

Corporate Social Responsibility Policy
for Aleltho Group Companies

The Aleltho Group intend to be a good corporate citizen in all aspects of our business. We have brought together a series of core policies under the broad heading of Corporate Social Responsibility (CSR) to which we will adhere in running our business. Our policies cover:

1. Business Conduct
2. Partner and Employee specific matters
3. Group specific matters
4. Fair Employment Practice
5. Workplace Health and Safety, and
6. Environmental Issue

1. Business Conduct

A. Our Principles

We believe in being accountable and honest and operating to the highest level of professional integrity in all aspects of our business. Our policy is to conduct our business in a manner which ensures:

- fair treatment of all employees and clients
- transparency of our business policies and practices
- high standards in all matters relating to health, safety and the environment
- ethical business practices throughout our operations

We recognise that our employees are critical to future success and we adopt a policy of keeping employees fully informed on all matters affecting them. We operate a remuneration approach that recognises both business and individual performance and aligns our rewards to our stake-holders. We are also committed to best practice in employment matters, recognising the role this plays in attracting and retaining staff.

To help ensure our business succeeds, we expect all partners and employees to adhere to our core values, to uphold them in the workplace and to respect them in their personal lives. We expect them to exercise the highest ethical judgement and comply with laws applicable to their duties.

2. Partner and Employee Specific Matters

A. Compliance with Codes and Regulations

In addition to the Group's internal operating policies laid down in the Procedures Manual parties and employees shall adhere to all national laws and regulations. As investors in more than one investment jurisdiction, managers will be required to familiarise themselves with the codes of practice in the domains for which they are responsible as well as those codes and regulations in force in the UK. These will include the rules of the FSA and other financial services regulators, regulations specific to OEICs, the ERISA rules and the recent stipulations of Sarbanes-Oxley.

Whistle Blowing

In the event that partner or employee discovers a breach of company policy there is a facility for him/her to report that breach in confidence anonymously to the Chairman. The Chairman has a duty to investigate fully the detail behind such a report and as part of the investigation will not normally make reference to the anonymous report. Reports for which there is no real basis for making a report are not welcomed and may result in disciplinary action being taken against the employee making the accusation maliciously.

B. Outside Interests

The Group requires that partners and employees avoid at all times any situation which may involve a conflict of interest between them and the Group. Partners and employees are expressly prohibited from accepting other paid employment, including directorships in other companies, without the consent of the Executive Committee. In general, this does not apply to charitable work or relationships with non-profit organisations unless this has the potential to impact on their normal duties.

C. Dealing with Customers, Stakeholder and External Parties

The Group is committed to the provision of accurate information and fairness in all its dealings with customers, stakeholders, officials and any other external party having direct business with the group.

D. Confidentiality

Partners and employees shall respect any information which is confidential to the Group including, but not limited to, trade secrets, confidential knowledge or any information concerning any process or invention used by the Group. Breaches of confidentiality may be cause for disciplinary action.

Data Protection

We are committed to complying with the data protection principles established by the 1995 EU Directive on Data Protection. This commitment applies throughout the group and in all countries in which it operates. If the group conducts business in a jurisdiction where stricter rules apply, then it will comply with those rules as a matter of course. All partners, employees and agents of the Group are responsible for ensuring compliance with the policy.

E. Malpractice

The Group actively works to deter malpractice in its workplace, with specific attention to activities involving bribery and corruption, fraud, money laundering and insider trading. The Group has detailed procedures for staff to follow in order to ensure observance of these principles.

Partners and employees should avoid any financial situation that conflicts with the Group's interests or potential interests.

F. Use of Company Information / Assets

Partners and employees shall use the company's computer systems, internet and intranet, and email systems for business use. Any partner or employee found to have disclosed confidential information, been abusive or malicious in using these facilities, or misusing the systems in any way may face disciplinary action. The Group strictly prohibits the use of its intranet, internet or email systems for acquiring, producing or disseminating pornography or similar material, including the use of abusive language or offensive images.

G. Disciplinary Procedure

The Company has a detailed formal disciplinary procedure, full details of which are contained in the Company's procedures manual.

3. Group Specific Matters

A. Political Contributions

It is the Group's policy not to make contributions for political purposes. However, partners and employees are not hindered from being politically active in their own time using their own resources.

B. Corporate Governance

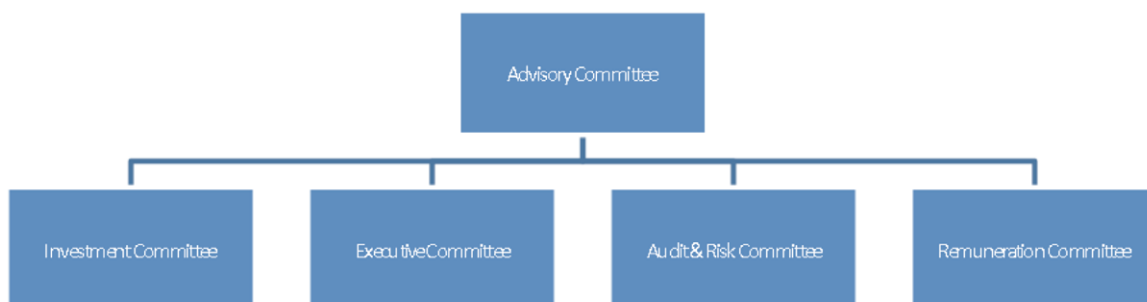
1. Background

The Aleltho Group develop and manage a diversified investment portfolio focussed upon sub-sectors of the RE sector. Aleltho aim to deliver long term superior risk adjusted returns for our stakeholders. Our further goal is to create sustainable wealth founded on sound business practice.

The Group are committed to the business values of integrity, transparency, honesty and accountability. These values form the basis of optimum corporate governance. The group is committed to complying with good corporate governance policies and to listening to and acting in accordance with the wishes of its stakeholders.

2. Structure

The Aleltho Group's corporate structure is represented in the diagram below.



Detailed terms of reference of each of these committees are contained within the Procedures Manual governing organisation, membership, meetings, quorum and voting procedures.

3. Stakeholder Relations

The Group place a great deal of importance on communication with our stakeholders and aim to keep stakeholders informed by means of regular communication throughout the year. Annual and Interim reports will be widely distributed to other parties who may have an interest in the Group's performance and these documents are also made available on the Company's website. The Chief Executive and Chief Finance Officer make regular reports to stakeholders, who are encouraged to attend regular Advisory Board Meetings.

4. Internal Controls

Dimitrios Hatzis, Head of Compliance and Internal Audit, has overall responsibility for our system of internal control and for reviewing its effectiveness. The internal controls are designed to cover all risks to achieving the Group's objectives including all business, operational, financial and compliance risks. The internal controls are designed to manage, rather than eliminate, risk of failure to meet business objectives and to provide reasonable, but not absolute, assurance against material misstatement or loss. The system of internal control is embedded within the day to day operations of the Group and a strong control culture is combined with clear management responsibility and accountabilities for individual controls.

At least twice a year the Executive presents a formal risk control report to the Board. This includes a summary of significant risks, key internal controls, the work of the monitoring functions and findings arising during the period. In addition, the Board regularly receives reports on the Group's social, ethical and environmental (SEE) issues which are further detailed later in this document.

C. Community Investment

Aleltho's Community Investment Programme has two main components, charitable giving and support for a wide variety of local and national organisations. The Group is an active sponsor of sports clubs and a supporter of business groups where the company operates. The Group also have a policy encouraging staff to donate their time to local and national causes and will accommodate reasonable requests for time away from the office to engage in community activities.

Charitable Donations

At the commencement of each fiscal year the Board will agree an amount which should be allocated to donations to charity and support for good causes. The Group will aim to grow this core amount over time and, depending on profitability, may make specific one-off donations.

4. Fair Employment Practices

In formulating employment policy the Group have been guided by the relevant legislation and guidelines in the United Kingdom that encourage companies to foster openness, sustainability, and respect for employees' rights. The policies are periodically reviewed and updated, when appropriate.

A. Equal Opportunities Employer

The Group are committed to providing equal opportunities to all workers and job applicants. We aim to ensure that no job applicant shall receive less favourable treatment on the grounds of sex, marital status, sexual orientation, race, colour, religion or belief, nationality or ethnic or national origin. The company will not treat an employee or job applicant less than favourably for a reason relating to their disability or part time or fixed term status unless this can be justified. The Group will also take all reasonably practical steps to ensure that disabled applicants or workers are able to participate in our business activities on an equal basis with people who are not disabled.

All partners and employees are responsible for complying with this policy and for ensuring that the standards of behaviour required by the company are observed by:

- Treating others on their merits and disassociating themselves from any form of direct or indirect discrimination, victimisation or harassment;
- Bringing to the attention of their Departmental Manager any suspected working practise in breach of this policy; and
- Working together to promote a harmonious working environment free from discrimination, harassment and bullying.

The Company regard direct or indirect discrimination, victimisation and harassment as a serious matter. Employees who fail to comply with this policy will be subject to the Company's disciplinary procedure. All breaches of this policy will be regarded as serious disciplinary matters and will, if there has been victimisation, intentional discrimination or deliberate harassment be regarded as potential gross misconduct leading to summary dismissal.

B. Human Rights

Altho support the Universal Declaration of Human Rights in all of its spheres of influence. We uphold the freedom of association and recognise the right to collective bargaining.

C. Discrimination, Sexual Harassment and Other Forms of Harassment and/or Bullying

All staff are entitled to work in an environment which respects their personal dignity and which is free from harassment, bullying or any other type of intimidation. Harassment, whether on the grounds of sex, race, colour, nationality or ethnic origin, religion or belief, or age, disability, sexual orientation, being in an inferior position in terms of power or hierarchy (leading to bullying), willingness to challenge harassment (leading to victimisation) or otherwise will not be tolerated by the Company.

D. Employee Benefits

The Group recognise the value of our partners and employees and have identified and assessed their long term retention as key to the short and long term value of the Group. To this end, the Group aim to attract and retain skilled employees and enhance the life/work balance of each individual.

E. Grievances

The Group have adopted a grievance procedure to provide employees who consider that they have a problem or complaint about their work with a mechanism for resolving the issue fairly and speedily. The grievance procedure encompasses the statutory grievance procedure.

5. Workplace Health & Safety

A. Health & Safety Policy

The Group aim to provide each partner and employee with a safe place to work. All group locations are required to abide by local health and safety regulations and each must submit on a regular basis to health and safety testing for accreditation.

B. H&S Records

The group record all accidents and/or near misses and investigate these to determine if preventative action is required to prevent further accidents.

6. Environmental Policy

A. Background

The Group understand that its activities affect the environment and the communities in which we operate. We believe that we have a responsibility to identify and manage these impacts as effectively as possible. We are committed to continually improving our environmental performance and moving towards best practices in corporate sustainability.

B. Environmental Management Team

Dimitrios Hatzis has been nominated by the Executive Committee to be accountable for the implementation and communication of this policy. Reporting regularly to the Advisory Board, he will also be responsible for establishing and monitoring performance against appropriate industry benchmarks.

Dimitrios will collate the financial data for the project and analyse results against industry benchmarks. Executive Committee members will be responsible for the day to day control of the environmental programme and for reporting on its progress. They will report to the Advisory Board on a semi-annual basis.

C. Communicating the Policy

All partners and employees are informed of the policy and are encouraged to contribute to the achievement of its objectives.

Progress towards environmental objectives will be communicated in an Environmental Report via the Group website and in the Annual Report.

D. Environmental Policy

The Group aims to:

- minimise the environmental impacts of our operations and ensure that the environmental impacts of new operations are fully assessed and minimised prior to their introduction;
- reduce consumption of materials in all operations, where practicable, to re-use rather than dispose of materials where possible, and promote recycling and use of recycled materials;
- seek to improve the energy efficiency of buildings and to manage energy wisely in all operations;
- reduce, wherever practicable, the level of harmful emissions from our office premises;
- introduce programmes that aim to minimise waste;
- dispose of waste and effluents in a responsible manner;
- promote the ownership and control of environmental issues at business level.
- provide the necessary training and support in order to ensure that staff fulfil their requirements;
- work with our suppliers to minimise the impact of their operations on the environment through a quality purchasing policy;
- support through our community programme the promotion of environmental protection by relevant external groups and organisations; and
- monitor progress and publish an environmental performance report on an annual basis.

E. Environmental Risks

Key issues for the Aleltho Group are the use of paper, the constant demand for energy and CO2 emissions resulting from the company's operations. Substantial quantities of paper are used in reports, including newsletters, to stakeholders, the preparation of research materials and in the recordkeeping process. Energy used for heating, lighting and cooling of offices and for office equipment is another critical element of the process while, CO2 emissions from energy and from travel by employees is also important. The Environmental Policy seeks to mitigate these risks and the Implementation Approach explains further how we seek to achieve this aim.

F. Implementation Approach ("IA")

The Group's IA has the following components and objectives. As additional areas for monitoring are identified, they will be integrated into the IA.

Energy

The group aim to reduce the consumption of energy and will also strive to ensure that their office premises use energy in as efficient a manner as possible. Energy is used for office lighting, heating and cooling systems and for the operation of office equipment and kitchen appliances.

a) Lighting

Aleltho will encourage the use of low energy lighting and where practicable, the use of segmented areas which will allow lights to be switched off when not required. Likewise we will encourage the use of manual and passive infra-red switches where practicable.

b) Heating

To make more efficient use of heating systems we will ensure that the temperature is set for a comfortable working environment and not more than 22oC. Where heating is provided as part of a leased or rented building system, we will aim to ensure that thermostats are available for use by partners and employees.

c) Air conditioning

Air conditioning units are available in our office location. These will only be used when required and will be switched off when the office is not in use.

d) Kitchen appliances

We will aim to ensure that our kitchen appliances are energy efficient and that they release the minimum amount of waste product.

Water

We seek to reduce the amount of water used. In shared buildings we will investigate the possibility of the installation of separate meters to monitor use and cost.

Paper

We seek to reduce the amount of paper used and to increase the amount of paper that is recycled. Although we will strive to reduce the amount of paper purchased and will encourage staff to re-use or recycle paper. Where possible, all reports will be printed on recyclable and chlorine free paper. In addition, staff are encouraged to make use of electronic communications in the form of email and the scanning of documents into electronic records for storage.

Waste

General office waste will be collected and removed each day by cleaners and taken to a compactor for removal by a waste contractor, or by the local authorities.

Toner cartridges are collected after use for donation to charity.

Redundant equipment, which is not sold or given to a charity, will be collected by an approved third party company who will dispose/ recycle the hardware in a manner that is environmentally friendly and adheres to EU regulations.

Hazardous materials

We will accept responsibility for monitoring hazardous materials found in the office, including, for example asbestos, polychlorinated biphenyls ("PCB's") and refrigerants to ensure that they do not pose a risk to our employees. We will ensure that annual service and maintenance programmes for our air conditioning plants are carried out, as required under current guidelines.

Transport

Transport is a major source of CO2 emissions. To reduce these emissions the group encourages employees to use public transport wherever possible. Car sharing is promoted and staff are encouraged to make use of public transport for regular journeys.

Conference calls and video-conference calls are used where possible to reduce the need for regular travel.

For essential distance business travel, train travel is promoted through a no car allowance or reimbursement policy. Airline travel is actively discouraged and has to be approved as essential by senior management.

Supply Chain Management

We wish to encourage sustainability and environmentally sound sourcing and production methods in our suppliers' manufacturing and delivery processes. To this end we will inform our suppliers of our Environmental Policy and we will inform them that we will look to favour companies with established environmental policies and practices in the allocation of future contracts. We will also aim to use local suppliers and local goods and services, where practicable.