

Market Abuse Policy

Policy

General Policy

The Firm's Market Abuse Policy establishes arrangements, systems and procedures appropriate and proportionate to the scale, size and nature of the business that seek to prevent, detect and report abusive practices or suspicious orders or transactions.

The EU's Market Abuse Regulation¹ (as onshored into UK law by virtue of the European Union (Withdrawal) Act 2018 and as set out in The Market Abuse (Amendment) (EU Exit) Regulations 2019) and the FCA's Market Conduct sourcebook set out the types of behaviour which can amount to market abuse when trading in financial instruments on UK trading venues (including UK recognised investment exchanges (RIEs), multilateral trading facilities ("MTFs"), organised trading facilities (OTFs) and systematic internalisers (SIs). Related criminal offences are set out in the Criminal Justice Act 1993 and the Company Securities (Insider Dealing) (Bailiwick of Guernsey) Law, 1996 ("CSIDL"). In addition to criminal and civil sanctions, association with market abuse has the potential to have a serious and adverse effect on the reputation of the Firm and its staff, including the possibility of financial penalties, court orders, suspension and prohibition from conducting regulated activities.

Nearly all international jurisdictions have their own insider dealing and/or market abuse regimes, which may also need to be considered in any potential scenario analysis where trades are carried out on other regulated markets. The standards described in this policy (in addition to local securities laws) should be observed by all Longview staff, wherever they are in the world, whenever they trade in financial instruments that are listed on public markets or in their related derivative instruments.

Longview's London Head of Compliance and MLRO has been assigned the FCA Prescribed Responsibility for the Firm's policies and procedures for countering the risk that the Firm might be used to further financial crime. However, the Executive Committee has overall responsibility for the firm policies and procedures for countering the risk of misconduct in, or misuse of, information relating to a financial market.

Inside Information

UK and US securities laws and equivalent international laws prohibit persons having Inside Information (as per the FCA) or material non-public information (as per the SEC) ("Inside Information") related to a security from transacting in that security or "tipping off" others about Inside Information. Violation of these laws can result in severe consequences, including summary dismissal and/or fines and/or civil and/or criminal proceedings.

Information must be material for its use to potentially trigger insider trading concerns. Information is "material" if there is a substantial likelihood that a reasonable investor would consider the information important in deciding whether to purchase, hold or sell a security or other financial instrument. Overall, information should be considered material if its disclosure would affect the market price of a security, whether positively or negatively.

¹ <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32014R0596>

Information is considered to be “non-public” if it has not been made available to the general public.

Longview follows FCA, SEC and GFSC guidance in implementing and enforcing written policies and procedures reasonably designed to prevent the misuse of Inside Information. We acknowledge there are certain differences in the definition of Inside Information that need to be considered on a case-by-case basis when considering the application of local rules. For the purposes of this policy we have included the term below as prescribed in the FCA MAR Handbook, as the FCA is the home state regulator for Longview LLP in London, which is the entity that undertakes investment management for Longview clients:

Information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments, or if disclosed, would likely influence a reasonable investor's decision to purchase or sell an issuer's securities.

“Precise” means information that indicates circumstances that exist or may reasonably be expected to come into existence or an event that has occurred or may reasonably be expected to occur and is specific enough to enable a conclusion to be drawn as to the possible effect of those circumstances or that event on the price of the instrument.

Typical examples of Inside Information would include the following events and circumstances where these have not been publicly disclosed:

- Earnings information;
- Tender Offers;
- Refinancings;
- Trades by an Issuer in its own securities, including share buy-backs;
- Private secondary offerings of securities, including plans to offer securities, cancellations of planned offerings and changes in the timing or terms of the offerings;
- Liquidity issues;
- Mergers and acquisitions;
- Joint ventures;
- New products or developments regarding customers and suppliers;
- Major changes in control or management;
- Change in auditors;
- Default or call on securities;
- Bankruptcy.

This list is not exhaustive, and there are other types of information, events or circumstances which may constitute Inside Information.

If you have any uncertainty as to whether information is Inside Information, you must contact Compliance.

Sources of Inside Information

The following are examples of some identified scenarios where Longview staff may be at a heightened risk of receiving inside information:

- **Contact with investment bank and broker analysts**

Day to day conversations with investment analysts at such firms, which may include potential inside information known by such individuals or market sensitive information about forthcoming research publications / significant customer orders that could amount to inside information.

- **Contacts with public companies and expert networks**

Contact with companies and expert networks represent a part of Longview's investment research activity. Longview may make investment decisions based on conclusions formed through such contacts, together with analysis of publicly available information regarding companies in the U.K. and overseas. Issues may arise, however, when, during these contacts, a member of staff becomes aware of information that may constitute inside information.

- **Shared Office Building**

Whilst the Firm's office space and infrastructure are utilised solely by Longview, the wider office building is occupied by other investment firms which also have use of some shared utilities e.g. lifts etc. As such, there is some risk surrounding the flow of potentially market sensitive information from Longview staff to those persons employed by the other investment firms and vice versa. This risk can also exist in a situation which involves extended periods of working remotely in a shared home with individuals who may receive or discuss potentially market sensitive information. This risk has been addressed through staff training, which provides guidance to Longview staff on the proper conduct with respect to conversations had in any shared spaces, the handling of confidential information and what course of action to take should they inadvertently be in receipt of market sensitive information.

- **Other Relationships**

Staff members may have personal relationships with insiders or Longview may have investors who are insiders and in the course of these relationships, staff may become aware of information that constitutes inside information.

In all such situations, the staff member must contact Compliance immediately. Compliance will assess whether the information is inside information and, if so, the general procedure must be followed.

Insider Dealing

Longview prohibits its staff (employees, members and Directors) from trading, either, for a client, personally or on behalf of others, on the basis of Inside Information. This conduct is frequently referred to as "insider dealing".

Any staff that have inside information at **any time** must be aware that unless an exemption applies (as set out below), should they deal, encourage others to deal, or disclose such information, they may be:

- committing a serious contravention of CSIDL or FCA rules, which could result in a large fine and in the UK prohibition from performing Senior Management and Certification Functions;
- committing a criminal offence punishable by a large fine and up to seven years imprisonment; and
- dismissed without notice or compensation, if, before the inside information becomes public, they do any of the following:

- try to profit from the inside information by buying, selling or underwriting any financial instrument²;
- instruct, encourage or advise any broker, colleague, friend or family member or other person to buy, sell or underwrite any financial instrument; or disclose the inside information.

In addition, the SEC or other applicable regulator may impose fines as well as pursue administrative or other enforcement actions. Insider trading is considered a form of securities fraud under United States law, and the fines and prison sentences imposed upon conviction may be severe. In other international jurisdictions similarly severe penalties may also apply.

Any Staff member who knows that another member of Staff has improperly engaged in or intends to engage in a transactions based on Inside Information should immediately notify the Head of Compliance.

Exemption – Legitimate Behaviour

For Longview, an exemption applies to those situations where a client has appropriately advised Longview that they wish to provide additional funds, to withdraw funds, or terminate their account. Additional funds and withdrawals will be undertaken in proportion to their portfolio in accordance with Longview's execution procedures (i.e. pro rata across all existing holdings). This potential exception exists because the transaction was not undertaken on the basis of that inside information and the decision to trade is based solely upon a client instruction (which would be implemented indiscriminately, irrespective of whether the outcome of the inside information presented a positive or negative outlook for the portfolio security concerned). Longview maintains records of all client contribution and withdrawal instructions.

Procedure

Investigation and Reporting of Suspicious Transactions and Orders and Market Observations

Identification of potentially suspicious actions

Given Longview's strategy is a low turnover strategy, the Firm maintains proportionate and appropriate processes to identify potentially suspicious transactions.

Further investigation of suspicious transactions or orders and decision to report

Transactions and orders that have been flagged are subject to further analysis by Compliance. This will typically include gathering as much relevant information about the trade, including the reasons for the order and any relevant circumstances either in the investment research process, or in news subsequently announced about that issuer and/or financial instrument.

Content of reports and method of reporting

Firms (and individuals) who are persons professionally arranging or executing transactions must detect and report suspicious transactions and orders to the FCA without delay via Suspicious Transaction and Order Reports ("STORs"). This applies to firms if they are registered or have their head office in the UK. A suspicious transaction or order is

² There are four main categories of financial instruments that are covered by MAR: (1) financial instruments admitted to trading on a regulated market or for which a request for admission to trading on a regulated market has been made; (2) financial instruments traded on an MTF, admitted to trading on an MTF or for which a request for admission to trading on an MTF has been made; (3) financial instruments traded on an OTF, or; (4) financial instruments not covered above, however the price or value of which depends on, or has an effect on, the price or value of a financial instrument referred to in those points, including, but not limited to, credit default swaps and contracts for difference.

one where there are 'reasonable grounds' to suspect it might be market abuse, such as insider dealing or market manipulation.

If Longview has observed suspicious activity in the market that isn't required to be notified to the FCA as a STOR, then this should be submitted as a Market Observation. For example, if Longview or a broker or trading venue is not involved in the activity and therefore we do not have a complete set of information.

STORs and Market Observations must be submitted to the FCA via Connect as soon as possible and where applicable, prior to the completion of internal investigations, noting that the following information is required:

- The person submitting (and their capacity in relation to the suspicious trade or order);
- A description of the order or transaction;
- Reasons for suspecting market abuse;
- Identification of any person(s) involved in the suspicious trade (both in the decision to trade and its execution); and
- Any other relevant information or supporting documents.

Responding to investigations by regulatory authorities and other 3rd parties

Compliance shall be responsible for all contacts with investigating agencies (e.g. the FCA, SEC) regarding suspicious transactions and orders, or market observations, or any other regulatory communications. Any staff receiving a call or other contact from a regulator or other such a third party should politely but firmly refer all such enquiries directly to Compliance. In the event of an investigation, staff may be required to be interviewed by investigators about the circumstances of a particular transaction or order. Any response to a regulator must be handled through the Compliance team.

Record-keeping of STORs and Market Observations

Appropriate records of STORs must be maintained by Compliance for a minimum of five years. As well as STORs and Market Observations submitted, Compliance must also record all near-misses, including all relevant facts and circumstances revealed during the internal investigation and an explanation why the potentially suspicious event was not reported.

Inside Information The following procedures have been established to aid Longview and its staff in the prevention and avoidance of insider trading. If a member of staff has any questions about these procedures, they must consult with Compliance.

Procedure on receipt of Inside Information

It is Longview's policy that no staff may engage in any purchase or sale of an issuer's securities whilst they are, and therefore Longview is, in possession of inside information about such issuer. Staff should not agree to become an insider or be given potentially inside information without prior approval from the CIO or the Managing Director in Guernsey (as applicable) and prompt notification to Compliance.

If a member of staff acquires inside information or thinks they may have been passed inside information (whether accidentally or otherwise), they must notify Compliance immediately by completing an Inside Information Form. Staff coming into possession of potential inside information must not communicate this information to anyone, whether internal or external to Longview, with the exception of Compliance.

If the information is deemed to be inside information, the security and the issuer (and potentially related securities and their issuers) will be placed on the Banned List.

Banned List

London Compliance maintains a Banned List of all securities where, through our dealings with clients, brokers or any other party, Longview is deemed to have inside information in relation to the underlying company.

The Banned List shall include the names of securities and issuers that are restricted, the date on which they were restricted and the individuals who have knowledge of the inside information. Records of decisions to place or remove a stock from the Banned List are maintained by Compliance. When a stock is added to the banned list, Compliance will record separately the reason why they were restricted and a date for review.

Knowledge of any stock being placed on or removed from the Banned List is only shared on a "need-to-know" basis, with individuals who need the information to fulfil their professional responsibilities, the individual who provided the information and Compliance. The CIO and Head of Research are informed by Compliance of changes to the Banned List and must be aware of the inclusion of investments when undertaking trades - they are not informed of why the investments are on the Banned List.

In line with Firm policy, all members of staff will be considered insiders and prohibited from trading in the affected securities on the banned list for both client and personal trades listed on the Banned List. Once a company has been added to the Banned List the following activities are prohibited:

- Trading in any securities of the company for Clients managed by Longview;
- Trading in any securities of the company for any Personal Brokerage account by any Staff; and,
- The release of any research information, recommendations or opinions relating to the company.

All Staff members are prohibited from disseminating any information to third parties about any security listed on the Banned List. Advent Rules Manager, a portfolio monitoring and compliance management system which checks all trades on a pre and post trade basis, restricts trading securities on the Banned List.

Activist Situations

From time to time, in respect of an investment held on behalf of clients, Longview may engage with an activist investor on a particular issuer. This may increase the chances of receiving inside information. The Research team must be alert to this risk; for example, that inside information might be received in error during a conversation with an activist (e.g., an inadvertent disclosure of trading or voting intentions).

Longview may also be made an insider if they are aware of the trading strategy of another investment firm. Whilst it is acknowledged that investment firms do speak to one another, particular care should be taken when communicating with another investment firm that inside information is not disclosed by either party. If inside information is disclosed, then Longview would be restricted from dealing on the information. Longview would be in receipt of inside information regardless of whether Longview agreed to be given that inside information or if was received in error.

Safeguarding Inside Information

Staff should assume that all information obtained in the course of their employment or association with Longview is not public unless the information has been publicly disclosed. Staff should take the following steps to ensure the confidentiality of Inside Information:

- Any communication of Inside Information must be undertaken with the utmost caution. Staff coming into possession of potential inside information must not communicate this information to anyone, whether internal or external to Longview, with the exception of Compliance. Staff must **not** discuss Inside Information in public places such as corridors or elevators or at social gatherings, and must exercise care when using telephones in areas where conversations might be overheard.
- Non-public information about Longview's investment strategies and holdings may not be shared with third parties, except as is necessary to implement investment decisions and conduct other legitimate business or where required to do so by regulation. Staff must never disclose proposed or pending deals or other sensitive information to any third party without the prior approval of Compliance. In the US, federal securities laws may prohibit the dissemination of such information, and doing so may be considered a violation of the fiduciary duty that Longview owes to its clients.
- Staff who have been made 'insiders' must exercise particular caution working in an open office and should only discuss Inside Information in non-public areas such as conference rooms.
- Documents containing Inside Information should be treated with the utmost discretion and kept secure. Proper safeguarding of documents includes (i) not leaving documents in plain view, (ii) storing documents in closed cabinets or files, (iii) locking cabinets and files, particularly outside of business hours, (iv) restricting access to cabinets and files to only those persons entitled to view the information, and (v) destroying duplicate documents or documents that are no longer needed. If files containing Inside Information are used in a conference room or other shared space, it is the responsibility of the Staff member to safeguard and monitor such files.

Expert Networks

Expert networks are firms that facilitate the exchange of information between industry "experts" and investment professionals. Longview maintains the discretion to engage with expert networks as part of its Research Process. Interactions with expert networks increase the risk of Longview staff receiving inside information; this risk of exposure to inside information is greatest during one-on-one 'expert calls'. Staff should be aware that any engagement with an *expert* must be conducted in accordance with this policy and Longview's Code of Ethics.

Prior to the onboarding of an expert network provider Longview will conduct sufficient due diligence to ensure that the firm has robust compliance policies and procedures and is able to demonstrate key compliance controls to reduce the risks related to the dissemination of inside information.

Longview Compliance have implemented a compliance screening questionnaire with each Expert Network, which requires any expert subject to a consultation to attest to certain conditions which may prompt a further review by Longview Compliance before any interaction can proceed (e.g. an expert may be flagged for review if they are employed, or have been employed in the previous six months, by the relevant issuer). Additionally, employees must tell the expert at the beginning of the meeting that Longview does not want to receive any information that the expert is prohibited from disclosing or that may be inside information. All research analysts have been instructed to use the following wording at the beginning of each expert call:

'For the purposes of this call Longview expressly state that we do not wish to be given any Price Sensitive or Insider Information in relation to any listed securities discussed in this conversation. Please confirm that all the information you give me is either based on your opinion, experience, research or on publicly available information'.

To further manage potential risks, Longview undertakes sample-based compliance monitoring on expert engagements. Longview Compliance may periodically chaperone expert network calls, review sampled transcripts, monitor the frequency with which various experts are being used and compare particularly profitable trading to Longview's past contacts with industry experts.

In the event that a member of staff is exposed to potential inside information from an expert, they should follow the procedure laid out in this policy and notify Compliance immediately.

Market soundings

Market soundings are communications of information made by either issuers or their professional agents prior to the announcement of a transaction (usually a placing of financial instruments) and sometimes accompanied by the announcement of a corporate finance transaction (e.g. an acquisition). Such soundings may themselves amount to inside information.

It is Longview's policy not to accept or receive or take market soundings. In the event that such a third party makes contact with the Firm in relation to a potential market sounding, the person receiving the communication (usually this will be by email or telephone) must terminate the conversation as soon as reasonably possible and inform Compliance (by email) of the fact. Under no circumstances should the conversation be proceeded with, as this will risk contaminating the individual and the Firm with inside information and hence restrict its investment strategy.

Outside Directorships and Business Interests

All staff must disclose any outside business interests that they may have. For family members ²³, this would only include directorships of quoted companies and connection to suppliers. Such persons will need to be cautious about any information they receive through such positions, as it may be considered inside information. If a member of staff were to receive inside information through an outside business interest, they would have to disclose it to Compliance and the general procedure would need to be followed.

Information barriers

The Boards of Directors have reviewed Longview's business and have decided that implementing information barriers (or 'Chinese Walls') within Longview is neither required nor practical, which means all members of staff are considered to know all aspects of the business and, as a result, are required to act accordingly. However, given the oversight responsibilities of the non-executive directors, an information barrier has been established between Longview and the non-executive directors of the Boards of Longview Partners (Guernsey) Limited and Longview Partners (UK) Limited. The non-executive directors continue to receive systems and controls information in order for them to undertake their role, however, no trading or research information is provided to them until it has been

² Family is given the same definition as in the outside business interest's policy, i.e.

(a) the spouse or civil partner or any partner of that person considered by national law as equivalent to a spouse;

(b) a dependent child or stepchild; and

(c) any other relative who has shared the same household as that person for at least one year.

released to clients. The non-executive directors are therefore not required to disclose to Longview any potential inside information they may be party to due to other outside business interests.

Market rumours

A rumour is defined as a “currently circulating story or report of unverified or doubtful truth” (e.g. internet bulletin boards). Longview policy is that staff must not create or disseminate rumours. Staff should be aware that passing on or helping spread a rumour that they know to be false could amount to “dissemination” - a form of market manipulation that involves giving out information that conveys a false or misleading impression about an issuer or financial instrument. If a rumour is heard it must not be acted on until research is performed and the facts are verified.

Receipt of rumours that are likely to lead to a significant price adjustment, or concern the solvency of an issuer, must be reported to Compliance, who will assess next steps to be taken (if any).

Media and Leaks

Communication with the media must be pre-approved by the CEO, ExCo or Compliance. If the enquiry relates (or may relate) to inside information or restricted securities, then Compliance should be advised. Compliance will, where necessary, monitor that communication. Staff should request a copy of any media publication that includes or references Longview. Records should be kept of verbal and written communication between staff and media.

In the event of a possible leak of information covered by this policy, Compliance will investigate the circumstances behind the leak. If necessary, the FCA, GFSC and Takeover Panel (if relevant), and/or SEC will be notified and the reasons for the investigation of the leak given. The outcome of the inquiry will be reported to the CEO in London or the Managing Director in Guernsey, as appropriate, and identified weaknesses in information or handling leaks should be addressed through an immediate strengthening of controls.

Staff will be subject to disciplinary consequences for leaking information to the media, in addition to any FCA, GFSC, and/or SEC action. Compliance will report its findings to the FCA, GFSC, or SEC, as necessary.

Managing further risks of Market Abuse

Manipulating Devices

There are a number of ways fictitious devices can be used to knowingly spread false or misleading information and trick investors. Some examples of these are:

- **Ownership**
Market abusers use a series of transactions to conceal the ownership of investments so that disclosure requirements are circumvented by the holding of the qualifying investment in the name of a colluding party, such that disclosures are misleading in respect of the true underlying holding.
- **Pump and dump**
Market abusers holding a long position disseminate positive, false information to drive up share prices then sell once the price has peaked.
- **Trash and cash**
Market abusers holding short positions disseminate false, negative information to drive down share prices.

Research Records

All research analysts post relevant data on all the stocks they analyse into Research Workspace, which is retained in a secure drive on Longview's servers and may be accessed by Compliance. Data posted includes models, company reports, notes on meetings with the company or with sell-side analysts, price targets, fair values and earnings and cash flow estimates. In addition, Research Workspace provides a history of our stock analysis.

Material research conclusions are discussed within the Research team including the CIO. Once decisions have been made and approved in Research Meetings these are also recorded on Research Workspace.

Company meetings are recorded by inputting them into the Longview office calendar. If the outcome of a meeting affects the investment rating of the company, a new Research Note and/or Model will be issued to allow the Research Team to discuss the matter and approve any changes necessary.

Longview's investment process is bound by strict investment criteria, ensuring that only quality companies, with solid business fundamentals and attractive cash-based valuations, are purchased. A stock must pass all three Investment Criteria (Quality, Fundamentals and Valuation) to be purchased. The two primary reasons for selling a stock are the deterioration of company's business fundamentals or that the stock reaches its price target. If a stock ceases to meet the stock selection criteria of quality, business fundamentals and valuation, the research process will downgrade the stock and the entire position will be sold. Portfolio construction is driven by the decision to buy or sell, derived from our bottom-up research process. For any new buy or sell decision, the underlying reasons for the decision must be recorded and must be wholly linked to the Investment process using the investment Criteria.

Other trades (not new buys or sells) are driven by the rules around portfolio management, rebalancing and risk control. The rationale for such activity is recorded.

Obtaining Research from Political Participants

Generally, staff members do not use political intelligence firms for research. Staff must consult with Compliance prior to seeking research or other information from participants in non-public political processes. This obligation may apply to elected officials, lobbyists, and political staff members. Compliance may discuss the matter with Outside Counsel, and/or chaperone any meetings or telephone calls with the information provider.

Staff Training

General staff awareness training

Training and awareness measures seek to ensure that members of staff are aware of the requirements and prohibitions of the market abuse regime and the measures Longview has adopted. Training is arranged by Compliance.

Longview provides training to all new employees as part of their initial Compliance Undertaking and at least annually thereafter.

Training for compliance/monitoring staff

Staff involved in the monitoring and investigation of potentially suspicious transactions and orders, undergo additional training to help them carry out appropriate analysis to determine whether a transaction is abusive and how to report such transactions and orders to the FCA or FIU in Guernsey, as applicable.

Monitoring

Real-time and post-trade monitoring

Longview undertakes its compliance monitoring on a risk-weighted basis. Market Abuse monitoring includes a focus on the possibility of receiving inside information through all aspects of the investment process and the steps taken to manage this risk.

Due to the limited volume of trading activity, trade surveillance is able to be performed effectively on a trade-by-trade basis by establishing the pre-trade rationale for trading activity. As part of the daily checks, Compliance reviews the previous day's trading activity in order to monitor for suspicious transactions.

Members of staff are obliged to attest on a quarterly basis that they have complied with Longview's Policies and Procedures, including the Market Abuse Policy, Conflicts of Interest Policy and the Code of Ethics.

Monitoring of telephone and electronic communications

Traders' phone lines are recorded, along with emails and other electronic messages (e.g. Microsoft Teams Instant Messaging,) of all staff members. Please also refer to our Telephone and Electronic Communications Policy for further details. Compliance will monitor a sample of phone calls, emails and other electronic messages on a periodic basis as part of the Compliance Monitoring Programme.

Timing issues around monitoring

It should be noted that sufficient indications of market abuse may only become apparent sometime after the order has been placed or the transaction has taken place. Staff involved in monitoring therefore need to be aware that a sequence of events over several days may need to be considered to assess a potential suspicion and whether a STOR or Market Observation should be submitted.

Version Control

| Date | Version | Updates Made |
|---------|---------|--------------------------|
| 2008 | 1.0 | Policy creation |
| 2009 | 2.0 | Annual Review and Update |
| 2010 | 3.0 | Annual Review and Update |
| 2011 | 4.0 | Annual Review and Update |
| 2012 | 5.0 | Annual Review and Update |
| 2013 | 6.0 | Annual Review and Update |
| 2014 | 7.0 | Annual Review and Update |
| 2015 | 8.0 | Annual Review and Update |
| 2016 | 9.0 | Annual Review and Update |
| 2017 | 10.0 | Annual Review and Update |
| 2018 | 11.0 | Annual Review and Update |
| 2019 | 12.0 | Annual Review and Update |
| 2020 | 13.0 | Annual Review and Update |
| 2021 | 14.0 | Annual Review and Update |
| 2022 | 15.0 | Annual Review and Update |
| 07/2023 | 16.0 | Annual Review and Update |
| 06/2024 | 17.0 | Annual Review and Update |

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