

Gabelli Merger Plus⁺ Trust – Tax Evasion Policy

The Gabelli Merger Plus⁺ Trust (the “Company”) is subject to the UK Criminal Finances Act 2017. The Act incorporates two new corporate offenses that address failure to prevent the facilitation of tax evasion. The tax evasion offenses are triggered if an individual evades tax; a director, an employee, or individual related to the Company or a service provider evades tax when acting as an associate of the Company or service provider; or, if the Company or service provider cannot demonstrate that reasonable preventative procedures were in place.

The Company has a zero tolerance policy to tax evasion and its facilitation. An annual review of the Company’s risk assessment guidelines will include due diligence examinations of the tax evasion policies and related matters of those performing services on behalf of the company.

The Board requires that it is informed immediately of any documented instances of tax evasion occurring at the Company or its service providers, as well as a detailed explanation of the course of action taken to address the event.