

Code of Conduct

1. Introduction

This Code of Conduct articulates the code of ethics and business conduct of Octium Life DAC (referred to as "Octium" or the "Company"). We foster an ethical culture where responsible behaviour is second nature. We protect our most important asset – our clients. The Code sets the standards that help us to make that happen.

The Code has the full backing of Senior Management. And every employee of Octium needs to make sure our day-to-day actions and decisions follow the standards set out in the Code. Above all, we put the interests of our clients and our shareholders above our own.

2. Principles

Our code of conduct is based on eight principles:

1. Agility, which is about providing products that give our clients the flexibility they need to suit their particular situation.
2. Optimisation which allows our clients to optimise their income.
3. Insight which allows Octium to apply our vast experience to understanding the needs of individual clients.
4. Protection which is about protecting our client's wealth and their families from a range of negative circumstances.
5. Innovation which allows Octium to pave the way for innovative new products.
6. Independence which allows Octium, to make decisions which are best for our clients.
7. Professionalism which is about delivering a superior level of service to our clients.
8. Freedom which allows our clients to enjoy life without worrying about the future.

3. Obeying the law

We obey the laws, rules and regulations where we live, work and do business – as well as our own Octium policies, guidelines and procedures. And we engage and co-operate in good faith with our regulators, being open and transparent in our dealings with them.

4. Cross-border business

When we are working across borders, we obey all pertinent laws, rules and regulations – both at home and abroad. If we are dealing with clients from outside our home country, it is our job to understand what rules, laws or policies apply – and follow them.

5. Values and ethics

We do not just follow the laws, rules and regulations in everything we do, we do what is right. We control and manage our affairs and systems sustainably, responsibly, and in a sound and prudent manner.

6. Client Relationships

We look after our clients for the long term, winning their loyalty by earning their trust. We try to anticipate what our clients are going to need, before they ask. We go out of our way to give them an exceptional service. And we treat them fairly, and with the same courtesy and respect,

however large or small they may be. We arrange adequate protection for assets held by Octium on behalf of our clients.

7. Anti-Money Laundering and Corruption

We have a duty to contribute to the integrity of the financial system, as well as our own business. We do whatever we can to combat money laundering, corruption and terrorist financing. We have rigorous systems in place to detect, report and stop any suspected money laundering. We have zero tolerance for corruption or any kind of bribery, including so-called facilitation payments. We don't offer or accept improper gifts or payments in the course of our business. We carry out due diligence and keep a constant lookout for any suspicious activities, reporting them to the Money Laundering Reporting Officer and senior management as soon as we discover them. And we follow strict client due diligence regulations.

8. Sustainability

We take committed action to reduce our environmental impact. As an institutional investor, Octium is determined to play its part in contributing to the welfare and resilience of society. Sustainability is integral to our business and culture.

9. Protecting our assets

We keep Octium's assets safe and secure. That means doing all we can to stop them being lost, stolen, damaged or misused. We never use anything that belongs to Octium for our own personal advantage. And we always handle these assets with the greatest care, in line with the relevant laws and regulations.

10. Conflicts of Interest

We put our clients' best interests before our own – and Octium's interests before our personal interests. And we never let Octium's, or our personal interests influence our dealings with them. We have systems to spot and manage potential conflicts of interest. And as soon as we do spot any such conflicts, we raise them with our line manager or with the Compliance function immediately.

11. Diversity and equal opportunity

We believe that people from different backgrounds, with different thoughts and opinions, make us a stronger business. They bring us valuable new ideas, approaches and experiences.

Regardless of their status, everyone has the same chance to get ahead at Octium. Whatever their race / ethnicity, gender, civil status, national origin, age, ability, sexual orientation or religion. We work to create a culture where everyone feels welcome, respected and that they are a valuable part of our team – whatever part of Octium they work in. We do not tolerate any kind of discrimination, bullying or harassment. And we encourage each other to speak up and report it through clear channels, without fear of reprisals.