

ANTI-CORRUPTION POLICY

1. INTRODUCTION

The Prevention of Corrupt Activities Act No 12 of 2002 provides for the prohibition of any corrupt and criminal activities by the FSP and Key Persons/ Parties/ Employees, whether it stems from either internal or external activities. Other legislation that also prohibits corrupt and criminal activities include: The Constitution of South Africa Act No 108 of 1996; The Promotion of Administrative Justice Act No 3 of 2000; the Prevention and Combating of Corrupt Act No 12 of 2004; The Companies Act No 71 of 2008; The Financial Intelligence Centre Act 38 of 2001; The Promotion of Access to Information Act 2 of 2000 and The Protected Disclosures Act 26 of 2000 which aims to promote the eradication of criminal, KING IV Report on Corporate Governance Policy.

2. PURPOSE

This Policy provides for the prohibition of any corruption, bribery, crime, fraud or theft in any form in the business of activities of the FSP and by all Key Persons/ Parties/ Employees who are required to commit themselves to act lawfully, ethically and with integrity to ensure that the FSP's values are upheld. A zero-tolerance stance is thus adopted by the FSP and corruption will not be tolerated, whether the influence is internal or external to the business activities of the FSP. This policy provides the framework to guide employees in dealing with corruption and economic crime in the business of the FSP. Non-compliance will result in legal, compliance and regulatory risks that may ultimately destroy the relationship of trust between the FSP and its Clients and stakeholders.

3. CONTROLS TO PREVENT CORRUPT AND CRIMINAL ACTIVITIES

The FSP acknowledges the importance of promoting a culture that is ethical and lawful at all times which is achieved by ensuring that controls are in place within the FSP and Key Persons/ Parties/ Employees.

Preventative controls may include:

- Commitment from The Managing Member and Executive committee to set the moral and ethical direction of the FSP so that others can follow in their guiding footsteps;
- Conducting risk assessments in high risk areas and introducing mitigating controls where necessary;
- Regular awareness and staff training to ensure diligence and awareness of actions that may be interpreted as corrupt activities or bribery;
- Ongoing communication within the stakeholder community to ensure that all are aware of the zero-tolerance attitude of the FSP. This includes The Managing Member or Executive Management encouraging individuals to report all corrupt and criminal activities to the appropriate channel.
- Monitoring, auditing and reviewing the environment as a preventative step to mitigate risk and exposure.
- The FSP ensuring that the relevant, responsible individuals are trained to ensure compliance with this Policy.

4. EXAMPLES

Some practical examples and how to deal with this are listed below:

- Gifts and Hospitality: Gifts and hospitality are perceived to affect the outcome of business transactions and as such a Conflicts of Interest Policy is in place limiting the value of offers that can be received.
- Contractual relationships: All contractual relationships between the FSP and its business partners should be reduced to writing and signed by the parties. Business partners may be subject to vetting, verification of information and due diligence to ensure the FSP limits inappropriate business associations. As such all business partners must keep proper records that may be subject to the review of the FSP.

- Payments: No unauthorised receipt/ payment of moneys are allowed in the FSP. All payments must have oversight and approval procedures in place. Supporting documentation and/or contracts should be in place to ensure the justification of all payments received/ paid.
- Compliance with ethical standards: The FSP will communicate and make known to all Key Persons/ Parties/ Employees its policy relating to anti-bribery and corruption. This will also be used to encouragement such person's pledge to compliance and adoption of this policy.
- Due diligence and procurement processes: The FSP will conduct proper due diligence and procurement in respect with all third parties in a fair and transparent manner. Where it is reasonably suspected that a specific third party pays bribes, the FSP will avoid and discard any further dealings with such party and may terminate any agreement where bribes have been confirmed. The FSP and Key Persons/ Parties/ Employees are required to disclose all their related business transactions.
- Contributions to political parties and charities: The FSP is a supporter of democracy in South Africa. If any donation is made, it must be done in accordance with internal policies and the Independent Electoral Commission's (IEC) formula for political party funding and would be accompanied by detailed disclosure in the Annual Financial Statements.

Signed and adopted by The Managing Member on 4 June 2021