

## **Polar Capital Global Healthcare Trust Plc – Anti-Corruption Policy**

As an investment trust Polar Capital Global Healthcare Trust Plc (“the Company”) is reliant on Polar Capital LLP (“the Investment Manager”) for the provision of operational services. The Company does not operate premises and has no physical presence. The Company is run and managed under third-party service contracts and is overseen by a Board of independent non-executive directors.

The Board is responsible to shareholders for the overall management of the Company’s affairs. The Board has established an ongoing process for identifying, evaluating, monitoring and managing any major risks faced by the Company. The process is documented through the use of a Risk Map which is subject to regular review by the Audit Committee and Board and accords with the Guidance on Risk Management, Internal Control and Related Financial and Business Reporting published by the Financial Reporting Council in September 2014. The Board undertakes an in-depth annual review of the Company’s system of internal controls where the Risk Map is reviewed, and control processes considered. A fuller description of the risks and the working of the Audit Committee is given in the Annual Report.

On the Company’s behalf, on a periodic basis, Polar Capital writes to all third-party providers to ensure compliance with certain policies adopted by the Company. The Boards policies in relation to anti-corruption are stated below.

### **Anti-Bribery – The Bribery Act 2010**

The Board has adopted a zero-tolerance policy to bribery and corruption in its business activities and uses the anti-bribery policy formulated and implemented by the Investment Manager which was sent to all suppliers of both the Investment Manager and the Company and is available from the Company Secretary.

### **Anti-Slavery – The Modern Slavery Act 2015**

The Company has no employees and has therefore not adopted a policy on human rights or operational control of its assets. As an investment company, the Company does not provide goods or services in the normal course of business and does not have any customers. Accordingly, it is considered that the Company is not required to make any slavery or human trafficking statements under the Modern Slavery Act 2015. The Company seeks to obtain assurance from third-party providers that appropriate anti-slavery and anti-human trafficking policies are in place.

### **Prevention of Tax Evasion – Criminal Finances Act 2017**

The Board has adopted a zero-tolerance policy to the facilitation of tax evasion and expects the same standard to be adopted by third-party service providers. As the Company is externally managed there is minimal opportunity to facilitate tax evasion directly. The Board has sought to ensure the third-party providers to the Company have adopted equivalent zero-tolerance policies. The Company is committed to acting with integrity and in the interests of Shareholders and will seek to ensure that the law is enforced should such a need arise.

The Board carries out a periodic risk assessment of the above policies which have been embedded into the Risk Map.

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