

ETHICAL CONDUCT POLICY STATEMENT

This Policy has been assembled to protect Company operations, customers, shareholders and employees from the adverse effect of unethical behaviour.

The Company requires all staff at all times to act with honesty, integrity and to promote ethical practices within the areas for which they are responsible. Unethical practices are an ever present threat to the company's operations and hence must be a concern to all members of staff.

The company are committed to the highest standards of ethical conduct and in order to further promote ethical and responsible business conduct we have assemble this **Ethical Conduct Policy (ECP)**. This is to be applied in all our business relationships. The ECP provides all employees of **Fredereck Sage & Co Limited** (collectively referred to as the "Company") and all third parties that represent the Company, such as consultants, representatives or third parties (collectively, "Representatives") with an important resource to guide them in making the right choices when dealing with matters relating to Business Ethics.

The ECP addresses those areas in which we must all act in accordance with law or regulation, and also establishes the responsibilities, conditions, guiding principles and procedures to ensure employees and Representatives act appropriately on the Company's behalf. In addition to adhering to the conditions and procedures set out in the ECP, employees and Representatives are required to comply with the law.

All employees are responsible for their own adherence to the ECP, and managers are also required to consider whether the actions of their own staff and Representatives are also in accordance with the ECP. All Representatives are in their own right responsible for both their and their staff's adherence to the ECP.

Fundamentally, the success of our approach depends upon our management and employees understanding the Company's values, applying judgment and reason in an open environment and having the confidence that the Company will help and support them over difficult issues. The Company has derived a training programme to support these aims, specifically designed to recognise differing roles and responsibilities. All employees will be required to undertake basic ethical training as a minimum. In all cases, where there is suspicion or evidence of non-compliance to the ECP, action will be taken to remedy the non-compliance.

The Company requires employees to advise their manager, who will inform the Chairman, when they become aware of violations of our policies. Unethical behaviour will not be tolerated and the Company will take action in all cases up to and including dismissal of employees in breach of the ECP and termination of contractual relationships with Representatives.

The Board of Fredereck Sage & Co Limited is fully committed to ensuring that Fredereck Sage & Co Limited complies both with the letter and spirit of the principles in the ECP. For that reason a Senior Director has been appointed by Fredereck Sage & Co Limited with the responsibility and authority to oversee and drive our Compliance Policy.

For and on behalf of Fredereck Sage & Co Limited



Senior Director

30.11.16

Date: