

EDINBURGH DRAGON TRUST PLC ("the Company")

Legal Entity Identifier (LEI): 549300W4KB0D75D1N730

POLICY FOR THE PREVENTION OF TAX EVASION

1. It is the Company's policy to conduct all of its business in an honest and ethical manner. The Company takes a zero-tolerance approach to facilitation of tax evasion, whether under UK law or under the law of any foreign country.
2. The Company is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter tax evasion facilitation.
3. The Company's policy establishes a culture across the Company and in relation to its service providers and other counterparties, in which tax evasion and the facilitation of tax evasion is unacceptable.
4. The Company will uphold all laws relevant to countering tax evasion, including the Criminal Finances Act 2017.

22 JANUARY 2018