FISHER INVESTMENTS EUROPE™

ESG OPPORTUNITIES IN SMALL CAP EQUITIES

TABLE OF CONTENTS

SMALL CAP ESG OVERVIEW

ENVIRONMENTAL UPSIDE

SOCIAL UPSIDE

ENGAGEMENT OPPORTUNITIES

TOP-DOWN ADVANTAGE

ESG OPPORTUNITIES IN SMALL CAP EQUITIES

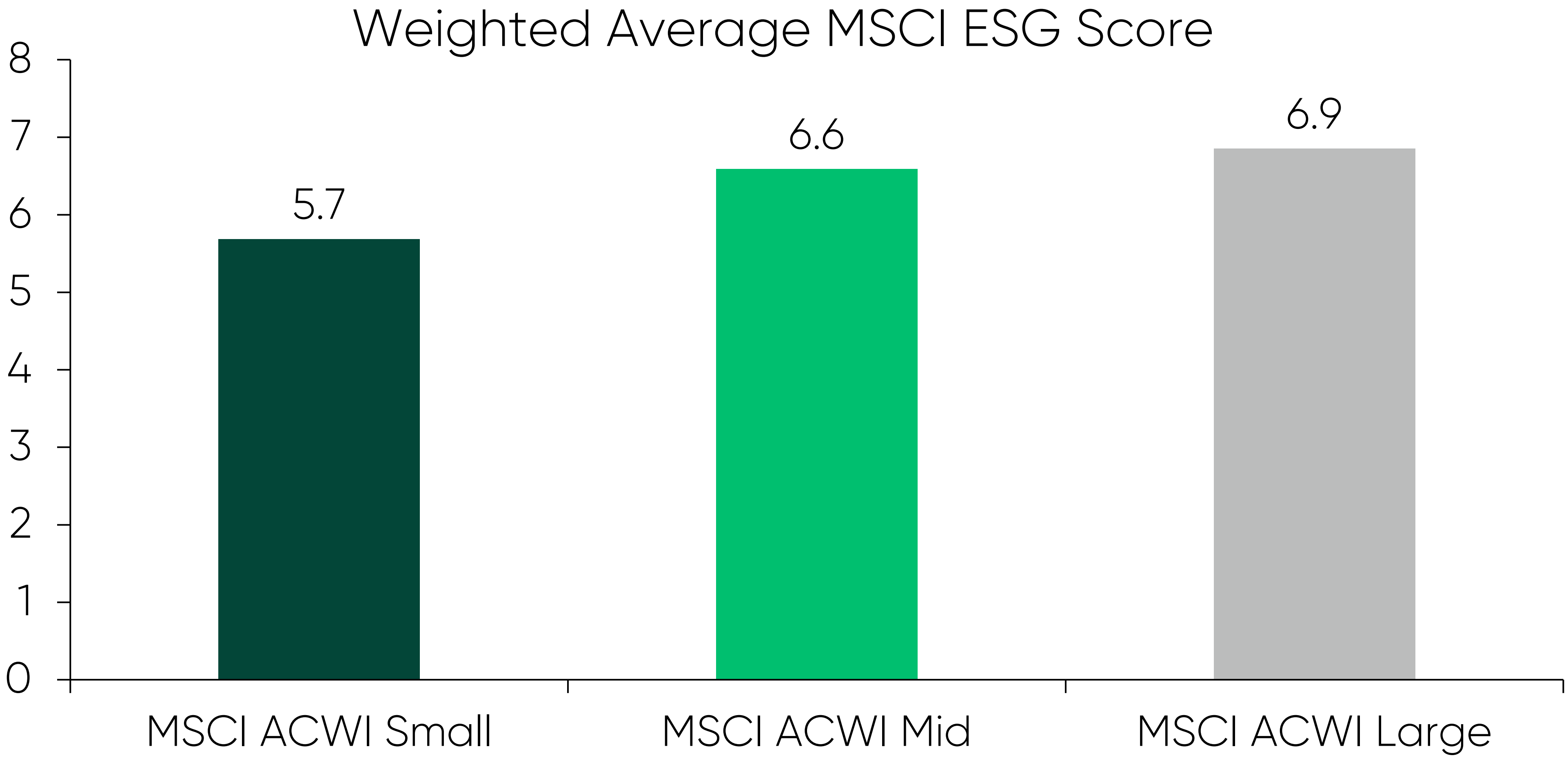
KEY POINTS:

- ESG scores and coverage favour large companies, creating attractive opportunities for active ESG managers in the space.
- Small cap companies have less bureaucracy and can move more quickly in implementing positive ESG change.
- Small cap companies are well positioned to have positive environmental impacts.
- Small cap companies have lower exposure to most social risks than larger companies.
- By analysing country, sector and company ESG drivers, Top-Down strategies offer more rigorous ESG analysis.

ESG SCORES FAVOUR LARGER CAP COMPANIES

To an extent, ESG scores reward data availability, leading them to favour larger companies with the resources to produce—often self-reported and unaudited—sustainability and corporate responsibility reports.

- ESG score differences result, in part, from capacity constraints faced by otherwise well managed, smaller companies.

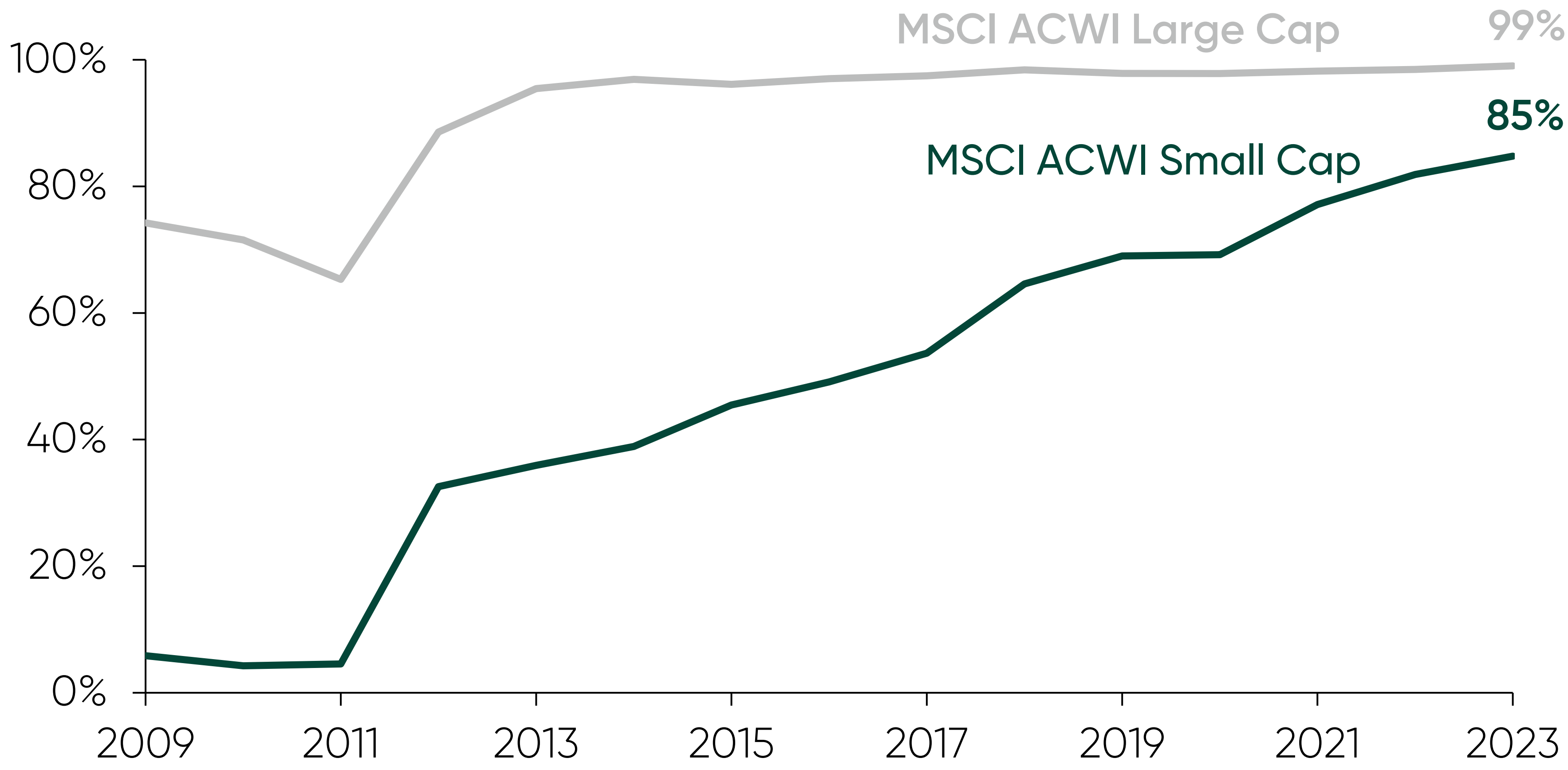


Source: MSCI ESG Research and Factset Portfolio Analysis as of December 2023 based on the MSCI ACWI, MSCI ACWI Small Cap and MSCI ACWI Large Cap. ESG score range is 1 to 10, 10 indicating the highest possible score.

ESG SCORE COVERAGE IS LOWER IN THE SMALL CAP SPACE

ESG analysis is critical when investing in small cap companies, as 1,074 MSCI ACWI small cap companies do not have ESG score coverage—compared to only 14 MSCI ACWI large cap. This emphasises the importance of active management in the small cap ESG space as many of these smaller companies lack thorough, publicly available, ESG analysis.

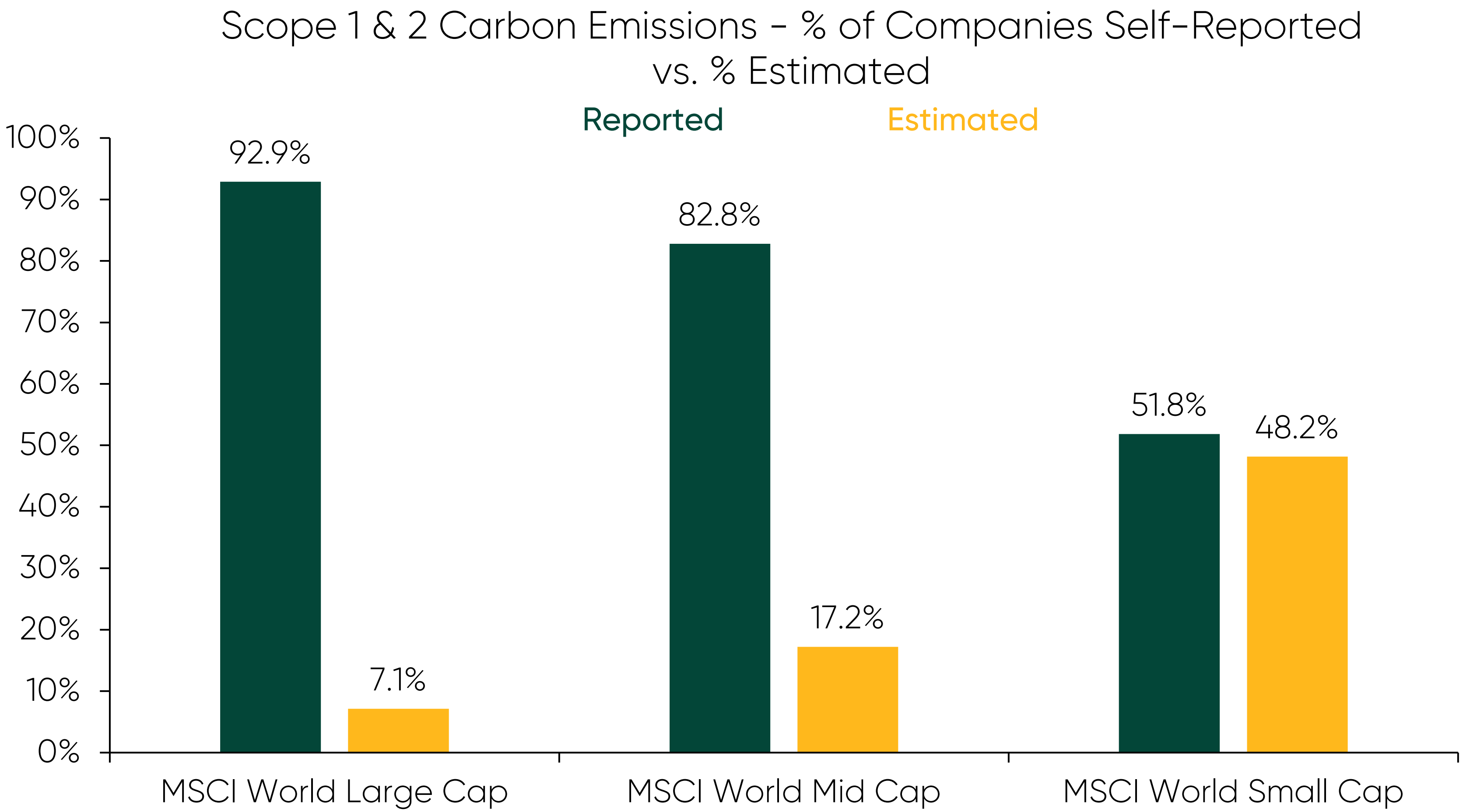
ESG Score Coverage



Unrated companies are based on the MSCI AC World Small Cap and MSCI AC World Large Cap index. Source: MSCI ESG Research and Factset Portfolio Analysis as of December 2023. ESG score coverage based on MSCI ESG Coverage.

CARBON DATA IS LESS RELIABLE IN SMALL CAPS

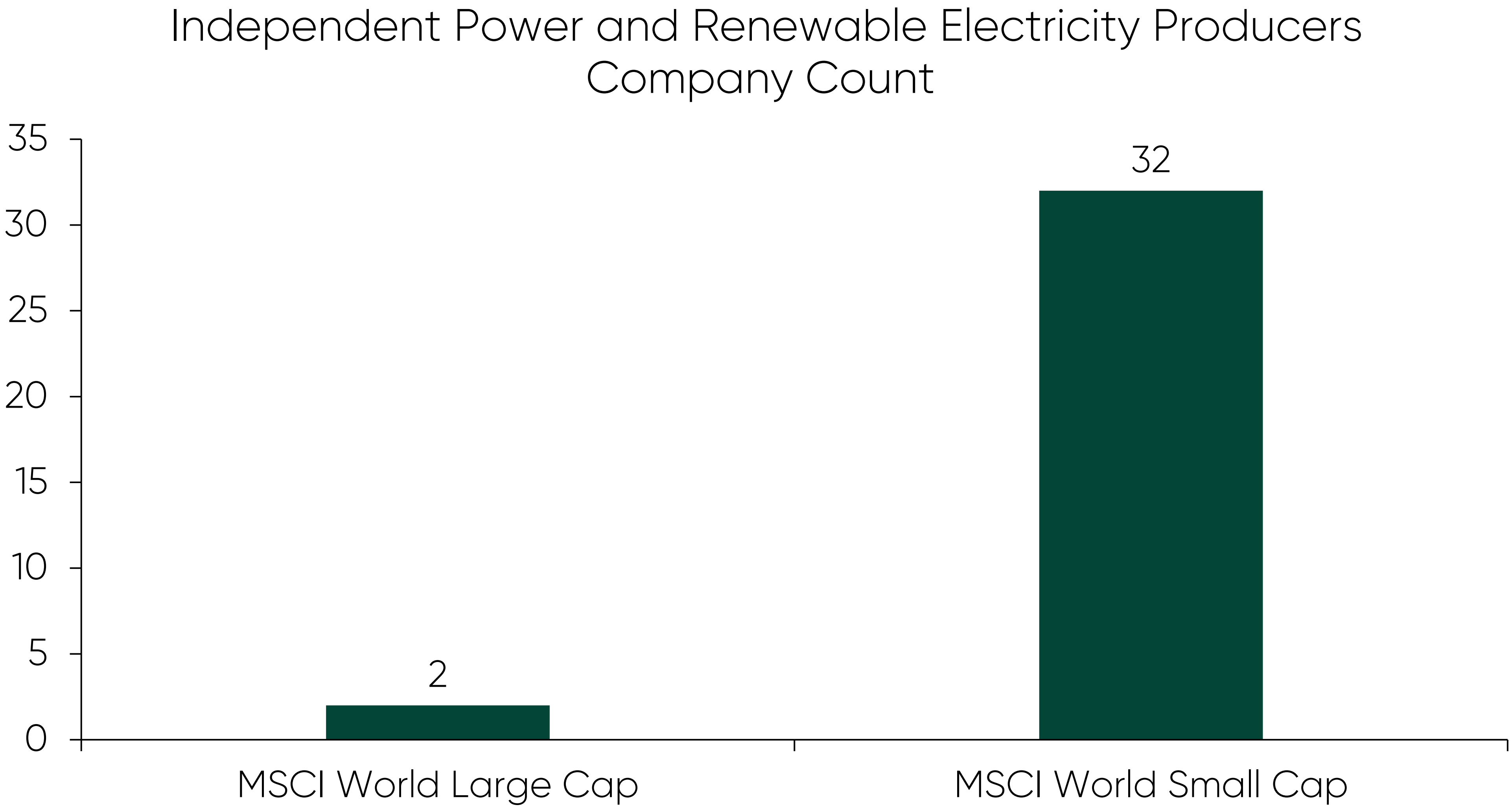
Relative to large and mid-cap companies, smaller companies' carbon emissions are estimated by research firms like MSCI much more frequently than they are reported by the companies themselves. This makes active management in the small cap ESG space important—both in terms of obtaining accurate figures and engaging with many of these companies to properly disclose this data.



Source: MSCI ESG Manager, as of December 2023. Data shows % reported vs estimated emissions by count of securities in each index. Estimated emissions are estimated by MSCI.

PURE PLAY RENEWABLE ENERGY FIRMS ARE SMALL CAP

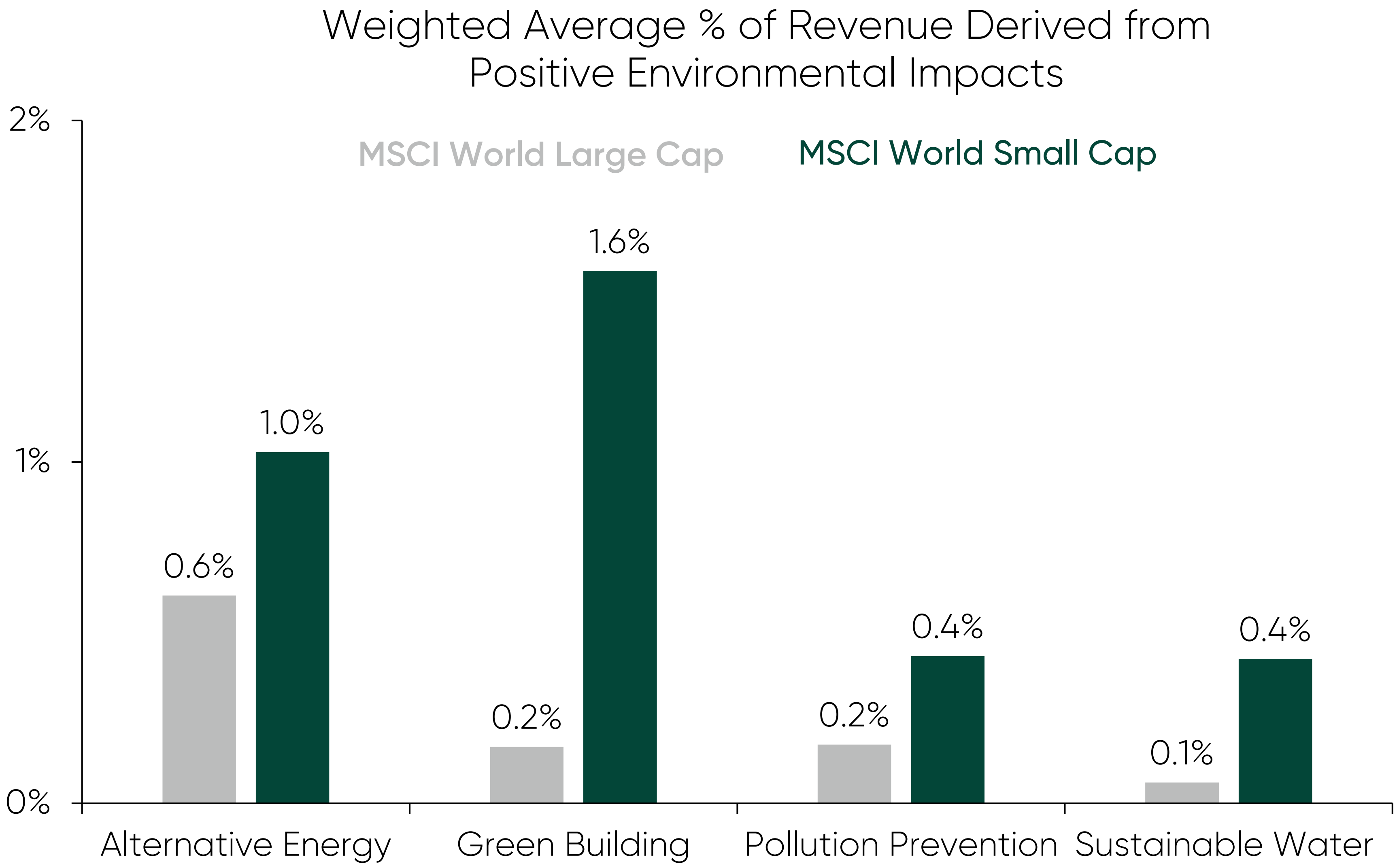
Small cap companies have positive environmental upside as large cap equities generally have limited exposure to pure play renewable energy firms.



Source: FactSet as of December 2023. Independent Power and Renewable Electricity Producers based on GICS industry in the respective index.

SMALL CAP COMPANY REVENUE IS FOCUSED ON FIGHTING CLIMATE CHANGE

Small cap companies direct larger percentages of their revenue, on average, towards activities focused on solving sustainability challenges than large cap companies.



Source: MSCI ESG Sustainable Impact Metrics Research as of December 2023. Recent-year percentage of revenue, or maximum estimated percent, a company has derived from products, services, or projects for: Pollution Prevention: waste minimisation, or recycling as a means of alleviating the burden of unsustainable waste generation. Sustainable Water: attempt to resolve water scarcity and water quality issues. Green Building: design, construction, redevelopment, retrofitting, or acquisition of 'green' certified properties. Alternative Energy: supporting the development or delivery of renewable energy and alternative fuels.

SMALL CAP ESG OVERVIEW

ENVIRONMENTAL UPSIDE

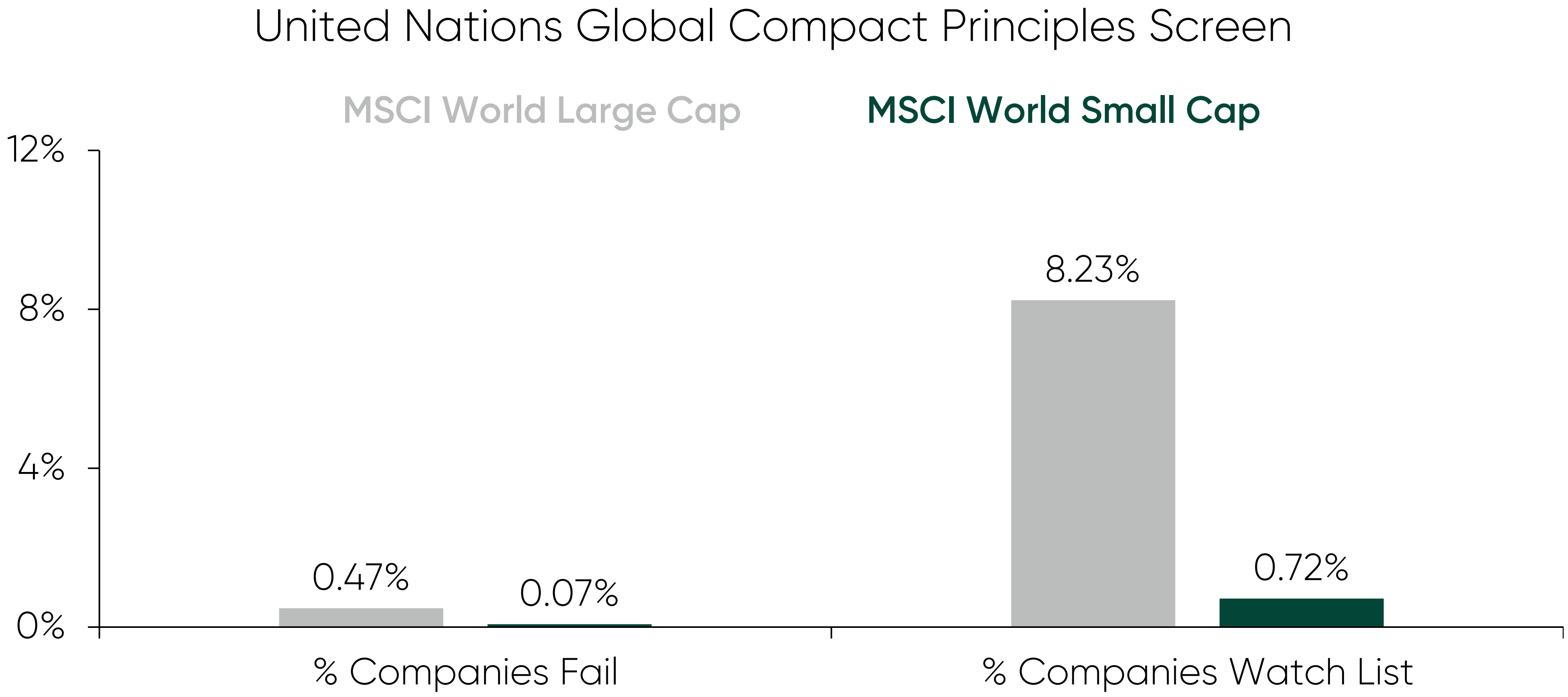
SOCIAL UPSIDE

ENGAGEMENT OPPORTUNITIES

TOP-DOWN ADVANTAGE

LARGE CAP COMPANIES ARE MORE OFTEN INVOLVED IN ESG CONTROVERSIES

MSCI ESG Global Norms screens leverage MSCI ESG Controversies Flags to identify companies involved in controversies that may constitute a breach of those global norms and conventions. One of these is The United Nations Global Compact Principles (UNGC) screen, which looks at categories such as: human rights, labour, environment and economic & business issues.



Source: MSCI ESG Manager as of December 2023. Calculation assumes equal weight for all rated companies in their respective index. The charts indicate whether the company is in compliance with the United Nations Global Compact ESG controversy screen. The possible values are Fail, Watch List, or Pass.

SMALL CAP ESG OVERVIEW

ENVIRONMENTAL UPSIDE

SOCIAL UPSIDE

ENGAGEMENT OPPORTUNITIES

TOP-DOWN ADVANTAGE

ESG ENGAGEMENT WITH SMALL CAP COMPANIES

FISHER'S SMALL CAP ENGAGEMENT EXPERIENCE

- Company management may be more receptive to our dialogue request and engagement objectives. We have the possibility of higher level company decision-makers joining our engagement dialogues when separate sustainability teams do not exist, giving us more access to the people within companies who make the final decisions.

- Due to their smaller budgets for sustainability initiatives and resulting gaps in disclosed ESG data, engagement with small caps can be very effective given the poor score coverage by data providers.

- We suggest that small cap companies assess, evaluate and disclose the relevant sustainability data points that are most salient to the business and industry, as well as, encouraging implementation of possible ESG programs. We also analyse the disclosures of industry peers, review key business relationships and assess existing ESG disclosures to point to areas for additional disclosures.

As of 31/12/2023.

ESG ENGAGEMENT WITH SMALL CAP COMPANIES

FISHER'S SMALL CAP ENGAGEMENT PRIORITIES

We conduct both direct and collaborative engagements with small cap companies. A few priority engagement objectives are:

- Measure and report their Scope 1 and 2 GHG emissions. Companies with well-developed emissions disclosure programs are asked to set reduction targets comparable to their peers.

- Through the CDP Non-Disclosure Campaign, we conduct collaborative engagement to seek company disclosure of standardised climate, water and forests data.

- Enhance the performance of their human capital development, training and development, and diversity and inclusion programs. Smaller companies can face tough competition for high level talent where specialised labor is needed, and these social factors and programs serve to mitigate the challenge of talent attraction and retention.

- Encourage companies to improve board diversity and independence. Smaller companies face the risk of entrenched, non-diverse boards tied to their founding and initial IPO. Board refreshment to allow diverse and independent voices in the board can provide necessary oversight and guidance to the company.

As of 31/12/2023.

SMALL CAP ESG OVERVIEW

ENVIRONMENTAL UPSIDE

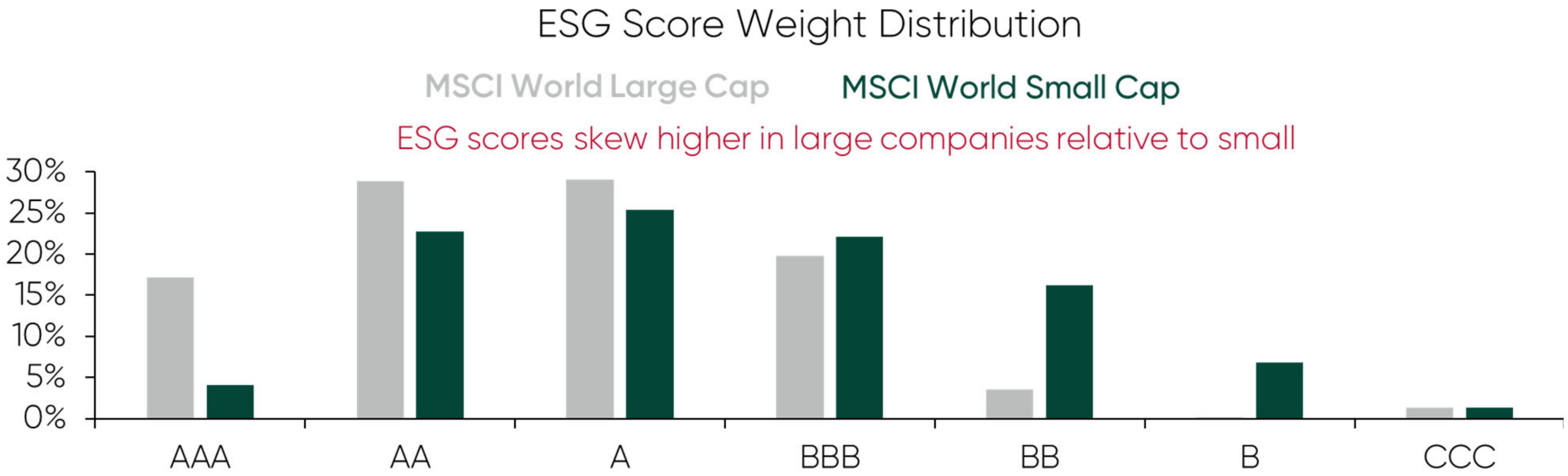
SOCIAL UPSIDE

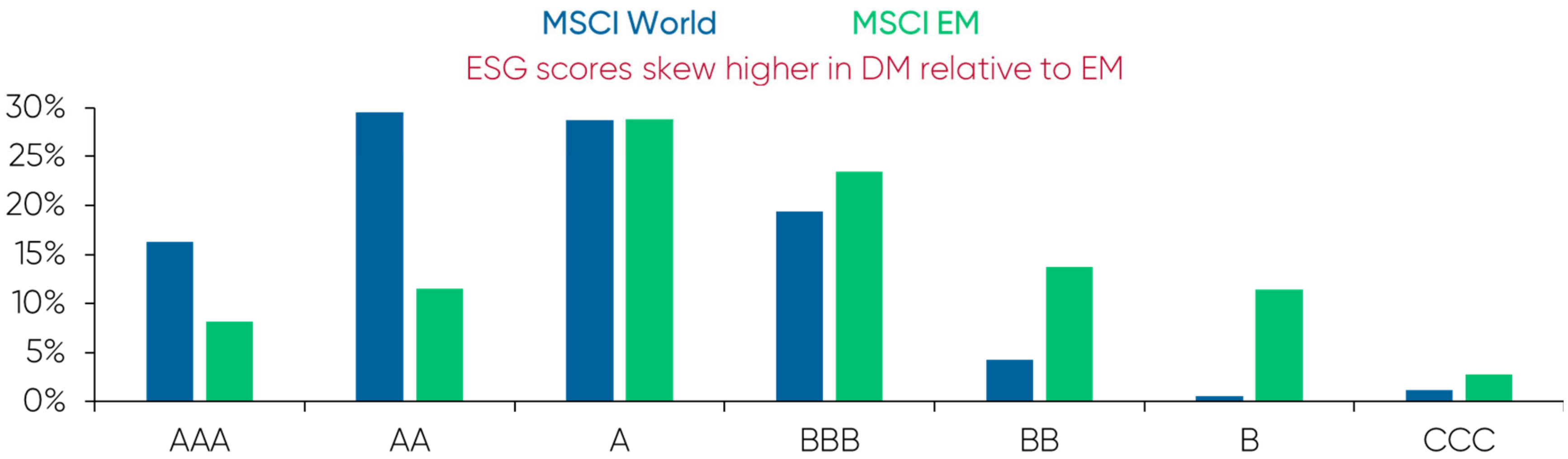
ENGAGEMENT OPPORTUNITIES

TOP-DOWN ADVANTAGE

ANALYSING MACRO FACTORS FACILITATES DEEPER ESG RESEARCH

Top-Down management is particularly important in the small cap ESG space as ESG scores vary greatly by region and size. Understanding high level Top-Down ESG trends prior to equity selection helps facilitate more rigorous ESG analysis.

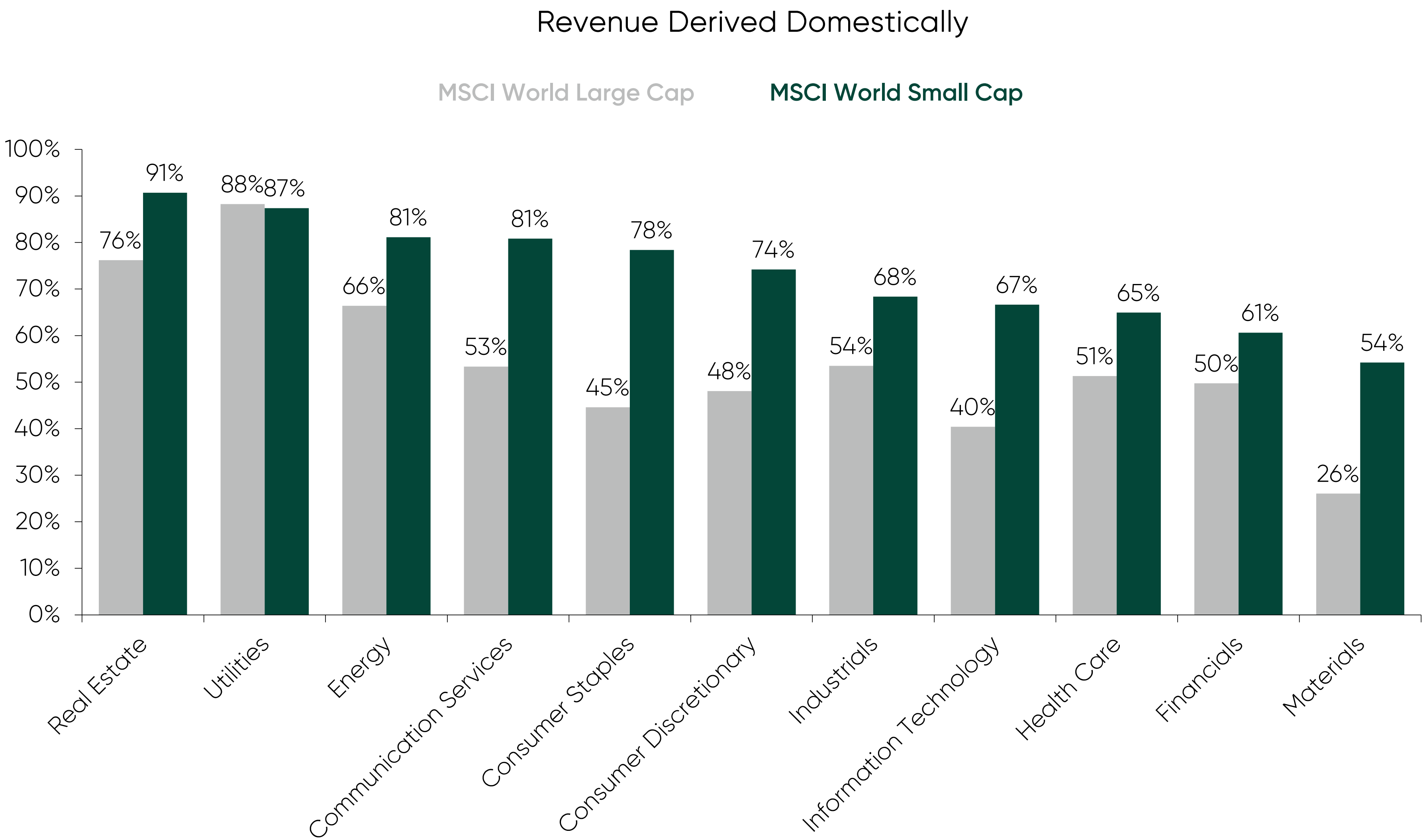




Source: MSCI ESG Manager and Factset Portfolio Analysis as of December 2023.

TOP-DOWN FACTORS DRIVE SMALL CAP REVENUE

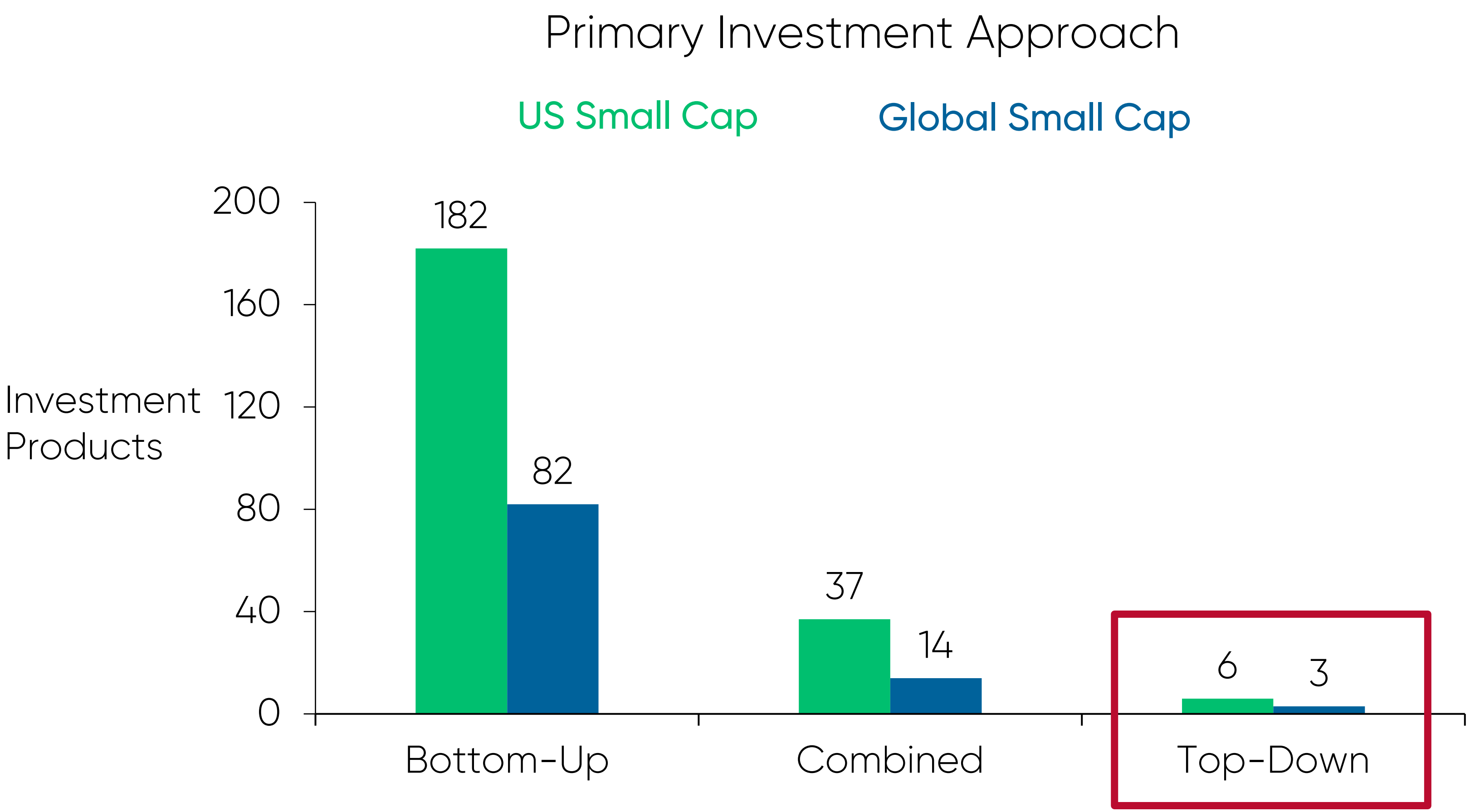
Small cap firms generally derive more revenue domestically rather than abroad. Therefore, in our view, it is important for an asset manager to have a global research platform and a thorough understanding of the economic and regulatory environment of countries around the world.



Source: FactSet GeoRev as of December 2023 revenue exposure is the weighted average by revenue.

TOP-DOWN CREATES ESG PROCESS DIVERSIFICATION

Top-Down is an underrepresented investment approach across small cap strategies.



Source: eVestment as of December 2023. US Small Cap uses the eVestment US Small Cap Core Equity Universe and Global Equity Small Cap uses the eVestment Global Small Cap Equity Universe.

APPENDIX

ENGAGEMENT DISCLOSURES

Source: Fisher Investments Research, as of December 2023.

Data indicated in this report are based on engagement meetings for all Fisher Investments clients. For Professional Client Use Only. Past performance is never a guarantee of future returns. Investments in securities involve the risk of loss. Any investment programme will always involve the risk of loss. Global investing can involve additional risks, such as the risk of currency fluctuations.

As an asset management firm, Fisher Investments (FI) manages investments in shares of a wide range of companies on behalf of our clients. These shares entitle the holders to vote on various issues put forth by the company and its shareholders at the company's annual meeting or at a special meeting.

The report showcases selected engagement highlights to demonstrate how FI engages with company management on ESG issues: environmental issues include but not limited to: climate change, toxic emissions & waste, vulnerability to legislation and impact on local communities; social issues include but not limited to: animal rights, human rights, labour relations, involvement with UN, EU and OFAC sanctioned countries, controversial weapons and governance issues include but not limited to: routine business, corporate governance, board independence, executive compensation, corporate stewardship and bribery & corruption.

FI engages according to Fisher Investments Engagement Policy and identifying engagement opportunities is a part of FI's fundamental analysis and to clarify or express concerns over potential ESG issues at the firm or industry level.

DISCLOSURES

FIRM

Fisher Investments Europe Limited (FIE), which also trades as Fisher Investments UK, is authorised and regulated by the Financial Conduct Authority (FCA Number 191609) and is registered in England (Company Number 3850593). Fisher Investments Europe has its registered address at: Level 18, One Canada Square, Canary Wharf, London, E14 5AX. Fisher Investment Europe's parent company is Fisher Asset Management LLC, trading as Fisher Investments (FI), a U.S. investment adviser registered with the Securities and Exchange Commission. As of 31 December 2023, FI and its subsidiaries managed or sub-managed $236 billion. FI and its subsidiaries maintain four principal business units - Fisher Investments Institutional Group (FIIG), Fisher Investments Private Client Group (FIPCG), Fisher Investments International (PCGI), and Fisher Investments 401(k) Solutions Group (401(k) Solutions). These groups serve a global client base of diverse investors including corporations, public and multi-employer pension funds, foundations and endowments, insurance companies, healthcare organisations, governments and high-net-worth individuals. FI's Investment Policy Committee (IPC) is responsible for investment decisions for all investment strategies.

For purpose of defining "years with Fisher Investments," FI was established as a sole proprietorship in 1979, incorporated in 1986, registered with the US SEC in 1987, replacing the prior registration of the sole proprietorship, and succeeded its investment adviser registration to a limited liability in 2005. "Years with Fisher Investments" is calculated using the date on which FI was established as a sole proprietorship through 31 December 2023.

Since Inception, Fisher Investments and its subsidiaries have been 100% Fisher-family and employee owned.

This material may also be found posted on the Fisher Investments Europe website at www.fisherinvestmentseurope.com. If your firm wishes to be removed from receiving these materials in the future or wishes to pay for this material, please contact Fisher Investments Europe.

TERMS OF BUSINESS

Fisher Investments Europe Limited (FIE) is authorised and regulated by the Financial Conduct Authority. Registered in England, Company No. 3850593.

1. Fisher Investments Europe

Fisher Investments Europe Limited trades under the name Fisher Investments UK, is registered in England (Company No. 3850593) and is authorised and regulated by the UK Financial Conduct Authority **("FCA")** (FCA No. 191609). Fisher Investments Europe's permitted business is agreeing to carry on a regulated activity, managing investments, advising on investments, making arrangements with a view to transactions in investments, arranging deals in investments, dealing in investments as agent, advising on pension transfers and pension opt-outs, and insurance mediation. You can check this on the FCA's register by visiting the FCA's website www.fca.gov.uk/register/home.do or by contacting the FCA on +44 0845 606 1234. The FCA's address is 12 Endeavour Square, London, England, E20 1JN.

2. Communications

Fisher Investments Europe can be contacted by mail at Level 18, One Canada Square, Canary Wharf, London, E14 5AX; by telephone on +44 0800 144 4731; or by email to FIEOperations@fisherinvestments.co.uk. All communications with Fisher Investments Europe will be in English only. Fisher Investments Europe's web address is https://institutional.fisherinvestments.com/engb.

3. Services

These Terms of Business explain the services offered to professional clients and will apply from when Fisher Investments Europe begins to advise you. Fisher Investments Europe offers restricted advice only (meaning it does not offer independent advice based on an analysis of the whole of the market and does not recommend investment management services of companies other than Fisher Investments Europe or its affiliates). As part of its services, Fisher Investments Europe seeks to:

a) Reasonably determine your client categorisation;

b) Understand your financial circumstances and investment aims to determine whether the full discretionary investment service described in Clause 4 and the proposed investment mandate and accompanying benchmark(s) (or an Undertaking for Collective Investment in Transferable Securities ("UCITS") with a similar mandate and benchmark for which Fisher Investments Europe's parent company serves as investment manager) are suitable for you;

c) Explain features of the investment strategy;

d) Describe investment performance as it relates to the investment strategy;

e) Provide a full explanation of costs;

f) Assist in the completion of documentation;

g) Where specifically agreed, review your position periodically and suggest adjustments where appropriate.

Fisher Investments Europe will not provide ongoing services unless you enter into an agreement for discretionary investment management services or invest in a UCITS as described in <u>Clause 4</u>.

4. Discretionary Investment Management Service and Investments

To help you achieve your financial goals, Fisher Investments Europe may offer its discretionary investment management services. In such case, Fisher Investments Europe will outsource the portfolio management function and trading functions to its affiliates. In particular, the portfolio management function will be outsourced to Fisher Investment Europe's parent company, Fisher Asset Management, LLC, trading as Fisher Investments **("Fisher Investments"),** which is based in the USA and is regulated by the US Securities and Exchange Commission (SEC). In addition, trading functions may be carried out by Fisher Investments Europe, its affiliate, Fisher Investments Luxembourg, Sàrl **("FIL"),** which is based in Luxembourg and is regulated by the Commission de Surveillance du Secteur Financier (CSSF), Fisher Investments, or other affiliates (each, a **"Trading Delegate").** Fisher Investments Europe may also outsource certain ancillary services to Fisher Investments, Fisher investments Ireland, or other affiliates.

Subject to applicable regulations, for qualified investors Fisher Investments Europe may recommend an investment in UCITS regulated by the Central Bank of Ireland and for which Fisher Investments serves as investment manager.

5. Client Categorisation

Fisher Investments Europe deals with both retail clients and professional clients. All clients and potential clients who deal with Fisher Investments Europe's institutional directors (sales) **("Institutional Directors")**, will be treated as professional clients, either through qualification as a professional client or, in the case of local municipal authorities, through opting up to be treated as a professional client. Accordingly, you are categorised as a professional client. You have the right to request re-categorisation as a retail client which offers a higher degree of regulatory protection, but Fisher Investments Europe does not normally agree to requests of this kind.

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6. Financial Services Compensation Scheme ("FSCS")

Whilst the activities of Fisher Investments Europe are covered by the FSCS, compensation under the FSCS in the event Fisher Investments is unable to meet its liabilities because of its financial circumstances is only available to eligible claimants. Because you have been categorised as a professional client, you are unlikely to be eligible. In addition, the protections of the UK regulatory regime, including the FSCS, do not apply in relation to the services of Fisher Investments or any non-UK service providers or to the extent your assets are invested in non-UK funds or ETFs. In the event you are eligible and do have a valid claim, the FSCS may be able to compensate you for the full amount of your claim up to £85,000 per person per firm. You can contact Fisher Investments Europe or the FSCS (www.fscs.org.uk) in order to obtain more information regarding the conditions governing compensation and the formalities which must be completed to obtain compensation.

7. Risks

Investments in securities present numerous risks, including various market and currency fluctuation, political, economic and political instability, differences in financial reporting, liquidity risk, interest rate risk, credit risk, and other risks, and can be very volatile.

Investing in securities can result in a loss, including a loss of principal. Using leverage to purchase and maintain larger security positions will increase exposure to market volatility and risk of loss and is not recommended. Investments in securities are only suitable for clients who are capable of undertaking and bearing a risk of loss. Specific risks associated with particular types of securities that may be held in your account are explained further below.

Past performance is not a guarantee nor a reliable indicator of future investment returns. Fisher Investments Europe cannot guarantee and makes no representation or warranty as to future investment returns or performance. There is no guarantee for avoidance of loss, which is impossible with investments in securities, and you have not received any such guarantee or similar warranty from Fisher Investments Europe or any representatives thereof.

Depending on your investment strategy, Fisher Investments Europe may invest in the following types of securities, which carry the following risks:

Investments in smaller companies may involve greater risks than investments in larger, more mature companies. Investing in derivatives could lose more than the principal amount invested in those instruments. Various investment techniques used by Fisher Investments Europe may increase these risks if market conditions are not accurately predicted.

Equity securities prices may fluctuate in response to many factors, including general market conditions, specific sector and country issues, and company specific information or investor sentiment. Individual equity securities may lose essentially all their value in the event of bankruptcy or other insolvencies of the underlying issuer.

Fixed income securities are subject to various risks, including price fluctuation due to changes in the interest rate environment, market liquidity, changes in credit quality of the issuer, prepayment or call features of the securities, and other factors, including issuer default. While some fixed income securities are backed by the full faith and credit of a sovereign government, this does not prevent price fluctuations nor fully eliminate the risk of default. If fixed income securities are not held to maturity, they may realise losses.

Using borrowed funds to purchase and maintain larger security positions will increase exposure to market volatility. In a declining market, investment losses may be substantially increased, occur more rapidly, or become realised. Fisher Investments Europe does not typically employ margin leverage (gearing) on the overall strategy, but may employ some leverage directly or indirectly as a defensive technique (e.g. margin borrowing of securities to sell short for hedging purposes), or indirectly on a limited basis through individual derivative securities, as described more fully below.

If Fisher Investments forecasts a prolonged and substantial market downturn, Fisher Investments Europe may adopt defensive posturing for your account by investing substantially in fixed income securities, money market instruments, structured or exchange traded notes, put options or other derivatives on securities or indexes or ETFs, selling short securities or ETFs, and other hedging techniques. There can be no guarantee that Fisher Investments will accurately forecast any prolonged and substantial downturn in the market, that Fisher Investments Europe will adopt a defensive strategy, or that the use of defensive techniques would avoid losses.

Derivatives typically derive their value from the performance of an underlying asset, interest rates or index. The price movements of derivatives may be more volatile than those of other securities and result in increased investment risk. Many of these investments may not enjoy as much liquidity as other securities.

Short sales may be used to fully or partially hedge other investments or to seek returns unrelated to other investments. "Short sales" means the borrowing of a security for a period of time and selling the borrowed security on the market; the seller is then required to buy the security on the market at a later time before it is due to be returned. Short sales result in gains or losses depending on whether the price of the security increases versus the price at the time of the short sale (which results in a loss) or decreases versus the price at the time of the short sale (which results in a gain). The loss from a short sale is theoretically unlimited depending on how much the security sold short increases in value.

Structured notes and ETNs are debt instruments whose return is derived from the performance of a reference index or other underlying securities or investments. The performance of a note is determined primarily by the performance of the underlying investments; therefore, despite technically being a corporate debt instrument, notes can be designed to provide returns similar to other asset classes. These notes may include leverage, which increases risk and volatility. These notes are issued by third-party financial institutions, at the request of Fisher Investments, and thus bear the credit risk of those entities. Whilst a feature of such notes is a maturity date, they may be sold in the market or redeemed with the issuer before maturity. Given the limited number of market makers involved in quoting a given note, price dislocation versus fair value may occur should limit orders not be utilised when sold in the open market. Alternatively, such notes may be redeemed daily back to the issuer, minus a redemption fee specific to each issuer (generally close to 0.10%), implicitly charged in the execution price.

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8. Data Protection

To offer and provide the services described in Clause 3, Fisher Investments Europe may collect and process personal data that is subject to data protection laws, in accordance with its Privacy & Cookie Policy. You acknowledge the Privacy & Cookie Policy, which can be found here: https://www.fisherinvestments.com/en-gb/privacy.

9. Custody and Execution

None of the Fisher Investments group companies (the "Fisher Group"), including Fisher Investments Europe, are authorised to hold client money. No Fisher Group company will accept cheques made payable to any of the Fisher Group companies in respect of investments, nor will they handle cash. All client assets are held at external custodian banks where each client has a direct account in their own name.

If you appoint Fisher Investments Europe as your discretionary asset manager, Fisher Investments Europe will arrange (including through its Trading Delegates) for the execution of transactions through selected custodian banks and brokers and at such prices and commissions that it determines in good faith will be in your best interests. Further information regarding selection of brokers is governed by your investment management agreement ("IMA") with Fisher Investments Europe. Fisher Investments Europe does not structure or charge its fees in such a way as to discriminate unfairly between execution venues.

The brokers and dealers to which your transactions may be allocated will use various execution venues, including without limitation:

a) Regulated Markets in the USA or elsewhere (usually those exchanges where companies have their primary listing and other exchanges on which their securities are admitted to trading);

b) Multi-Lateral Trading Facilities ("MTF") and Organised Trading Facilities ("OTF") in the USA or elsewhere (i.e. a multilateral system, operated by an investment firm or a market operator, which brings

together multiple third-party buying and selling interests in financial instruments—in the system and in accordance with non-discretionary rules—in a way that results in a contract);

c) Systematic Internalisers (which are investment firms dealing as principal and providing liquidity on a systematic basis);

d) Other liquidity providers that have similar functions to any of the above;

e) Counterparties that may access the above venues on behalf of Fisher Investments Europe and/or its Trading Delegates (or their clients) or trade on their own account.

You must be notified and approve of any off-venue trades prior to execution unless previously agreed to by you directly with the custodian. As a result of brokers/dealers using the execution venues mentioned above, your transactions may be executed on an execution venue that is neither a regulated market in the European Union nor an MTF in the European Union and therefore you will be required to expressly consent to the execution policy of Fisher Investments Europe by signing the IMA.

Fisher Investments Europe's top five trading venues are listed on its website.

Generally, financial instruments will not be affected if a custodian suspends payments or goes bankrupt. This is due to the fact that you will normally be able to take possession of your financial instruments based on the custodian's registration of your rights. Generally, it is only if the custodian fails to handle your financial instruments or register your rights correctly where you may not be able to take possession of the financial instruments.

If you appoint Fisher Investments Europe as your discretionary asset manager, you will receive a periodic statement every calendar quarter. This statement compares the performance of your account with that of a relevant benchmark in order to facilitate the assessment of performance achieved by the account. For performance, management fee calculation and reporting purposes, exchange traded equity securities are valued based upon the price on the exchange or market on which they trade as of the close of business of such exchange or market. All equity securities that are not traded on a listed exchange are valued using a modelled estimate of the bid price, also known as a bid evaluation, provided by Fisher Investments Europe's primary pricing service. Fixed income securities are valued based on market quotations or a bid evaluation provided by Fisher Investments Europe's primary pricing service. All securities are valued daily given a price from Fisher Investments Europe's primary pricing service is provided; otherwise, all securities are valued on at least a monthly basis.

10. Conflicts of Interest

Fisher Investments Europe has a conflicts of interest policy to identify, manage and disclose conflicts of interest Fisher Investments Europe, its affiliates or any of their employees or representatives may have with a client of Fisher Investments Europe, or that may exist between two clients of Fisher Investments Europe. Fisher Investments Europe's conflicts of interest policy covers gifts and favours, outside employment, client privacy, inadvertent custody, marketing and sales activities, recommendations and advice, and discretionary investment management services. Institutional Directors of Fisher Investments Europe are paid a variable component of their total remuneration, calculated as a percentage by reference to management fees paid to Fisher Investments Europe during the first three to ten years of a client relationship. Such remuneration will not increase or impact the fees payable by you. Fisher Investments Europe and Fisher Investments have a financial incentive for Fisher Investments Europe to manage client assets. Details on Fisher Investments Europe's conflicts of interest policy are available on request.

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11. Fees

If you enter into an IMA with Fisher Investments Europe, you will pay management fees to Fisher Investments Europe as detailed in the IMA. Fisher Investments Europe will pay a portion of such management fees to Fisher Investments as the sub-manager. If you invest in a UCITS fund managed by Fisher Investments, Fisher Investments will receive its management fee indirectly through the UCITS. Fisher Investments Europe does not charge a separate fee for its introducing or distribution services. You will also incur transaction and custody fees charged by brokers and custodians. However, any such additional fees will be payable directly to those brokers/custodians, and no Fisher Group company will receive any commission or other remuneration from those brokers/custodians.

12. Termination

If you wish to cease using the services of Fisher Investments Europe at any time, then send notification in writing and the arrangement will cease in accordance with the IMA. However, if a transaction is in the middle of being arranged on your behalf at that time and it is too late to unwind it, then the transaction may need to be completed first.

13. Complaints

Fisher Investments Europe seeks to provide a high standard of service to clients at all times. If you have a complaint about services, please contact Fisher Investments Europe:

by writing to: Head of Compliance

Fisher Investments Europe Limited

Level 18, One Canada Square

Canary Wharf, London, E14 5AX

or by calling: +44 0800 144 4731

Fisher Investments Europe will endeavour to resolve the matter, as soon as practicable and generally within 8 weeks. If you are dissatisfied with the outcome of any complaint made to Fisher Investments Europe, or you do not receive a response within such time, you may be eligible to complain directly to the UK Financial Ombudsman Service ("FOS"). Further details in respect of FOS can be found at www.financial-ombudsman.org.uk.

14. Governing Law

These Terms of Business are governed by, and will be construed in accordance with, the laws of the England.

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