

CANTOR FITZGERALD IRELAND LTD

CONFLICTS OF INTEREST POLICY SUMMARY

Effective Date 3 January 2018

1. Introduction

This document contains a summary of Cantor Fitzgerald Ireland Ltd's ("Cantor") Conflicts of Interest Policy.

Cantor is committed to identifying, with reference to the specific investment services and activities and ancillary services carried out by or on behalf of Cantor, the circumstances which constitute or may give rise to a conflict of interest entailing a risk of damage to the interests of its clients. Equally, in response, Cantor will take all reasonable steps designed to prevent or manage such conflicts from adversely affecting the interests of its clients.

Cantor will identify and record all conflicts of interest, wherever possible, that arise in the course of providing its investment services and activities and ancillary services, examples of which may include between:

- Cantor and the interests of one or more clients;
- Cantor Employees and the interests of one or more clients;
- The Group to which Cantor belongs and one or more clients; or
- Two or more Cantor clients.

Cantor has an obligation to establish, implement and maintain an effective conflicts of interest policy.

The purpose of this document is to provide a summary of Cantor's Conflicts of Interest Policy. In many cases, Cantor will operate additional procedures that will be described in other policy documents and in business line operating procedures documents, in order to implement the Conflicts of Interest Policy at a detailed level.

2. Identification of Conflicts of Interest

Procedures for identifying conflicts operate at two key levels:

- (1) It is the responsibility of all Employees in all business lines of Cantor to be aware of the potential for conflicts of interest to arise within Cantor's operations. They receive training to create awareness of conflicts and of Cantor's responsibilities, as its clients' agent, to manage conflicts appropriately. Where they believe they may have identified a conflict, Employees

are required to report details to Cantor's Compliance department.

Employees involved in the oversight of activities carried out on behalf of Cantor's clients by a third party such as a delegate or counterparty are required to report identified conflicts in the same way.

- (2) The governance arrangements of Cantor have been established to provide oversight of Cantor's duties with regard to conflicts of interest. Conflicts of interest management practices are reviewed by Cantor's Board of Directors via a written report from Cantor's Compliance department.

WARNING: Where Cantor does not consider that arrangements that it has in place are sufficient to ensure with reasonable confidence that a potential or actual conflict of interest will not damage your interests, we will inform you of the nature of the conflict, the risks that arise due to this conflict and the steps undertaken by Cantor to mitigate these risks, in sufficient detail to enable you to take an informed decision with respect to how you wish to proceed.

3. Analysis and Prevention or Management of Conflicts of Interest

Where Cantor identifies a potential or actual conflict of interest arising in the provision of its investment services and activities and ancillary services, Cantor analyses and records the following information on its conflicts of interest register:

- Details and type of conflict;
- How the conflict could lead to a risk of damage to the interests of their clients; and
- What organisational and effective arrangements have been put in place to prevent the conflict of interest from adversely affecting the interests of their clients; or
- If required as a matter of last resort, confirmation that disclosure has been clearly made to the relevant clients, detailing the general nature and/or sources of conflicts of interest and the

steps taken to mitigate those risks before undertaking business on behalf of those clients.

Cantor has considered the circumstances which constitute or may give rise to a conflict of interest entailing a risk of damage to the interests of its clients. In response, Cantor has adopted procedures and measures in order to prevent or manage such conflicts from adversely affecting the interests of its clients, examples include, but are not limited to:

- Implementing policies and procedures that either limit practices that result in conflicts or prescribe operating practices that provide proper handling of clients' interests;
- Assessing the potential for conflicts when creating or changing reporting lines and job descriptions including whether they could compromise controls achieved through segregation of duties or through our three lines of defence risk management model;
- Assessing the potential for conflicts when new clients, new products, new systems or procedures are being introduced, or where there are reorganisations of business lines – e.g., assessing the potential for conflicts that may arise as part of Cantor's product distribution approval process, including analysing for any potential conflicts of interest each time a product is proposed for distribution, which is formally reviewed as part of Cantor's Product Governance process;
- Recognising that in instances where we service our clients using services provided by other parts of the Cantor global group that we need to be satisfied that conflicts of interests are appropriately managed in such instances;
- Implementing policies and procedures to prevent or control the simultaneous or sequential involvement of a relevant person in separate services or activities;
- Implementing remuneration policies to prevent or manage conflicts arising from Cantor's remuneration and other incentive structures;
- Implementing appropriate segregation of duties, reporting lines and governance structures to prevent or limit any person from exercising inappropriate influence;

- Implementing policies and procedures to prevent or manage conflicts arising from Cantor's research content and related distribution processes; and
- Implementing effective procedures to prevent or control the inappropriate exchange of information, which could include a physical barrier, document classification, security and computer protections and/or confidentiality agreements.

4. Inducements

For the avoidance of doubt, where Cantor provides portfolio management services or investment advice, solely on an independent basis, it will not accept and retain from any third party, or person acting on behalf of a third party (other than the client or a person on behalf of the client) any fees, commissions, or any monetary or non-monetary benefit in connection with the provision of those services.

When providing investment services and activities and ancillary services on a non independent basis, Cantor must not pay to, or accept from any third party, or person acting on behalf of a third party (other than the client or a person on behalf of the client) any fees, commissions, or any monetary or non-monetary benefits in connection with the provision of its investment services and activities and ancillary services to its clients, other than when the payment or benefit, except when:

- It is designed to enhance the quality of the relevant service to the client and does not impair compliance with Cantor's duty to act honestly, fairly and professionally in the best interests of its clients;
- It is an acceptable minor non-monetary benefit; or
- It is third party research received and treated by Cantor in accordance with relevant regulatory requirements.

5. Disclosure

Cantor will take all reasonable steps to prevent conflicts from adversely affecting the interests of clients and will only revert to disclosure as a measure of last resort.

Where organisational or administrative arrangements made by Cantor to prevent

conflicts of interest from adversely affecting the interests of its clients are not sufficient to ensure, with reasonable confidence, that the risk of damage to its clients' interests will be prevented, Cantor clearly discloses to the relevant client the general nature and/or sources of conflicts of interest, as well as the risks to the client that may arise as a result of

the conflicts of interest and the steps taken to mitigate the risks before undertaking business on their behalf.

Such disclosure is made in a durable form, is fair, clear and not misleading.
