

FISHER INVESTMENTS EUROPE TM

Chinese Regulations Mirror Developed Markets Regulations

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KEY POINTS

- With numerous regulatory developments coming from US, EU & China, investor concerns are elevated particularly in China and EM. We think it is unlikely that their worst fears are realized.
- Most of the announced or potential regulations from the Chinese State Administration for Market Regulation (SAMR) aren't materially different than regulations in place or that are being considered in the US and Europe.
- We remain broadly constructive on Chinese internet names as regulatory developments are leading to depressed investor sentiment, overlooking strong fundamentals.
- Differing political systems and legislative processes result in the impact of regulatory risk having more initial surprise power in China as compared to the US & EU, where legislation is typically slow moving and publicised well in advance.

COMPARING REGULATORY ENVIRONMENT: US & EU AND CHINA

By comparing the differences in political systems, we are able to analyze the regulatory environment and its impact on the market. Regulatory risk is more material in China as policy responses can be swift and severe, whereas the slow grinding gears of democracy in the US & EU limit surprise power.



The European Union's data privacy directive, the GDPR, was implemented gradually between initial approval by legislative bodies in December 2015 to full application in May 2018.



In contrast, the Personal Information Protection law was passed on the 13th August by China's top legislative body and will come into rigor on the 1st of November 2021.

PAST REGULATIONS DID NOT IMPEDE LONG TERM PERFORMANCE

Announced regulations in China have typically led to short-term uncertainty but have not necessarily translated to long term underperformance of affected equities against the MSCI World.

Chinese Tech-Like Not Materially Impacted by Announced Regulations in the Long Term



Source: FactSet. Shows relative performance of Tencent and Baidu relative to the MSCI World, 6 months prior and 2 years after regulatory announcement. Indexed to 100 on date of regulation.

Key Points

Comparing Regulatory Environment: US & EU and China

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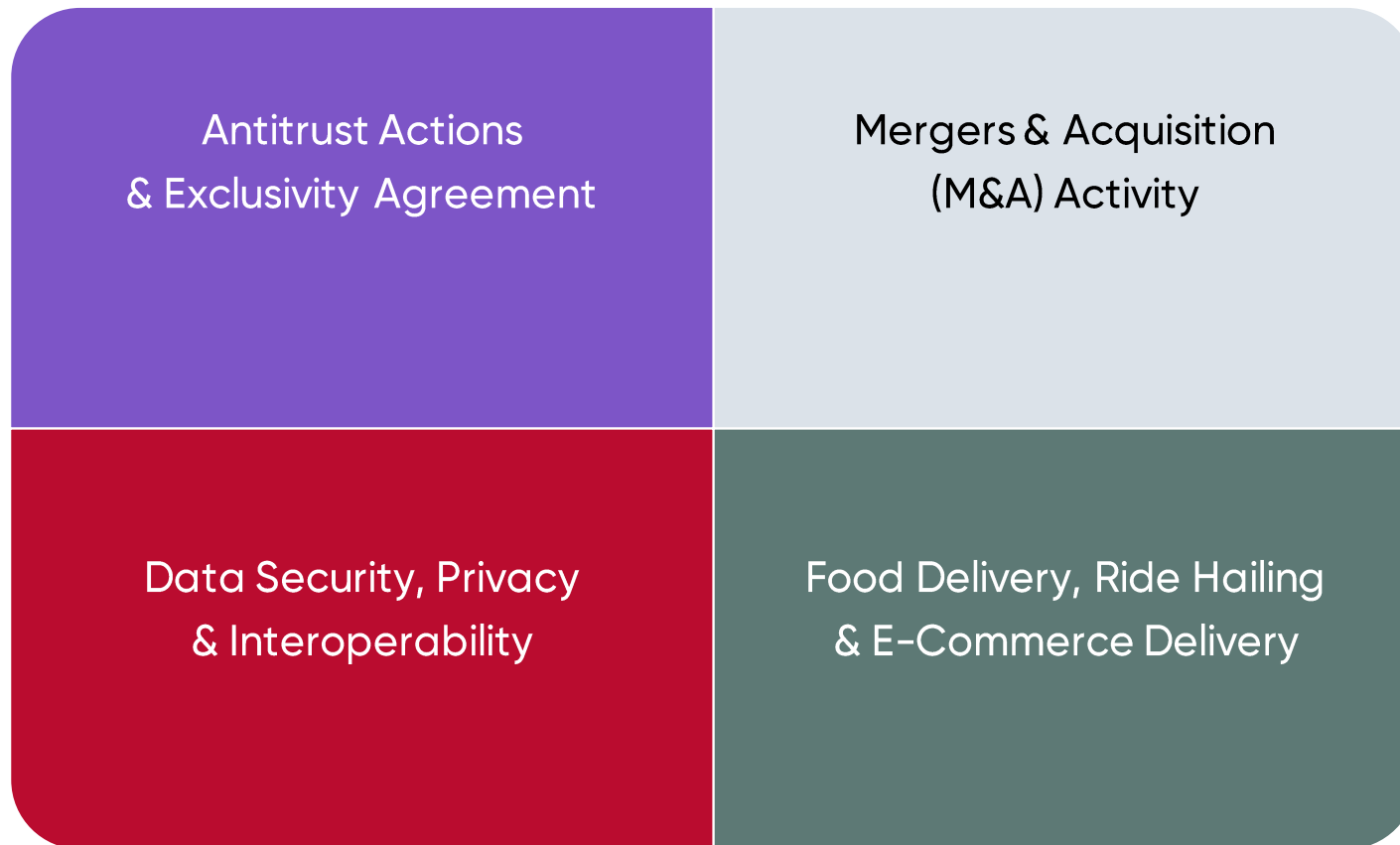
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IMPACT OF INCREASED REGULATION IN TECHNOLOGY SECTOR

The US, EU & China are similarly interested in reigning in the growing influence of tech & tech-like companies. They are actively promoting legislation in the following areas. US governments attempts to break-up big tech are likely to be largely unsuccessful. Likewise, we expect Chinese internet companies to outperform as they adjust to the changing regulatory environment and as regulatory uncertainty falls.

TECH REGULATION: AREA OF FOCUS



Source: Fisher Investments Research, as of August 2021.

ANTITRUST ACTIONS

Most of the announced or potential antitrust regulations in China are not materially different than regulations in place or that are being considered in the US.

July 2021:

US Federal Trade Commission votes to push harder for the right of consumers to repair devices, ranging from smartphone to tractors, arguing current restrictions raise costs for consumers and stifles innovation, amongst others

June/ July 2021:

Both Apple and Google face lawsuits tied to control of mobile app infrastructures and whether the firms abuse this power over app developers and stifle competition through their respective app stores

Possible Regulation:

Platform Anti-Monopoly Act would restrict firms giving their products/services an advantage over rivals who depend on same platforms while the Ending Monopolies Act would make it illegal for a platform company to operate multiple lines of business that create "conflicts of interest"

United States

2020-2021:

SAMR warned 8 sharing-economy companies to standardise pricing in reaction to an increasingly common growth strategy of initially losing revenue to seize market share before hiking prices to increase profits, amongst others

2021:

Several Tech company founders have reduced their influence on the companies they founded in various ways

2021:

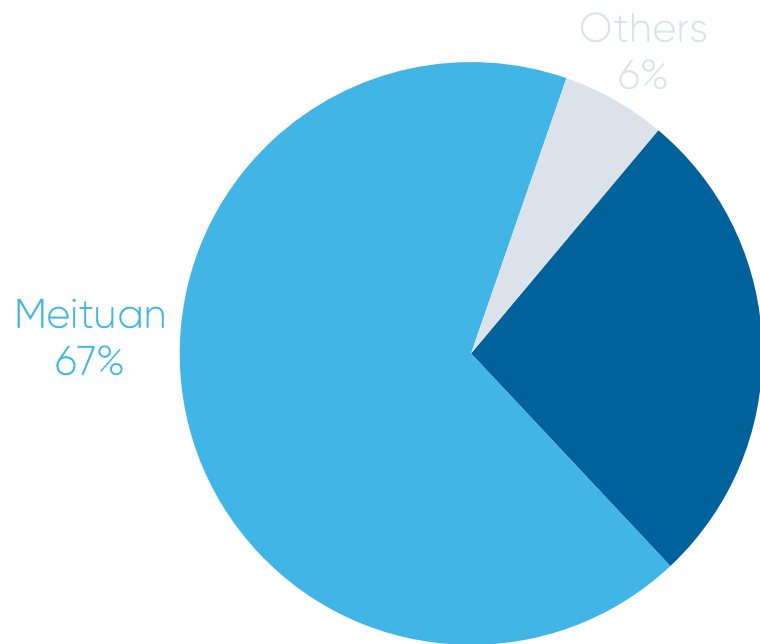
China SAMR fines some of the biggest platforms in the community-group buy industry RMB 6.5m for selling products below cost and issues a list of restrictions on group-buy business, forbidding predatory pricing, amongst others

China

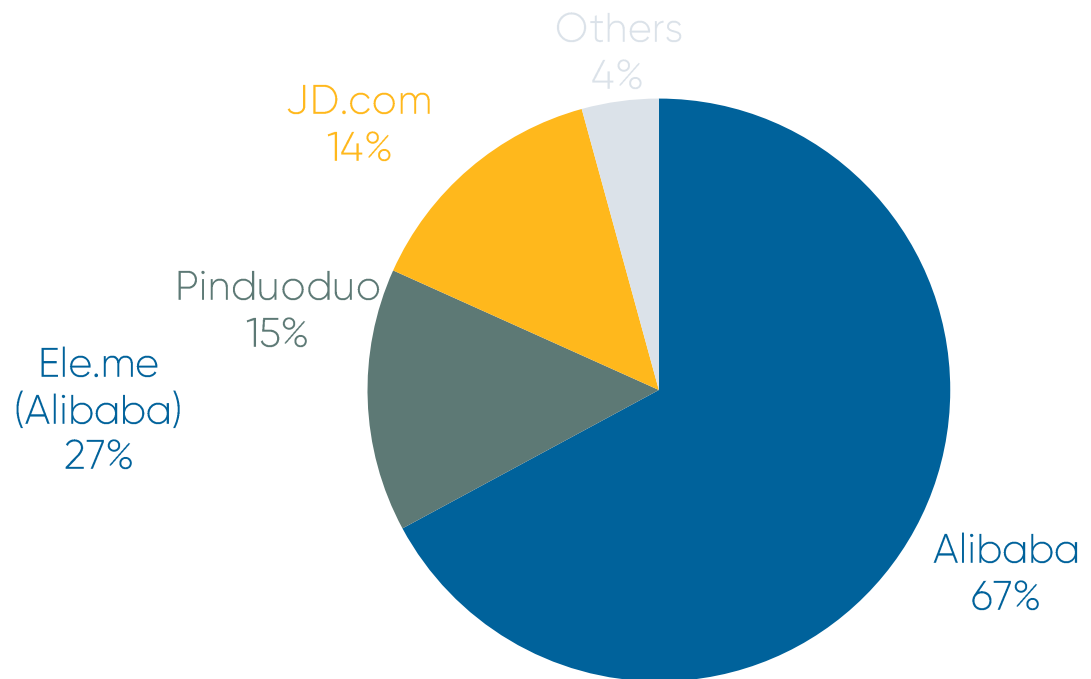
Source: Fisher Investments Research, as of August 2021.

EXCLUSIVITY AGREEMENTS

Historically both US and Chinese companies had exclusive agreements to purchase or use good and services from one another. Concentrated market share in both Chinese food delivery & e-commerce industries likely means removing the exclusivity agreements won't have a material impact because the option set for suppliers is already limited. In addition, Alibaba's management noted that exclusivity agreements are limited to a small number of TMall flagship stores and adjusting these arrangements will be immaterial to financial results. Increased regulation in the US, such as the DOJ's recent lawsuit against Google entering agreements that made Google the preset default search engine on billions of devices and prohibiting pre-installing competing search engines, would likely have a much larger material impact.



China's Food Delivery Market Share



China's Internet Retail & E-Commerce Market Share

Right Chart Source: FactSet, as of July 2021.

Left Chart Source: CBNDData, Trustdata, Statista, as of April 2020.

M&A ACTIVITY

President Biden's Administration will increase scrutiny of M&A activity done by US tech companies. SAMR is also likely to investigate almost all M&A done by Chinese Internet companies but should allow reasonable acquisitions. However, neither US tech nor Chinese Internet companies are heavily dependent on M&A.

Jul 2021: AON and Willis Towers Watson terminating merger after DOJ lawsuit indicates greater scrutiny of large scale M&A	Possible Regulation: Make it more expensive to file for M&A via Merger Filing Fee Modernisation Act, so that fees would more equitably fall on larger deals	Possible Regulation: Platform Competition & Opportunity Act would shift the burden of proof in merger cases to dominant platforms
United States		

Apr 2021: SAMR fined several Chinese Internet companies RMB 500,000 for not declaring past M&A	Jul 2021: SAMR rejected merger between 2 game-centric live streaming services, with a combined 80% market share	SAMR is allowing reasonable acquisitions (e.g. Tencent's acquisition of Sogou)
China		

President Biden's Executive Order calls for scrutiny of past M&A and the FTC is attempting to unwind past M&A. However, we believe those attempts will be largely unsuccessful.

Dec 2020: The Federal Trade Commission (FTC) is attempting to unwind Facebook's acquisitions of Instagram and WhatsApp. However, a federal court has already dismissed the antitrust complaint against Facebook stating FTC did not prove Facebook is a monopoly	China is not looking to unwind past M&A
United States	China

Source: Fisher Investments Research, August 2021.

DATA SECURITY, PRIVACY & INTEROPERABILITY

Investors have been seeking to make sense of the recent regulatory action surrounding data security and privacy. For example, new interoperability rules implemented refers to the functionality of information systems to exchange data and to enable sharing of information.

July 2021

Executive Order urges FTC to establish rules on surveillance and the accumulation of data

Possible Regulation:

ACCESS Act* requires standards of data portability and interoperability, making it easier for consumers to take their data with them to other platforms

United States

May 2018

EU's GDPR, to some extent resembling China's PIPL, comes into rigor after gradual implementation

November 2020:

EU to pursue data localisation and limiting data flows to non-EU countries. Several EU countries such as Germany have long had such laws to retain data in home countries

Economic Impact:

Despite initial short term uncertainty and challenges, economic and financial impact from GDPR was not significant

EU

August 2021

Cyberspace administration of China will evaluate data security of firms prior to listing overseas

September/November 2021

Data Security Law & PIPL** to strengthen app users control and require consent on certain sensitive personal data as well as localise data for national security and other purposes

Economic Impact:

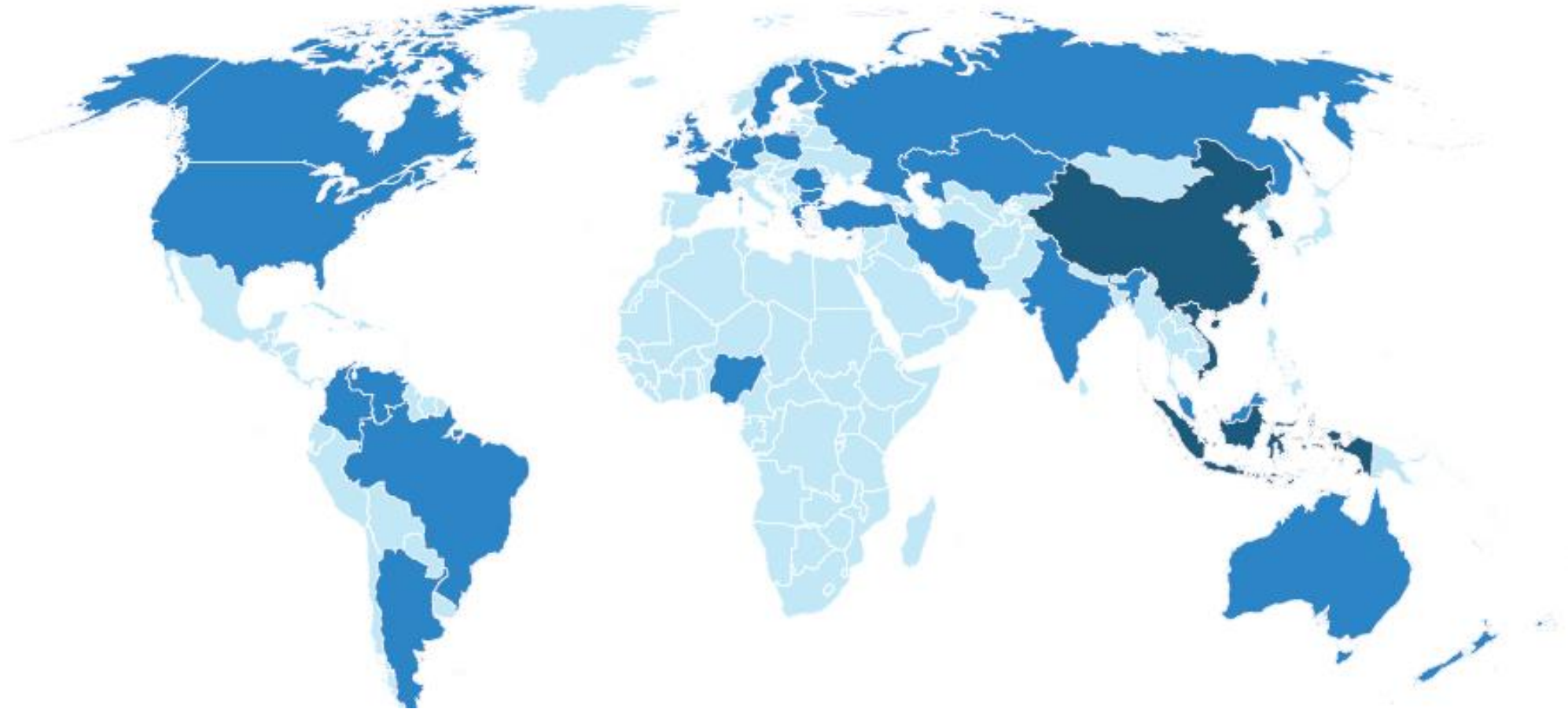
Precise quantification of PIPL & DSL is challenging, but impacted companies, such as JD.com, Bilibili & Alibaba believe impact will be immaterial and have taken steps beyond regulatory requirements to comply with changes. Pinduoduo and Tencent are committing funds (~1.6bn and ~7.7bn) apparently to appease gov. push for "common prosperity"

China

DATA SECURITY, PRIVACY & INTEROPERABILITY

Several EU countries and many others have long had data sovereignty laws that keep data of people and companies in home countries.

Data Localisation Laws by Country



No data blocked
1-2 types of data blocked
3+ types of data blocked

Source: ITIF, analysis of formal laws or regulations publicly reported as of April 2017.

FOOD DELIVERY, RIDE HAILING & E-COMMERCE DELIVERY

China's push for higher salary and benefits for delivery/ride sharing workers has precedence in Europe and California. Food delivery companies were able to pass through additional costs with limited impact on demand or margins.

December 2020

California's Proposition 22 went into effect, ruling app-based drivers continue to remain independent contractors with additional benefits

Associated Additional Costs

Additional benefits included minimum earnings, certain mileage reimbursement and Healthcare subsidies for certain drivers

Economic Impact

Both Uber and Lyft introduced flat fee per ride to offset additional costs. Prop 22 passed with limited impact on demand

United States

2020

Just Eat, the largest food delivery platform in Western Europe, moves from independent contractor model to hired employee model

Associated Additional Costs

New model led to higher cost from equipment, insurance as well as sick and holiday pay

Economic Impact

Despite costs associated with the new model, Just Eat was able to maintain high margins, with EBITDA margins falling from 14 to 11%

Europe

July 2021:

China announced regulation driven by need to ensure fair wages/benefits and ensuring safety for workers and consumers

Associated Additional Costs

China's express delivery companies (e.g. ZTO Express, SF Holdings, JD Logistics) are increasing salary and benefits as well as implementing social insurance

China

Key Points

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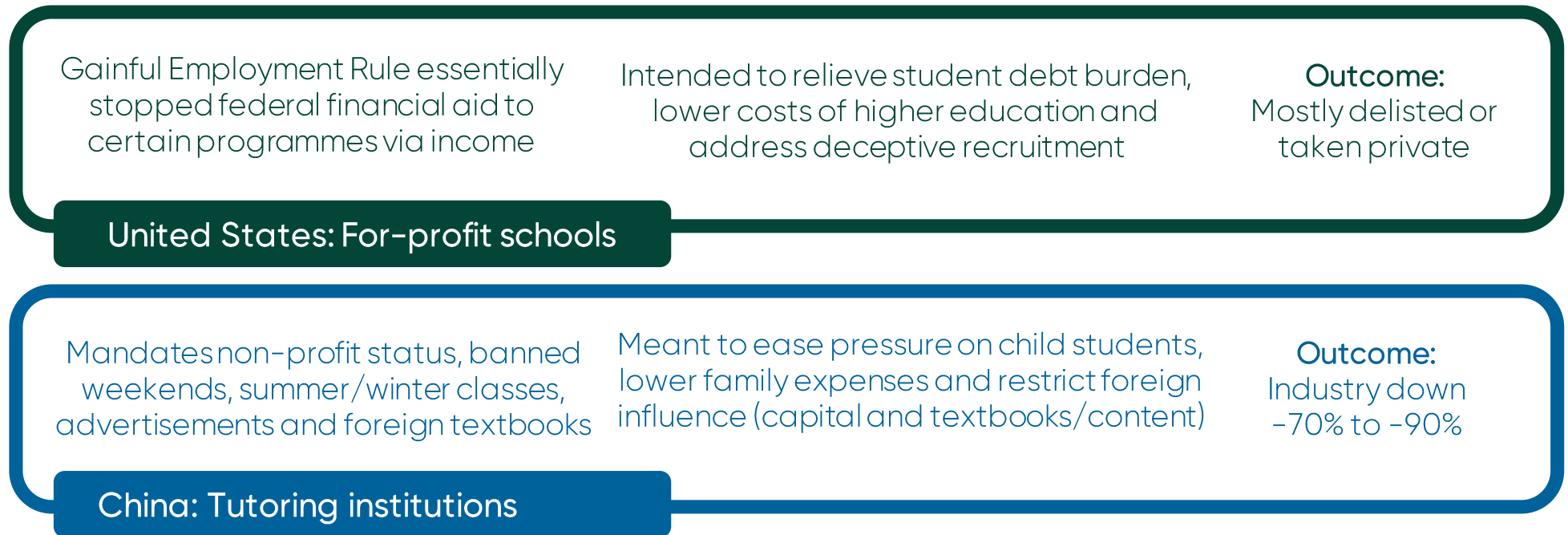
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OVERVIEW OF EDUCATION REGULATION

- Education has historically been a political target and governments have intervened to regulate the industry.
- In early July 2021, the Chinese government's announcement of stricter-than-expected regulations for education firms reignited and intensified investor concerns, leading to a sharp sell-off in Chinese equities.
- This announcement has modest parallels to regulation previously implemented in the US.
- We believe the new regulations imposed on the sector materially impact the longer term growth outlook for the industry.

US EDUCATION REGULATION IN 2012 VS CHINA'S IN 2021

A good comparison to the current policy reform on Chinese tutoring institution is the Gainful Employment Rule in the US. The rule required US for-profit colleges to maintain average annual loan payments that are less than 8% of earnings or less than 20% of discretionary income in order to receive federal financial aid funding. The regulation ultimately killed the growth of fast-growing for-profit schools.



Source: Fisher Investments Research, August 2021.

DISCLOSURES

FIRM

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Fisher Investments (FI) is an investment adviser registered with the Securities and Exchange Commission. As of 30 June 2021, FI managed over \$187 billion, including assets sub-managed for its wholly-owned subsidiaries. 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 30 June 2021.

FI is wholly owned by Fisher Investments, Inc. Since Inception, Fisher Investments, Inc. has been 100% Fisher-family and employee owned, currently Fisher Investments Inc. beneficially owns 100% of Fisher Investments (FI), as listed in Schedule A to FI's Form ADV Part 1. Ken and Sherrilyn Fisher, as co-trustees of their family trust, beneficially own more than 75% of Fisher Investments, Inc., as noted in Schedule B to FI's Form ADV Part 1.

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1. Fisher Investments Europe

Fisher Investments Europe Limited trades under the name Fisher Investments Europe ("**Fisher Investments Europe**"), 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 25 The North Colonnade, Canary Wharf, London, E14 5HS.

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.

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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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