

Odyssean Investment Trust PLC
(“the “Company””)

POLICY ON PREVENTION OF THE FACILITATION OF TAX EVASION

(approved on 17 November 2020 for ongoing application)

The Board of Odyssean Investment Trust PLC has adopted a zero-tolerance approach to the criminal facilitation of tax evasion.

Accordingly, it expressly prohibits any Director, suppliers, agents or third parties, when acting on behalf of the Company, to facilitate tax evasion on behalf of the Company.

The Directors of Odyssean Investment Trust PLC recognise 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 insists that it is informed immediately of any identified instances of tax evasion within any of its principal service providers and details of the corrective courses of action taken.

As part of a risk based approach, the Board will carry out an annual risk assessment on matters relating to tax evasion, involving due diligence enquiries in respect of persons who perform or will perform services for or on behalf of the Company, in order to mitigate identified risks. Due diligence records will be kept and be made available for inspection by the statutory auditor.

The Board reviews this policy on an annual basis and will ensure that it is publicly available on the Company’s website.

Principal Service Providers

Odyssean Capital LLP – Portfolio Manager

Frostrow Capital LLP – Company Secretary and Administrator

Equiniti Limited - Registrars

KPMG LLP – Auditors

Winterflood Services Limited – Corporate Broker