

Stock Exchange Transactions – Consultants*

Consultants may not take advantage of confidential information obtained whilst working with or for Shaftesbury Capital for personal investment purposes, nor may they advise others to buy or sell securities on the basis of such confidential information.

The retained EU law version of the Market Abuse Regulation (“UK MAR”) and the Criminal Justice Act 1993 (criminal law) prohibit market abuse and insider dealing in corporate securities. Penalties can include financial penalties, unlimited fines and/or imprisonment.

By virtue of their position, consultants may at times be aware of inside information that would, if public, affect the price of Shaftesbury Capital shares. Consultants may not deal in Shaftesbury Capital shares at times when they are in possession of information which may have a significant effect on price of Shaftesbury Capital’s shares if it were made public.

Consultants will be reminded of their responsibilities where they are deemed to be in the possession of such information however if a Consultant is uncertain about their responsibilities in respect of such information, they should contact the Company Secretary who will supply the relevant information.

Consultants are expected to ensure, as far as it is in their control to do so, that such dealings by persons closely associated with them (i.e. family members: spouses, civil partners, dependent children/stepchildren, relatives that have shared the same household as an employee for at least one year and entities directly or indirectly controlled by an employee or family member which are set up for the benefit the employee or family member or the economic interests of which are substantially equivalent to those of such a person) are controlled as if they were purchases or sales made on their own account.

*consultants, contractors, suppliers and other similar third parties providing services or goods to or for Shaftesbury Capital.