CROSSING POINT

Investment Policy Statement

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The effective date of this Investment Policy Statement (the "IPS") is the 1st September, 2019.

Background

Crossing Point Investment Management Limited (**CPIM**)(**The Investment Manager**) will act as discretionary investment manager for a range of Model Portfolios (also referred to as "Portfolios") with risk profiles and investment objectives appropriate to the terms and conditions of this IPS and which are offered exclusively via a range of investment platforms.

The Investment Manager agrees to act as a discretionary investment manager in respect of specified Model Portfolios on behalf of Financial Advisers by entering into its Terms of Business for Authorised Intermediaries with such Financial Advisers. All terms that are not otherwise defined below shall have the meaning provided in the Investment Manager's Terms of Business for Authorised Intermediaries.

Financial Adviser shall mean an individual, partnership or company which is authorised to carry out Regulated Activities by the Financial Conduct Authority (FCA).

This IPS supersedes all previous benchmarks, asset allocation and other guidelines previously issued.

Management

The Investment Manager is responsible for achieving the investment outcomes set out in this IPS. It is the responsibility of the Financial Adviser to monitor and assess the performance of the Model Portfolios in determining the ongoing suitability of the Model Portfolios in respect to its clients. Crossing Point will provide all the necessary data and information on a regular basis to allow the Financial Adviser to complete this assessment.

Desired Client Outcomes

The desired client outcome is to provide capital growth over investment horizons of at least five years from a diversified portfolio of the relevant platform's available funds, exchange traded funds (ETF) or investment trusts. "Funds" means the range of funds available on the relevant platform, which comprises of collective investment schemes, such as Unit Trusts and Open-Ended Investment Companies. Exchange traded funds and investment trusts means the range of closed end securities available on the relevant platform.

Risk

The Portfolios will attempt to balance risk and reward from assets consisting largely of equities. Equity risk shall be managed through asset allocation, controlled equity limits and a tactical trading risk management function. The Model Portfolios invests in index tracking funds, exchange traded funds or investment trusts where the underlying physical assets are equities, fixed interest securities, commercial real estate, alternative investments, commodities, precious metals or cash.

Reference Portfolios

The performance and volatility of the Portfolios will be monitored relative to a composite index reference framework (the "Reference Portfolios"). For clarity, an individual Portfolio is not likely to consistently match the risk and return profile of one of the Reference Portfolios due to the tactical trading risk management function. The Reference Portfolios enable the Portfolios to be monitored in relation to a contextual reference. For clarity, the asset allocation for the Portfolios is intended to match the range of asset allocation of the Reference Portfolios.

Model Portfolio	Reference Portfolio and Benchmark Sector Index
Crossing Point Defensive Strategies	IA Mixed Investment 0-35% Equity
Crossing Point Cautious Strategies	IA Mixed Investment 20-60% Equity
Crossing Point Balanced Strategies	IA Mixed Investment 20-60% Equity
Crossing Point Strategic Strategies	IA Mixed Investment 40-85% Equity
Crossing Point Adventurous Strategies	IA Mixed Investment 40-85% Equity

The Reference Portfolios reflect the gross return including income or dividends (i.e. 'total return' indices).

IA Sector Definitions

Mixed Investment 0-35% Shares.

Funds in this sector are required to have a range of different investments. Up to 35% of the fund can be invested in equities. At least 45% of the fund must be invested in fixed interest securities or cash.

Mixed Investment 20-60% Shares

Funds in this sector are required to have a range of different investments. The fund must have between 20% and 60% invested in equities. At least 30% of the fund must be invested in fixed interest securities or cash.

Mixed Investment 40-85% Shares

Funds in this sector are required to have a range of different investments. However the fund must have between 40% and 85% invested in equities.

Rebalance Schedule

The Portfolios will be rebalanced as often as CPIM considers necessary in order to react to material changes in prevailing market conditions. Stated equity limits will be clearly adhered to.

Performance Measurement

Objective

The objective is to construct investment portfolios which are able to increase or decrease exposure to equity markets dynamically as market conditions dictate, through technical analysis of market movement and momentum as well as through factors impacting the growth and volatility of equity markets. These investment portfolios are linked to a risk framework, through a construction process that aims to create portfolios which incrementally increase in risk and the potential for reward.

It is expected that the objective will be achieved through investment primarily in a blend of index tracking funds, exchange traded funds or investment trusts that are proportioned in line with a performance efficient asset allocation in order to enhance returns and reduce the overall level of portfolio risk.

The Investment Manager shall allocate assets to the Model Portfolio from funds and securities available on the relevant platform to match the range of asset allocation of the Reference

Portfolios, on the clear understanding that any tactical trading risk management function performed within the Model Portfolios may lead to significant differences in the nature of returns.

Benchmarking

For analysis purposes each Model Portfolio's total return will be calculated using a "Proxy Portfolio" and compared to the return of the corresponding Risk Benchmark. The Proxy Portfolios are necessary because the Model Portfolios are not in themselves unitised collective investment schemes and will not, therefore, produce single daily unit prices or daily share prices that can be used for analysis purposes.

The Proxy Portfolios will be established as internal models on the Investment Manager's current portfolio analysis system (or any other system used for this purpose in the future as chosen by the Investment Manager) in order to mirror the initial and on-going composition of the Portfolios. It is expected that there will be a variance between the value of the Portfolios and the corresponding Proxy Portfolio due to a number of factors, including inter alia the pricing of Portfolio holdings (arising from timing differences and/or implicit charges) as well as the treatment of both taxation and reinvested income. The Proxy Portfolios' performance will also not take into account management fees, except those arising from the underlying Portfolio holdings.

The Investment Manager will take all reasonable measures to ensure that the performance of the Proxy Portfolios is a fair representation of the overall behaviour of the Portfolios.