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This document is issued by Polar Capital LLP (the 'Manager' or the 'AIFM') solely in order to make certain particular information available to investors and potential investors in the Polar Capital Global Financials Trust plc (the 'Company' or the 'AIF') before they invest, in accordance with the requirements of the Financial Conduct Authority ('FCA') Rules implementing the EU Alternative Investment Fund Managers Directive (Directive 2011/61/EU) (the 'AIFM Directive' or 'AIFMD') in the United Kingdom ('UK'). It is made available to investors ('investors' or 'shareholders') in the Company by being made available at www.polarcapitalglobalfinancialstrust.com.

Potential investors in the Company's shares should consult their stockbroker, bank manager, solicitor, accountant or other financial adviser before investing in the Company.

Polar Capital Global Financials Trust plc

INVESTOR DISCLOSURE DOCUMENT

IMPORTANT INFORMATION

Regulatory status of the Company

Polar Capital Global Financials Trust plc is an "alternative investment fund" ('AIF') for the purposes of the AIFM Directive and is incorporated under the Companies Act 2006 as a public limited company in England and Wales. It operates as an investment company as defined in the Act and has been granted investment trust status in accordance with section 1158 of the Corporation and Tax Act 2010 subject to continuing to meet the ongoing requirements.

The Company's shares are listed on the premium segment of the Official List of the UK Listing Authority ('UKLA') and are admitted to trading on the main market of the London Stock Exchange. The Company is subject to the provisions of its Articles of Association, the UKLA Listing, Prospectus and Disclosure and Transparency Rules, the UK Corporate Governance Code and the Companies Act 2006.

Implications of the contractual relationship entered into for the purpose of investment

While investors acquire an interest in the Company on purchasing or subscribing for the Company's ordinary shares ('shares'), the Company is the sole legal and/or beneficial owner of its investments. Consequently, shareholders have no direct legal or beneficial interest in those investments. The liability of shareholders for the debts and other obligations of the Company are limited to the amount unpaid, if any, on the shares held by them.

Shareholders' rights in respect of their investment in the Company are governed by the Company's Articles of Association and the Companies Act 2006. The Articles of Association set out the respective rights and restrictions attaching to the Company's shares. Under English law, the following types of claim may in certain circumstances be brought against a company by its shareholders: contractual claims under its Articles of Association; claims in misrepresentation in respect of statements made in its prospectus and other marketing documents; unfair prejudice claims; and derivative actions. In the event that a shareholder considers that it may have a claim against the Company in connection with such investment in the Company, such shareholder should consult its own legal advisers.

Jurisdiction and applicable law

As noted above, shareholders' rights are governed principally by the Articles of Association and the Companies Act. By subscribing for or purchasing shares, investors agree to be bound by the Articles of Association which is governed by, and construed in accordance with, the laws of England and Wales.

Recognition and enforcement of foreign judgments

Regulation (EC) 593/2008 ('Rome I') must be applied in all member states of the European Union (other than Denmark). Accordingly, where a matter comes before the courts of a relevant member state, the choice of a governing law in any given agreement is subject to the provisions of Rome I. Under Rome I, the member state's courts may apply any rule of that member state's own law which is mandatory irrespective of the governing law and may refuse to apply a rule of governing law if it is manifestly incompatible with the public policy of that member state. Further, where all other elements relevant to the situation at the time of the choice are located in a country other than the country whose law has been chosen, the choice of the parties shall not prejudice the application of provisions of the law of that other country which cannot be derogated from by agreement.

Investors should note that there are a number of legal instruments providing for the recognition and enforcement of foreign judgments in England. Depending on the nature and jurisdiction of the original judgment, Council Regulation (EC) No 44/2001 on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters, Regulation (EC) No 805/2004 of the European Parliament and of the Council of 21 April 2004 creating a European Enforcement Order for uncontested claims, the Convention on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters done at Lugano on 30 October 2007, the Administration of Justice Act 1920 and the Foreign Judgments (Reciprocal Enforcement) Act 1933 may apply. There are no legal instruments providing for the recognition and enforcement of judgments obtained in jurisdictions outside those covered by the instruments listed above, although such judgments might be enforceable at common law.

Limited purpose of this document

This document is not being issued for any purpose other than to make certain required regulatory disclosures to investors and, to the fullest extent permitted under applicable law and regulations, the Company and the Manager will not be responsible to persons other than the Company's shareholders for their use of this document, nor will they be responsible to any person (including the Company's shareholders) for any use which they may make of this document other than to inform a decision to invest in or dispose of shares in the Company.

This document does not constitute, and may not be used for the purposes of, an offer or solicitation to buy or sell, or otherwise undertake investment activity in relation to, the Company's shares.

This document is not a prospectus and it is not intended to be an invitation or inducement to any person to engage in any investment activity. This document may not include (and it is not intended to include) all the information which investors and their professional advisers may require for the purpose of making an informed decision in relation to an investment in or disposal of the Company's shares.

No advice

This document may include statements or direct the reader to statements that are, or may be deemed to be, "forward-looking statements". In some cases, such forward-looking statements can be identified by the use of forward-looking terminology, including the terms "targets", "believes", "estimates", "anticipates", "expects", "intends", "may", "will" or "should" or, in each case, their negative or other variations or comparable terminology. By their nature, forward-looking statements involve risks and uncertainties because they relate to events and depend on circumstances that may or may not occur in

the future. Forward-looking statements are not guarantees of future performance. The Company's actual performance, results of operations, returns, yields, financial condition, liquidity, distributions to investors and the development of its strategies may differ materially from any impression created by any forward-looking statement(s) contained in these materials. Opinions, estimates, forecasts, and statements of financial market trends that are based on current market conditions, constitute the authors' judgment and are subject to change without notice. Changes in exchange rates may cause the value of underlying investments to go down as well as up. The value of any investments and the income from them may fall as well as rise and investors may not get back the amount invested. Target yields or returns are targets only and there can be no guarantee that the Company will achieve such targets at the levels stated or at all. Prospective investors should not place any reliance on such targets in deciding whether to invest in the Company.

The Company and the Manager are not advising any person in relation to any investment or other transaction involving shares in the Company. Recipients must not treat the contents of this document or any subsequent communications from the Company, or any of its affiliates, officers, directors, employees or agents, as advice relating to financial, investment, taxation, accounting, legal, regulatory or any other matters. Prospective investors must rely on their own professional advisers, including their own legal advisers and accountants, as to legal, tax, accounting, regulatory, investment or any other related matters concerning the Company and an investment in shares.

Potential investors in the Company's shares should consult their stockbroker, bank manager, solicitor, accountant or other financial adviser before investing in the Company. Potential Investors should also consult the Articles of Association and the latest Financial Report, both of which are available from the Company's website.

Overseas investors

This document is not for release, publication or distribution, directly or indirectly, in whole or in part outside the UK.

The distribution of this document in certain jurisdictions may be restricted and accordingly persons into whose possession this document comes are required to inform themselves about and to observe such restrictions. The shares have not been, and will not be, registered under the United States Securities Act of 1933 (as amended) or under any of the relevant securities laws of Canada, Australia or Japan. Accordingly, the shares may not (unless an exemption from such Act or such laws is available) be offered, sold or delivered, directly or indirectly, in or into the USA, Canada, Australia or Japan. The Company is not registered under the United States Investment Company Act of 1940 (as amended) and investors are not entitled to the benefits of such Act.

Prospective investors must inform themselves as to (a) the legal requirements within their own countries for the purchase, holding, transfer or other disposal of shares; (b) any foreign exchange restrictions applicable to the purchase, holding, transfer or other disposal of shares which they might encounter; and (c) the income and other tax consequences which may apply in their own countries as a result of the purchase, holding, transfer or other disposal of shares.

THE COMPANY

Investment policy

The Company's annual report, which is available from its website, www.polarcapitalglobalfinancialtrust.com, sets out the Company's investment policy.

Investment restrictions and guidelines

The Company's annual report, which is available from its website, www.polarcapitalglobalfinancialtrust.com, sets out the investment restrictions and guidelines currently applied in managing the Company's portfolio.

Leverage

It is not intended that the Company incur borrowings to provide long-term structural debt. No borrowings have been made and no arrangements made for any banking loans. However the Articles of Association provide that the Company may borrow up to 15% of its NAV at the time of drawdown for tactical deployment when the Board of the Company believes that gearing will enhance returns to shareholders.

The AIFMD prescribes two methods of measuring and expressing leverage (as opposed to gearing) and requires disclosure of the maximum amount of 'leverage' the Company might be subject to. The definition of leverage is wider than that of gearing and includes exposures that are not considered to contribute to gearing. Without prejudice to the foregoing (on compliance with the investment policy and Articles of Association re gearing), the Company has set the following "leverage" limit: 200% (on both a "gross" and "commitment" basis).

The Company will disclose the following in its annual report or on its website at the same time as it makes its annual report and accounts available to investors or more frequently at its discretion:

- any changes to the maximum level of leverage that the AIFM may employ on behalf of the Company;
- any changes to the right of reuse of collateral or any guarantee granted under the leveraging arrangements; and
- the total amount of leverage employed by the Company.

Investment strategy and investment techniques

The Company's annual report, which is available from its website, www.polarcapitalglobalfinancialtrust.com, sets out the investment strategy and techniques currently applied in managing the Company's portfolio.

As a closed-ended investment fund whose shares are admitted to the Official List under Chapter 15 of the UKLA Listing Rules, the Company is required to obtain the prior approval of its shareholders to any material change to its published investment policy. Accordingly, the Company will not make any material change to its published investment policy without the approval of its shareholders by ordinary resolution. The Company will announce any such change through a Regulatory Information Service. The Company's published investment policy is set out in the annual report and on the website.

Any change in investment strategy or investment policy which does not amount to a material change to its published investment policy may be made by the Company without shareholder approval. An accumulation of small changes that over time constitute a material change also requires shareholder approval.

Risk in connection with derivatives

The Company may use various derivative instruments, including options, futures, forward contracts and swaps, as part of its investment strategy for purposes of efficient portfolio management. Some of these derivative instruments may be volatile and speculative in nature, and may be subject to wide and sudden fluctuations in market value. Derivatives, especially over-the-counter derivatives in the form of a privately negotiated contract against a principal counterparty, may also be subject to adverse valuations reflecting the counterparty's marks (or valuations), which might not correspond to the valuations of other

market or exchange traded instruments. In addition, derivative instruments also may not be liquid in all circumstances, so that in volatile markets the Company may not be able to exit its position without incurring a loss. Investing in derivative instruments can result in large amounts of gearing, which may magnify the gains and losses experienced by the Company and could cause the Company's NAV to be subject to wider fluctuations than would otherwise be the case.

Any use of call and put options and futures by the Company will entail additional risks. Although an option buyer's risk is limited to the amount of the original investment for the purchase of the option, an investment in an option may be subject to greater fluctuation than an investment in the underlying securities. Futures markets are highly volatile and are influenced by factors such as changing supply and demand relationships, governmental programmes and policies, national and international political and economic events and changes in interest rates. Because of the low margin deposits normally required for investments in futures, a high degree of gearing is typical of a futures investment account, so that a relatively small price movement in a futures contract may result in substantial losses to the investor. Futures positions are marked to market each day and variation margin payments must be paid to or by the Company. Futures investments may also be illiquid and certain exchanges do not permit investing in particular contracts at prices that represent a fluctuation in price during a single day's trading beyond certain set limits. Should prices fluctuate during a single day's trading beyond those limits (which might last for several days with respect to certain contracts), the Company could be prevented from promptly liquidating unfavourable positions and thus be subjected to substantial losses.

In addition, the Company would be exposed to the credit risk of the counterparty bank or other market maker writing any derivative instrument.

ADMINISTRATION AND MANAGEMENT OF THE COMPANY

The AIFM

Identity of AIFM

The AIFM is Polar Capital LLP, whose registered office is 16 Palace Street, London, SW1E 5JD. The ultimate holding company of the AIFM is Polar Capital Holdings plc, which is public limited company incorporated in England and Wales.

The Manager has been authorised by the FCA to act as an Alternative Investment Fund Manager pursuant to the AIFMD and has been designated by the Company to perform the following functions:

- the investment management function in respect of the Company which includes portfolio management and risk management;
- the general administration of the Company, including:
 - Company Secretarial and fund management accounting services;
 - valuation and pricing of the assets of the Company, including tax returns;
 - regulatory compliance monitoring; and
 - record keeping.
- marketing functions.

Fees

The Investment Manager is entitled to a fee at the rate of 0.85% per annum of the lower of the Company's market capitalisation and the Company's net asset value. 80% of the management fee is charged to the capital account and the remaining 20% to income.

The Investment Manager is also entitled to a performance fee. The fee is equal to 10% of the excess return over the performance fee hurdle. The hurdle is 100p increased or decreased by reference to the

return on the Benchmark plus 1.25p per annum. The performance is adjusted for these purposes to take into account the dividends paid by the Company. The fee is calculated and payable on the liquidation of the Company. Further details are given in the Annual Report. The Company Secretarial services are provided at no extra cost to the company.

The Administrator

Identity of the Administrator

The Administrator is HSBC Security Services (UK) Limited. The Administrator is public limited company incorporated in England and Wales and is regulated by the FCA. Its registered office is at HSBC Security Services (UK) Limited, 1 Lochside Way, Edinburgh Park, Edinburgh EH12 9DT.

The Investment Manager has, with the consent of the Directors, delegated the provision of certain administrative functions to HSBC Securities Services (UK) Limited and to Polar Capital Secretarial Services Limited. The fees of HSBC Securities Services (UK) Limited in providing such services are paid by the Company.

Fees

The Manager has delegated certain administrative functions to the Administrator under the terms of the Administration Delegation Agreement. For these services, the Administrator is entitled to an administration fee calculated on an agreed tariff for the functions that it undertakes. The fees of the Administrator are payable by the Company monthly in arrears and may be greater or lesser dependent on the number of transaction fees incurred during the year. The administration fees are included within the 'other expenses' section of the Annual Report.

The Depositary

Identity of the Depositary

The Depositary is HSBC Bank plc. Pursuant to the agreement dated 21 July 2014 between the AIFM, the Company and the Depositary (the "Depositary Services Agreement") and for the purposes of and in compliance with the AIFMD Legislation the Depositary has been appointed as depositary to the Company.

The Depositary is a public limited company incorporated in England and Wales with company registration number 00014259. HSBC Bank plc is a wholly owned subsidiary of HSBC Holdings plc. The Depositary's registered and head office is located at 8 Canada Square, London E14 5HQ and the principal business activity of the Depositary is the provision of financial services, including trustee and depositary services. HSBC Bank plc is authorised by the Prudential Regulation Authority and regulated by the Prudential Regulation Authority and the Financial Conduct Authority.

The Depositary provides services to the Company as set out in the Depositary Services Agreement and, in doing so, shall comply with the AIFMD Legislation.

The Depositary's duties include the following:-

- (i) Ensuring that the Company's cash flows are properly monitored and that all payments made by or on behalf of applicants upon the subscription to shares of the Company have been received.
- (ii) Safekeeping the assets of the Company, which includes (i) holding in custody all financial instruments that can be physically delivered to the Depositary; and (ii) verifying the ownership of other assets and maintaining records accordingly.

(iii) Ensuring that issues, redemptions and cancellations of the shares of the Company are carried out in accordance with applicable law.

(iv) Ensuring that the value of the shares of the Company is calculated in accordance with applicable law.

(v) Carrying out the instructions of the AIFM and the Board, unless they conflict with applicable law.

(vi) Ensuring that in transactions involving the Company's assets any consideration is remitted to the Company within the usual time limits.

(vii) Ensuring that the Company's income is applied in accordance with applicable law.

The appointment of the Depositary under the Depositary Services Agreement may be terminated without cause by not less than 180 days written notice provided that the Depositary Services Agreement does not terminate until a replacement Depositary has been appointed.

The Depositary may delegate its safekeeping functions subject to the terms of the Depositary Services Agreement and agreement of the AIFM.

Shareholders have no personal right to directly enforce any rights or obligations under the Depositary Services Agreement.

In general, the Depositary is liable for losses suffered by the Company as a result of its negligence or wilful default to properly fulfil its obligations. Subject to the paragraph below, and pursuant to the Depositary Services Agreement, the Depositary will be liable to the Company for the loss of financial instruments of Company which are held in its custody. The Depositary will not be indemnified out of the property of the Company for the loss of financial instruments where it is not so liable.

The liability of the Depositary will not be affected by the fact that it has delegated safekeeping to a third party save where this liability has been lawfully discharged to a delegate (any such discharge will be notified to the Shareholders and consent will be obtained from the AIFM and the Company to such delegation and discharge). At the date of this notice, the Depositary has not discharged its liability for the safekeeping of assets in its safekeeping.

The Depositary will not be liable where the loss of financial instruments arises as a result of an external event beyond the reasonable control of the Depositary, the consequences of which would have been unavoidable despite all reasonable efforts to the contrary. The Depositary shall not be liable for any indirect, special or consequential loss.

In the event there are any changes to the Depositary's liability under the AIFMD Legislation the AIFM will inform Shareholders of such changes without delay.

From time to time actual or potential conflicts of interest may arise between the Depositary and its delegates, for example, and without prejudice to the generality of the foregoing, where an appointed delegate is an affiliated group company and is providing a product or service to the Company and has a financial or business interest in such product or service or where an appointed delegate is an affiliated group company which receives remuneration for other related products or services it provides to the Company. The Depositary maintains a conflict of interest policy to address this.

In addition, actual or potential conflicts of interest may also arise between Company or the AIFM on the one hand and the Depositary on the other hand. For example, such actual or potential conflict may arise because the Depositary is part of a legal entity or is related to a legal entity which provides other products or services to Company or the AIFM and from which fees and profits in relation to the provision of those products or services may arise and from which the Depositary may benefit directly or indirectly. In addition, the Depositary may have a financial or business interest in the provision of such products

or services, or receives remuneration for related products or services provided to Company, or may have other clients whose interests may conflict with those of Company, or the AIFM.

In particular, HSBC Bank plc may provide foreign exchange services to the Company for which they are remunerated out of the property of the Company. HSBC Bank plc or any of its affiliates or connected persons may also act as market maker in the investments of the Company; provides broking services to Company and/or to other funds or companies; acts as financial adviser, banker, derivatives counterparty or otherwise provides services to the issuer of the investments of the Company; acts in the same transaction as agent for more than one client; has a material interest in the issue of the investments of Company or earns profits from or has a financial or business interest in any of these activities.

The Depositary will ensure that any such additional services provided by it or its affiliates are on terms which are not materially less favourable to the Company than if the conflict or potential conflict had not existed.

The Depositary has a conflict of interest policy in place to identify, manage and monitor on an on-going basis any actual or potential conflict of interest. The Depositary has functionally and hierarchically separated the performance of its depositary tasks from its other potentially conflicting tasks. The system of internal controls, the different reporting lines, the allocation of tasks and the management reporting allow potential conflicts of interest and the Depositary issues to be properly identified, managed and monitored.

Fees

The fee paid to the Depositary is agreed by the Board and contains a fixed and variable element dependent on the size of the Company's assets. The fee paid each year is disclosed in the Company's Annual Report and Financial Statements. The Custody fee is charged at agreed rates dependent on the domicile of the Company's investments.

The Auditor

Identity of the Auditor

The auditors to the Company are PricewaterhouseCoopers LLP, whose registered office is Level 4, Atria One, 144 Morrison Street, Edinburgh EH3 8EX. The Auditor is incorporated in England and Wales as a limited liability partnership and is regulated by the FCA.

Duties Description of the duties of the Auditor and investors rights

The Auditor carries out its duties in accordance with applicable laws, rules and regulations, including the audit of the accounting information contained in the Annual Report of the Company. The Auditors' work has been undertaken so that they might state to the Company's members those matters they are required to state to them in an Auditor's report and for no other purpose. To the fullest extent permitted by law, the Auditors do not accept or assume responsibility to anyone other than the Company and the Company's members as a body, for their audit work, for their audit report, or for the opinions they formed.

Fees

The fees payable to the auditors shall be determined by the Directors annually. The Company's Annual Report, which is available from its website, www.polarcapitalglobalfinancialstrust.com, details the fees paid to the Company's Auditor in the last financial year for both Audit and any non Audit work.

The Registrar

Identity of the Registrar

The registrar to the Company is Equiniti Limited, whose registered office is at Aspect House, Spencer Road, Lancing, West Sussex BN99 6DA. The Registrar is incorporated in England and Wales as a private limited company.

The duties of the Registrar include the maintenance of the register of shareholders, payment of dividends, processing of shareholder legal documentation, certifying and registering transfers and general meeting services.

Fees

Under the terms of the Registrar Agreement, the Registrar is entitled to an annual maintenance fee of £1.05 per Shareholder account per annum, subject to a minimum fee of £3,250 per annum. The Registrar is also entitled to activity fees under the Registrar Agreement. The fees paid each year are disclosed in the Company's Annual Report and Financial Statements.

Investors' Rights

The Company is reliant on the performance of third party service providers, including the Investment Manager, the Depository, the Auditor and the Registrar.

Without prejudice to any potential right of action in tort that a shareholder may have to bring a claim against a service provider, each shareholder's contractual relationship in respect of its investment in shares is with the Company only. Accordingly, no shareholder will have any contractual claim against any service provider with respect to such service provider's default.

In the event that a shareholder considers that it may have a claim against a third party service provider in connection with such shareholder's investment in the Company, such shareholder should consult its own legal advisers.

The above is without prejudice to any right a shareholder may have to bring a claim against an FCA authorised service provider under section 138D of the Financial Services and Markets Act 2000 (which provides that breach of an FCA rule by such service provider is actionable by a private person who suffers loss as a result), or any tortious cause of action. Shareholders who believe they may have a claim under section 138D of the Financial Services and Markets Act 2000, or in tort, against any service provider in connection with their investment in the Company, should consult their legal adviser.

Shareholders who are "Eligible Complainants" for the purposes of the FCA "Dispute Resolutions Complaints" rules (natural persons, micro-enterprises and certain charities or trustees of a trust) are able to refer any complaints against the Investment Manager to the Financial Ombudsman Service ('FOS') (further details of which are available at www.financial-ombudsman.org.uk). Additionally, shareholders may be eligible for compensation under the Financial Services Compensation Scheme ('FSCS') if they have claims against an FCA authorised service provider (including the Investment Manager) which is in default. There are limits on the amount of compensation available. Further information about the FSCS is at www.fscs.org.uk. To determine eligibility in relation to either the FOS or the FSCS, shareholders should consult the respective websites above and speak to their legal advisers.

Delegation of functions by the AIFM

Fund Accounting

Fund accounting, including the calculation of net asset values has been delegated to HSBC Fund Services, which is authorised and regulated in the UK by the FCA.

Conflicts of Interest

It is our policy to identify the conflicts of interest that may exist between a) ourselves or anyone linked to the firm (including managers, employers and controllers) and our clients or the investors in those clients or b) one client or the investors in that client and another client or c) a client or the investors in that client, and another client and the investors in that client or d) 2 clients of the firm or e) ourselves and any third party or 'delegate' as defined under AIFMD. We must as a priority aim to ensure that clients are not adversely affected by potential conflicts. It is therefore our policy to document the arrangements we have put in place to manage the conflicts identified. A copy of the Conflicts of Interest Policy is available upon request.

SHAREHOLDER INFORMATION

Reports and accounts

Copies of the Company's latest annual and half year reports may be accessed at www.polarcapitalglobalfinancialstrust.com.

Publication of net asset values

The latest net asset value of the Company may be accessed at www.polarcapitalglobalfinancialstrust.com. The Company also publishes its net asset values on a daily basis via a Regulatory Information Service.

Valuation Policy

The valuation function is performed by the Depositary with oversight from the Polar Capital Valuation Committee. The valuation function is performed independently from the portfolio management function.

The Company's valuation policy is included in the accounting policies of the Annual Report.

Historical performance of the Company

Details of the Company's historical financial performance are provided in the Company's Annual Reports and Accounts and monthly factsheets, which are available at www.polarcapitalglobalfinancialstrust.com.

Performance is shown net of fees and expenses and includes the reinvestment of dividends and capital gain distributions. Many factors affect fund performance including changes in market conditions and interest rates, and in response to other economic, political, or financial developments. Past performance is not a guide to or indicative of future results. Future returns are not guaranteed and a loss of principal may occur. Investments are not insured by the FDIC (or any other state or federal agency), are not guaranteed by any bank, and may lose value. No investment process or strategy is free of risk and there is no guarantee that the investment process or strategy described herein will be profitable.

How to Invest

The ordinary shares of Polar Capital Global Financials Trust plc are listed and traded on the London Stock Exchange. There are a number of ways to invest as set out in the company website www.polarcapitalglobalfinancialstrust.com and Annual Report.

Fair Treatment of Investors

The legal and regulatory regime to which the Company and the Directors are subject ensures the fair treatment of investors. The UKLA Listing Rules require that the Company treats all shareholders of the same class of shares equally.

In particular, as directors of a company incorporated in the United Kingdom, the Directors have certain statutory duties under the Companies Act 2006 with which they must comply. These include a duty upon each Director to act in the way she or he considers, in good faith, would be most likely to promote the success of the Company for the benefit of its members as a whole.

No investor has a right to obtain preferential treatment in relation to their investment in the Company and the Company does not give preferential treatment to any investors.

The Company's ordinary shares rank *pari passu* with each other.

RISK MANAGEMENT

Key risks

The key risks facing the Company and the mechanisms in place to monitor and measure these risks are set out in the Company's annual report, a copy of which is available from its website, www.polarcapitalglobalfinancialstrust.com.

Risk management systems

The AIFM employs a risk management process in accordance with COLL 5.6.16 R, FUND 3.7.5R and Articles 38 to 45 of the AIFMD as reviewed by the Depositary and filed with the FCA. This process enables the AIFM to identify, measure, manage and monitor at any time the relevant risks of the positions to which a Fund is or may be exposed and their contribution to the overall risk profile of the Fund and which includes the use of appropriate stress testing procedures. Further details regarding the risk management process can be found in the Polar Capital Pillar 3 Disclosure Document which is available on the AIFM website, www.polarcapital.co.uk and the Polar Capital Internal Adequacy Assessment Process (ICAAP) which is available to view upon request. The address of the AIFM is Investor Relations, 16 Palace Street, London, SW1E 5JD.

The Company will periodically disclose to investors the risk management systems which it employs to manage the risks which are most relevant to it. The Company will make this disclosure on its website at the same time as it makes its annual report and accounts available to investors or more frequently at its discretion.

Liquidity risk management

The AIFM has a liquidity management policy in relation to the Company which is intended to ensure that the Company's investment portfolio maintains a level of liquidity which is appropriate to the Company's obligations. This policy involves an assessment by the AIFM of the prices or values at which it expects to be able to liquidate its assets over varying hypothetical periods in varying market conditions, taking into account the sensitivity of particular assets to particular market risks and other relevant factors.

Shareholders do not have the right to redeem their shares or to require their shares to be purchased by the Company. Accordingly, the liquidity management policy ensures that the Company's investment portfolio is sufficiently liquid to meet the following principal obligations:

- the Company's operating and financing expenses: in practice, these expenses are typically covered by dividends received from the Company's investments; and
- the possible need to repay borrowings at short notice, which would require to be met by the sale of assets.

The liquidity management policy requires the AIFM to identify and monitor its investment in asset classes which are considered to be relatively illiquid. The majority of the Company's investment portfolio is invested directly in liquid equities and this equity portfolio is monitored on an ongoing basis to ensure that it is adequately diversified.

The liquidity management policy is reviewed and updated, as required, on at least an annual basis.

Investors will be notified, by way of a disclosure on its website, in the event of any material changes being made to the liquidity management systems and procedures or where any new arrangements for managing the Company's liquidity are introduced.

Professional negligence liability risks

The AIFM covers its potential liability risks arising from professional liability by holding the appropriate additional 'own funds' within the meaning of the AIFMD.

Amendment of this document

When there is a material change to the information contained in this document, it shall be updated.

AIFM REMUNERATION DISCLOSURES

All authorised Alternative Investment Fund Managers are required to comply with the AIFMD Remuneration Code.

The annual report of the AIF will comprise the AIF's audited financial statements together with the additional (unaudited) content required by AIFMD Article 22, namely an investment adviser's report and certain specific disclosures on the amount of remuneration the AIFM pays to its staff.

AIFMD disclosure requirements that are required in advance of investment in the AIF and information that substantiates the remuneration disclosures is made available in the annual report of the AIF. This has been and will be the case for the annual reports from 2016.

Updated April 2018