

INFORMATION BARRIER POLICY

This policy complies with RICS guidelines

Information Barriers can be set up when a potential conflict of interest exists to prevent the flow of confidential information between selected individuals who are “in the know” on each side of the barrier.

- 1.0 When an Information Barrier is required, the Director or other Company employee responsible to each client for the instruction must first:-
 - Inform the Company’s Compliance Director of the facts.
 - Reach agreement as to whether an Information Barrier can operate
 - Provide written proof of each client’s knowledge and approval of the erection of an Information Barrier
 - Provide the Compliance Director with a complete list of the Company employees “in the know” on each side of the Information Barrier and notify of any addition/removal. No individual is to act on both sides.
- 2.0 The Company’s Compliance Director maintains a comprehensive list of all situations where Information Barriers exist to protect the interests of one client as against another.
- 3.0 The Company employees forming the specific and separate teams representing each client must take full responsibility for maintaining the confidentiality of its particular client’s position vis-à-vis those individuals acting for the other party.
- 4.0 There is to be no sharing of secretaries or other support staff between the 2 separate teams. Either team, however, will be able to request factual information from our central data systems and Research Department.
- 5.0 Respective files are to be kept entirely separate and secure so as to maintain confidentiality as between the individuals representing each client. Electronic access is to be restricted so that only those individuals nominated can gain access.
- 6.0 There is to be no internal communication between teams on the instruction and, where practical, the teams representing each client should not be co-located. If this is not possible, each team will be physically separated or will make use of separate meeting rooms to conduct client’s business to ensure that client confidentiality is preserved.
- 7.0 The detailed arrangements set up on a case by case basis to cover paragraphs 5.0, 6.0 and 7.0 above will be communicated in writing to each client and to the Company’s Compliance Director, upon confirmation of instructions.

The Company’s Compliance Director will undertake checks from time to time to ensure that Information Barriers are being operated properly. Any transgressions from the procedures set out above, whether or not they result in a client complaint, will be subject to strict disciplinary action.