

ADVISOR'S FAIS DISCLOSURE

In terms of the Financial Advisory and Intermediary Services Act, 37 of 2002 (hereinafter referred to as FAIS), All financial services provided by our Representatives are done on behalf of the Financial Services Provider, who assumes full responsibility for the actions of its representatives conducted within the normal course and scope of business. We regularly monitor the fit and proper status of our Representatives and hereby confirm that Mrs. Knowles remains Fit and Proper. Please be aware that the financial services provider cannot be held liable in terms of any prejudice in respect of services or advice provided by any representative which falls outside the scope of this authorization, and any complaint in respect of any product which falls outside the definition of financial product of the FAIS Act, cannot be forwarded to the FAIS Ombud.

FINANCIAL SERVICES PROVIDER

A.S. Sure Investment Services (Pty) Ltd

A.S. Sure Investment Services (Pty) Ltd trading, registration number 2009/001944/07 is an authorized financial services provider, FSP no. 8213. The provider accepts responsibility for those activities of the representatives performed within the scope of, or in the course of business.

Key Individuals: Anthea Knowles & Colin Meddows Taylor & Nicole Muscat
Professional Indemnity & Fidelity Insurance / Anti Money Laundering & Conflict of Interest

COMPLIANCE OFFICERS

COMPLISERVE

Represented By: Elzabe Botha
Physical Address: 106 Johan Avenue
Sandton, 2196
Contact Details: Tel: (082) 577 805, Email: elzabe@compliserve.co.za

CODE OF CONDUCT

A.S. Sure's REPRESENTATIVE:

1. Act in the interest of their clients at all times;
2. Conduct their business with integrity, always acting honestly and fairly and with due diligence and care;
3. Comply with all applicable legal requirements;
4. Provide their clients with professional and appropriate advice by:
 - Disclosing all relevant and required information to clients,
 - Obtaining all appropriate and applicable information from clients, and subsequently analyzing this information to ensure that their clients are provided with the most suitable advice and products for their needs,
 - Treating all information provided by clients with respect and confidentiality,
 - Keeping adequate records of all transactions, communications and other relevant information,
 - Handling any complaints from clients in the proper manner,
 - Acting with the utmost care when collecting funds from clients on behalf of product providers,
 - Abstaining from using misleading marketing methods.
5. Act in the interest of A.S. Sure;
6. Act in such a way that the integrity of the financial services industry is never compromised.

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7. All information obtained or acquired from you shall remain confidential unless you provide written consent, or unless the FSP is required by law to disclose such information.
8. To provide the client with the relevant FNA and advice in 14 days

COMPLAINTS

A.S. Sure values the support of our clients and places a strong emphasis on maintaining a long-lasting relationship that is fair and transparent. Clients feeling that their rights have been prejudiced, are encouraged to use the formalized complaints procedure to ensure that the issue is resolved timeously and to the client's satisfaction. A copy of the FSP's Complaints Policy and Conflict of Interest Management Policy is available at our office on request.

Complaints Report : www.as-sureinvestments.co.za – if not satisfied with the result a complaint can be lodged at the FAIS OMBUD, 3rd Floor Sanclare Building 21 Dreyer Street, Claremont, 7735 (Tel: 021 657 5000)

WAIVER OF RIGHTS

Nobody may ask you or offer any inducement to you to waive any right or benefit conferred on you by or in terms of any provision of the General Codes of Conduct. A copy of the Code of Conduct is available on request.

REMUNERATION

Representatives are remunerated in accordance with prevailing commission regulations, which are disclosed on documents such as quotes, and fund fact sheets. Where any fees are charged, these shall be agreed in writing with you before any financial services are provided. In addition, A.S. Sure has an agreement whereby Boutique Collective Investment Schemes manages certain "white labelled" funds on behalf of A.S. Sure. Where investments are placed within these funds, A.S. Sure earns additional management remuneration by way of an average fee across the 3 funds of 0.8% and when applicable a performance fee capped at 0.5% on the Cautious fund, Moderate 0.75% and Aggressive fund is 1%. By placing your business into these funds, you specifically agree to the potential deduction of these fees.

PROFESSIONAL INDEMNITY AND FIDELITY INSURANCE

A.S. Sure Investment Services (Pty) Ltd holds professional indemnity insurance to the value of R2 000 000 and fidelity insurance to the value of R1 000 000 through Aon, which means we are insured for claims arising from professional negligence, errors and omissions on the part of representatives, as well as for employee dishonesty.

ANTI MONEY LAUNDERING

In terms of prevailing legislation, Section 20A FICA, we are required to obtain and verify your personal and/ or business information, before any transaction is permitted, and going forward, this may need to be re-verified intermittently. We may, subsequent to this, require additional information and/or verification, and request your patience in this regard. Where we are unable to verify the information provided to us, or where you do not provide us with the required information and verification documentation, we are unable to proceed with any transaction on your behalf.

CONFLICT OF INTEREST

Our business is conducted with the highest ethics and integrity, and we understand that actual or perceived conflicts of interest may impact upon our relationship with you. In order to address this, we will avoid any such instance where possible, and if this is not possible, we will fully disclose such to you so as to place you in an informed position prior to the provision of any services. Should you require a copy of our conflict of interest policy or register, a copy is available from our offices. In the past 12 months this business did not earn more than 30% of its income from any single product provider, and we can confirm

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our independence in that we have no financial interest in any product supplier. The Optimum Group (Pty) Ltd holds 35.1% shareholding in A.S. Sure investment Services (Pty) Ltd.