

LGBR Capital: CODE OF ETHICS

JULY | 2021

Our purpose, strategy and culture

LGBR Capital (LGBR) is an independent, outsourced distribution team for asset managers offering long only funds, alternative & closed end funds and tax-advantaged products for distribution primarily via financial intermediaries.

A market leader in terms of resources, breadth of product, assets under management and geographies covered, LGBR partners with asset managers to devise tailored distribution and marketing strategies which draw on our proprietary CRM system. Our clients lie at the heart of our business and our commitment to providing excellent service underlines everything that we do.

As well as forming long-term relationships with the asset management companies to which we provide marketing and distribution services, we forge close partnerships with our network of UK investment intermediaries. We aim to maintain an open culture that encourages close collaboration and communication with all our partners and across our business as a whole.

Our commitment to our clients

We believe that our business is built on the high standards of service that we deliver to our clients. We directly benefit from their success and align our interests with theirs by adopting a fee structure that rewards us on our delivery on objectives.

We believe in maintaining open and transparent communications with our clients to ensure that our services meet or exceed their expectations.

At all times we strictly maintain client confidentiality and take the greatest care to manage any conflicts of interests.

We also undertake not to engage as clients any businesses that might damage the reputation of LGBR, or by extension, our existing clients.

We are committed to an efficient and transparent complaints process should a client feel we fall below their expected levels of service.

Our commitment to our employees

We acknowledge the vital role all employees play in the delivery of excellent service to our clients and in the ongoing success of LGBR. We believe, therefore, that it is essential that we embrace an

inclusive culture that encourages personal professional development and that rewards performance across the business.

We are an equal opportunities employer and believe that a diverse and inclusive workplace is highly beneficial in bringing a broad range of experience for the benefit for our stakeholders, clients and the business as a whole.

For appropriate roles, we accommodate differing preferences towards working from the office or remotely to enable employees to choose the working pattern that best suits their circumstances.

We also operate an internship programme to offer young people the experience of working within the financial services industry and encourage the participation of candidates from a broad range of backgrounds.

We have a structured professional development process in place which provides all employees with online training modules and we sponsor all salespeople to sit the industry kitemark qualification, the Investment Management Certificate (IMC).

We structure remuneration and incentives to ensure that they recognise individual performance and professional development.

We expect all employees to execute their duties with the same high levels of integrity and client focus that the business embraces as a whole.

Our commitment to suppliers and service providers

We believe all partners that supply services to LGBR play an important part in the success of our business. We are therefore committed to conducting our working relationships with all suppliers with integrity and professionalism.

We are also committed to working with third parties that share our high standards across their operations and in their behaviour towards employees and any other businesses that they engage with, and regularly review all service providers we engage with.

Our commitment to the environment

LGBR's operations are not intensive in terms of carbon emissions. Nonetheless, we strive to minimise our environmental footprint by using energy in the office as efficiently as possible, by recycling as much office waste as possible and by encouraging our employees to reduce their carbon footprint by subscribing to the 'Cycle to Work' scheme.

Our relationship with regulators

LGBR is an appointed representative of Mirabella Advisors LLP which is authorised and regulated by the Financial Conduct Authority (FCA) number 606792. We believe that by following the codes of conduct expected by the FCA and other government sponsored legislative bodies, our clients and other partners can have confidence in our commitment to applying best practice to all areas of our operations.

By extension, we expect our clients to have in place the necessary regulatory oversight in those jurisdictions where we partner with them to distribute their products.

We are committed to maintaining robust corporate governance as we believe this directly benefits our clients, partners and stakeholders as well as being essential in ensuring the ongoing success of our business. We have a fully accountable Board that places high importance on ethical corporate behaviour, guides our corporate strategy, monitors compensation, manages risk and ensures the delivery of transparent and compliant reporting to relevant regulatory bodies.

LGBR Capital and the UK Stewardship Code

Given the nature of LGBR's principal activities as a marketing and distribution partner, we are not eligible to be a signatory to the UK Stewardship Code as a service provider (see: [UK STEWARDSHIP CODE 2020](#)), however, we are fully supportive of the principles that the UK Stewardship Code promotes. We believe that those businesses which adopt high levels of governance are more likely to reward shareholders and stakeholders and therefore make more compelling investments.

We actively engage with our clients to encourage them to adhere to the guidance, best practice and reporting that the UK Stewardship Code defines, so that they can discharge their responsibilities as investors effectively; where appropriate, hold the management of the companies in which they invest to account in the event of any perceived malpractice; and demonstrate their engagement through transparent reporting.

LGBR Capital and the UN Principles for Responsible Investment (PRI)

Given the nature of LGBR's principal activities as a marketing and distribution partner, we are not eligible to be a signatory to the UN Principles for Responsible Investment as a service provider (see: [PRI REPORTING FRAMEWORK; MAIN DEFINITIONS](#)). We do believe, however, that a responsible approach to investment that includes environmental, societal and governance (ESG) considerations as part of the overall process and philosophy can help to achieve superior returns while having a positive impact in tackling key challenges facing society and the environment.

We also acknowledge the fact that many advisers and their clients are increasingly interested in understanding the extent to which asset managers integrate ESG factors across their operations.

We therefore actively engage with our clients to encourage them to invest in a way that benefits society and the environment and to subscribe to the UN PRI and to support them in their application. Where we also feel it is appropriate for our clients, we look to work in conjunction with them to help them both implement and document ESG policies within their business and investment process.

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