

Schroder Asian Total Return Investment Company plc (the “Company”)

Financial crime policy

(Adopted 4 March 2021)

1. Financial crime covers a wide range of activities including money laundering, bribery and corruption, tax evasion and the facilitation of tax evasion.
2. The Company has adopted a zero tolerance policy with respect to financial crime.
3. The directors and the Company’s service providers have all received a copy of this policy.
4. Directors will receive training on appointment and as required in relation to the Company’s commitment to and procedures in relation to financial crime.
5. All gifts and or hospitality offered to directors in their capacity as an officer of the Company should be reported to the Chairman or Senior Independent Director for approval prior to acceptance. All such reports are notified to the Secretary for recording in the gifts and hospitality register.
6. All of the Company’s service providers will be asked to provide annual confirmations with respect to the operation of their own financial crime policies. Any breaches relevant to the Company should be reported to the directors as soon as possible.
7. The directors will report on their work reviewing the Company and its service providers’ compliance with this policy in the Company’s annual report.