FISHER INVESTMENTS EUROPE™

WHY US SMALL CAPS TODAY

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US SMALL CAPS OUTPERFORM POST RECESSIONS

While US small caps tend to underperform during a recession, they usually strongly outperform in the months that follow. As the economy starts to stabilise and credit becomes more widely available, a small cap relief rally typically leads markets higher. While a technical recession didn't develop the past few years, one was widely expected and earnings did decline significantly—suggesting small caps could be in a position to rebound in this early bull market cycle similar to past cycles.

				Post U.S. Recession Returns							
Dates		During U.S. Recession		+3 Months		+6 Months		+12 Months		+18 Months	
Start	End	S&P 500	Russell 2000	S&P 500	Russell 2000	S&P 500	Russell 2000	S&P 500	Russell 2000	S&P 500	Russell 2000
31/01/1980	31/07/1980	9.6%	7.5%	6.1%	14.8%	9.1%	18.5%	13.0%	30.3%	6.8%	17.1%
31/07/1981	30/11/1982	14.2%	14.8%	8.1%	15.9%	19.9%	36.9%	25.6%	33.4%	16.3%	15.1%
31/07/1990	31/03/1991	8.0%	7.7%	-0.2%	-1.6%	5.1%	6.5%	11.0%	21.0%	16.7%	16.0%
31/03/2001	30/11/2001	-0.9%	3.2%	-2.5%	2.2%	-5.7%	6.5%	-16.5%	-10.6%	-13.3%	-2.2%
31/12/2007	30/06/2009	-35.0%	-32.0%	15.6%	19.3%	22.6%	23.9%	14.4%	21.5%	41.1%	57.2%
29/02/2020	30/04/2020	-1.1%	-11.0%	12.9%	13.3%	13.3%	18.1%	46.0%	74.9%	61.9%	78.1%
Average		**-0.9%**	**-1.6%**	**6.7%**	**10.6%**	**10.7%**	**18.4%**	**15.6%**	**28.4%**	**21.6%**	**30.2%**

Source: FactSet as of 31/12/2023. Data in the table shown from 01/01/1980-31/10/2021 for the Russell 2000 index. Data in USD. Peak and trough dates using month end data. Dates chosen based upon official NBER recession peaks and troughs.

US SMALL CAP OUTPERFORMANCE FOLLOWING EARNINGS TROUGHS

Equity markets typically bottom around 9 months before earnings. However, the troughs of both commonly signal strong small cap outperformance over large cap in the following 12-24 months.

S&P 500 EPS Trough Dates (<-15%)	US Small Cap – US Large Cap Returns Following EPS Trough		
	+12M Return	+18M Return	+24M Return
31/12/1930	-4%	1%	-3%
30/06/1938	-2%	12%	7%
30/09/1942	30%	49%	64%
30/09/1958	9%	9%	10%
31/12/1970	8%	10%	-3%
30/09/1975	13%	35%	50%
31/12/1982	12%	8%	1%
29/02/1992	0%	7%	17%
31/05/2002	2%	16%	15%
31/10/2009	12%	25%	14%
31/03/2021	-24%	-18%	-22%
31/05/2023	-4%	-	-
Average	4.4%	13.9%	13.6%
% Small Cap Outperformance	66.7%	90.9%	72.7%

Source: Small Cap returns based on the FamaFrench Small Cap Index from 01/01/1926 –31/12/1978 and the Russell 2000 from 01/01/1979 –29/02/2024. Large Cap returns based on Global Financial Data's S&P 500 Total Return Index from 01/01/1926 –29/02/2024. Monthly data is used through 31/12/1987, and daily data is used thereafter. Trough dates determined by S&P 500 earnings per share y/y, rolled monthly troughs of less than -15%.

US SMALL CAP OUTPERFORMANCE OFF BEAR MARKET BOTTOMS

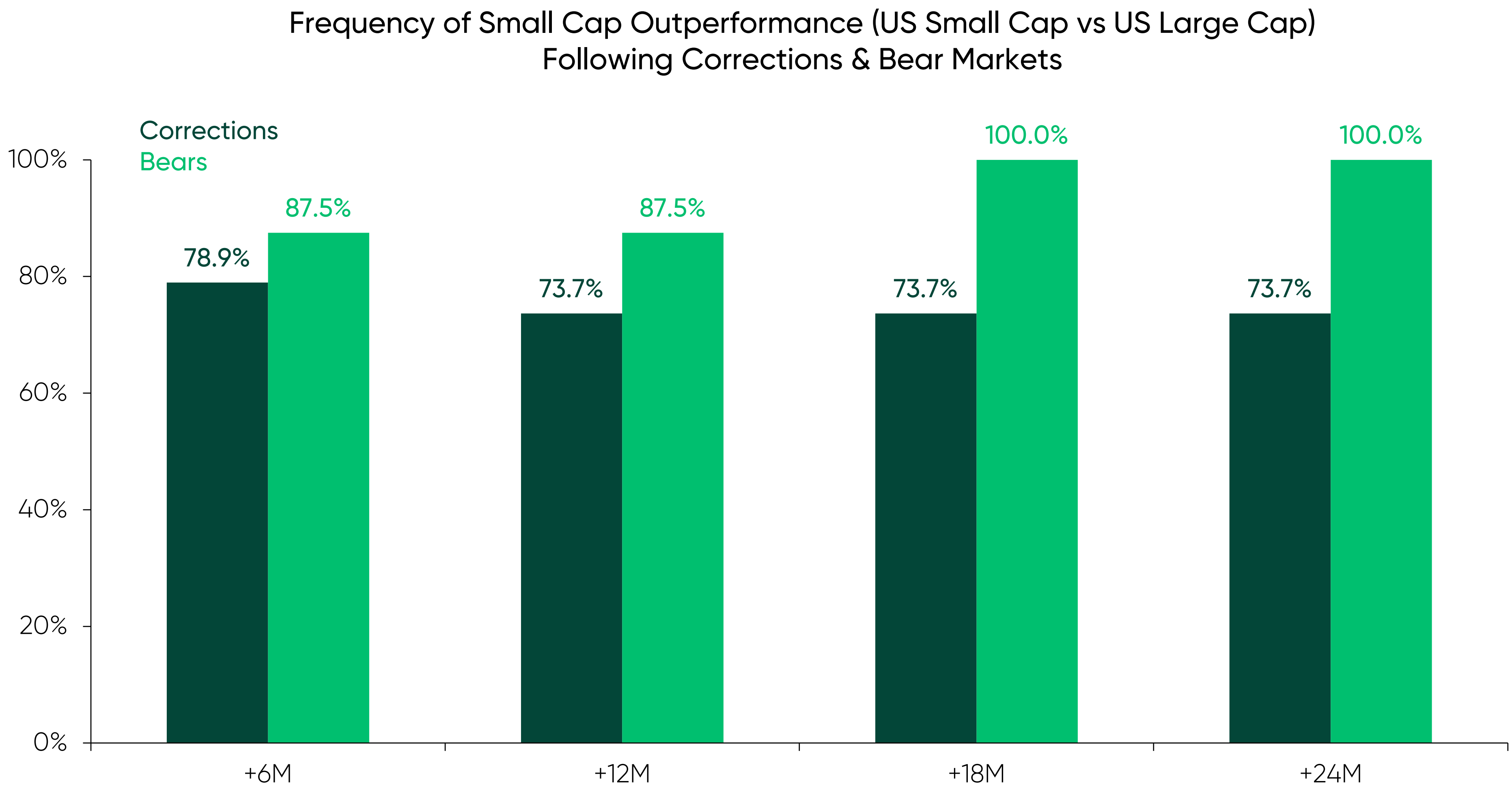
Small caps' best days are typically the first few years early in new bulls, where outperformance can be powerful. The current market cycle has been an outlier relative to history, with large caps underperforming during the 2022 bear and thus leading the rebound. In addition, small caps faced a multitude of other issues in 2023, from isolated bank failures to potential overhang from the prior IPO/SPAC boom—leading to small caps bottoming a full year after large. However, these issues were mostly isolated or sentiment driven, suggesting small could still perform well in this early bull.

End of Bear Market Dates	US Small Cap – US Large Cap Following End of Bear		
	+12M Return	+18M Return	+24M Return
01/06/1932	124%	83%	149%
28/04/1942	30%	38%	49%
13/06/1949	12%	22%	24%
22/10/1957	31%	49%	46%
26/06/1962	10%	6%	8%
07/10/1966	47%	55%	82%
26/05/1970	37%	27%	52%
03/10/1974	8%	32%	33%
12/08/1982	41%	26%	21%
04/12/1987	15%	22%	7%
11/10/1990	21%	32%	27%
09/10/2002	28%	40%	36%
09/03/2009	29%	26%	51%
23/03/2020	47%	34%	7%
12/10/2022	-20%	-	-
Average	30.7%	35.0%	42.2%

Source: Small Cap returns based on the FamaFrench Small Cap Index from 01/01/1926 –31/12/1978 and the Russell 2000 from 01/01/1979 –29/02/2024. Large Cap returns based on Global Financial Data's S&P 500 Total Return Index from 01/01/1926 –29/02/2024. Monthly data is used through 31/12/1987, and daily data is used thereafter.

US SMALL CAP OUTPERFORMANCE AFTER CORRECTIONS & BEAR MARKETS

Small cap equities frequently outperform after bear markets. They are typically more leveraged than large firms, so lenders are more restrictive as brutal recessions wear on—leaving small cap companies fighting for survival. However, at the beginning of bull markets when credit becomes more widely available, a small cap relief rally typically leads markets higher.



Source: FactSet, Dartmouth College. Frequency of outperformance in small cap (SC) equities versus large cap (LC) equities during bear markets and corrections. SC represented by FamaFrench Small Cap Index (Nov 1971 –May 1993) and Russell 2000 Index (May 1993 –Feb 2024); LC represented by S&P 500 index based on FactSet Price Returns (Nov 1971 –Feb 2024).

US SMALL CAP OUTPERFORMANCE DURING FED RATE CUT CYCLES

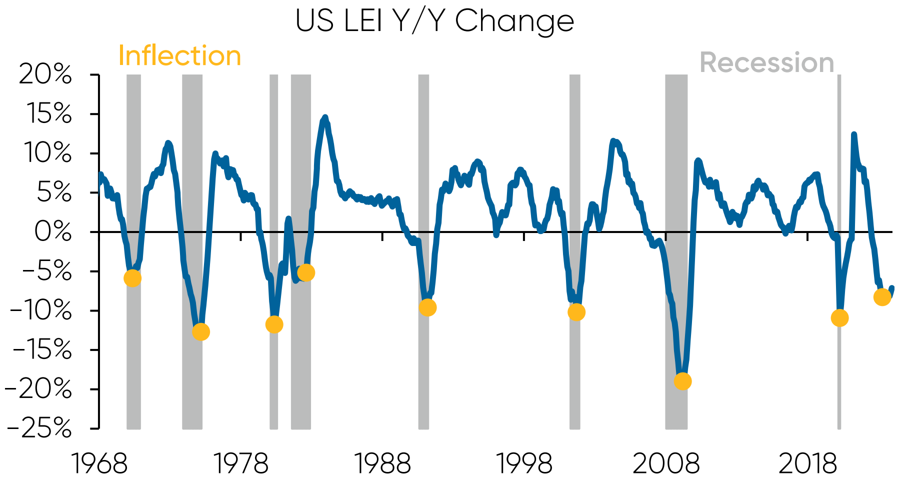
The Fed typically cuts rates to aid a struggling economy. Historically, rate cuts tend to benefit US small caps over large, with small leading a majority of the time following the start of cut cycles since 1990.

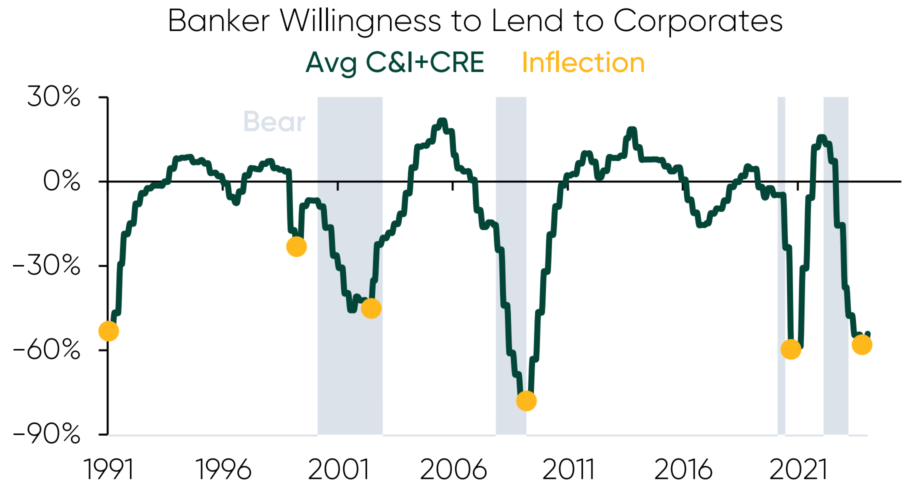
Rate Cut Cycle Start	US Small Cap – US Large Cap After First Rate Cut		
	+12M Return	+18M Return	+24M Return
13/07/1990	-4.7%	2.7%	4.7%
06/07/1995	-1.2%	-10.2%	-30.2%
29/09/1998	5.8%	4.7%	5.7%
03/01/2001	16.2%	18.3%	13.4%
06/11/2002	23.5%	22.3%	26.9%
18/09/2007	9.8%	-1.2%	5.2%
01/08/2019	-16.1%	8.5%	6.9%
03/03/2020	21.0%	2.2%	-10.0%
Median	7.8%	3.7%	5.5%
% Small Cap Outperformance	62.5%	75.0%	75.0%

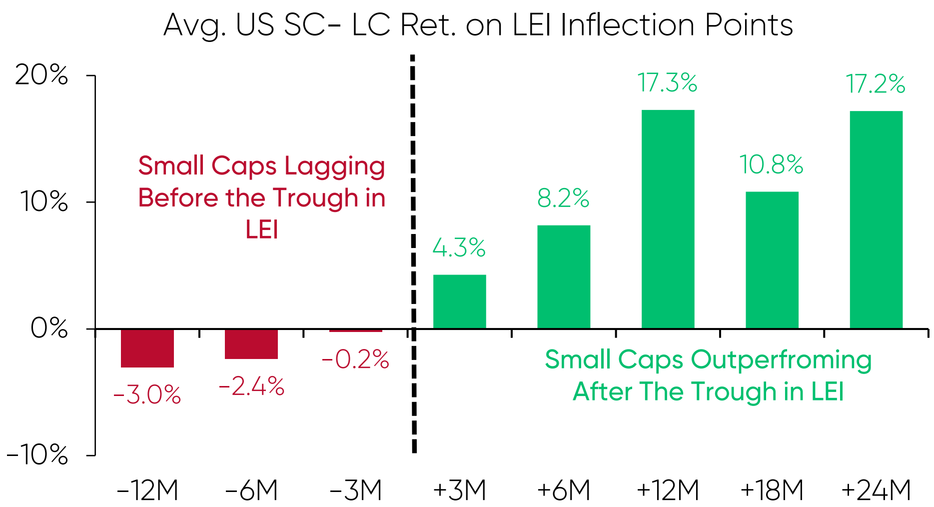
Source: FactSet as of 28/02/2024. Data uses S&P 500 and Russell 2000 total returns in USD from 13/7/1990-3/3/2022.

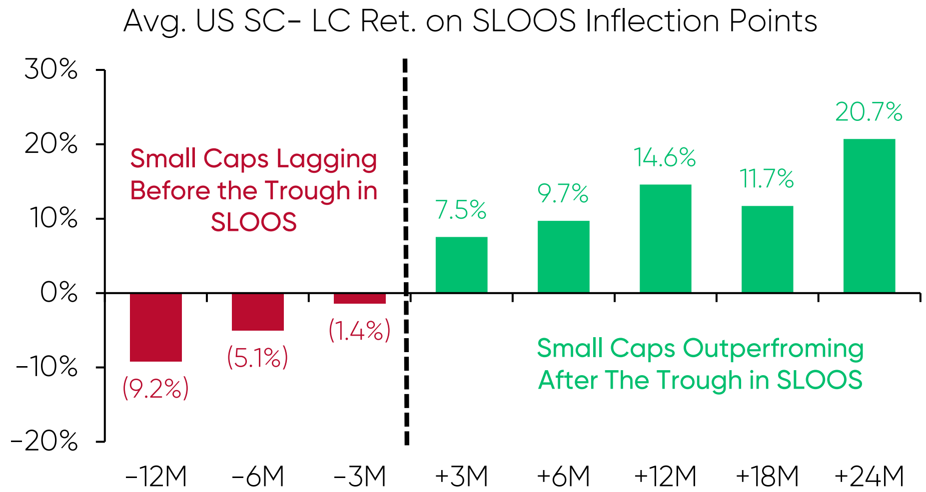
SLOOS & LEI IMPROVEMENT COULD SUPPORT SMALL CAPS

Historically, troughs in economic indicators like the Senior Loan Officer Survey (SLOOS) and Leading Economic Index (LEI) have boded well for future small cap relative performance. It might be too early to call a definitive trough in these measures, but they are likely to show improvement before long.





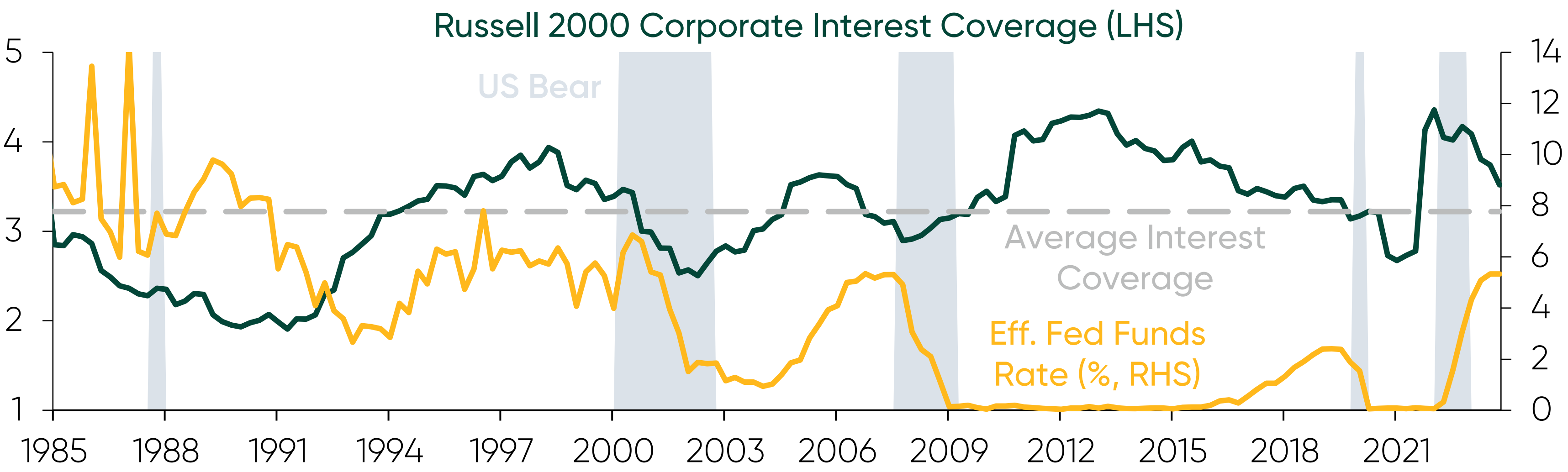


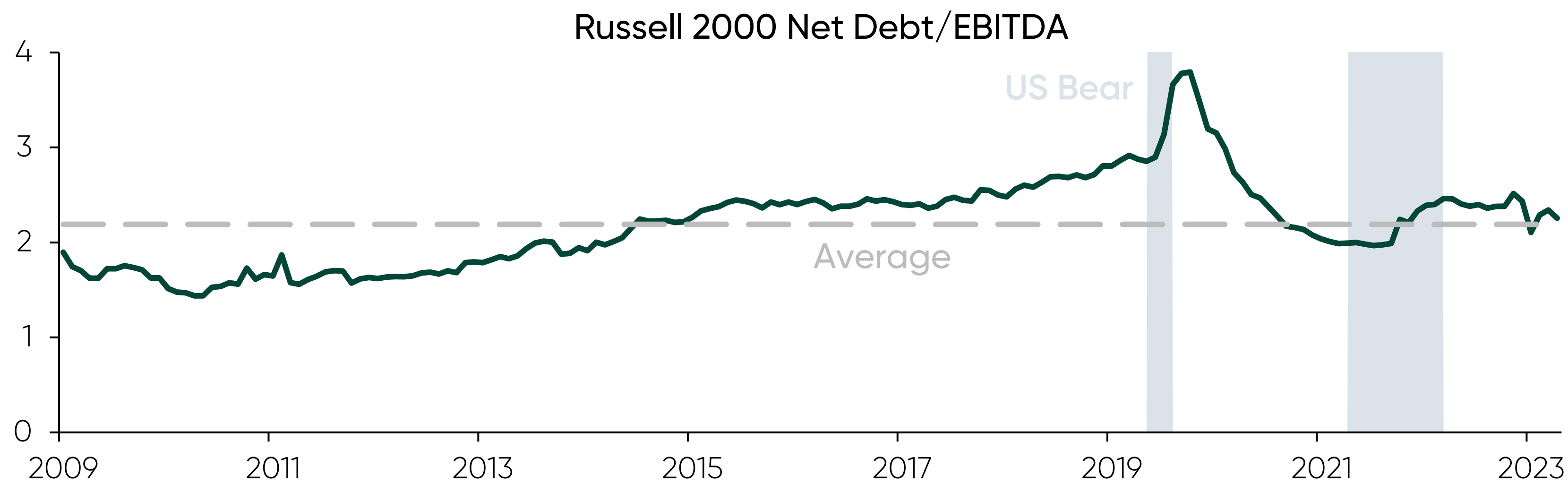


Source: Factset, Fama French and Federal Reserve Senior Loan Officer Opinion Survey (SLOOS). Russell 1000 and Russell 2000 used for US small cap and US large cap. Fama French data for US small linked to Russell 2000 on 29/12/1978 & Fama French data for US Large linked to Russell 1000 on 29/12/1978. SLOOS data shown monthly from 01/01/1991-31/12/2023. LEI data shown from 01/01/1968-31/12/2023. Data in USD.

US SMALL CAPS' HEALTHY BALANCE SHEETS

US small cap companies' healthy earnings and balance sheets likely allow small caps to bear the brunt of higher rates better than many investors anticipate. While interest coverage has fallen from recent highs amid the move higher in rates, US small cap companies' ability to service debt is at a healthy level and still above historic averages.

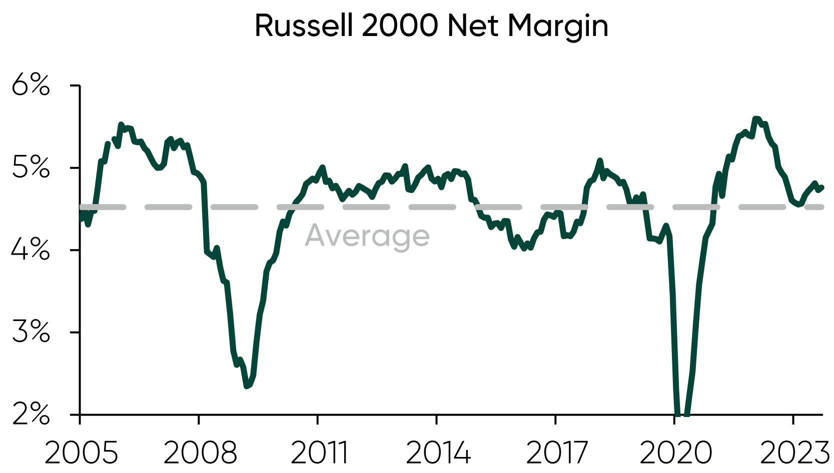


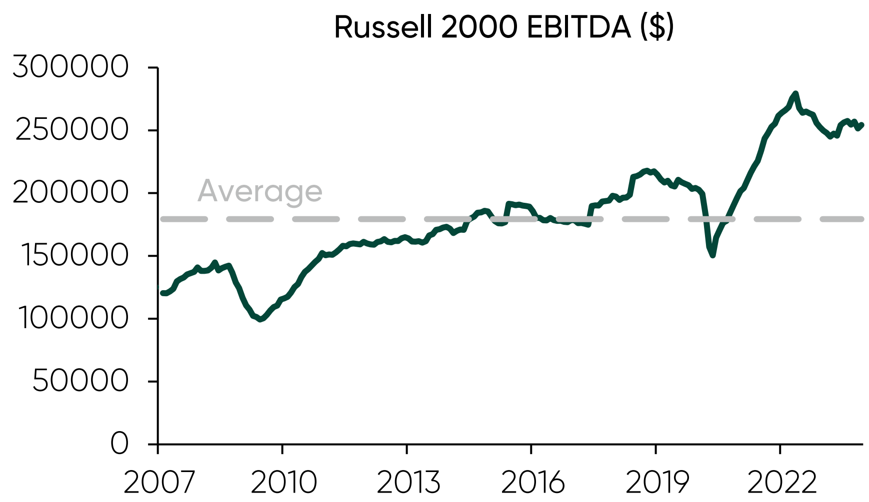


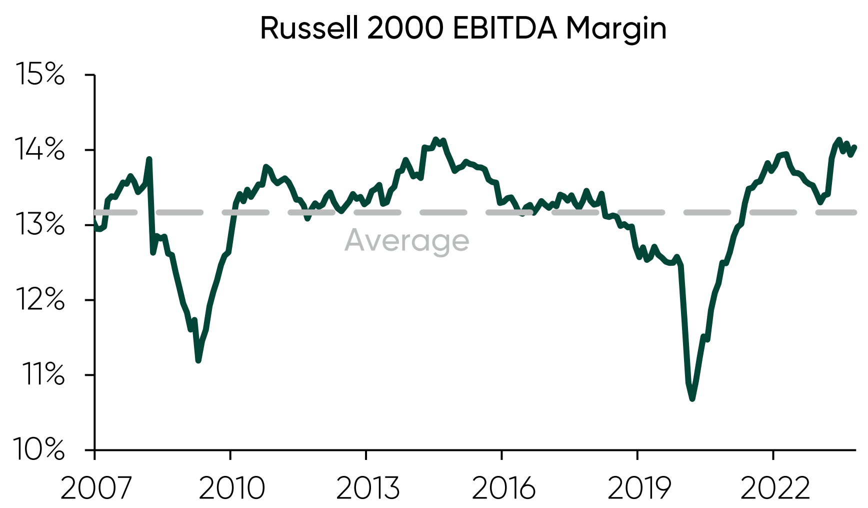
Source: FactSet and Federal Reserve Bank of St. Louis as of 31/12/2023. Top chart shows Russell 2000 Corporate Interest Coverage and Effective Federal Funds Rate, quarterly, from 01/01/1985-31/12/2023. Bottom chart shows Russell 2000 Net Debt/EBITDA, monthly from 30/09/2009-31/12/2023. Data in USD.

US SMALL CAP FUNDAMENTALS

US small caps have taken advantage of the economic and low interest rate environment over the past few years and improved their profitability. While some of this profitability took a hit during the 2022 bear, US Small cap companies today broadly remain healthy relative to historic averages and their strong earnings and margins should help offset "higher for longer" interest rates.



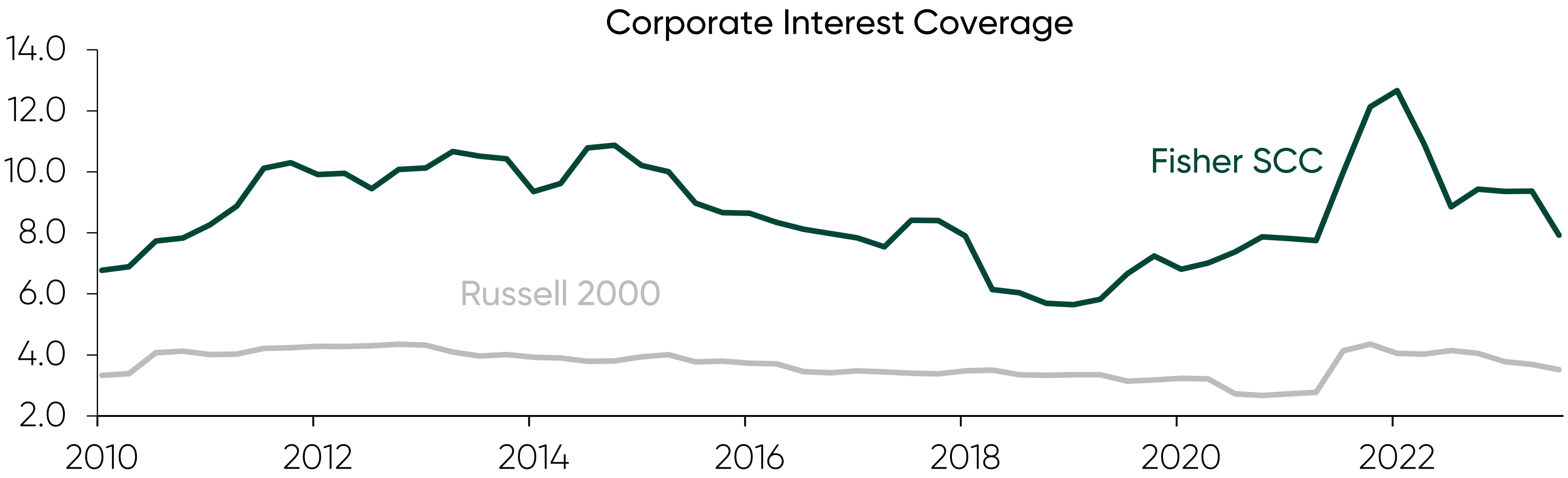


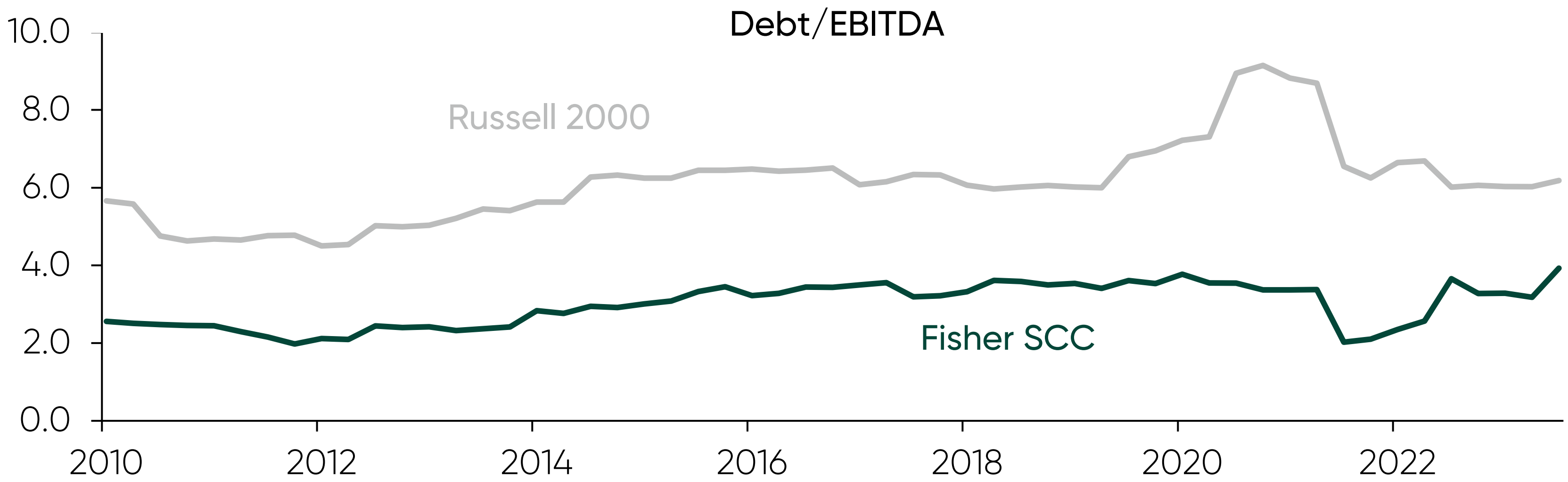


Source: FactSet, as of 31/12/2023. Data shown monthly, LTM from 31/12/2005-31/12/2023 and 01/01/2007-31/12/2023. Data in USD.

FISHER'S US SMALL CAP CORE INTEREST RATE SENSITIVITY

Fisher's US Small Cap Core portfolio is currently well positioned for the higher interest rate environment. The portfolio is significantly less interest rate sensitive than the benchmark with a higher interest coverage ratio and lower leverage relative to earnings.

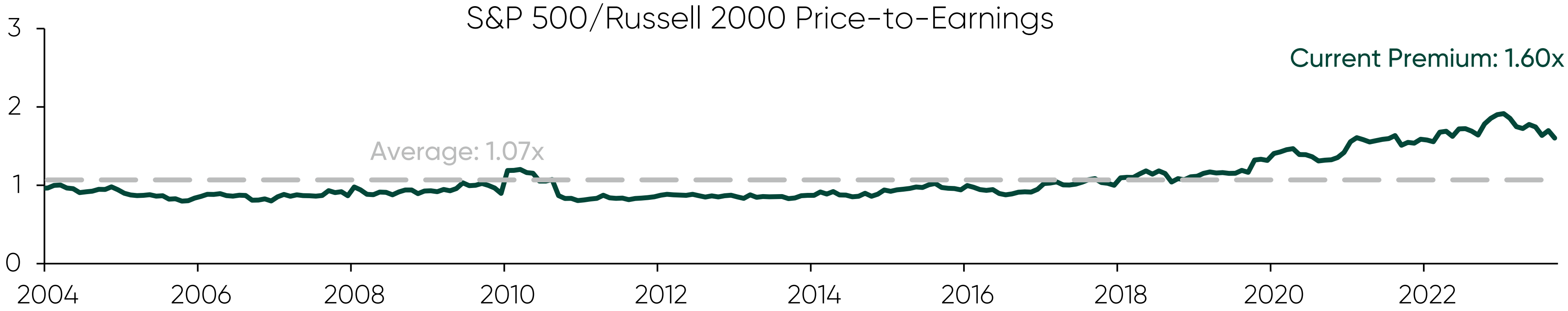


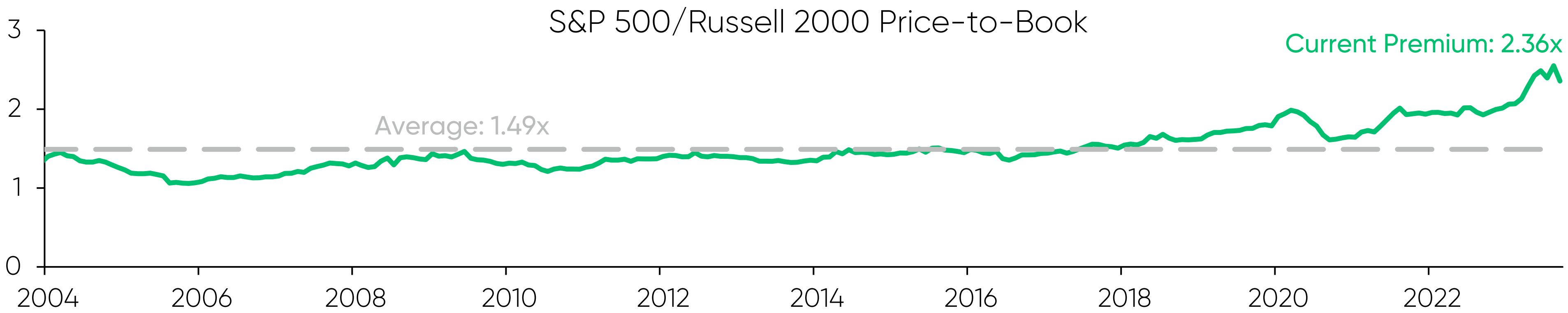


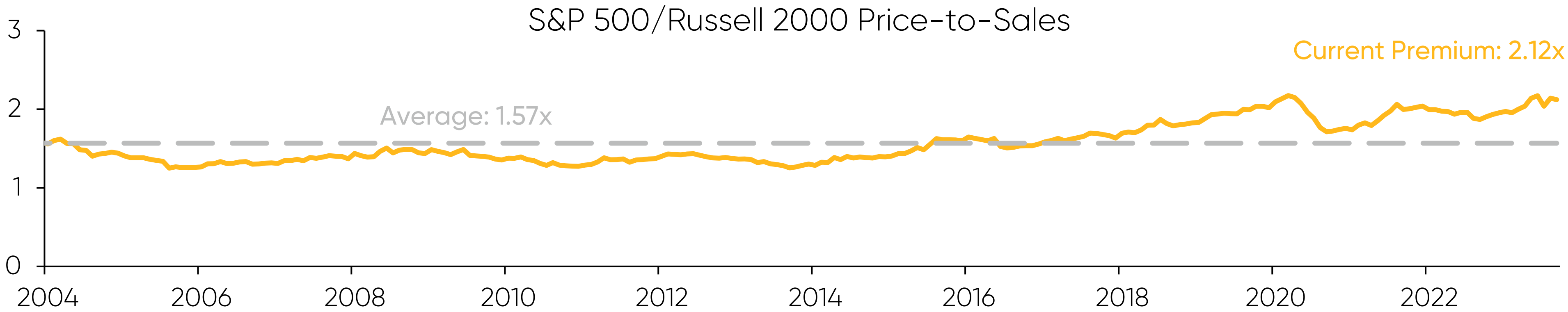
Source: FactSet as of 31/12/2023. Fisher Investments portfolio based on a representative account. Top chart shows Russell 2000 and Fisher Small Cap Core Corporate Interest Coverage quarterly, from 01/06/2010-31/12/2023. Bottom chart shows Fisher Small Cap Core and Russell 2000 Debt/EBITDA, quarterly from 01/06/2010-31/12/2023. Data in USD.

VALUATION PREMIUMS FOR US LARGE CAPS ARE AT 20 YEAR HIGHS

US small caps are currently trading at a significant and historic discount relative to US large caps.







Source: FactSet as of 29/02/2024. Data for both indexes in charts shown monthly from 01/06/2004-29/02/2024, in USD. Data for charts start on 01/06/2004 given data limitations.

US SMALL CAPS IN EARLY MARKET CYCLES

US SMALL CAPS CAN HANDLE HIGHER FOR LONGER RATES

US SMALL CAPS ARE UNLOVED

APPENDIX

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.

REPRESENTATIVE PORTFOLIO

Information on certain pages is based on a representative portfolio (rather than a composite or an average of a group of portfolios) as noted on those pages and excludes cash, unless otherwise denoted. This representative portfolio information is derived from an actual client portfolio from the relevant composite (which includes accounts managed or sub-managed by FI or its affiliates). Clients' portfolio characteristics may differ given the various investment restrictions, cash requirements and other circumstances that can apply to particular clients. Portfolio information is as of the dates indicated, and no assurances can be given that it has not changed or that it will not change in the future.

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1. Fisher Investments Europe

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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 Clause 4.

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.

TERMS OF BUSINESS

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

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.

FISHER INVESTMENTS EUROPE ™