

In the spirit of transparency, and to ensure that you have the information to make an informed decision, we would like to provide some background regarding ourselves and our company, as well as information required in terms of the Financial Advisory and Intermediary Services (FAIS) Act no 37, 2002.

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|--------------------------------------|---|--|
| FinPlanCo (Pty) Ltd. | Provide financial planning, -advice and -intermediary services on the following areas/categories: | |
| FAIS Category 1 Licence no. 49229 | Participatory interest in Collective Investment Schemes | Local and Foreign Unit Trust Funds |
| | Participatory interest in a Hedge Fund | Local and Foreign Hedge Funds |
| | Long-Term Insurance subcategory A | Assistance policies, e.g. Funeral Policies |
| | Long-Term Insurance subcategory B1 | Long term insurance risk policies with no investment component such as Disability, Health and Life policies. |
| | Long-Term Insurance subcategory B2 | Long term insurance policies which contain an investment component which guarantee a minimum return. (Guaranteed endowment or Annuity) |
| | Long-Term Insurance subcategory B1-A and B2-A. | |
| | Long-Term Insurance subcategory C | Single Premium Retirement Annuity policies, Preservation funds and Investment Endowment Policies and Living annuities |
| | Retail Pension Benefits | Advice on the creation of, and benefits received from, Retirement Annuities and Preservation Funds |
| | Pension Fund Benefits | Employer based retirement funds and structures |
| | Shares | Direct local and offshore share portfolios and single stocks |
| | Money Market Instruments | Listed money market instruments, direct or via an approved product provider |
| | Debentures and Securitised debt | Secured and unsecured debt structures listed directly on an exchange or provided via an approved product provider |
| | Warrants, certificates and other instruments | Other contractual financial instruments listed on an exchange or provided via an approved product provider |
| | Bonds | Listed and unlisted Bonds on the exchange or provided via an approved product provider |
| Derivatives | Derivative structures on an exchange or provided by an approved product provider | |
| External Compliance Officer | <p>Etude Risk Management</p> <p>Mr Francois LeRoux van Wyk</p> <p>Tel: 087 550 1115 Mobile: 082 415 5587</p> <p>e-mail: leroux@etude.co.za</p> | |

SERVICES PROVIDED

During the course of Professional Financial Planning, we are able to provide the following services to our clients.

Initial Financial Planning or Consultation services that can be provided:

| Service Category | General Service Scope |
|--|--|
| Administration & Intermediary Services | General financial administration and implementation; Updates to Financial Plan and Portfolio; Compilation of tax info; Enhanced performance reporting; |
| Cash-flow Planning | Budgeting; Emergency Fund Planning. |
| Retirement Planning | Pre- and Post-retirement planning; Retirement Asset Preservation; Retirement Annuity, Pension and Provident fund creation; Annuity creation (living-, life- and combined-annuities). |
| Investment Planning | Asset allocation, structure- and portfolio-planning pertaining to: Discretionary Savings; Tax-Free Savings; Pre- and Post-Retirement portfolios; Direct Offshore portfolios; Education savings; Ad hoc Savings Goals; Direct Securities; ETF portfolios; Endowment Policies; Currency and Forex transactions; Bespoke investments; Equity Structured Products. |
| Asset & Liability Planning | Setup of debt paydown strategies; Property Investment Evaluation; Income and Expense matching. |
| Risk Planning | Long term insurance requirements such as: Life Insurance; Disability Cover; Income Protection; Critical Illness Cover. |
| Tax Planning | Tax planning and structuring; Tax Efficient Investing. |
| Estate Planning* | Wills; Simple Estate Planning; Trust considerations. |
| Financial Coaching | General financial consulting and discussion; Assistance with life altering events that have a financial impact on clients. |
| Research & Development | Product-, investment-, structure- and provider due-diligence investigations and analysis; Researching and developing investment- and asset-allocation strategies. |
| Tax & Accounting Services* | Basic to advanced tax returns; payroll; bookkeeping; compilation of financial statements; CIPC applications; VAT, PAYE & UIF registrations. |

Ongoing planning, advisory, administrative, and intermediary services that can be provided:


| Service Category | General Service Scope |
|--|--|
| Ongoing Administration & Intermediary Services | Administrative maintenance, Instruction tracking, FAIS and FICA compliance, Consolidation of Tax information, Portfolio reporting, Valuation statements, Demographic changes, Error corrections, Forex services, Record maintenance, Quoting, Comparisons, Provision of factual information, etc. |
| Ongoing Financial Planning/Advisory Services | These services are related to all the underlying financial planning and advice components listed in the table above and generally they include: the Maintenance and amendments to your Financial plan, Portfolio/investment re-balancing, Income revisions for retirees, Review meetings, Progress reporting, Additional financial planning/advice needs, Analysis and projections, Investment/product/structure research, Tax planning and structuring, Maintaining budgets and cash-flow plans, Discussion of tax implications, Property investment evaluation, Debt to asset analysis, Maintaining of Wills, Estate illustrations, Bias management, Behavioural finance considerations, Support with life altering events that have a financial impact, Due-diligence investigations, Strategy amendments, etc. |

At the request of the client these services may be rendered in a limited scope.

*These services are not regulated by the FSCA.

INTRODUCING OUR FINANCIAL PLANNERS

FinPlanCo accepts responsibility for the activities of its representative as performed within the scope of their employment. Only the following employees are authorised to give you financial advice.

| Name | Carel Marx | Wilhelm Tempelhoff |
|-----------------|---|--|
| Contact details | E-mail: carel@finplanco.co.za / Mobile: 084 588 8339 | E-mail: wilhelm@finplanco.co.za / Mobile: 072 726 4713 |
| Position | Key Individual, Representative, Director, Shareholder | Representative, Director, Shareholder |
| Qualifications | BComm Finance, BComm Investment Management (Hons), Post Grad Diploma Financial Planning | BComm Finance (Cum Laude), BComm Financial Planning (Hons) (Cum Laude), H.Dip Tax Law, CERTIFIED FINANCIAL PLANNER™ PROFESSIONAL |
| Experience |  <p>Carel has over 13 years' experience in the Financial Services Industry, 10 years' experience in the Life Insurance Industry and 9 years' experience in the Shares and Securities Industry.</p> |  <p>Wilhelm has over 16 years' experience in the Financial Services Industry, 13 years' experience in the Life Insurance Industry and 9 years' experience in the Shares and Securities Industry.</p> |

INDEPENDENCE

The benefit of being Independent Financial Planners is that we need not have terms of business or a contract in place with a particular asset manager, product provider, life insurer or platform to be able to provide their offering to our clients. As long as it falls within the scope of our FSP licence categories we can place and advise clients on a bevy of financial solutions. Our array of licences therefore enables us to provide clients with advice and intermediary services across the full range of their financial planning needs. For ease of doing business however, we tend to set formal terms of business contracts with a wide range of providers. The list of contracted providers can be provided on request.

HOW WE GET PAID

Remuneration and fees

The company earns its remuneration and fees in various ways, the predominant arrangements are as follows:

Clients who predominantly seek ongoing financial planning/advice, administration and intermediary services are charged an annual percentage fee dependent on the assets under our ongoing planning purview. The percentage fee is determined via a sliding scale dependent on the client's investment and asset portfolio size and varies between 0.75% and 0.35% per annum excl. VAT. This percentage may also be determined according to the client's required service level agreement (SLA).

Professional Financial Planning services can be rendered on consultation basis, whether once-off or recurring, for those who do not seek ongoing financial planning services. Fees are determined on a "time spent" basis and our latest hourly rates and fees are provided on request.

Although it is not the company's intention to market or provide clients with commission- or rebate-paying products, in some cases this cannot be avoided because of the needs of the client. Long term insurance product providers may pay commissions to the company should their products be provided to a client. Some product providers may also provide a rebate in the form of a referral/advice fee to the company. In these cases, the fees are communicated to the client and fully disclosed.

All fees and/or commissions due to the company will be disclosed to the client. Customised fee arrangements can be created for clients with specific service requirements beyond the norm.

YOU ARE PROTECTED

Professional Indemnity Cover

In order to protect our clients, FinPlanCo holds professional indemnity insurance to the amount of R 10 000 000.00 held with, and administered by, AON South-Africa (Pty) Ltd.

As a further measure of protection and in line with legislation, we only use products that are approved by the Financial Services Conduct Authority (FSCA).

UNBIASED ADVICE

Conflict of Interest Disclosure

FinPlanCo and its staff always endeavor to be aware of, and identify, potential conflicts of interest.

We stand by our values of providing unbiased advice, that is in your best interests. This is the surest way for you and us to succeed in meeting our respective financial planning and business goals.

We hereby disclose all financial and ownership interests and relationships with third parties, which may cause a conflict of interest and deter us from providing you with objective unbiased advice.

Neither FinPlanCo, nor its employees, hold a shareholding of more than 10 percent in any of the product provider businesses. FinPlanCo earned more than 50 percent of its total remuneration from Allan Gray Investor Services during the last calendar year. This was due to diversified local and offshore investments and policies being held on its investment platform.

FinPlanCo, its employees and its representatives have contractual relationships with financial service providers. During the course of the relationship, we may receive inconsequential and educational benefits from product providers. A register of these benefits is available for viewing.

LEGAL AND ATTORNEY SERVICES - REFERRALS

FinPlanCo may refer clients to attorneys or legal practices for legal advice and services they may require, occasionally these practices refer clients to FinPlanCo. No fee sharing arrangements are in place and no quid pro quo exists.

ACCOUNTING AND TAX SERVICES - REFERRALS

FinPlanCo may also refer clients to accounting and/or tax consultant practices for tax advice and accounting services, and these companies occasionally refer clients to FinPlanCo. No fee sharing arrangements are in place and no quid pro quo exists.

OFFSHORE ASSET MANAGER REBATES

Investments in offshore unit trusts may result in FinPlanCo receiving a rebate out of the annual fund charge. The amount received is disclosed to the client.

FOREIGN EXCHANGE DEALERS - FEE SHARING

The client may choose to use a foreign exchange dealer, recommended by FinPlanCo, to purchase foreign currency. FinPlanCo has fee sharing arrangements with these providers to receive up to 50 percent of total fees earned. Fees are included in the quoted exchange rate.

PORTFOLIO MANAGERS AND STOCKBROKERS - FEE SHARING

FinPlanCo has fee sharing arrangements with stockbrokers and discretionary managers to receive up to 0.5 percent per annum of the discretionary management fee charged to the client.

THE RIGHT TO PRIVACY AND POPIA

The right to privacy is an integral human right recognised and protected in the South African Constitution and the Protection of Personal Information Act 4 of 2013 ("POPIA"). POPIA aims to promote the protection of privacy by providing guiding principles that are intended to be applied to the processing of personal information in a context-sensitive manner. A person's right to privacy entails having control over his or her personal information and being able to conduct his or her affairs relatively free from unwanted intrusions.

Through the provision of quality services, FinPlanCo is necessarily involved in the collection, use and disclosure of certain aspects of the personal information of clients, customers, employees and other stakeholders.

FinPlanCo is committed to processing personal information in accordance with the below principles when collecting, recording, storing, disseminating, and destroying personal information, and responding to government requests for our clients' data:

- I. We shall not contact/solicit you unless you have given us your consent to do so or unless required as part of an existing relationship with you.
- II. We shall process your personal information for a specific, lawful reason and only adequate, relevant information which is limited to the purposes for which they are processed, and which relates to the functions or the activity of the organisation.
- III. If you cancel your services with FinPlanCo, we will delete or otherwise de-identify your personal information after the minimum storage periods required under our risk and statutory record-keeping periods have expired.
- IV. We take measures to ensure data is kept safe and prevent loss of, damage to, or unauthorized destruction of personal information, and unlawful access to or processing of personal information.

FinPlanCo collects information directly from you where you provide us with your details. In addition to the aforementioned, we shall, subject to your consent, or to execute our service agreement with you, obtain further information required from third parties and other sources where necessary. FinPlanCo does not collect and process special personal information unless it is a requirement by law to process such information as part of our service delivery, in which case we shall obtain consent from you before collection thereof. We do not knowingly collect personal information from children (under 18 years of age) without the permission of their parent/s or guardian.

FinPlanCo and its employees may disclose personal information: to other services providers involved in the rendering of services or the provision of products to the clients; to services providers, it is engaged with such as accountants, compliance officers, administration etc.; if FinPlanCo has a duty or a right to disclose same in terms of law or certain industry codes; or if it is necessary to protect FinPlanCo's legal rights and interests. We undertake to review and update our security measures in accordance with future legislation and technological advances. Access to client data from within our organisation is limited to essential staff or specialist contractors that are required to access our systems for client service or maintenance purposes, who are bound by the requirements of the legislation and are required to maintain safety and security measures. FinPlanCo will not transfer personal information to a third party in a foreign country without ensuring that it complies with the provisions of POPI.

UNHAPPY WITH US?

Complaints

Should you as the client be dissatisfied with services rendered by us, a complaint should be lodged in writing with copies of relevant documentation and addressed to:

The Compliance Officer, FinPlanCo

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| Physical and Postal Address | Suite G5A, MISA Centre, 12 Fir Drive, Northcliff Ext. 2, 2195. |
| Telephone | 011-431-0235/6 |
| Facsimile | 011-431-0025 |
| E-Mail | admin@finplanco.co.za |

If we fail to address your complaint satisfactorily within six weeks, you can submit your complaint to: **The Ombud for Financial Services Providers**

Postal Address PO Box 74571, Lynwood Ridge, 0040

Physical Address 125 Dallas Avenue,
Menlyn Central,
Waterkloof Glen,
Pretoria, 0010

Telephone +27 12 470 9080 / +27 12 762 5000

Facsimile +27 12 348 3447

E-Mail info@faisombud.co.za

Website www.faisombud.co.za