

Conflict of Interest Management Policies Concerning Research Analysts and the Production of Investment Research ("Conflict Policies")

Introduction and Purpose

These provisions, pursuant to U.K. Financial Conduct Authority (the "FCA") requirements under Chapter 12 of its Conduct of Business Sourcebook ("COBS") rules and guidance and other regional regulations, summarize certain policies (the "Conflict Policies") that SMBC Nikko Securities ("SMBC NIKKO"), based in Japan, has adopted in order to manage conflicts of interest that may arise in the research production process.

The Conflict Policies, which were originally prepared by SMBC NIKKO in compliance with its relevant local competent authority in Japan - the Japan Securities Dealers Association (the "JSDA") - are designed to ensure that all research produced by SMBC NIKKO Research Analysts is objective, independent, impartial, fair, clearly understandable, and not misleading, and incorporate additional provisions, as necessary, to demonstrate and ensure compliance with the U.K. FCA and other regional regulatory requirements.

Disclosure of Conflicts of Interest in Analyst Research Reports produced by the Equity Research Department

A) If there is a material conflict of interest between the subject company of an Analyst Research Report and the Equity Research Department (the "Research Department") or between the subject company and the Research Analyst, then details of such material conflicts of interest must be explicitly disclosed in the Analyst Research Report in question. B) Analyst Research Reports must disclose whether SMBC NIKKO was a lead manager for the subject company in cases where it acted as lead manager with regard to public or secondary offerings. C) In the event that SMBC NIKKO becomes the lead manager for the subject company with regard to public or secondary offerings of, or solicitations to professional investors to buy or sell the subject company's shares, any Analyst Research Report concerning the shares of the subject company that is published must not display any information pertaining to the investment rating or target price for the subject company for a certain designated period. D) Research Analysts are not permitted to write Analyst Research Reports on subject companies for which they concurrently serve as an executive officer. E) If SMBC NIKKO holds 1% or more of the securities of companies referred to in research reports. F) An explanation of the meaning of the Firm's ratings; information of the valuation methods used by the firm; the percentage of securities on which the Firm has a rating of outperform, neutral or underperform; and a share price chart of the companies referred in research reports over time and the points at which the firm assigned or changed a rating or price target;

Transactions and Dealings Involving Material Information

A) Executive officers and employees of SMBC NIKKO are prohibited from making proprietary trades based on material information in their possession, using material information to solicit clients and using material information to trade in their personal accounts. B) The Trading Management Department may, as necessary, investigate proprietary trading and agency trading activity with regard to certain individual stocks.

Prohibition of Analyst Involvement in Investment Banking Department Business Activities

SMBC NIKKO gives due consideration to the steps necessary to ensure that Research Analysts remain completely independent from the Investment Banking Department, and prohibits its executive officers and employees from behaving in a manner contrary to the code of conduct guidelines

Restrictions and Limitations on the Securities Transactions of Research Analysts and Other Employees

A) Research Analysts and members of their households are prohibited, from owning or trading in the securities (including shares) of companies that the Research Analyst covers. B) Research Analysts and executive officers and employees of the Research Department are prohibited from trading in securities based on material information obtained through the normal course of business. C) Executive officers and employees involved in the internal examination and review of Analyst Research Reports are prohibited from trading in securities on their own account using material information obtained during the examination and review process.