

## BREWIN DOLPHIN HOLDINGS PLC

### POLITICAL DONATIONS POLICY

#### DONATIONS TO POLITICAL PARTIES AND OTHER EU POLITICAL ORGANISATIONS AND EU POLITICAL EXPENDITURE

#### INTRODUCTION

The Companies Act 1985 (incorporating law introduced in the Political Parties, Elections and Referendums Act 2000) controls contributions and other donations made by Brewin Dolphin Holdings plc and other group companies to UK and European political parties and other EU political organisations, and EU political expenditure incurred by the Company and other group companies.

#### POLICY

It is Brewin Dolphin Holdings plc policy that the Company and other group companies **will not** make donations (of any amount) to political parties.

#### DEFINITIONS

A **donation** is:

- any gift of money or other property to, or any sponsorship of, a political party;
- any subscription or affiliation fees for membership to a political party;
- the payment of any direct or indirect expenses of a political party;
- any money lent to a political party;
- the provision of any property, services or facilities for the use or benefit of the political party;
- anything given or transferred to any officer, member, trustee or agent of a political party in his capacity as such (and not for his own use or benefit) - it is regarded as given or transferred to the party.

Certain payments and services are not considered to be donations for the purposes of the legal restrictions, including:

- subscriptions made to any trade association;
- donations made to any cross-party parliamentary group (there is a list of these at <http://www.publications.parliament.uk/pa/cm/cmparty/061206/memi01.htm>);
- donations to individuals for their own use or benefit as opposed to that of their party; and
- the services of a volunteer in his own time and free of charge.

**Political expenditure** is any money spent in the preparation, publication and/or the distribution of advertising or publicity material that is intended to affect public support for a 'European political organisation' or on activities undertaken by the company itself which are capable of being reasonably regarded as intended to affect public support for a political party (or independent election candidate) or influence voters in a referendum.

**A European political organisation** includes a registered political party in the UK or in any other part of the EU and extends to other organisations which carry on activities which are capable of being reasonably regarded as intended to affect public support for a political party (or independent election candidate) or influence voters in a referendum. A UK trade union is likely to be a European political organisation but

political think-tanks and charities are likely to fall outside the definition (unless the cause supported is an important issue in the politics of the day).

Approved by the Board of  
Brewin Dolphin Holdings PLC  
23 January 2007