

IMPORTANT INFORMATION – SEI Investments Europe Limited (“SEI”)

Updated : January 2011

We are required to provide you with certain information about our regulatory responsibilities. In order to assist you in reviewing this information, we have provided it in the form of questions and answers which we hope will assist in your review. If you have any questions about any of the information in this document, please contact your PFP Representative.

GENERAL

What is SEI’s Relationship with PFP Wealth Management LLP (“PFP”)?

PFP has entered into an agreement with SEI, whereby PFP have arranged for SEI to act as the Custodian for your assets. A copy of the SEI Custody Terms and Conditions has been made available in the ‘Legal and Regulatory information’ which can be found in the ‘About Us’ section of our website – www.pfpg.co.uk

By signing an Investment Management Agreement with PFP Wealth Management you have accepted SEI as your Custodian. In addition, SEI is responsible for the Client Money Bank Accounts (“Client Money Accounts”). These accounts are used for the administration of any cash received and paid to you for the purposes of investments.

How is SEI regulated?

SEI is authorised and regulated by the Financial Services Authority (“FSA”) and is listed on the FSA Register, which is accessible at www.fsa.gov.uk/register. Our firm registration number is 191713. The FSA is located at 25 The North Colonnade, Canary Wharf, London, E14 5HS. The FSA’s other contact details can be found at www.fsa.gov.uk. Our contact details can be found at the bottom of each page of this document.

Will SEI communicate with me directly?

Communications will be through PFP unless we are required by the FSA to contact you directly. All communications will be in English.

What are SEI’s complaint handling procedures?

Any formal complaints should be referred in writing to PFP for the attention of SEI. PFP will arrange for these complaints to be forwarded to us. We have written procedures designed to ensure appropriate consideration and proper handling of complaints. In some circumstances, Eligible Complaints can be referred to the Financial Ombudsman Service (“FOS”). Further information and contact details for the FOS are available on their website at: <http://www.financial-ombudsman.org.uk/>.

What protections are in place?

In the event that SEI is unable to meet any of its liabilities, or in the event of a failure of the bank where it is unable to meet any of its liabilities compensation may be available under the Financial Services Compensation Scheme (“FSCS”). Full details of the arrangements under the FSCS are available on their website at <http://www.fscs.org.uk>.

What fees does SEI charge for acting as Custodian and holding Client Money Accounts?

SEI charges PFP for these services as part of charges for wider services.

CLIENT MONEY

What are Client Money Accounts and how are they operated?

All cash deposits and redemption proceeds are currently held in Client Money Accounts at HSBC Bank Plc ("HSBC"). All of our Client Money Accounts are operated in accordance with the applicable FSA Client Money Rules. We have made arrangements to ensure that all Client Money Accounts are segregated from SEI's own assets. The name 'Client Money Accounts' also makes it clear that the assets held within them are client assets. Whilst our Client Money Accounts are currently held at HSBC, Client Money may be deposited with other authorised banks held outside the European Economic Area ("EEA") in accordance with FSA Client Money Rules. We regularly review our policy for selection of banks with the primary consideration being the security of our clients' money.

Is my money pooled with other client's money?

All Client Money Accounts are "pooled" meaning that they are held together with other PFP client assets. However, we hold all PFP client monies in separate Client Money Accounts from other Client Money Accounts we hold for other clients of SEI. SEI is at all times able to distinguish between the assets held for one client and the assets held for another client.

CUSTODY

Can you explain how SEI acts as a Custodian for my assets?

When SEI places trades for you as instructed by PFP Wealth Management, they are placed in the name of SEI Global Nominees for your benefit. Once the transactions have been completed, your assets are held in the name of SEI Global Nominees for the benefit of PFP and its clients. When we hold your assets on your behalf in this manner, we are acting as your Custodian.

Who is SEI Global Nominees? What role do they play?

We use SEI Global Nominees to assist in ensuring all client assets are segregated from the assets of SEI. SEI Global Nominees is a Nominee Company whose business consists solely of acting as a nominee holder of investments. It has no material liabilities and as it is a separate entity from SEI, its assets would not be available to an administrator/liquidator of SEI or its parent company, SEI Investments Company, in bankruptcy proceedings should such an event occur.

Are there any other Custodians holding my money?

In accordance with the SEI Custody Terms and Conditions, we may appoint the use of third party Sub-Custodians to administer and hold certain asset types. In appointing a third party Sub-Custodian, all client assets may be held in an omnibus position by the third party Sub-Custodian. This means that certain securities may therefore be registered collectively in the same name for all of SEI's clients and therefore your individual entitlements may not be identifiable by separate certificates or other physical documents of title.

How are Custody Accounts operated?

All Custody Accounts are operated in accordance with the applicable FSA Regulations. Under the applicable regulations, we are required, amongst other things, to *"make adequate arrangements so as to safeguard clients' ownership rights and to prevent the use of safe custody assets belonging to a client on the firm's own account"*. We have procedures in place designed to meet the following obligations:

- records and accounts are kept as necessary to enable us to distinguish safe custody assets held for one client from the safe custody assets held for any other client and from our own applicable assets and;
- reconciliations are made to our own internal accounts and records and those of any third parties with whom safe custody assets are held (i.e.: Sub-Custodians)

Will I get an Account Statement from SEI?

We are required to issue a statement of your custody position at least annually. This will be incorporated into the valuation issued to you by PFP.

CONFLICTS OF INTEREST

SEI is required to have a conflicts of interest policy in place.

How does SEI identify conflicts of interest?

When trying to identify a conflict, SEI takes into account (at a minimum) whether we (and/or any Directors, officers, employees or any person directly or indirectly linked to us):

- are likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- have an interest in the outcome of a service provided to a client or of a transaction carried out on behalf of a client, which is distinct from the client's interest in that outcome;
- have a financial or other incentive to favour the interest of another client or group of clients over the interests of a different client or group of clients;
- carry on the same business as our client(s); or receive or will receive from a person other than our client(s), an inducement in relation to a service provided to our the client(s), in the form of monies, goods or services, other than the standard commission or fee for that service.

How does SEI manage conflicts of interest?

We are obligated to manage conflicts of interest fairly, both between ourselves and our clients and between one client or group of clients and another client or group of clients. We have both a Conflicts of Interest Policy and other Compliance Policies ("Compliance Policies") intended to operate, monitor and maintain effective organisational and administrative arrangements with a view to taking all reasonable steps to prevent conflicts of interest.

What happens if SEI is unable to manage conflicts of interest through usual procedures?

If we are unable to manage conflicts through our Compliance Policies we will disclose the nature and/or source of conflicts of interest with and between our clients.

Whilst we make every effort to ensure that all reasonable steps are taken to prevent conflicts of interest, in certain situations, a conflict may arise. Set out below is a summary of our main conflict of interest situations that apply to the business we undertake for you, and a summary of how we try to manage and minimise these conflicts.

- Conflicts may arise where directors, officers or employees receive any gifts, entertainment or other inducements in relation to the financial instruments or companies that we have a relationship with or in which we invest for our clients.
- Conflicts may also occur where our directors, officers or employees have a personal financial interest in financial instruments that may be bought, sold or held for our clients.
- Conflicts may arise when we have multiple clients with directly conflicting interests.

We have a Compliance Policy covering the receipt and approval of personal gifts or other benefits that may be accepted by employees or directors. No employee or director is permitted to receive or provide to another person any benefit that cannot be justified as reasonable in the circumstances. We also have a Compliance Policy for personal transactions designed to prevent conflicts between employees' trading and services carried out on behalf of clients.

- We are currently affiliated with a number of entities. There are currently over 40 international SEI entities, as well as branches of SEI in the Netherlands and in Dubai. We use our affiliates for holding clients' assets, holding clients' cash accounts, managing the SEI Funds, providing investment advice about the SEI Funds and providing or assisting with the provision of brokerage services for transitional management services.
- We also have third party arrangements with various banks and Sub-Custodians.
- Our directors and officers may serve in dual capacities as directors or officers of other SEI entities.

We have implemented procedures designed to minimise the risk of any conflict by closely monitoring all associated relationships. In addition, there are effective barriers in place as well as a Compliance Policy which is designed to ensure that information is not improperly shared between affiliates and their directors, officers and employees.

Further information regarding our Conflicts of Interest Policy (or any other relevant Compliance Policy) is available upon request.