

Mobius investment Trust plc

(the “Company”)

Anti-Bribery and Anti-Corruption Policy

The Board of Mobius Investment Trust plc has adopted a zero-tolerance approach to instances of bribery and corruption. Accordingly it expressly prohibits any Director or associated persons when acting on behalf of the Company, accepting, soliciting, paying, offering or promising to pay or authorise any payment, public or private, in the United Kingdom or abroad to secure any improper benefit for themselves or for the Company.

The Directors of Mobius Investment Trust plc recognise their responsibilities in ensuring that the Company has a robust policy to avoid such practices and to ensure compliance with its legal obligations. The Board insists that it is informed immediately of any identified instances of bribery or corruption within any of its principal service providers and auditors. A copy of the Anti-Bribery and Corruption Policy in place, together with a report detailing any identified instances of bribery or corruption and details of the corrective courses of action taken, are provided for the Board’s review on an annual basis.

As part of a risk-based approach, the Board will carry out an annual risk assessment on matters relating to bribery, involving due diligence enquiries in respect of persons who perform or will perform services for or on behalf of the Company, in order to mitigate identified risks. However, the Board confirms that such a review will be carried out more frequently if, for example, the Company’s investment policy were to change, if a perceived low risk country of investment became a higher risk or if a new investment manager, manager or other principal service provider were appointed. Due diligence records will be kept and be made available for inspection by compliance officers or statutory auditors.

The Board will review this policy at least on an annual basis and will ensure that it is publicly available on the Company’s website.

Principal Service Providers and Auditors

Mobius Capital Partners LLP – Investment Manager and Alternative Investment Fund Manager

Frostrow Capital LLP – Company Secretary and Administrator

Northern Trust Global Services SE – Depositary and Custodian

Computershare Investor Services PLC – Registrars

PricewaterhouseCoopers LLP – Auditors

Jefferies International Limited – Corporate Broker

Approved by the Board of Directors on 30 January 2020