

NB Distressed Debt Investment Fund Limited (the “Company”)

Anti-Bribery and Corruption Policy

(Last updated April 2024)

The Company has adopted this Anti-Bribery and Corruption Policy to set out the rules and procedures that must be followed to ensure robust compliance with The UK Bribery Act 2010.

The UK Bribery Act contains the following categories of bribery offense:

1. Active Bribery – offering, promising or giving an advantage to another person intending to induce/reward improper performance by someone of a relevant function/activity;
 2. Passive Bribery - requesting, agreeing to receive or accepting an advantage from another person relating to improper performance by someone of a relevant function/activity;
 3. Bribing a Public Official - where the focus is on intending to influence the official in order to obtain/retain business or an advantage; and
 4. Failure of a Commercial Organization to prevent Bribery – a corporate offense of failing to prevent bribery of any of its employees, subsidiaries, agents or service providers or other associated persons. A commercial organization is liable if a person associated with it bribes another person to retain or obtain business or a business advantage for the organization, both in the UK or internationally.
- The Board of the Company has a zero tolerance approach to instances of bribery and corruption. Accordingly it expressly prohibits any Director or associated persons, when acting on behalf of the Company, from accepting, soliciting, paying, offering or promising to pay or authorize any payment, public or private, in the United Kingdom or abroad to secure any improper benefit for themselves or for the Company.
 - The Directors of the Company recognize their responsibilities in ensuring that the Company has a robust policy to avoid such practices and to ensure compliance with its legal obligations. The Board has requested that it is informed immediately of any identified instances of bribery or corruption within any of its principal service providers.
 - On an annual basis, principal service providers are required to confirm to the Company that an anti-bribery policy and adequate procedures are in place and report any identified instances of bribery or corruption and details of the corrective courses of action taken.
 - The Board will review this policy and procedures at least annually and ensure that it is publicly available both on the Company’s website and also in its Annual Report & Accounts.