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## APPENDIX F: PERSONAL ACCOUNT DEALING

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### Personal Account Dealing Requirements

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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 for other AR staff members and that evidence of pre-clearance is retained. (Midmar's Compliance Officer should pre-clear the trades executed by the nominated senior manager). All trade requests should be submitted and cleared via the Leo platform where possible.
- 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.