

Anti-Bribery Statement

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Timeline Portfolios Ltd (Timeline) is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK. Every employee and individual acting on Timeline's behalf is responsible for maintaining our reputation and for conducting company business honestly and professionally.

Timeline considers that bribery and corruption have a detrimental impact on business by undermining good governance and distorting free markets.

Timeline benefits from carrying out business transparently and ethically and by helping to ensure that there is honest, open and fair competition in the financial services industry. Where there is a level playing field, Timeline can lead the market through innovation and technical expertise and by delivering excellent service to our clients.

Transparent, fair conduct helps to foster deeper relationships of trust between Timeline and its business partners and clients. It is vital for Timeline's reputation and future growth.

Timeline does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. The Board and Senior Management are committed to implementing and enforcing effective systems throughout Timeline to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

Timeline has issued an anti-bribery policy outlining the company's position on preventing and prohibiting bribery on the staff intranet and company website. The anti-bribery policy applies to all employees, including those of any subsidiary, as well as agency workers, consultants and contractors. All employees and other individuals acting for Timeline are required to familiarise themselves and comply with Timeline's anti-bribery policy with immediate effect.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of Timeline are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of its anti-bribery measures, Timeline is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, in accordance with the procedures set out in the company's anti-bribery policy.

A breach of the Timeline's anti-bribery policy by an employee will be treated as grounds for disciplinary action. Employees and other individuals acting for the organisation should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the company.

Timeline will not conduct business with service providers, agents or representatives that do not support the company's anti-bribery objectives. Timeline reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, Timeline with immediate effect where there is evidence that they have committed acts of bribery.

The success of the Timeline's anti-bribery measures depends on all employees, and those acting for the company, playing their part in helping to detect and eradicate bribery.

Therefore, all employees and others acting for, or on behalf of, the Timeline are encouraged to report any suspected bribery in accordance with the procedures set out in the anti-bribery policy. Timeline will support any individuals who make such a report, provided that it is made in good faith.

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