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Personal Account Dealing Requirements

In order to comply with the FCA rules on personal account transactions, the Firm requires that all ARs put in place the following processes:

- Maintain a restricted list where relevant securities are added as appropriate in cases of conflicts.
- Maintain an insider list as per Section 4.5.3 of this Manual.
- Ensure the nominated senior manager pre-clears all personal account dealing and that evidence of pre-clearance is retained.
- Set up surveillance reports to monitor staff trading.
- Provide commentary on surveillance in each monthly narrative report.

The senior manager at the AR should raise any breaches or concerns with the Compliance Officer at the Firm without delay.