

BRITISH EMPIRE SECURITIES AND GENERAL TRUST PLC

POLICY ON ENGAGEMENT OF THE AUDITOR FOR NON-AUDIT SERVICES

1. The following non-audit services may be provided by the Group's external auditor:
 - a. Advice and assurance on the interpretation and implementation of accounting standards, financial reporting matters, tax and governance regulations;
 - b. Advice and assurance in respect of direct and indirect tax matters including tax compliance, routine tax planning advice, tax consultancy services and employee tax services, including share plans;
 - c. Due diligence investigations related to potential acquisitions, disposals or joint ventures;
 - d. Internal accounting and risk management control reviews, including information systems, and reviews of policy and procedure compliance;
 - e. Attestation reports, control compliance or reasonableness reports as required by third parties;
 - f. Review and assurance in respect of documentation published by the Company, including in conjunction with the Annual Report and Half-Year report;
 - g. Reports and assurance in respect of any loan instruments issued by the Company;
 - h. Project assurance and advice on business process improvement.

2. Any new engagement with the Group's external auditor in excess of £10,000 for an individual service or specific project in the above categories of service (or any project that is not covered by the above list) must be approved in advance by the Audit Committee or a sub-committee of any two members of the Committee. Such proposals should be submitted in writing to the Audit Committee Chair for discussion with the Audit Committee.

Up to the limit of £10,000 for an individual service or specific project in the above categories, the engagement must be reported to the Audit Committee.

3. The following non-audit services may not be provided by the Group's external auditor:
 - a. Bookkeeping and other services relating to accounting records and corporate financial statements;
 - b. The design, implementation and operation of financial information systems;
 - c. Actuarial and internal control functions;
 - d. Executive management of company operations and activities, including acting temporarily or permanently as a director, officer or employee of the Group; and
 - e. Legal, broker, investment adviser or investment banking services.