



Administration

Owner	Compliance, Liontrust Asset Management Plc
Governance Owner	Financial Crime Prevention Committee
Effective Date	May 2024
Review Cycle	Annually
Document Distribution	External

Scope

This statement is designed to provide an overview to external parties of Liontrust's Compliance related policies and procedures.

The use of "Staff" in this document refers to both Partners and Employees.

Code of Conduct

Liontrust expects all employees to conduct themselves responsibly, with integrity, and with investor's best interests at the core of what they do. All Liontrust employees must comply with our internal policies and procedures, as well as the Financial Conduct Authority's (FCA) Conduct Rules under the Senior Managers and Certification Regime (SM&CR) – these principles are reinforced through the performance management and training and development processes. We have also adopted the Chartered Financial Analyst Institute's Asset Manager Code, a voluntary code of conduct to help asset managers practice ethical principles that put client interests first.

Compliance

Liontrust operates across both the United Kingdom and the European Union and as such, is subject to authorisation and ongoing compliance with regulatory requirements from multiple regulatory bodies. These include the Financial Conduct Authority (FCA) in the UK, the Central Bank of Ireland (CBI) in Ireland and the Commission de Surveillance du Secteur Financier (CSSF) in Luxembourg.

Liontrust's Chief Compliance Officer, who holds the SM&CR responsibility for Compliance Oversight and Financial Crime Compliance (SMF16) in the UK, is supported by a nine-strong team of Compliance professionals who support the Chief Compliance Officer in implementation of policies, procedures and controls, as well as ongoing monitoring activity, cyclical and thematic reviews, regulatory change management and training delivery.

Financial Crime Compliance

Liontrust is committed to the highest standards of business conduct and to actively playing its part in reducing financial crime within the financial services industry. The expectation for staff to behave with honesty and integrity is central to the Liontrust culture and Liontrust recognises that firm culture and staff conduct is a key control in managing financial crime risk. We assess and manage the risks associated with Money Laundering and other types of Financial Crime in a variety of ways including an annual financial crime risk assessment. This is a way to analyse our exposure to each identified financial crime type and to document and record controls and mitigants in place as well as identifying recommendations for escalating to senior management where required. Culture, governance, products and staff training are all covered within this assessment.

All staff are required to complete an induction process and training programme on joining the firm and financial crime matters are covered through this process which includes computer-based training (CBT) and policy attestations. This training is repeated annually after being reviewed and updated to reflect any changes in the regulations or industry requirements.

The training is supported through policies and procedures which are reviewed at least annually. Liontrust maintains a set of policies and procedures to support the ongoing operation of the business, including the Financial Crime and Market Conduct Policy which covers anti-money laundering, anti-bribery and corruption, market abuse, and fraud.

Whistleblowing

Liontrust actively seeks to foster a culture of openness, transparency and fairness. As part of this, it is essential to have a mechanism in place to allow employees to raise concerns without fear of reprisal, victimisation or harassment. All employees are made aware of and have access to our anonymous Whistleblowing reporting tool through an independent party called Navex which enable reports through a telephone hotline or a web form. Through this tool they can submit concerns on malpractice or wrongdoing. All employees are also made aware of their ability to make a Whistleblowing report directly to the FCA. A whistleblowing policy is in place.

Data Protection

Liontrust is committed to protecting the personal data of its staff, customers and contacts and using it in the appropriate manner. We recognise the rights afforded to individuals by data protection legislation and must advise stakeholders of the fact that we process their personal data and the specific purpose for which we do so.

Our Data Protection Policy reflects the legal requirements set out in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act (DPA) 2018 by ensuring Liontrust:

1. Is clear about how personal data must be processed and the expectations for all those who process personal data on its behalf;
2. Complies with the relevant data protection law(s) and regulation, and with industry good practice;
3. protects the firm's reputation by ensuring all personal data is processed in accordance with data subjects' rights; and
4. protects itself from the risks of personal data breaches and other breaches of data protection law

For more information on any of the content of this statement, please contact a member of the Liontrust Compliance team.