

Conflicts of Interest Policy

Fisher Funds Management Limited | April 2021

Conflicts of Interest Policy

1. Introduction

Fisher Funds Management Limited (Fisher Funds) is committed to acting honestly, fairly and in the best interests of our clients when providing products, services and advice.

2. Purpose

The purpose of the Policy is to ensure employees understand their responsibility to identify, avoid and/or manage conflicts of interests.

3. Application

The Policy applies to all Fisher Funds' employees.

Employees include permanent, temporary and fixed-term employees as well as contractors.

4. Conflict

A Conflict is any situation where the separate interests of Fisher Funds; employees; clients; or external parties differ and serving one party's interest may conflict with the interests of others.

5. Conflicts awareness

The identification, avoidance and/or management of conflicts of interest is an ongoing process. Fisher Funds has a conflict-aware environment, central to which are the following elements:

- fostering a culture of compliance which encourages open reporting issues, incidents and conflicts;
- a set of Conduct Principles which puts good clients outcomes at the forefront of everything Fisher Funds do;
- Gifts and Entertainment Policy – employees are required to comply with the Policy, which is designed to ensure that they are not inappropriately influenced by the receipt or giving of gifts or entertainment;
- Personal Share Trading – employees are subject to limitations regarding their personal investing which, amongst other things, requires prior approval of personal investment decisions. Employees must also comply with insider trading laws and regulations;
- Client and employee personal information – employees are made aware of their obligations to protect client and employee personal information through the Privacy Policy; and
- Segregation of duties – duties that may give rise to conflicts of interest if performed by the same person are segregated and performed by other employees.

6. Identification

Employees are responsible for identifying and escalating conflicts. Employees receive induction and annual re-training to enable them to identify, avoid and/or manage conflicts.

7. Escalation

Actual or potential conflicts of interest should be referred by a employees to their manager. Conflicts can be escalated to the Risk and Compliance Team for advice and guidance, which may include assisting the relevant employee or business group prepare a conflicts management plan.

Material conflicts of interest are referred to the Chief Executive Officer.

8. Review

Each business group is required to periodically review and / or update their identified conflicts and maintain effective controls to mitigate them.

9. Register

Conflicts are recorded in the Conflicts Register.

10. Non-compliance

Risk and Compliance monitors compliance with the Policy.

Non-compliance with the Policy may result in disciplinary action which could include performance review, employment suspension or termination.

11. Review of policy

The Policy will be reviewed bi-ennially or more frequently if required. The Policy is subject to change at any time.