



LONDON WALL

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London Wall Private Office LLP - Ethics Policy

When taking on a new client or accepting a new matter, the following aspects need to be considered:

- Could the client or the matter pose or be likely to pose, any clear and obvious ethical questions or concerns?
- Are you aware of any aspects of the client's history, business activities, or public image, which might be incompatible with London Wall's Core Values?
- Could there be any aspects of the matter which might be in conflict with the Firm's Core Values?
- Could acceptance of the client/matter cause offence to any 'class/group' of people within the Firm?
- Could there be any risk to the Firm's public image or standing amongst existing clients, intermediaries or the legal community that may occur as a consequence of the Firm acting for this client or on this matter?

If any of the above apply the following should occur:

Before agreeing to act or to act further the matter should be brought to the attention of the Head of Department. The Head of Department will then take a view or refer the matter to the Management Board, acting as the Ethics Committee.

When a decision of the Ethics Committee needs to be made at short notice, two out of three members of the Ethics Committee will be sufficient to take that decision. Otherwise the matter will be discussed at the next Management Board meeting.

If any fee earner, through ethical or other personal reasons, does not wish to work on a particular matter, he/she should speak immediately with the Matter Partner who may arrange for another fee earner to deal with the matter. This should apply regardless of whether or not any ethical concerns are raised following the above procedure.

If considered appropriate, the instructions should be declined.

In the event that any ethical issues are raised after accepting instructions to act, these should be communicated to the Matter Partner who in turn will in turn inform their Head of Department. This matter will then be referred to the Management Board as appropriate. Where a decision is made by the Management Board, it will be minuted. These minutes are available on the Partners' intranet site. By reading these minutes Partners will therefore be able to ensure consistency in the Firm's approach to ethical issues.

If considered appropriate a record of any decision to decline instructions or stop working for a client will be maintained by Ned El-Imad. Any such record will be available for inspection by all Partners.