ORDER EXECUTION AND ALLOCATION POLICY

DOLFIN FINANCIAL (UK) LTD.

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Dolfin Financial (UK) Ltd – Order Execution and Allocation Policy ('the Policy')

1 Introduction

Dolfin Financial (UK) Ltd ('Dolfin' or 'the Firm') is an FCA Regulated Firm which executes orders on behalf of clients (execution-only), arranges deals in investments (acting as broker), deals as principal (dealing on own account) and provides advisory/discretionary management services (dealing as agent). We are therefore under an obligation to take all sufficient steps to obtain, when executing orders, the best possible result for our clients taking into account the various Execution Factors and Execution Criteria referred to below. This obligation is referred to as the best execution obligation.

This Policy takes into account rules arising as a result of the implementation of the Markets in Financial Instruments Directive 2014/65/EU ("MiFID II") that came into force on 3 January 2018. Other FCA Rules and Guidance have been taken into account in designing this Policy, as have other EU Regulations and ESMA Guidance where appropriate.

In some circumstances, we may aggregate client orders, which will require us to allocate the aggregated orders and transactions. This policy sets out how we intend to meet our requirement to fairly allocate aggregated orders and transactions. Order Allocation is covered in section 6.

In order to comply with our Best Execution Obligation we are required to establish and implement an Order Execution Policy.

2 The Best Execution obligation

FCA rules place a high-level obligation on firms to ensure that client orders are executed on terms that are most favourable to that client, which is referred to as the 'Best Execution Obligation'.

MiFID II has further enhanced this standard, by requiring that firms take 'all sufficient steps' to obtain the best possible result for its clients on a consistent basis when executing orders.

For the purposes of this Policy and in relation to the best execution rules more generally, the term "client order" should be understood to mean all orders in financial instruments, whether they are executed direct in the market or transmitted to another firm to execute on the Firm's behalf, that are carried out on behalf of a client. This includes orders that arise in relation to discretionary portfolio management and fund management activities, and therefore originate within the Firm rather than with the client. In this situation, the Firm still has a best execution obligation in relation to the execution of this order. Indeed, the obligation is widened in this situation as it applies both to the trader, in executing the trade order, and to the portfolio manager when giving instructions to the trader (where these roles are separated). The portfolio manager must therefore also consider his best execution obligation when giving instructions to the trader on how the order is to be executed.

3 Application of FCA and EU Regulations

For investment firms authorised under MiFID, the best execution rules relating to direct execution are contained in Article 27 of MiFID II and the corresponding level 2 provisions[1].

[1] For example, Articles 64 and 66 of the MiFID II Delegated Org Regulation and RTS 28.

Separate requirements apply when orders are transmitted to a broker ("indirect execution") and these are set out primarily in Article 65 of the MiFID II Delegated Org Regulation[2]. These requirements have been implemented by the FCA in the UK in COBS 11.2A.

4 Direct and Indirect Execution

The nature of the best execution obligations differs depending on whether the Firm is executing orders directly, or whether these orders are being transmitted to third parties (i.e. brokers) for execution.

Direct execution includes situations where the Firm interacts directly with other counterparties to the trade, without going through a broker, and in addition covers situations where the Firm uses its own membership of a Trading Venue[3], or otherwise places an order directly with an Execution Venue[4] in order to execute the trade.

Indirect execution refers to the practice of transmitting orders to brokers, for which the broker is then responsible for execution. These orders may be transmitted to the broker by a variety of methods, including by telephone, Bloomberg chat, email and electronic order entry and transmission systems (e.g. FIX).

5 Scope

This Policy applies where we:

(a) execute orders on behalf of a client;

(b) receive and transmit orders on behalf of a client;

(c) place orders with entities for execution as a result of a decision by us when providing our Discretionary Investment Management Service; and

(d) Execute orders on behalf of a client where the order is received from a financial intermediary.

The Policy will not apply when, in executing an order, we are following a client's specific instructions (for example, to execute the order in a particular manner or at a particular price).

This Policy applies to client orders in respect of all categories of Investment, including, but not limited to; equities, bonds, money market instruments and derivatives. It will apply regardless of whether the order is placed on a Regulated Market, a Multilateral Trading Facility, an Organised Trading Facility or any investment firm. Where any of the above activities take place on an Over The Counter ('OTC') basis this policy will not apply in full, however we will take all sufficient steps to ensure that the order is executed in the best interests of the client.

Where an order is transmitted to another broker on an agency basis, we will place reliance on the best execution criteria of the broker. We will monitor the broker as per section [11], and as part of our Execution Report in section [16].

[2] Commission Delegated Regulation (EU) 2017/565 of 25 April 2016

[3] A Trading Venue is defined as a Regulated Market, MTF or OTF.

[4] Execution Venues include regulated markets (i.e. exchanges), MTFs, OTFs, systematic internalisers, market makers and 'any other liquidity provider or an entity that performs a similar function in a third country'.

6 Execution Factors

Taking all sufficient steps to achieve best execution is not a guarantee that we will always be able to provide best execution on every order executed on behalf of clients, particularly where a client gives us specific instructions as to all or part of an order. In seeking to achieve best execution, we will take into account a number of factors including the following:

(a) price;

(b) costs (i.e. all expenses incurred by the client including, but not limited to, Execution Venue fees, clearing and settlement fees and any other fees paid to third parties involved in the execution of the order);

(c) speed;

(d) likelihood of execution and settlement (liquidity);

(e) size of the order;

(f) nature of the order;

(g) type and characteristics of the relevant financial instrument;

(h) characteristics of the possible Execution Venues; and

(i) any other consideration relevant to the execution of the order.

In the absence of specific client instructions, total consideration (price and costs) would usually be the most important Execution Factors although the overall value to the client of a particular transaction may be affected by one or more of the other factors listed above. Therefore, we may conclude that Execution Factors other than price and costs are more important in achieving the best possible result for the client, and dependent on the characteristics of the order we may prioritise any one criteria if doing so would be in the best interests of the client.

7 Best Execution Criteria

When executing a client order, we will take into account the following Execution Criteria for determining the relative importance of the execution factors:

(a) any special objectives that the client may have in relation to the execution of the order;

(b) the characteristics of the client including the categorisation of the client as Retail or Professional;

(c) the characteristics of the client order;

(d) the characteristics of the financial instruments that are subject to the order; and

(e) the characteristics of the Execution Venues (if there is more than one) to which that order can be directed.

8 Execution Venues

In order to give effect to this Policy we are required to select the Execution Venues which, on a consistent basis, allow us to obtain the best possible results for the execution of client orders. For these purposes, Execution Venues means regulated markets (e.g. the LSE), multilateral trading facilities, organised trading facilities (together 'Trading Venues'), market makers, systematic internalisers, brokers and other liquidity providers (together 'Investment Firms').

Unless we agree otherwise with a client, we will use a selection of Execution Venues which we will review periodically including the following:

(a) member firms of the London Stock Exchange;
(b) members firms of the International Capital Markets Association;
(c) member firms of overseas stock exchanges;
(d) managers and administrators of collective investment schemes; and
(e) other UK and overseas Execution Venues that we deem appropriate and that accord with our Order Execution Policy.

Factors that we consider in selecting Execution Venues include general price availability, depth of liquidity, relative volatility in the market, speed of execution, cost of execution, creditworthiness of the counterparties on the relevant Execution Venue or the central counterparty and the quality and cost of clearing and settlement. Where a particular financial instrument is illiquid there may be little, or no, choice of Execution Venue. In other cases, the choice of Execution Venue may be limited because of the nature of the client order or the client's particular requirements.

Volatile Markets

Clients should be aware of the following risks associated with volatile markets, especially at or near the open or close of the standard trading session:

- Execution at a substantially different price from the quoted bid or offer or the last reported price at the time of order entry, as well as partial executions or execution of large orders in several transactions at different prices.
- Delays in executing orders for financial instruments that firm must send to external market makers and manually routed or manually executed orders.
- Opening prices that may differ substantially from the previous day's close.
- Locked (the bid equals the offer) and crossed (the bid is higher than the offer) markets, which may prevent the execution of client orders.
- Price volatility is one factor that can affect order execution. When there is a high volume of orders in the market, order imbalances and back logs can occur. This implies that more time is needed to execute the pending orders. Such delays are usually caused by the occurrence of different factors:
    i. the number and size of orders to be processed,
    ii. the speed at which current quotations (or last-sale information) are provided to firm and other brokerage firms; and
    iii. the system capacity constraints applicable to the given exchange, as well as to firm and other firms

Our dealing commissions will not be structured or charged in such a way that discriminates unfairly between Execution Venues. Our fees will not differ dependent on the venue chosen, unless the client has been informed of such for a specific order or type of order before the order has taken place. Fees charged by Execution Venues may differ dependent on the circumstances of the order, and we will take account of any charges levied by a third parties or incorporated into its prices to reflect cost differentials of dealing at different Execution Venues.

Set out below are the Execution Venues on which we place significant reliance in meeting our obligation to take all sufficient steps to obtain on a consistent basis the best possible result for the execution of order for our client orders. The list below is reviewed on a regular basis and is, therefore, subject to change over time. We will not notify clients specifically of any changes but a current list will be available on our website: www.dolfin.com.

Financial Instrument	Execution Venues
Equities	Cowen execution services LLC
Debt Securities	Credit Suisse Morgan Stanley London JP Morgan London CITI London VTB Capital TD Securities Ltd Tradition Broker Soc Gen London Bridport & Co (Jersey) LTD Mitsubishi UFJ William Blair and Company Commerzbank London Sberbank CIB UK Goldman Sachs London Zurcher Kantonalbank
Foreign Exchange	PPF banka a.s. Currenex hosted by State Street Global Markets
Collective Investment Schemes/Open-ended Investment Companies	International Fund Services & Asset Management S.A.
Contingent Liability Investments	Berkeley Futures Ltd

9 Relying on a single Execution Venue

The FCA and ESMA have clarified[5] that it is permitted to rely on a single Trading Venue or Investment Firm to execute client orders. However, in order to demonstrate that best execution is being provided in this situation, firms must be able to show that its reliance on this single Execution Venue provides the best possible result for its clients on a consistent basis, and that the results are at least as good as could be obtained from relying on other entities.

[5] See COBS 11.2A.29G, COBS 11.2A.36G and question 3 of the best execution section of the ESMA Q&A on MiFID II and MiFIR investor protection topics (ESMA35-43-349)

10 Allocation and Client Order Handling

We are required to implement procedures and arrangements which provide for the prompt, fair and expeditious execution of orders, relative to other orders or our own trading interests. We will aggregate client orders only where this is unlikely to lead to the overall disadvantage of any client whose order is to be included in this aggregation. This includes where we aggregate a client order with an order on our own account.

We will disclose to each client whose order is to be aggregated that the effect of aggregation may work to the disadvantage of the client in relation to a particular order despite sufficient steps taken by Dolfin to avoid this.

The allocation procedures set out below are designed to ensure that, when we aggregate a client order with another client's order and subsequently allocate the executed transactions, we do so consistently and in accordance with the FCA Rules covering:

(a) ***Timely allocation***: allocation will be carried out promptly and by the broker when relevant.

(b) ***Fair allocation***: all clients will receive the same executed price or a volume weighted average where there is a series of transactions.

(c) ***Re-allocation***: any errors in allocation will be promptly corrected so as to not benefit any one client over another.

i. Allocation Procedures

Where we are able to fulfil the whole of an aggregated order on a single business day, orders will be allocated based on either the price paid for each investment or based on a volume weighted average of the prices paid for a series of transactions.

Where we are unable to fulfil the whole order on a single business day, we will give priority to satisfying Retail Client orders over Professional Client orders. Where an aggregated order has been aggregated with our own order, we will prioritise client orders over our own, unless reasonable mitigating circumstances in line with FCA requirements allow us to allocate proportionately.

Where we are unable to fulfil all client orders, we will allocate the business done proportionately to the size of the order from each client, provided that these orders are received at the same time.

Aggregated orders dealt on a single business day will be allocated to clients on that day.

Where the market in the relevant investment is illiquid and/or smaller in size than the total amount we wish to trade, we may be able to deal to the advantage of clients if we can negotiate in relation to the total amount rather than smaller piecemeal amounts.

We will retain records of all deals in aggregated orders and of their allocation for a period of at least five years.

ii. Partially Filled Aggregated Orders

In the event that an aggregated order can only be partially filled, allocation will be effected on a reduced pro-rata basis, unless the allocation becomes uneconomic for a client.

Where it is no longer in a client's interest to receive a reduced allocation, we may eliminate that client from the allocation and reallocate the order on a pro-rata basis to the remaining clients.

Where relevant, we will take account the investment strategies agreed with clients whose orders have been aggregated.

iii. Client Sub-Accounts

If a client gives an order which is to be split among various sub-accounts, we will use reasonable efforts to determine the sub-account names and the basis for the allocation when the order is first obtained. The order should then be allocated in accordance with the client's instructions.

In the absence of client instructions as to the basis of the allocation, the allocation should be made either:

a) on a pro-rata basis among the sub-accounts as the order is filled; or

b) on such other basis agreed with Compliance.

iv. Re-allocation

Re-allocation is permitted only if:

(a) we have made an error and we are able to re-allocate within one business day of the date of the error; or

(b) the order is only partially executed, resulting in an uneconomic allocation to one or more clients. In this situation, we will take reasonable steps to ensure that re-allocation is in the best interests of the relevant clients.

v. Records

We are required to make a record of the intended basis of allocation when we aggregate the orders of several clients. Once the allocation is made we will record the actual basis of allocation. Should the actual basis of allocation be changed, a record of the details of, and the rationale for, the reallocation will be made.

When we execute aggregated orders, we will record:

a) the date and time of allocation;

b) the details of the relevant security;

c) the identity of each client involved; and

d) the amount allocated to each client.

11 Placing Orders with Other Firms

To ensure we obtain the best possible result for our clients we will only pass on orders to Execution Venues that we have determined have an order execution policy which results in Dolfin fulfilling its best execution obligation to its client. Prior to setting up brokerage arrangements with such firms we will undertake a review of their current order execution policies. These shall be retained on file and we will review such policies at least annually to ensure they remain adequate.

Where it appears to us that in a particular case better execution is available from an Execution Venue that we do not ordinarily use, we may use such a venue on a case by case basis. However, we are not under any obligation to check a variety of brokers with respect to each order.

From time to time, we may execute outside of a Trading Venue, either where the instrument is an OTC instrument or where it is in the best interests of the client to execute the order outside of a venue. Where this is the case, we will continue to apply this policy to the full extent possible. In some circumstances, trading off venue can lead to certain risks arising, such as counterparty risk. This will occur particularly in the case of instruments which are not settled by delivery versus payment; in which case, our credit risk assessment of counterparties may have an impact on our selection of the Investment Firm operating as our trading counterparty and the strategy adopted for each trade.

For more information on potential risks in OTC instruments, please contact your relationship manager.

12 Client's Specific Instructions

When a client gives us a specific instruction in relation to the execution of an order, we will follow those instructions to the extent it is possible for us to do so. We may, therefore, not comply with the entirety of this Order Execution and Allocation Policy, or our obligation to obtain the best outcome because the characteristics of the specific instructions prevent us from doing so. We will endeavour to adhere to this Order Execution and Allocation Policy for any criteria at our discretion with respect to an order where there is a specific instruction. For example, we will not comply with our obligation to provide best execution where a client instructs us to execute an order at a particular price. Similarly, where a client instructs us to execute an order on a particular Execution Venue, we will not be responsible for the selection of the Execution Venue for that order.

Where a client instructs us to execute an order at a particular time or over a particular period regardless of the price available, we will endeavour to execute the order at that time or over that period in the best possible manner but we will not be responsible for the consequences in terms of price, cost and other factors resulting from the timing of the execution of the order.

Clients should be aware that when they provide specific instructions in relation to the execution of an order we may be prevented from taking the steps set out in this Policy to obtain the best possible result for the execution of those orders in respect of the elements covered by those instructions.

13 Execution of orders outside a Trading Venue

By signing our Client On-boarding Form, each client gives its express consent to us executing orders (including margined transactions) on behalf of such client outside of a Trading Venue (as defined in the FCA Rules).

14 Client order limits

By signing our Client On-Boarding Form, each client expressly confirms that, unless the client specifies otherwise, we shall not be obliged to make public any limit orders placed by the client in respect of shares admitted to trading on a regulated market which are not immediately executed under prevailing market conditions. In such cases, we will have discretion in the client's best interests in determining how and when unexecuted limit orders are made public.

15 Governance and Senior Management oversight

15.1 Ongoing monitoring of execution quality (first line)

The ongoing monitoring of execution quality and 'first line' controls are undertaken by our trading desk and individual traders with independent scrutiny carried out by our compliance and trading support team as the 'second line of defence'. The first and second lines of defence are therefore primarily responsible for ex ante and ex post monitoring of best execution on an ongoing basis, with oversight of this monitoring undertaken by senior management by way of the Board.

The Firm's front-office staff receive regular training on the Firm's best execution obligations and fully understand our best execution policies and processes, and seek to deliver best execution on a consistent basis. The Firm's Trading Team have a suite of tools in order to assist in the delivery of best execution. The trading team are overseen on a daily basis by our Head of Trading who reviews the Firm's trades on a real-time basis and is able to identify and undertake remedial action if required. In particular, this review considers whether our execution parameters need to be altered where necessary.

End of day reviews are undertaken with a view to ensuring that the quality of execution has met the required standards, and in particular this aims to identify any potential outliers or deficiencies in trade execution so that remedial action can be taken.

15.2 Periodic monitoring of execution quality (second line)

Independent monitoring of the quality of execution obtained is undertaken by compliance as the 'second line of defence'. Testing is undertaken on a sample basis, using quantitative and qualitative techniques. The monitoring considers the entirety of the Firm's trading operations where best execution is relevant, and considers how individual trades were carried out using a combination of internal and external data (which includes the use of benchmarks and market reference data, price feeds, market information (i.e. credit risk, yield curves) and comparable quotes using 'point in time' analysis. Analysis and MI is subsequently provided to the Head of Compliance for his review and comment.

Where any exceptions or outliers are identified, these are discussed with the trader in the first instance, and if necessary the executing broker may also be contacted to obtain further information on why the price of execution (or other factors, as identified) did not meet the expected standards. Where immediate remedial action can be taken this is done, and the results of this analysis (whether positive or negative) are fed into the Board as part of the periodic reports.

15.3 Periodic broker assessment process

The Firm tracks the performance of each broker used on an ongoing basis, and the results of this analysis are periodically escalated to the Board. Note that this is distinct from the daily and checks that are done at trade level, as this analysis groups the all trading done through a particular broker to allow comparison of the performance between one broker and another.

On an annual basis, this information is compiled and escalated to the Board who will be responsible for decisions regarding the adding and removing of brokers from the approved list. This information will also be supplemented by the latest disclosures made by each broker under RTS 28.

15.4 Removing a broker from the approved list

Where a broker is found to be not providing best execution for our clients on an ongoing basis, this broker will be removed from out list of approved brokers. The Board will be responsible for making this determination and has the authority (and responsibility) to add and remove brokers from this list as necessary.

Brokers may on occasion be removed for other reasons, for example because they are not being used, because the costs of maintaining an active relationship with them are too high, regulatory issues or concerns about the solvency of the broker, or because they have ceased trading or merged with another broker, or otherwise altered their service as to no longer be useful to the Firm.

15.5 Review and oversight of Best Execution Policy

The Board will review and approve any necessary changes to this Policy. This review will take place at least annually and will be led by the Compliance Officer who will review and propose any necessary changes to the Policy before this is presented to, discussed and approved by the Committee. The results of the periodic monitoring of execution quality described above, as well as the periodic broker assessments undertaken will feed in to this review. This will allow the Board to assess whether the Policy is being adhered to and whether the Policy itself is sufficient to deliver the best outcome for clients on a consistent basis.

The Committee will also consider as part of this review whether any changes made represent a ‘material change’ that needs to be notified to clients. Further details on this are found in Section 6.

In addition, the Compliance Officer, as well as Board will be responsible for identifying circumstances that require an ad hoc review and/or updates to this Policy to be made as and when these circumstances come to their attention.

16 Disclosure Top 5 Execution Venues (RTS 28)

Where a firm executes trades for clients, it is required under RTS 28 to make an annual disclosure of the top five execution venues where orders were executed, broken down for each class of financial instrument traded. Where firms also execute trades indirectly by transmitting orders to brokers, an equivalent disclosure of the top 5 brokers is also required under COBS

11.2A.34 EU (6). Where both direct and indirect execution takes place, these reports must be made separately.

16.1 RTS 28 – Information to be disclosed

This information should be broken down by class of financial instrument, as set out in Appendix 2 of this Policy and defined in Annex 1 of RTS 28. The format of the disclosure should be made in line with Annex II of RTS 28, and must be made separately for retail clients, professional clients, and in relation to securities financing transactions (Tables 1, 2 and 3 respectively), if any such transactions took place.

RTS 28 in its entirety, along with all of the Annexes and Tables referred to above is reproduced in COBS 11 Annex 1 EU.

It should be noted that the data only needs to be provided where trading has taken place in relation to the financial instrument in question. In addition, where the Firm has executed less than one trade on average per business day during the year in the financial instrument in question, it is sufficient to state this fact rather than providing a breakdown of execution venues.

In relation to portfolio management business and the reception and transmission of orders, ESMA have clarified that the concept passive orders and aggressive orders is not generally relevant, unless specific instructions have been attached to the order that suggest otherwise. This field can therefore be omitted in this context.

The Compliance Officer is responsible for ensuring that the investment team have systems and processes in place to retain all relevant data to enable these disclosures to be made as required on an annual basis.

16.2 RTS 28 – Qualitative disclosure of execution quality

In addition, the reports referred to above should be accompanied by information on the execution quality obtained. This will take the form of a summary of the analysis conducted by the Firm and the conclusions drawn from its regular monitoring of execution quality and should include at a minimum:

• An explanation of the relative importance the Firm gave to each of the execution factors in selecting an execution venue or broker. Where appropriate, this should be broken down by class of financial instrument.

• A description of any close links, conflicts of interest or shared ownership with any execution venue or broker used.

• A description of any specific arrangements regarding payments, rebates, discounts or non-monetary benefits given to or received from any execution venue or broker used.

• Where the Firm's list of approved execution venues or brokers changed, an explanation of the factors that led to such a change.

• Where relevant, an explanation of how order execution differed according to client categorisation (i.e. between retail and professional clients)

• Where relevant, an explanation of how and why any other execution factors were given precedence over cost and price in relation to retail clients and how this improved the outcome for the client in terms of total financial consideration.

• An explanation of how the Firm used any data published by execution venues under RTS 27 or brokers under RTS 28.

• Where applicable, an explanation of how the Firm used the output of a consolidated tape provider

The Head of Compliance is responsible for coordinating these reports between different departments. They will then be provided to the Board for approval and sign-off, along-side other monitoring of execution quality performed by the Firm to ensure that they are consistent.

These reports will be prepared on an annual basis, covering the calendar year (i.e. 1 January 20 31 December). The first report due will be the one covering 2017, although since this period covers the calendar year prior to the one when MiFID II (and this Policy) came into force, it is recognised that some of the required information may not be present.

These reports will be published no later than 4 months after the end of each calendar year (i.e. no later than 30 April). The reports will be hosted on the Firm's website, in machine readable format (i.e. not as a graphic) and will not have any access restrictions. The Firm's clients will be alerted to the publication of these reports and will be sent a link. The Firm will ensure that each report stays on the Firm's website for at least 2 years after it is first published.

It is the responsibility of the Compliance Officer to ensure that these reports are published on a timely basis, comply with the relevant requirements and remain accessible on the Firm's website for the minimum period of 2 years.

16.3 Demonstrating best execution to clients and the FCA

The Firm is obliged by FCA rules to be able to demonstrate to clients, on request, that all trades have been executed in accordance with this Policy. This obligation does not generally extend to the underlying investors in any fund although such information can be provided to them upon request at the Firm's discretion. It does however extend to the fund board, which should be considered the Firm's client for these purposes.

In relation to MiFID business only there is a further new requirement that the Firm must be able to demonstrate to the FCA, upon request, that best execution has been achieved. This requirement goes beyond just demonstration that the execution policy has been adhered to.

The Firm considers that this Policy, along with the detailed monitoring of execution quality undertaken and the reports escalated to and ratified by Board, along with the RTS 28 reports (qualitative and quantitative) published annually, are sufficient to demonstrate the Firm's adherence to this Policy and to demonstrate more widely that the Firm has taken all sufficient steps to provide best execution to its clients and that this has been delivered on a consistent basis.

We will notify you of any material change to our order execution arrangements or Order Execution Policy by providing you with an updated version of this document. Any non-material changes will be listed on our website: www.dolfin.com. For any further information on Dolfin's execution policy, please contact your relationship manager.

Version

Version	Date	Reviewer	Approved
2.0	21/07/2017	Oliver Rodwell	Asif Lalani
3.0	01/12/2017	Oliver Rodwell	Asif Lalani