

FISHER INVESTMENTS EUROPE™

GROWTH & VALUE EQUITY STYLE OUTLOOK

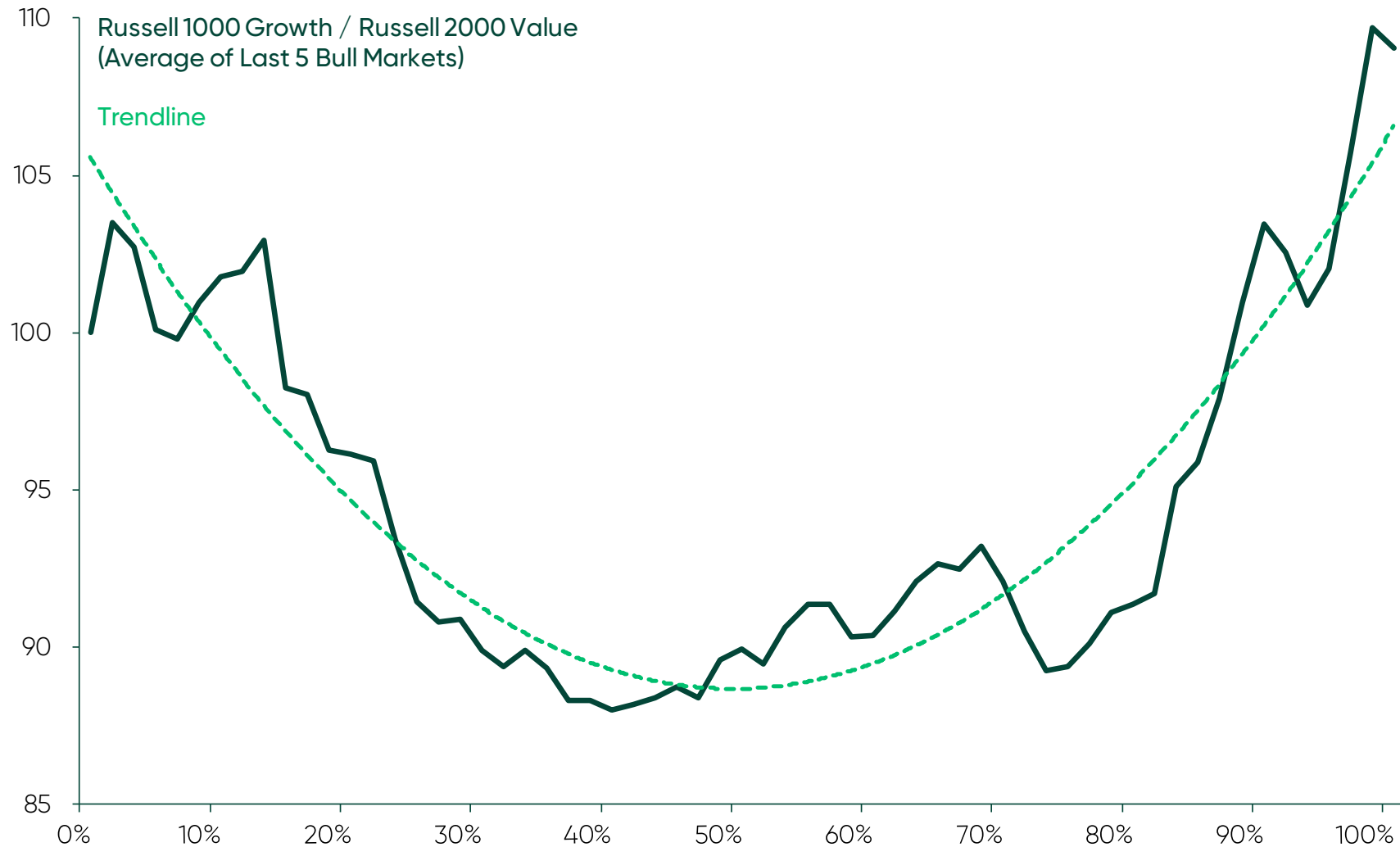
GROWTH/VALUE OUTLOOK

- We believe equity style trends are driven by the economic and market cycles.
- **Early cycles** are characterized by: rapidly increasing economic growth; steep yield curves facilitating access to capital; low sentiment/skepticism about the market recovery; low inflation and low capacity utilization. This backdrop favors **smaller capitalization, Value and lower quality stocks**.
- **Late cycles** are characterized by moderating economic growth; flattening yield curves which inhibit access to capital; high sentiment/optimism about the market; higher inflation and high capacity utilization. This backdrop favors **larger capitalization, Growth and high-quality stocks**.
- We believe we are in a late cycle environment and are thus overweight larger capitalization, Growth, high-quality stocks and the countries and sectors with significant exposure to these factors.
- The recent market downturn has all of the hallmarks of a classic market correction (as opposed to a bear market) and we believe the global bull will reassert itself in the coming months. In the correction, stocks have acted as they commonly do and as the upturn resumes in full force we expect Growth and Quality to lead as they have in recent weeks on up days.
- While Russia's invasion of Ukraine is a terrible human tragedy, we do not believe it will materially affect the global economy or stock market.
- Our inflation and interest rate forecasts are more benign than many – we expect both rates to be below consensus and supportive of our late cycle posture.

EQUITY STYLE LEADERSHIP DURING BULL MARKETS

Small Cap Value equities outperform early in the bull market cycle when yield curves are steep and investors are skeptical about a market recovery. As the bull market matures, style preferences shift and Large Cap Growth outperforms late cycle as the yield curve flattens and investor optimism increases.

Large Growth vs. Small Value (Avg. of Last 5 Bull Markets)

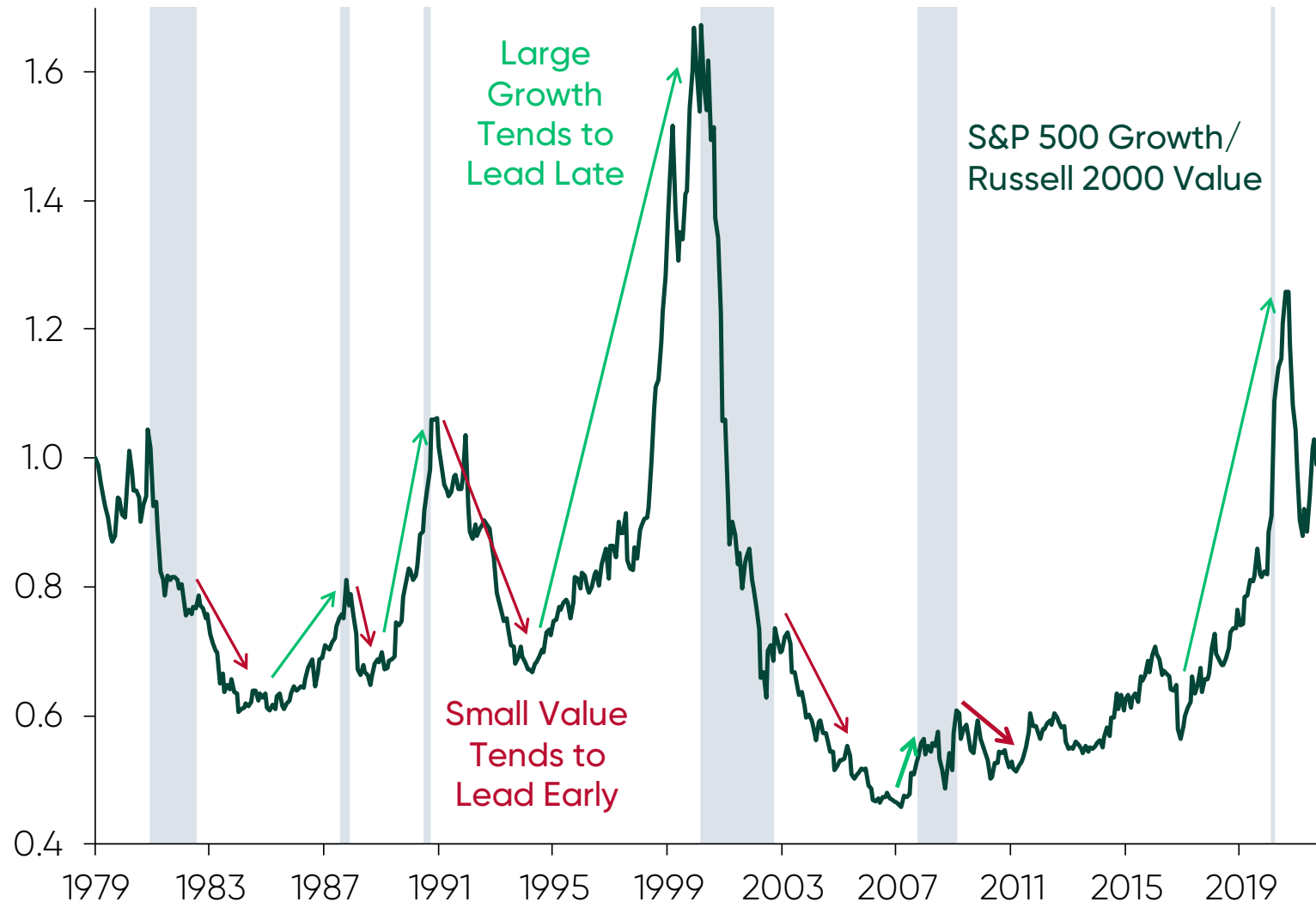


Source: FactSet, as of 10/27/2021. Russell 1000 Growth vs. Russell 2000 Value Price Indexes, indexed to 100 at start of last five bull markets.

LARGE GROWTH & SMALL VALUE LEADERSHIP CYCLES

In the early stages of economic recovery, Value equities which are capital-intensive tend to dominate. As the economic cycle progresses, an improving consumer position typically supports outperformance for Growth equities, which are dominated by services-oriented businesses leveraged more to consumption.

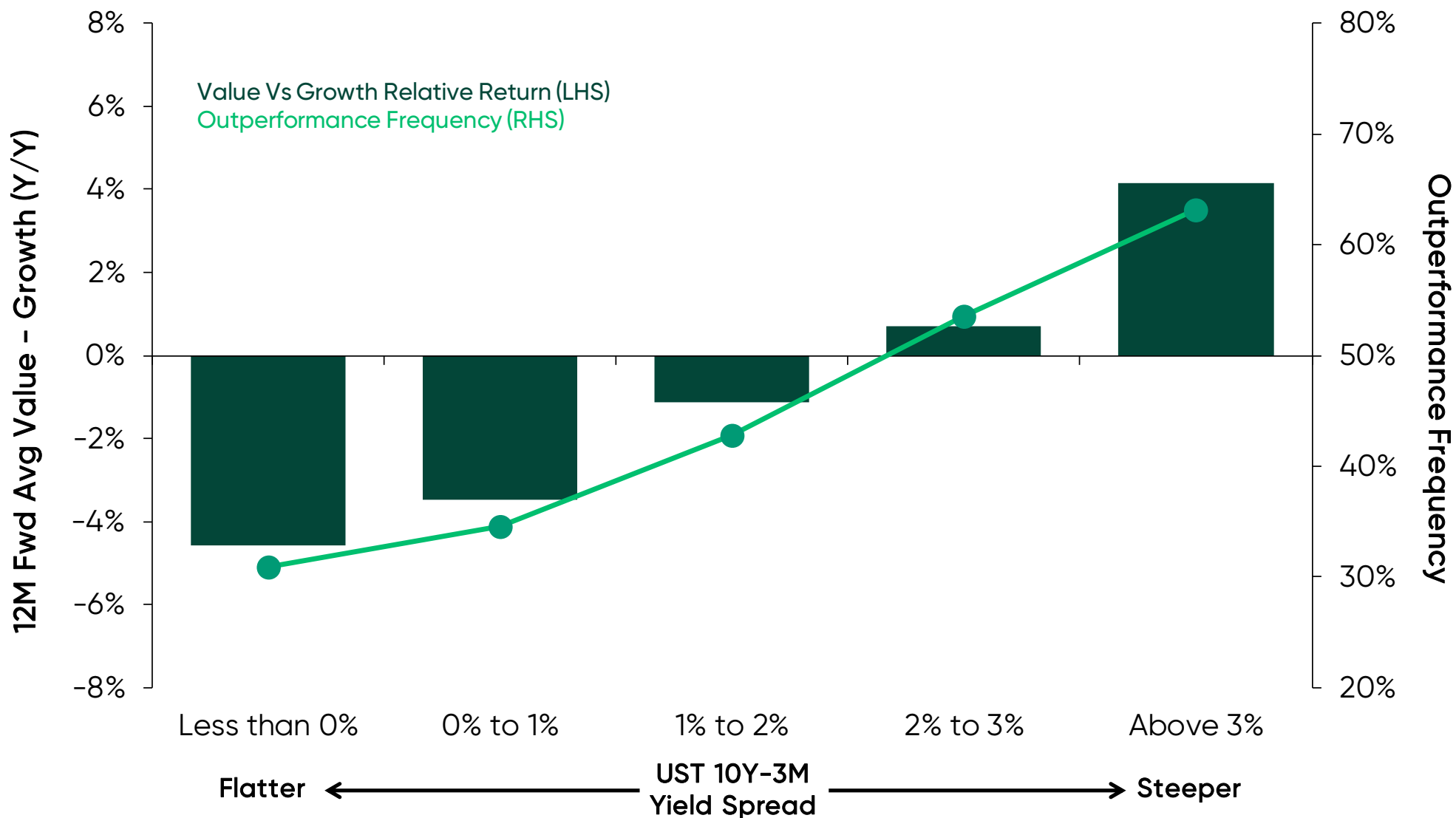
Relative Performance of Large Growth over Small Value



Source: FactSet. Shows daily relative performance of the S&P 500 Growth index against the Russell 2000 Value index, 1/31/1979 – 02/28/2022. Indexed to 1 on 1/31/1979.

GROWTH OUTPERFORMS DURING TIGHTER YIELD SPREADS

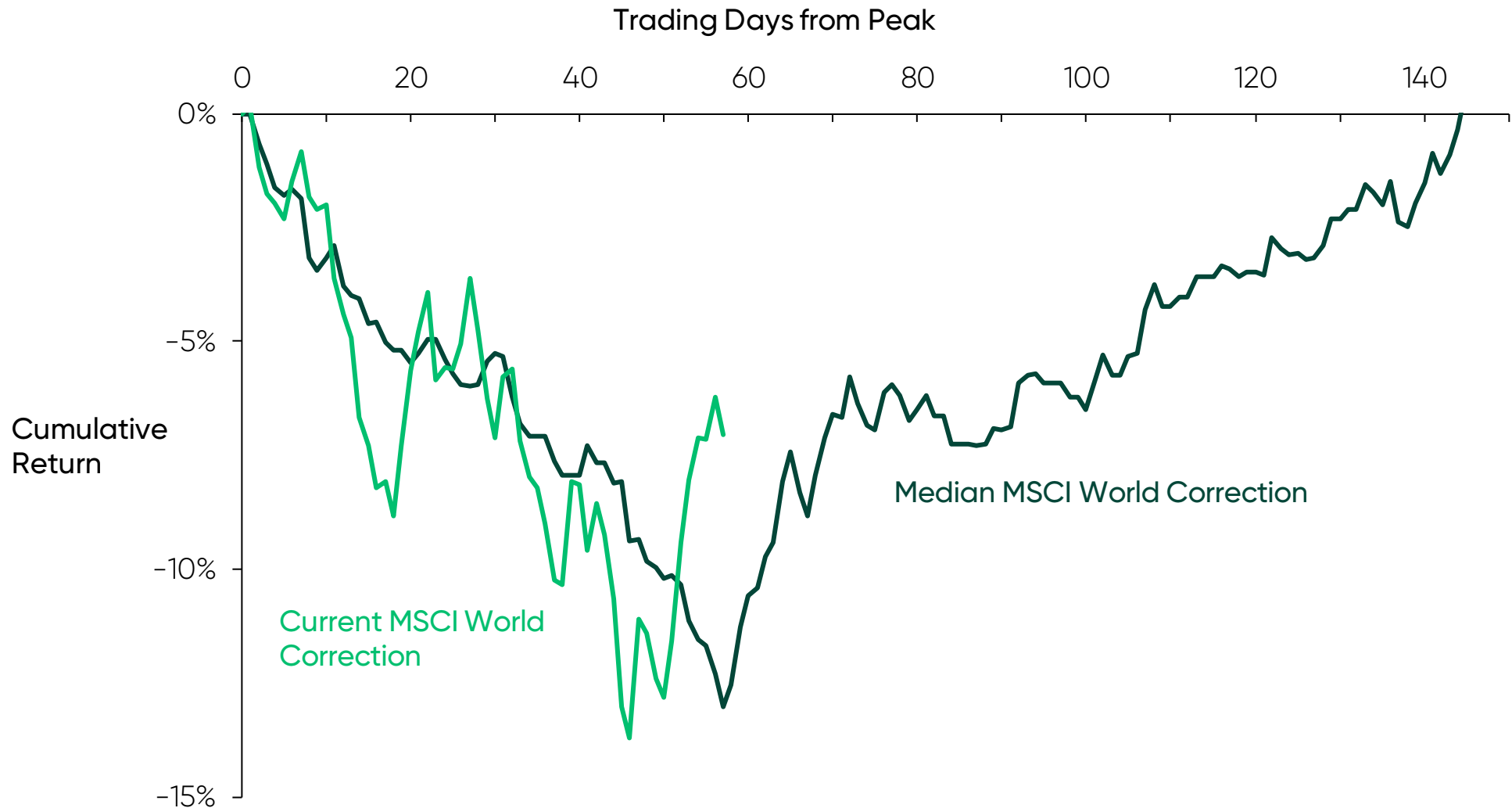
Value equities typically benefit from a steeper yield spread, as banks play an important role in facilitating early-cycle investment. Growth equities usually outperform when the yield spread narrows as they are less dependent on bank lending as a source of capital. Our emphasis on Growth positions us well for a Fed tightening cycle.



Source: FactSet. Shows the frequency and average relative performance for Russell 3000 Value versus the Russell 3000 Growth during different levels of yield spread from 1/1/1979 – 2/28/2022. Yield spread defined as the difference between the 10-Year and 3-Month US Treasuries.

CURRENT DOWNTURN VERSUS HISTORICAL MEDIAN CORRECTION

The MSCI World fell ~13% between January 3rd and March 14th as a variety of concerns drove investor fears that we are on the precipice of a new bear market. However, the current downturn is behaving more like a typical correction based on market performance. While we continue to evaluate new developments closely, we expect the current downturn to remain a correction and for the bull market to continue, particularly as uncertainty falls in the second half of the year.



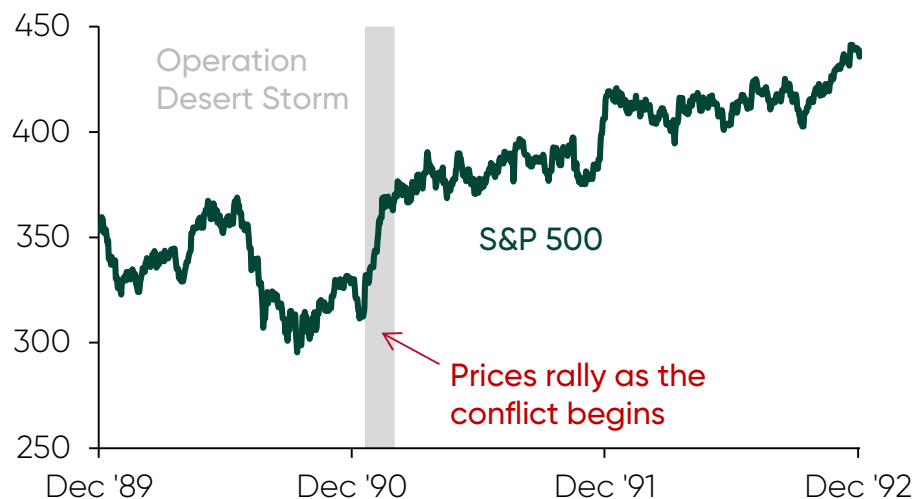
Source: FactSet and Fisher Investments Research, as of 3/24/2022. Shows MSCI World cumulative returns from 1/3/2022 – 3/23/2022 compared to the historical median correction for the index.

IMPACTS OF GEOPOLITICS, INTEREST RATES AND INFLATION ON STYLES

- **Geopolitics:** The Russia/Ukraine conflict is a terrible human tragedy. However, as long as the conflict remains contained, the situation is unlikely to cause a global recession as regional conflicts historically have not resulted in extended market downturns. The economies of Russia and Ukraine combined account for only about 2% of global GDP. Broader Europe may slow as well tied to higher oil, gas, and other resource prices, but Europe's economic linkages with Russia and Ukraine are limited otherwise. The conflict likely presents a slight headwind to global economic growth, further supporting our preference for Growth over Value.
- **Interest Rates:** The 2020 downturn behaved more like an outsized correction than a traditional bear so the market cycle did not reset. We expect the US Yield curve to flatten this year, as global central banks raise short term interest rates and demand for US Treasuries remains robust, keeping long term rates modest. Value equities typically benefit from a wider yield spread, while Growth tends to outperform when the yield spread narrows. A flatter yield curve discourages bank lending, which Value equities rely on for access to capital. Our emphasis on Growth equities positions us well for a Fed tightening cycle.
- **Inflation:** Although we see inflation moderating in 2022, higher energy prices caused by the Russia/Ukraine conflict likely keeps headline inflation elevated for longer. High-quality, growth-oriented companies with big, durable margins and the scale to navigate complex logistics and spread higher costs over more products are uniquely positioned to navigate this environment.
- **Technology:** Many fear that rising interest rates present a headwind to growth-oriented sectors such as Technology. However, historically Tech has performed well as rates rise. Technology equities benefit from strong secular growth trends, independent of the business cycle, which stand out in an environment with moderate economic growth.

EQUITY IMPACT OF REGIONAL CONFLICTS

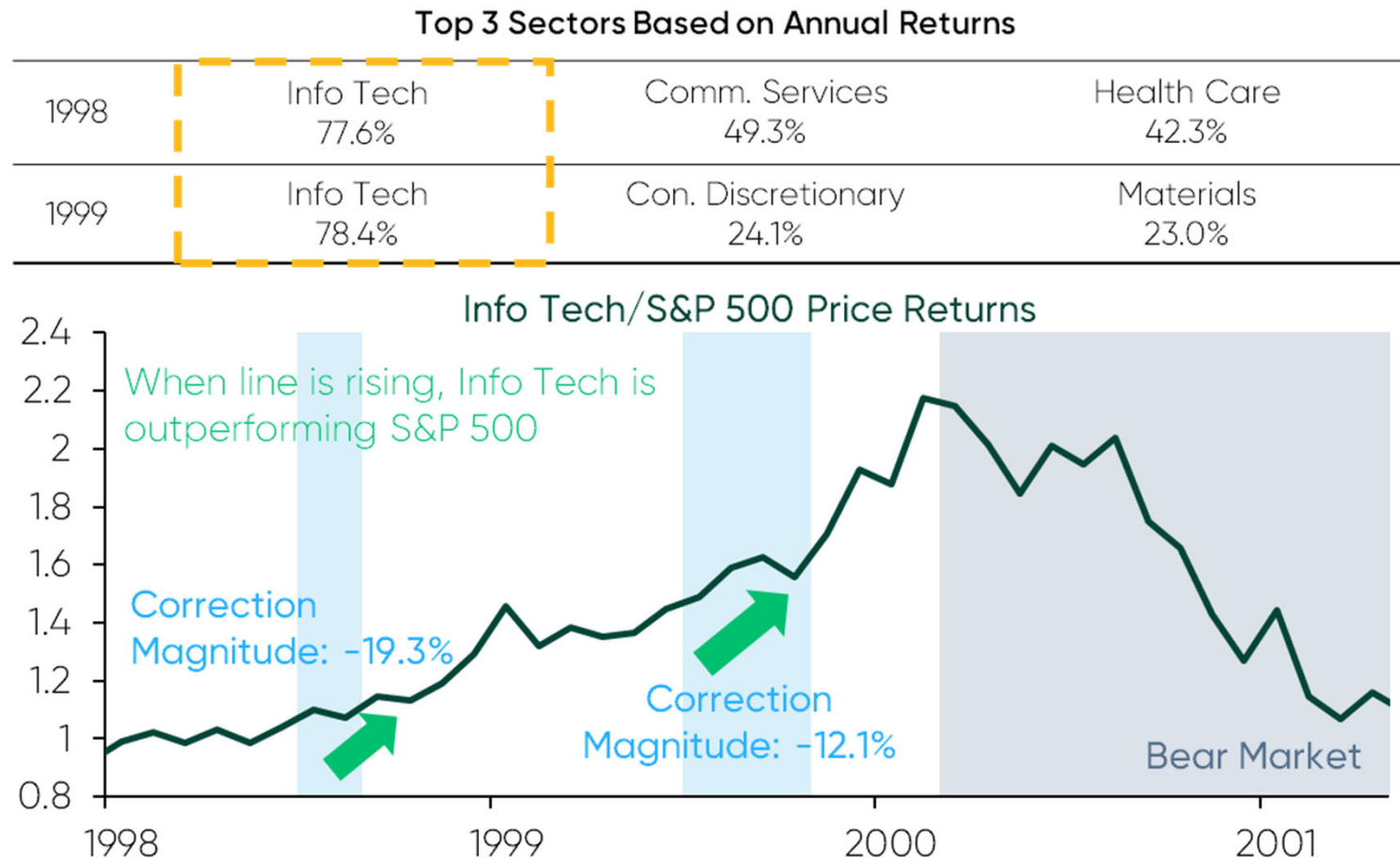
The Ukrainian economy is being devastated by the invasion, and Russia is likely to slow significantly due to sanctions. However, while regional conflicts are a constant risk, we don't believe this one is likely to be impactful enough to cause a global bear market given the countries small share of the global economy. Headlines and alarmist sentiment may sway equities in the short-term but style trends tend to reassert themselves over time.



Source: FactSet, as of 12/31/2006. S&P 500 price level during major events, daily, USD, 12/30/1966 – 12/31/2006.

CONTINUED SECTOR/STYLE LEADERSHIP AFTER CORRECTION

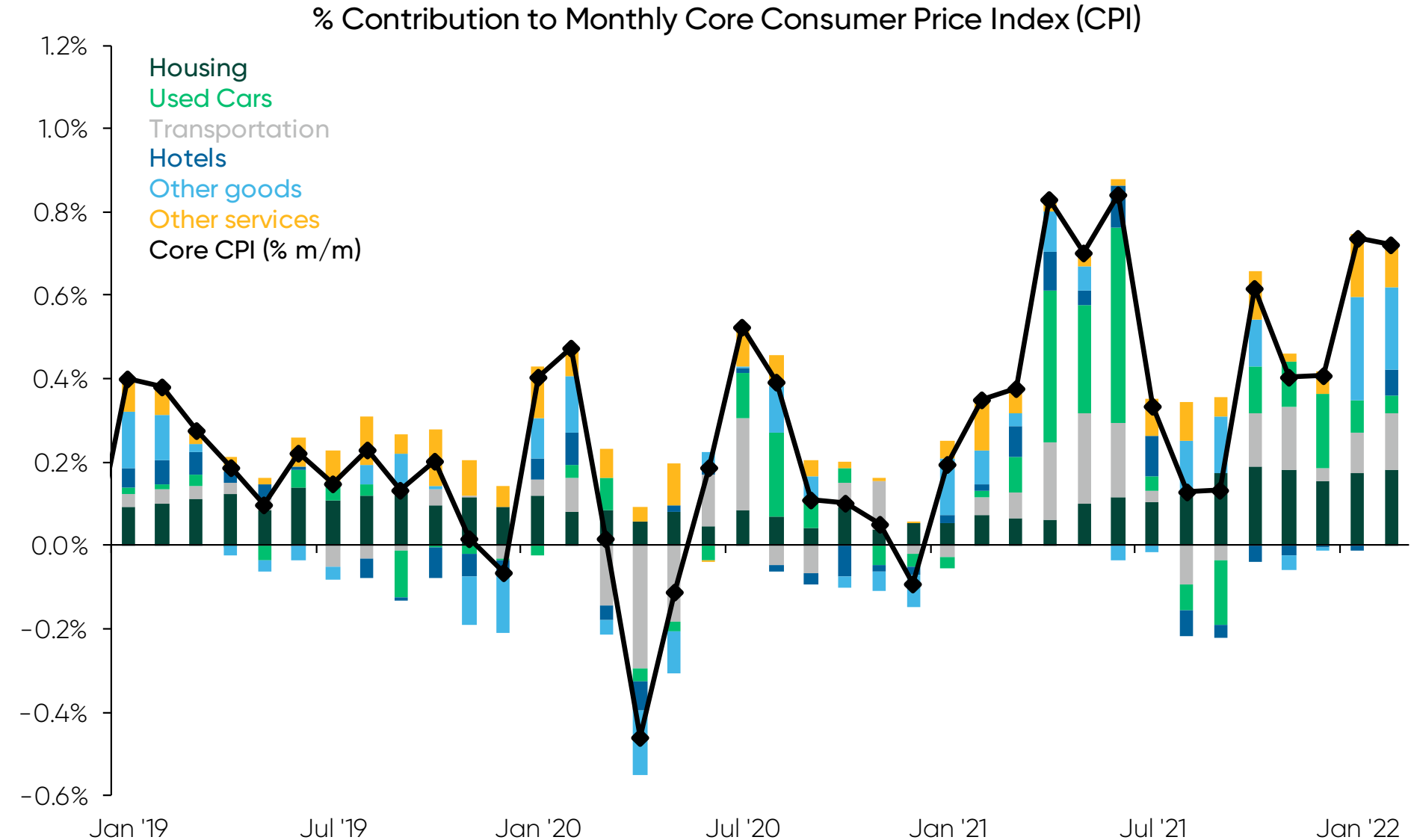
When Russia invaded Ukraine in late February markets entered into a steep correction, with negative sentiment weighing heavily on Growth equities in particular. However, history demonstrates there are periods where a sharp correction was followed by a continuation of market leadership without a big style shift. For example, in 1998 the Russian Ruble crisis led to the Long-Term Capital Management Crisis. Markets sharply corrected, but Information Technology, a Growth heavy sector, continued to lead after the correction for the remainder of the cycle.



Source: FactSet and Global Financial Data, USD, monthly price returns of S&P 500 and respective S&P 500 sectors index from October 1997 to April 2001. Bottom chart shows cumulative price returns indexed to 1 on November 1997.

BOTTLENECKS APPARENT IN INFLATION DATA

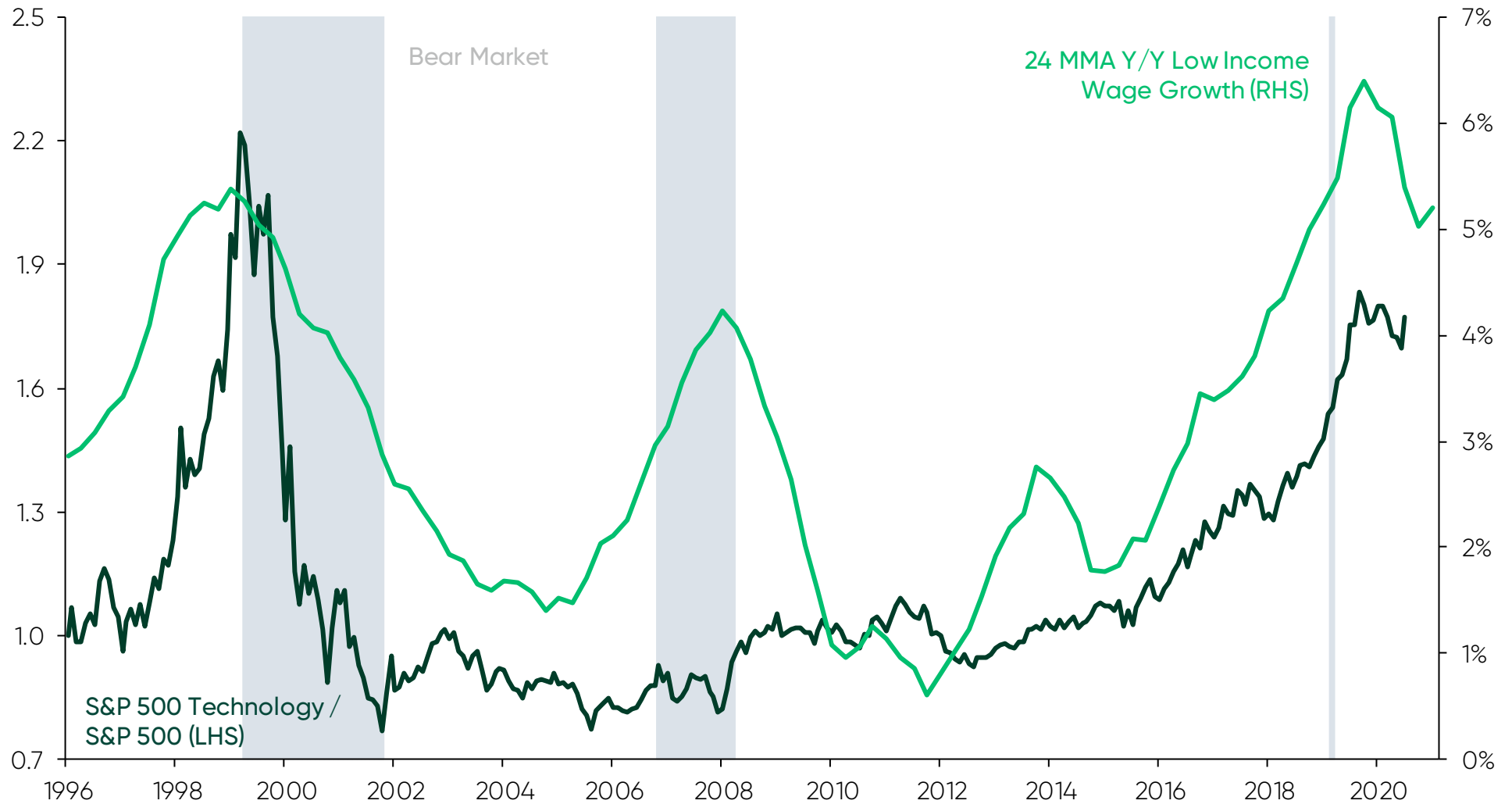
The pandemic prompted a historic shift in consumer behavior from services towards goods, and supply chains are still adjusting to this shift—while dealing with COVID-19 and now geopolitical disruptions as well. Over time, we believe the recent spike in goods demand likely shifts back towards services while businesses operating in market-driven economies adapt to help supply adequately meet demand—moderating current price pressures in our view.



Source: FactSet & U.S Bureau of Labor Statistics. US Core Consumer Prices Index (CPI), month-over-month change, monthly, 01/01/2019 – 02/28/2021. Breakdown is based on custom grouping/components of core CPI. February 2022 weights are based on January 2022 weights, the latest available data.

RISING WAGES BENEFIT THE TECHNOLOGY SECTOR

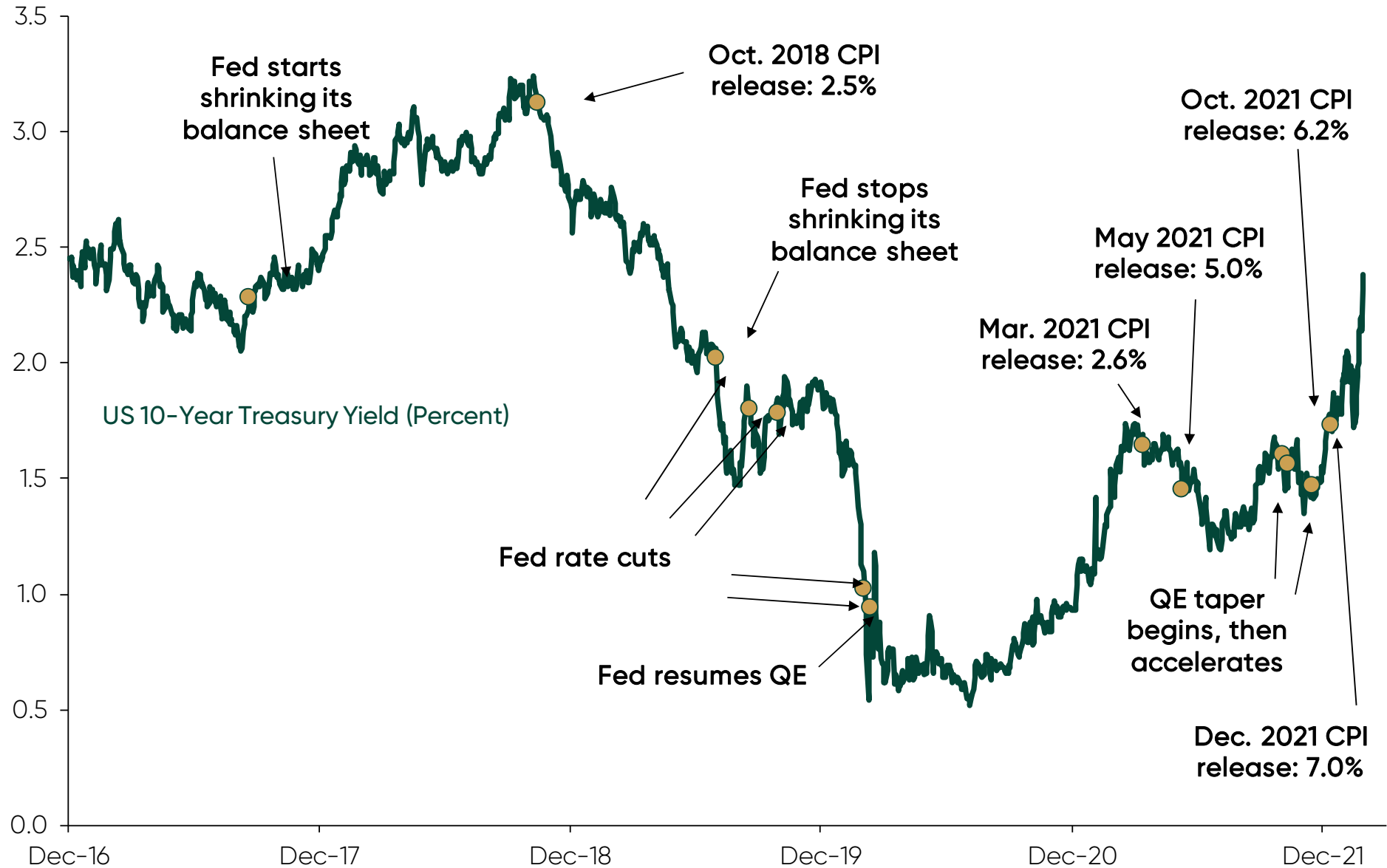
Inflation is not inherently bearish for growth-oriented sectors such as Technology. As employment costs increase, companies tend to increase spending on labor-saving and productivity enhancing technologies, benefitting Technology's relative performance, making the sector less vulnerable to negative effects of rising inflation.



Source FactSet and US Department of Labor. Indexed to 1 at 12/31/1996. Based on monthly data, USD, 12/31/1996 – 12/31/2021.

10-YEAR TREASURY YIELDS ARE MODERATE

We anticipate rising short term interest rates and moderate long term yields, creating a flatter yield curve, consistent with a late-cycle environment. Despite the sharp increase in early 2022, 10-Year US Treasury yields remain moderate compared to recent history. Strong demand for US Treasuries as a safe haven asset likely keeps long term interest rates modest.



Source: FactSet, as of 1/12/2022. US 10-Year Treasury Yield, 12/30/2016 – 2/28/2022.

IMPACTS OF INFLATION AND TIGHTER US MONETARY POLICY

Following the start of Federal Reserve rate hike cycles, long rates and equities tend to moderately rise. Growth consistently leads Value in times of tight access to credit, as value-oriented firms tend to be more reliant on credit markets and bank lending.

Impact of Tighter US Monetary Policy on Long Rates & Equity Prices

Hike Date	12M Post-Hike Change				24M Post-Hike Change			
	10Y UST Yield	MSCI EM	S&P 500	CPI, m/m	10Y UST Yield	MSCI EM	S&P 500	CPI, m/m
07/16/1971	-8%	--	8%	-1%	6%	--	7%	-25%
08/16/1977	14%	--	7%	12%	20%	--	11%	47%
10/21/1980	31%	--	-9%	-63%	-9%	--	5%	-54%
03/27/1984	-5%	--	14%	18%	-40%	--	52%	-84%
12/16/1986	26%	--	-1%	-19%	29%	--	10%	-3%
03/29/1988	9%	26%	12%	24%	0%	65%	31%	21%
02/04/1994	26%	-20%	2%	-1%	-5%	-11%	35%	-1%
06/30/1999	4%	8%	6%	16%	-7%	-22%	-11%	-20%
06/30/2004	-15%	31%	4%	-32%	11%	73%	11%	-12%
12/16/2015	13%	8%	9%	36%	2%	42%	29%	25%
Average	10%	20%	5%	-1%	1%	57%	18%	-11%
Median	11%	20%	7%	6%	1%	57%	11%	-8%
Frequency (+)	70%	100%	80%	50%	60%	100%	90%	30%

Source: FactSet as of 03/23/2022. 10 Year US Benchmark Bond Yield, S&P 500 Index Price, CPI-U All Items M/M Growth %, all daily data from 12/31/1969 – 02/09/2022; MSCI Emerging Markets Index Price daily data from 12/31/1987 – 02/09/2022.

DISCLOSURES

FIRM

Fisher Investments Europe Limited (FIE) is authorised and regulated by the Financial Conduct Authority. It is registered in England, Company Number 3850593. Fisher Investments (FI) is an investment adviser registered with the United States Securities and Exchange Commission. FIE is wholly-owned by Fisher Asset Management, LLC, trading as Fisher Investments, which is wholly-owned by Fisher Investments, Inc. This document has been approved and is being communicated by Fisher Investments Europe Limited. This document may be considered advertising within the meaning of article 68(1) of the Swiss Financial Services Act dated June 15, 2018 (status as of January 1, 2020).

Fisher Investments (FI) is an investment adviser registered with the Securities and Exchange Commission. As of 31 December 2021, FI managed \$208 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 31 December 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.

Investing in securities involves a risk of loss. Past performance is never a guarantee of future returns. Investing in foreign stock markets involves additional risks, such as the risk of currency fluctuations. Nothing herein is intended to be a recommendation or a forecast of market conditions. Rather it is intended to illustrate a point. Current and future markets may differ significantly from those illustrated herein. Not all past forecasts were, nor future forecasts may be, as accurate as those predicted herein.

This content constitutes the general views of Fisher Investments and should not be regarded as personal investment advice. No assurances are made we will continue to hold these views, which may change at any time based on new information, analysis or reconsideration. In addition, no assurances are made regarding the accuracy of any forecast made herein.

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 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 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 [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.

TERMS OF BUSINESS

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

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.

TERMS OF BUSINESS

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

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™