

9th February 2018

Dear Sir/Madam,

Statement of Commitment to the UK Money Markets Code

Smith & Williamson Investment Services Limited hereby acknowledges that the UK Money Markets Code ('the Code') represents a set of principles generally recognised as good market practice in the UK Money Markets. The Institution confirms that it is a UK Market Participant as defined by the Code, and has committed to conducting its UK Money Market activities in adherence with the principles of the code.

Specifically, in a manner that is commensurate with the size and nature of its UK Money Market activities, the Institution has established and implemented policies and procedures that accord with the Code (in so far as the content does not conflict with the applicable law). Appropriately senior management will review these regularly to ensure their continued relevance and effectiveness.

For and on behalf of Smith & Williamson Investment Services Limited



Peter Mitchell
Head of Banking
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Director of Banking & Treasury Operations
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