

Receipt of market soundings and inside information

Introduction

Close Brothers Asset Management (“CBAM”) may receive market soundings from legitimate sources. A market sounding is defined as a communication of information prior to the announcement of a transaction, in order to gauge the interest of potential investors in a possible transaction, and the conditions relating to it such as its potential size or pricing to one or more potential investors.

Inside information may only be conveyed to CBAM where such notification is carried out during the normal course of the exercise of employment, profession or duties in compliance with the Market Abuse Regulation (“MAR”).

Contact Points

The below individuals are the designated persons for the reception of market soundings within CBAM. All other individuals have been advised that they are not permitted to receive market soundings. Before making any disclosure you must obtain consent from the person within CBAM receiving the market sounding to receive inside information, and inform them of the prohibitions this will enforce upon them.

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Contact

Where contact is made via telephone, we expect that such calls are recorded by the Disclosing Market Participant (“DMP”) in compliance with the requirements of MAR. Such calls may only be conducted during CBAM’s normal office hours 9am – 5pm and CBAM reserves the right to record them.

Where contact is made via email, the communication should be appropriately subject headed and in accordance with the requirements of MAR.

Agreement

Subject to CBAM having agreed to be made an insider, we expect the DMP to contact CBAM once any inside information conveyed to us ceases to be inside information.

Further Information

For further information on CBAM’s approach to market soundings and inside information, please contact the Compliance Department at Compliance@closebrothers.com.