

**MIGO OPPORTUNITIES TRUST PLC**  
**(the “Company”, “MIGO”)**

**Anti-Bribery and Corruption Policy**

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed to ensure that no bribery occurs.

The Bribery Act 2010 contains two general offences covering the offering, promising or giving of a bribe and the requesting, agreeing to receive or accepting of a bribe. It also sets out two further offences which specifically address commercial bribery: one relating to the bribery of a foreign public official in order to obtain or retain business or an advantage in the conduct of business and one creating a new form of corporate liability which an organisation can commit by failing to prevent bribery of any of its employees, subsidiaries, agents or service providers or other associated persons (defined as a person who “performs services” for or on behalf of an organisation and may include employees, contractors, agents, service providers and subsidiaries) in an attempt to obtain or retain business or a business advantage both in the UK or internationally.

The Board of MIGO Opportunities Trust plc has adopted a zero-tolerance approach to instances of bribery and corruption. Accordingly, it expressly prohibits any Director or associated persons when acting on behalf of the Company, accepting, soliciting, paying, offering or promising to pay or authorise any payment, public or private, in the United Kingdom or abroad to secure any improper benefit for themselves or for the Company. Reasonable hospitality received and/or business entertainment expenses which seek to establish good relationships or facilitate a business transaction are allowed under the Bribery Act 2010.

MIGO maintains a policy of approving and monitoring all hospitality received and/or business entertainment expenses of £100 and above, which need to be noted in the Register of Directors’ Interests and Potential Conflicts of Interest. This register is reviewed at every Board meeting. Directors claiming such expenses are required to record the name of the guest and nature of business. The Directors concerned must be present at the entertainment activities. Any gift received or expense of £100 or above should be notified to the Company Secretary for inclusion on the Register of Directors’ Interests and Potential Conflicts of Interest.

The Directors of MIGO recognise their responsibilities in ensuring that the Company has a robust policy to avoid practices of bribery and to ensure compliance with its legal obligations. The Board insists that it is informed immediately of any identified instances of bribery or corruption within any of its principal service providers and auditors. A copy of the Anti-Bribery and Corruption Policy in place, together with a report detailing any identified instances of bribery or corruption and details of the corrective courses of action taken, are provided for the Board’s review on an annual basis.

As part of a risk-based approach, the Board will carry out an annual risk assessment on matters relating to bribery, involving due diligence enquiries in respect of persons who perform or will perform services for or on behalf of the Company, in order to mitigate identified risks. However, the Board confirms that such a review will be carried out more frequently if, for example, the Company’s investment policy were to change, if a perceived low-risk country of investment became a higher risk or if a new investment manager, manager or other principal

service provider were appointed. Due diligence reports will be kept and be made available for inspection by compliance officers or statutory auditors.

The Board will review this policy at least on an annual basis and will ensure that it is publicly available on the Company's website.

### **Principal Service Providers and Auditors**

- Premier Portfolio Managers Limited – Alternative Investment Fund Manager
- Premier Fund Managers Limited – Investment Manager
- Frostrow Capital LLP – Company Secretary, Administration and Marketing
- The Bank of New York Mellon (International) Limited – Depositary and Custodian
- Computershare Investor Services PLC – Registrars
- PricewaterhouseCoopers LLP – Auditors
- Numis Securities Limited – Corporate Brokers
- Kepler Partners LLP – Fund Research
- Eversheds Sutherland (International) LLP - Lawyers

Approved on 25 March 2022.