

CRYPTO CURRENCY POLICY

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THE AIM OF THIS POLICY

The aim of the policy is to explain the rules that apply when giving advice on investing in crypto currencies.

WHO THIS POLICY APPLIES TO

All Representatives authorised under Insight Investment Partner's AFSL.

WHAT THIS POLICY COVERS

This policy provides you with the requirements for recommending portfolio construction when including crypto currencies and ongoing review and maintenance in relation to crypto currency allocations.

VARYING FROM THIS POLICY

Where you wish to take action that falls outside of this policy, you must contact the Responsible Manager before discussing or making a recommendation to the client.

CRYPTO CURRENCY INVESTMENT GUIDELINES

The adviser may only recommend Crypto Currency products that are listed on the Approved Product List. The Authorised Representative will need to obtain an Off APL Product Approval to recommend any product not on the APL.

Risk Profiles & Sector Allocations

Crypto Currencies form part of the client's 'Alternate' sector allocation for asset allocation purposes.

Authorised Representatives may only recommend crypto currency investments for those investors who have profiled as 'Balanced' to 'High Growth' risk profile.

Maximum allocations

When constructing a portfolio that includes crypto currencies, the portfolio allocation cannot exceed the designated 'Alternative' allocation in accordance with the client's risk profile.

Where a portfolios allocation to crypto currencies exceeds 20%, the portfolio must be rebalanced back in accordance with the client's risk profile.

YOUR RESPONSIBILITIES AND OBLIGATIONS

You Must:

- Only provide advice on crypto currencies as outlined in the Approved Product List provided by Insight Investment Partners and this policy, unless you receive Off APL Product Approval to do otherwise.
- Evidence of each contact with a client, as well as comprehensive file notes must be recorded on file.
- Take into consideration the client's personal situation, overall risk profile, and their needs and objectives before making a recommendation. Refer to Best Interest Duty Policy on advice considerations while preparing your advice.
- Offer to review the client's portfolio at least annually.
- Rebalance the portfolio when the portfolios exposure to crypto currencies exceeds 20%

You Must Not:

- Recommend crypto currencies for clients who profile as 'Defensive' or 'Moderate'.
- Use geared funds to invest in crypto currencies.

GOOD OPERATING PRACTICE

You should ensure you construct a diversified portfolio for your clients.