported at the earliest possible opportunity. All reports raised are taken seriously and no member of staff is discriminated against in any way as a result of reporting a concern in good faith.

Aberdeen supports any member of staff who makes such a report and ensures that the report is treated appropriately. No disciplinary action is taken against any person who makes a legitimate report, even if the suspicions turn out to be incorrect. Disciplinary action is taken against any person who attempts to victimise or discriminate against a person making such a report.

Reporting can be via line management or via the confidential whistleblowing service or to the Anti-Financial Crime team.

NB The Policy must be read in conjunction with the Anti-Bribery and Corruption Handbook which provides further guidance and explains how the Policy is implemented.