



1. Carter's Conflict of Interest Management Policy

1.1. Introduction

1.1.1. The General Code of Conduct imposes a general duty on Carter to, at all times, render financial services honestly, fairly, with due skill, care and diligence, and in the interests of clients and the integrity of the financial services industry.

1.2. Adoption of the policy

1.2.1. This conflicts of interest management policy shall be known as the Carter COI Policy and has been formally adopted by the Board of Directors of Carter. Management is responsible for the implementation of this policy and the Finance Executive shall ensure appropriate training and monitoring thereof.

1.3. Annual Review of the policy

1.3.1. The Carter COI Policy shall be reviewed on an annual basis.

1.4. Publication of the policy

1.4.1. The Carter COI Policy is available to all clients and may be accessed at the offices of Carter or the call centre during office hours

1.5. Online access

1.5.1. All representatives and employees of Carter will be given online access to this policy.

1.6. Monitoring

1.6.1. Carter must monitor compliance with the Carter COI Policy on an ongoing basis. Monitoring is the responsibility of the Finance Executive who shall report to management and the Board of Directors in respect of the results of such monitoring.

1.7. Consequences of non-compliance with the policy

1.7.1. All employees and representatives of Carter must comply with the procedures contained in this policy.

1.7.2. Non-compliance with the Carter COI Policy will result in a disciplinary hearing and appropriate disciplinary action.

1.8. Aim of the Policy

1.8.1. The aim of the Carter COI Policy is to avoid or mitigate any conflict of interest that may arise between Carter and its clients or any of Carter's employees or representatives and its clients.

1.9. Identification and reporting of conflicts of interest



1.9.1. Definition of "conflict of interest": "Conflict of interest" means any situation in which a provider or a representative has an actual or potential interest that may, in rendering a financial service to a client

i) influence the objective performance of his, her or its obligations to that client;
or

ii) prevent a provider or representative from rendering an unbiased and fair financial service to that client, or from acting in the interests of that client, including but not limited to a financial interest

(ii) an ownership interest

(iii) any relationship with a third party.

1.9.2. How to identify a "conflict of interest"?

A conflict of interest arises if you are influenced to not act fairly, independently or objectively towards your client because of some factor such as a financial interest. In order to identify whether you are acting in your client's best interest, ask yourself the following questions:

- Do I have my client's best interest at heart, or am I acting in my own best interest?

- Am I acting professionally?

- Am I acting independently?

- Am I acting objectively?

- Are my interests aligned with my client's interests?

1.10. Reporting a "conflict of interest"

1.10.1. Once you have identified a conflict of interest, report the conflict of interest to the Finance Executive who will assist you in the avoidance or mitigation thereof as well as the disclosure thereof.

1.11. Avoidance or mitigation of conflicts of interest

1.11.1. Representatives and employees must avoid conflicts of interest between Carter and the client or themselves and the client.

1.11.2. If they are unable to avoid the conflict, they must provide the reasons therefore and they must identify measures to mitigate the conflict.

1.12 Vendor Conflict of interest (COI)



1.12.1. Any proposed suppliers that may cause a conflict of interest (E.g. Supplier that is family) would need to be approved by the finance, risk and compliance committee.

1.12.2. Should a conflict of interest arise with a vendor, the conflict of interest needs to be immediately be disclosed to the Finance Executive and the vendor would need to be reapproved by the finance, risk and compliance committee.

1.12.3. Failure to disclose any COI with suppliers (current or proposed) to the Finance Executive may lead to disciplinary action.

1.12. Disclosure of conflicts of interest

1.12.1. Where a conflict of interest has been identified, it must be disclosed to the client, together with the following information:

- The measures taken to avoid or mitigate the conflict of interest,
- Any ownership or financial interest that Carter or the representative may be eligible for,
- The nature of the relationship giving rise to the conflict of interest in sufficient detail to enable the client to understand the nature of the relationship and the conflict of interest, and
- The Carter COI Policy and that it can be accessed via Carter's office, intranet or directly from the call centre.

2. Carter's Policy on Fraud, Corruption, Theft and Maladministration

2.1. The term fraud, corruption, theft and maladministration include, but are not limited to:

2.1.1. Any dishonest, fraudulent or corrupt act or acts.

2.1.2. Theft of funds, supplies, or other assets. • Maladministration or financial misconduct in handling or reporting of money or financial transactions.

2.1.3. Making a profit from insider knowledge.

2.1.4. Disclosing confidential information to outside parties.

2.1.5. Destruction, removal, or abuse of records, furniture, and equipment.

2.1.6. Deliberately omitting to report on dishonest conduct.

2.1.7. Incidents of wasteful expenditure.

2.2. It is the policy of Carter that fraud, corruption, theft, maladministration or any other dishonest activities of a similar nature will not be tolerated. In addition, these will be



investigated and Carter may make any evidence collected during the course of an investigation available to legal and law enforcement agencies and will pursue the prosecution of all parties involved in criminal activities.

2.3. It is the responsibility of Carter employees to report all incidents of fraud, corruption, theft, maladministration or any other dishonest activities of a similar nature to their Manager or a director.

2.4. Carter will take appropriate legal recourse to recover losses or damages arising from fraud, corruption, theft or maladministration.

2.5. All information relating to irregularities that is received and investigated by Carter will be treated confidentially. The investigation will be handled in a confidential manner and will not be disclosed or discussed with any other person(s) other than those who have a legitimate right to such information. This is important in order to avoid harming the reputations of suspected persons who are subsequently found innocent of wrongful conduct.

2.6. All employees are expected to adopt professional scepticism with regard to all transactions and be aware of the potential risk of money laundering and/or funding of terrorist activities per the FIC act. In such instances, the employee needs to report such suspicions immediately to senior management. No cash transactions or direct deposit of R25,000 or more will be allowed in the business – these should be done via EFT.