

Anti Bribery Statement

Acting with the highest standards

We have a moral and ethical duty to act with the highest standards of integrity and honesty at all times in delivering our services for customers. We will not tolerate acts of bribery or corruption committed by any of our employees, including the Board of Directors, and any third parties who act on our behalf. Our commitment to anti-bribery and corruption builds on our corporate responsibility to our customers, shareholders and colleagues to deter, prevent, detect and respond to those who would seek to use the Group to facilitate any form of financial crime.

We define bribery as 'an offer or acceptance of any gift, fee, reward or other advantage to or from any person as an inducement to do something in the conduct of the Group's business, which is dishonest, illegal or a breach of trust'. This includes offers and promises to give, as well as requests and agreements to receive bribes. We define corruption as a term used to describe a wide range of misconduct of which bribery can be a part; it is often associated with 'the abuse of entrusted power for private gain'.

Compliance with legislation and regulation

We make sure that our Anti-Bribery Policy includes the requirements of all relevant laws and regulations, in particular the UK Bribery Act 2010 (which applies to us wherever in the world we operate), the U.S. Foreign Corrupt Practices Act of 1977 and the requirements of our primary regulator, the Financial Conduct Authority.

We are well placed to meet the expectations of the law, regulations and guidance and we ensure that our anti-bribery control environment continues to evolve and mature. Neither MSMK Training, nor to the best of our knowledge any of our current Directors, is subject to any material pending investigation or proceedings under anti-corruption

legislation.

Providing a clear framework for colleagues

Our Anti-Bribery Policy requires all employees, including Directors and Non-Executive Directors and anyone acting on our behalf (agents, other intermediaries, contractors, subcontractors and suppliers) to act with honesty and integrity and in accordance with the

behaviours set out in our separate Codes of Personal and Business Responsibility and

Code of Supplier Responsibility.

Employees and those acting on our behalf are prohibited from paying, offering, accepting

or requesting a bribe, in any form; from making facilitation payments, even where this

may represent local practice or custom; and from taking any action to circumvent

established controls to deter, prevent, detect or respond to bribery.

MSMK Training Ltd Vasyl Kruk MD