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Statement of Commitment to the UK Money Markets Code

The Northern Trust Company – London Branch (the 'Institution') 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 applicable law). Appropriately senior management will review these regularly to ensure their continued relevance and effectiveness.

Date:

11th December 2018

The Northern Trust Company - London Branch

Signatures:

John Davie

EMEA Chief Financial Officer

Andrew Clayton

Head of Capital Markets, EMEA