

## Ashmore Group plc Internal Audit Function

### Internal Audit Charter

The operation of the internal audit function of Ashmore Group plc and its in-scope legal entities (“Group internal audit”) is governed by this Charter, supplemented by the internal audit Terms of Reference, Strategy, Procedures and the internal audit section of the Ashmore Group plc Audit and Risk Committee (“ARC”) Terms of Reference<sup>1</sup>.

#### Constitution

Group internal audit is established to assist the Board of Directors of Ashmore Group plc in enhancing and protecting organisational value, assets, reputation and sustainability by providing risk-based and objective, relevant and timely assurance, advice and insight.

#### Authority

Group internal audit derives its authority from the Ashmore Group plc Board (“the Board”). The Board has delegated authority for the oversight of Group internal audit to the ARC, as set out in the ARC Terms of Reference, which includes ensuring that Group internal audit has appropriate access to information to perform its role effectively and that the function has adequate standing and is free from management and other restrictions.

Group internal audit has no authority to provide assurance to parties outside Ashmore and no authority to assess the reliability of the work of third-party assurance providers unless specifically requested by ARC.

#### Operation

Group internal audit operates in accordance with the professional standards of the International Professional Practices Framework (“IPPF”)<sup>2</sup> developed by the Global Institute of Internal Auditors (IIA Global) (“Standards”), the Code of Ethics and the Chartered Institute of Internal Auditors’ in the UK and Ireland’s (“CIIA”) guidance on Effective Internal Audit in the Financial Services Sector (“FS Code”). This includes the maintenance of a proportionate quality assurance and improvement programme (“QAIP”). ARC is responsible for ensuring that the internal audit activity has an external quality assurance review every five years.

#### Independence

Group internal audit operates independently of the day-to-day operations of the Group and is functionally accountable to the ARC. The Head of Internal Audit reports functionally to the Chair of the ARC and has unfettered independent access to the Chair of the ARC and/or the Chair of the Board.

The Head of Internal Audit has direct access to the Group CEO at any time to discuss internal audit findings and other internal audit-related matters, as well as scheduled formal semi-annual meetings. The Head of Internal Audit reports administratively to the Head of Risk Management and Control.

The Head of Internal Audit provides an annual confirmation to ARC on the organisational independence of the internal audit activity and also provides a recommendation with regard to the reporting lines for ARC consideration and ratification.

#### Appropriate and Adequate Resource

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<sup>1</sup> This Charter was first approved in February 2023. It will be reviewed and reapproved annually by ARC as part of the annual review and reapproval of the internal audit Terms of Reference and updated on the website as required.

<sup>2</sup> Group internal audit qualifies as a Small Internal Audit Activity per the IPPF Practice Guide.

The Head of Internal Audit provides an annual confirmation with regard to appropriate resources, to enable ARC to satisfy the FS Code requirement that it is satisfied that Group internal audit has “appropriate resources”. Where the Head of Internal Audit advises that additional resource is needed, alternatives such as co-sourcing or temporary in-house resourcing will be considered. More generally, the ARC is responsible for ensuring that Group internal audit has adequate resources to perform its role effectively.

The internal audit function has no direct responsibility for, nor authority over, the activities it reviews.

## **Duties**

The Head of Internal Audit is solely responsible and accountable for the direction and performance of Group internal audit. This includes:

- Setting the internal audit Strategy, and maintaining up-to-date internal audit Terms of Reference, for approval by ARC;
- Establishing the annual internal audit plan for review by CEO and ARC and final approval by ARC;
- Execution of audits within the plan, using the internal audit methodology (Procedures) approved by the ARC;
- Providing reporting to ARC on internal audit activity vs plan and other relevant matters;
- Establishing the scale of any co-sourcing required to execute audit plan and providing a recommendation to ARC where additional resource requirements are identified;
- Providing an annual confirmation to the ARC of the organisational independence and authority of the internal audit function, and a recommendation with regard to the Head of Internal Audit’s reporting lines functionally to the Chair of the ARC and administratively to the Head of Risk Management and Control for ARC consideration and ratification;
- Providing an annual opinion on the overall effectiveness of the governance, and risk and control framework;
- Providing an independent assessment of assurance on an annual basis to ARC;
- Implementing a proportionate and appropriate QAIP in accordance with the criteria of the FS Code and the IIA Standards;
- Coordinate as necessary with other internal and third party assurance providers and Regulator(s).