



Ruffer Investment Company Limited

Non-Audit Services Policy

Adopted 10 September 2020

The Company has adopted the following policy in relation to engagement of the external auditor, to perform non-audit services. As a Market Traded Company (MTC), since March 2020, the Company has been classified as an EU/UK Public Interest Entity (PIE).

Accordingly, the Audit and Risk Committee must consider whether the provision of such non-audit services is compatible with the 'white list' (see Appendix 1) of permissible services under the Revised Ethical Standards 2019 (the 'Auditing Standards'). The white list has been analysed by the FRC into services that are not subject to the 70% cap on non audit services and those that are.

The Company's Non-Audit Services Policy is as follows –

- in accordance with the Auditing Standards, the Company may not utilise its external auditor for internal audit purposes, secondments, valuation or tax advice or other services which are otherwise not included on the 'white list' of permissible services, as amended from time to time by the FRC and
- the Directors must consider the actual, perceived and potential impact upon the independence of external audit prior to engaging external audit to undertake any non-audit service.

The Audit and Risk Committee is responsible for ongoing review of the policy and reports to the Board on the continuing suitability of the policy and recommended changes to the existing policy as and when required.

The Company aims to have available to it the best and most suitable providers of professional services where it is necessary to engage external advisers. It would therefore not wish to exclude its external auditor from providing such services so long as they are not prohibited by code, regulations, guidance or best practice.

The Audit and Risk Committee shall be required to approve in advance any such engagements and the fees for them including, where appropriate, any over-runs or additional fees where the scope of the engagement is expanded.

The Audit and Risk Committee aims to ensure that the provision of such services does not impair the external auditor's independence or objectivity. In this context, the Audit and Risk Committee will consider –

- whether the skills and experience of the external audit firm make it the most suitable supplier of the non-audit service
- whether there are any safeguards in place to eliminate or reduce to an acceptable

level any threat to objectivity and independence in the conduct of the audit arising from the provision of such services by the external auditor

- the nature of the non-audit services
- the fees incurred, or to be incurred for non-audit services relatively to the audit fee and
- the criteria which govern the remuneration of the individuals performing the audit.

The external auditor may not provide a service which –

- places the external auditor in a position to audit their own work
- a mutuality of interest is created
- results in the external auditor developing close personal relationships with the key individuals who manage and advise the Company
- results in the external auditor functioning as a manager or employee of the Company or
- places the external auditor in the role of advocate or legal adviser for the Company.

The external auditor may provide non-audit services that do not conflict with their independence and objectivity, subject to the necessary approval procedures set out in this

policy. Fees must not be contingent or success related.

The external auditor is eligible for selection to provide non-audit services only to the extent that their skills and experience make them the most suitable supplier of these services. Non-audit services will be subject to market tenders or tests and will be awarded to the most appropriate provider. If there is a preferred provider, it will be subject to a market test on a regular basis, with a review at least every three years.

Fees for non-audit services provided by the external auditor, other than those required by law or regulation, are subject to a limit of 70% of the average of the audit fees paid in the previous three years ('the Cap').

The external auditor will confirm each year in writing to the Audit and Risk Committee that it has complied with all relevant independence rules and regulations governing independence and the provision of non-audit services.

The annual financial statements should disclose the amounts paid to the external auditor both for audit and non-audit services, with a description of the services provided and, where thought appropriate, the reason for the services to have been provided by the external auditor rather than another supplier.

Appendix 1

Type of non-audit service	Outside cap	Counts towards cap
<p>Reporting required by a competent authority or regulator under UK law or regulation for example –</p> <ul style="list-style-type: none"> – reporting to a regulator on client assets – in relation to entities regulated under the Financial Services and Markets Act 2000 (FSMA), reports under s166 and s340 of FSMA – reporting to a regulator on regulatory financial statements – reporting on a Solvency and Financial Condition Report under Solvency II. 	Yes	
<p>In the case of a controlled undertaking incorporated and based in a third country, reporting required by law or regulation in that jurisdiction where the auditor is required to undertake that engagement.</p>	Yes	
<p>Reporting on internal financial controls when required by law or regulation.</p>	Yes	
<p>Reporting on the iXBRL tagging of financial statements in accordance with the European Single Electronic Format for annual financial reports.</p>	Yes	
<p>Reports, required by or supplied to competent authorities/regulators supervising the audited entity, where the authority/regulator has either specified the auditor to provide the service or identified to the entity that the auditor would be an appropriate choice for service provider.</p>	Yes	
<p>Services which support the entity in fulfilling an obligation required by UK law or regulation, including listing requirements where –</p> <ul style="list-style-type: none"> – the provision of such services is time critical – the subject matter of the engagement is price sensitive and – it is probable that an objective, reasonable and informed third party would conclude that the understanding of the entity obtained by the auditor for the audit of the financial statements is relevant to the service, and where the nature of the service would not compromise independence. 	Yes	
<p>Reviews of interim financial information and providing verification of interim profits not otherwise required by law or regulation.</p>		Yes

Type of non-audit service	Outside cap	Counts towards cap
Where not otherwise required by law or regulation, non-audit and additional services, as defined in this Ethical Standard provided as auditor of the entity, or as reporting accountant, in relation to information of the audited entity for which it is probable that an objective, reasonable and informed third party would conclude that the understanding of the entity obtained by the auditor is relevant to the service, and where the nature of the service would not compromise independence.		Yes
Extended audit or assurance work that is authorised by those charged with governance performed on financial or performance information and/or financial or operational controls, in the audited entity or a third-party service provider, where this work is closely linked with the audit work.		Yes
Additional assurance work or agreed upon procedures authorised by those charged with governance performed on material included within or referenced from the annual report.		Yes
Reporting on government grants.		Yes
Reporting on covenant or loan agreements which require independent verification and other reporting to third parties with whom the audited entity has a business relationship in accordance with Appendix C of this Ethical Standard.		Yes
Services which have been the subject of an application to the Competent Authority.		Yes
Generic subscriptions providing factual updates of changes to applicable law, regulation or accounting and auditing standards.		Yes