



Jordan Ray Consulting is an Authorised Financial
Services Provider With FSP no 49845

JORDAN RAY CONSULTING (PTY) LTD

("the Provider")

ETHICS POLICY

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1. INTRODUCTION

The culture of a business is a combination of the philosophy, ethos, values, principles and beliefs of its people. Culture, like character is truly revealed when the pressure is on.

“Greatness is not primarily a matter of circumstance; greatness is first and foremost a matter of conscious choice and discipline.” Jim Collins

In addition, according to Jim Collins: ***“Discipline, in essence, is consistency of action, consistency with values, consistency with long-term goals, consistency with performance standards, consistency of method, consistency over time. True discipline requires the independence of mind to reject pressures to conform in ways incompatible with values, performance standards, and long-term aspirations. The real question is, once you know the right thing, do you have the discipline to do the right thing and, equally important, to stop doing the wrong things? Sustained great results depend upon building a culture full of self-disciplined people who take disciplined action.”***

Top management understands that the culture of a business becomes the character which in turn becomes the business brand.

“Business culture is the sum of the habits of the people in it. This is why it is so important to cultivate the right culture. You can quickly determine whether a business operates under a culture of mutual respect and teamwork. Some businesses are known for the integrity of their people and others are not. A culture of integrity, competence, diligence, professionalism, discipline, mutual respect and humility becomes its character and would attract people, whereas a culture of dishonesty, corruption, incompetence, laziness, unprofessional behaviour, disrespect and arrogance would push people away.”

Anton Swanepoel.

Further, the desired culture establishes the principles for ethical conduct, which if nurtured consistently and with humility and sincerity will naturally provide the desired economical outcomes.

Our Mission Statement and Value System

- To always act with the utmost integrity, ensuring that we are honest and transparent with our clients and all stakeholders.
- To always act in the best interests of our clients irrespective of the monetary gains.
- To constantly seek to add value to the lives of our clients, our staff and our stakeholders, including attempting to create employment opportunities within the communities we engage in.
- To abide by the Treating Customers Fairly policies in all our interactions.

- To develop innovative tailor-made solutions for our clients through healthcare and insurance products based on benefits verses best costs.
- To strive for service excellence, building long-term, mutually beneficial relationships with our clients
- To do whatever it takes within our means to improve the lives of all South Africans that we engage with.

JORDAN RAY CONSULTING is aware that in our working lives, we often experience situations where the '*right thing to do*' is not immediately apparent. Loyalties -- to our fellow employees, to managers, customers and suppliers, to our families, our communities, the environment, the corporation as a whole, and to ourselves -- may seem to conflict. When we're faced with a complicated situation, it can be difficult to decide where the ethical path lies.

We are committed to upholding high ethical standards in all our operations. Living up to both the letter and the spirit of this commitment is not always an easy task.

Our Goal: An ethical work environment.

We have established a Code of Conduct, a corporate Ethics Policy, and have appointed an independent external compliance officer who is charged with the responsibility of monitoring and perfecting this process. This vigorous, corporate-wide effort to promote a positive, ethical work environment underscores our commitment to ethical conduct throughout our company.

2. DEFINITIONS

“Ethics”

The Oxford Wordfinder defines **ethics** as “*the science of morals in human conduct*”. Morals refer to issues of right and wrong, and how individual people should behave. Moral/ethical conduct, and integrity, requires of an individual to distinguish between right and wrong, but also to then choose what is right. The distinction between right and wrong is based on generally accepted norms and standards of human behaviour in society, and to make decisions based on that knowledge

“Business ethics”

is the study of proper business policies and practices regarding potentially controversial issues, such as corporate governance, insider trading, bribery, discrimination, corporate social responsibility and fiduciary responsibilities.

“Code of ethics”

A written set of guidelines issued by an organization to its workers and management to help them conduct their actions in accordance with its primary values and ethical standards. A code of ethics is a guide of principles designed to help professionals conduct business honestly and with integrity. A code of ethics document may outline the mission and values of the business or organization, how professionals are supposed to approach problems, the ethical principles based on the organization's core values and the standards to which the professional will be held. A code of ethics

is important because it clearly lays out the "rules" for behaviour and provides a pre-emptive warning.

"Ethics policy"

Also known as a code of ethics an ethics policy is a document that defines the essentials of how people within an organization will interact with one another, as well as how they will interact with any customers or clients they serve. A corporate ethics policy will also often address how employees are to interact with vendors and others who supply goods and services to the company. Because the scope of situations involving human interaction is so broad, a well-crafted policy of this type will include general principles as well as identify the more common situations that are likely to occur.

"Corporate ethics"

are a set of beliefs to which a company adheres that govern its behaviour in the ways its employees conduct business.

"Company culture"

is best described as "*the way we do things*". Behaviour is learnt by observing top management and other employees, and therefore needs to be aligned with strong ethical principles.

3. RATIONALE

Significant organizational benefits arise from adopting and applying good ethical leadership.

JORDAN RAY CONSULTING has taken a conscious decision to promote ethics in the organisation for the following reasons:

Competitive advantage

Customers are increasingly favoring providers and suppliers who demonstrate responsibility and ethical practices. Failure to do so means lost market share, and shrinking popularity, which reduces revenues, profits, or whatever other results the organisation seeks to achieve.

Better staff attraction and retention

The best staff want to work for truly responsible and ethical employers. Failing to be a good employer means good staff leave, and reduces the likelihood of attracting good new-starters. This pushes up costs and undermines performance and efficiency. Aside from this, good organisations simply can't function without good people.

Investment

Few and fewer investors want to invest in organisations which lack integrity and responsibility, because they don't want the association, and because they know that for all the other reasons here, performance will eventually decline, and who wants to invest in a lost cause?

Morale and culture

Staff who work in a high-integrity, socially responsible, globally considerate organisation are far less prone to stress, attrition and dissatisfaction. Therefore they are happier and more productive. Happy productive people are a common feature in highly successful organisations. Stressed unhappy staff are less productive, take more time off, need more managing, and also take no interest in sorting out the organisation's failings when the whole thing implodes.

Reputation

It takes years, decades, to build organisational reputation - it only takes one scandal to destroy it. Ethical responsible organisations are far less prone to scandals and disasters. And if one does occur, an ethical responsible organisation will automatically know how to deal with it quickly, transparently and honestly.

Legal and regulatory reasons

Soon there'll be no choice anyway - all organisations will have to comply with proper ethical and socially responsible standards. And these standards and compliance mechanisms will be global. So it makes sense to change before we are forced to.

4. OBJECTIVES

JORDAN RAY CONSULTING ("the Provider") is fully committed to governing the entity in accordance with the highest standards of ethical behaviour which can reasonably be expected from individuals who render independent advisory and intermediary services.

Top management realise that fully complying with rules and regulations on paper, does not necessarily mean that the people within an organisation are ethical, however when ethics lies at the core of a company's objectives, this will in fact lead to a culture of compliance.

All employees and representatives of the Provider are to act with integrity, fairly, with due skill, care, diligence, in the interests of clients and to enhance the integrity of the financial services industry, at all times.

JORDAN RAY CONSUTLING maintains certain policies to guide its employees with respect to standards of conduct expected in areas where improper activities could damage the company's reputation and otherwise result in serious adverse consequences to the company's clients and to employees involved.

The purpose of this policy is to affirm, in a comprehensive statement, required standards of conduct and practices with respect to employer/employee behaviour in general and compliance with required legislation.

5. LEADERSHIP

OUTCOME 1 of the Treating Customers Fairly roadmap

"Customers are confident that they are dealing with providers where the fair treatment of customers is central to the FSP's culture";

Top management understand that the fair treatment of customers begins with the leadership being able to demonstrate that they are committed to exercise and execute their duties and responsibilities through cultivating an ethical culture within the organisation.

6. EMPLOYEES

JORDAN RAY CONSULTING is committed to providing an empowering work space.

All employees want and deserve a workplace in which they feel respected, satisfied and appreciated. The company will not tolerate harassment or discrimination of any kind -especially involving race, colour, religion, gender, age, national origin, sexual orientation or disability.

Our goal is excellence in the workplace and an environment that supports honesty, integrity, respect, trust and responsibility. In addition, good citizenship is everyone's responsibility.

While everyone who works for the company must contribute to the creation and maintenance of this environment, our executives and management personnel are charged with special responsibilities for fostering a work environment that is free from the fear of retribution.

Managers and team leaders must be careful in words and conduct to avoid placing, or seeming to place, pressure on subordinates that could cause them to deviate from acceptable ethical behaviour.

An employee's actions under this policy however, are significant indications of the individual's ethical judgment and competence. Accordingly, those actions constitute an important element in the evaluation of the employee for position assignments and promotion. Correspondingly, insensitivity to or disregard of the principles of this policy will be grounds for appropriate management disciplinary action.

Before you act, ask:

1. Will this cause **harm**?
2. Will this **make things better**?
3. Will this **respect others**?
4. Is this **fair**?
5. Is this **caring**?

7. CLIENTS

We are committed to providing complete confidentiality, attention to detail, reliable product delivery, and uncompromising service at a fair price.

JORDAN RAY CONSULTING adheres to the desired fairness outcomes of the Treating Customers Fairly ("TCF") roadmap published by the Financial Sector Conduct Authority, as well as the framework provided by the FAIS Act's General Code of Conduct ("GCoC"), as it provides a clear ethical framework for all role players when dealing with clients in the financial services industry, of which the Provider is an active participant.

TCF and the GCoC provide guidance on issues of right and wrong for the different role players in the treatment of clients, especially when faced with difficult ethical choices.

The following ethical obligations must be adhered to at all times when dealing with clients:

- Trust
- Confidentiality
- Adequate disclosure
- Respect for the client
- Appropriate knowledge, experience and skills
- Professional behaviour
- Sustainable service, based on compliant and proven policies and procedures

8. KEEPING ACCURATE AND COMPLETE RECORDS

JORDAN RAY CONSULTING maintains accurate and complete company records.

Accounting:

Transactions between the company and outside individuals and organizations must be promptly and accurately entered in our books in accordance with generally accepted accounting practices (GAAP) and principles.

Clients:

Client records are completed accurately and promptly and stored securely.

No one should rationalize or even consider misrepresenting facts or falsifying records. It will not be tolerated and will undoubtedly result in disciplinary action, including the possibility of immediate termination of employment.

9. BIDDING, NEGOTIATING AND PERFORMING CONTRACTS

We will compete fairly and ethically for all business opportunities.

If an employee is involved in the preparation of proposals or contract negotiations, he or she must be certain that all statements, communications and representations to prospective clients are accurate, truthful and deliverable.

Once executed, all contracts must be performed in compliance with specifications, requirements, and clauses. Copies of contracts must be safely stored.

In utilizing consultants, agents, sales representatives or others, the Provider will employ only reputable, qualified individuals or firms under compensation arrangements which are reasonable in relation to the services performed.

Consultants, agents or representatives retained in relation to the provision of goods or services to the company must agree to comply with all laws, regulations and company policies governing employee conduct.

Relationships with vendors, subcontractors and suppliers are handled in a fair and reasonable manner, consistent with all applicable laws and good business practices.

Vendors, subcontractors and suppliers are selected on the basis of objective criteria, including standards of quality, service, price, delivery capability and technical excellence.

All purchasing decisions are based on price and the supplier's abilities to meet our clients' needs. Under no circumstances are decisions based on personal relationships, whether the relationship involves the employee, an officer or director of **JORDAN RAY CONSULTING** a family member, a friend or any associate of the Provider. (See also "Conflict of interest management policy").

We employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards and the administration of all purchasing activities.

JORDAN RAY CONSULTING does not knowingly enter into contracts or do business with vendors convicted of a criminal offenses related to financial services or have been excluded from, or is otherwise ineligible to participate, in business opportunities, as per the honesty and integrity requirements of the FAIS Act.

JORDAN RAY CONSULTING does business with only those vendors, subcontractors and suppliers that comply with applicable laws and whose business conduct is consistent with our Code of Ethics Policy and compliance program.

10. ETHICAL RISKS

JORDAN RAY CONSULTING has compiled an extensive risk management plan in which ethical risks have been identified, evaluated and rated. A risk control plan is in place, and is regularly reviewed. Risk owners are assigned to the various risks we identified and risk owners report to an ethics officer.

Training and guidance are provided to employees on how best to deal with ethical risks, and how to practice ethical decision making. (Refer to Annexure 1)

Examples of Ethical risks that the Provider could face are :

- Fraud
- Theft
- Bribery
- Forging of documents and signatures
- Misuse of client funds
- Discrimination

and many more.

JORDAN RAY CONSULTING is aware that even the strongest ethics and compliance policy won't be worth the paper it's printed on (or the server it resides on) if it isn't successfully implemented and enforced.

Our policy is reinforced through training, repetition and enforcement of consequences for violation of the provisions set out therein. Training is compulsory for all staff members, from board level through all levels of employees, to ensure the entire organization is on board with ethical policies and procedures.

Most importantly, our company executives set the tone from the top, demonstrating ethical business practices and attitudes and a zero-tolerance policy for violations.

JORDAN RAY CONSULTING ensures that the ethical architecture is in place to ensure that ethical conduct becomes embedded in the cultural values of the company: the ethics policy is published / distributed to our employees as well as relevant stakeholders, contained in employee contracts and supplier agreements, identifying individuals and boards who are accountable for outcomes, creating ongoing awareness-raising programmes, opening discussions with feedback and having oversight and monitoring procedures in place. Ethical outcomes also form part of employee performance reviews.

11. **OBEYING THE LAW**

JORDAN RAY CONSULTING will at all times conduct our business in accordance with all applicable laws and regulations.

Compliance with the law does not comprise our entire ethical responsibility; rather, it defines our minimum, absolutely essential performance of our duties. We are committed to go beyond the minimum requirements in order to reach our ethical goals.

12. **VIOLATIONS OF THE POLICY**

JORDAN RAY CONSULTING views ethical violations in the utmost serious light. Violations of the policy are grounds for discharge or other disciplinary action, adapted to the circumstances of the particular violation and having as a primary objective furtherance of the Provider's interest in preventing violations and making clear that ethical violations are neither tolerated nor condoned.

Disciplinary action will be taken, not only against individuals who authorize or participate directly in a violation of the Policy, but also against:

1. any employee who may have deliberately failed to report a violation of the policy;
2. any employee who may have deliberately withheld relevant and material information concerning a violation of this policy; and
3. the violator's managerial superiors, to the extent that the circumstances of the violation reflect inadequate leadership and lack of diligence.

In terms of our obligations to the adherence to the FAIS Act, debarment and dismissal are direct consequences of violation of this policy.

13. MONITORING AND ACCOUNTABILITY

An anonymous help line is in place to ensure employees and third parties can report ethics violations confidentially, and with the confidence that no retribution will take place for reporting ethical breaches.

JORDAN RAY CONSULTING will report on number and types of breaches committed to top management in order to provide guidelines for future prevention, and actions could be published at discretion of management, if it is to prevent future breaches. This also serves to enforce the notion that reports are actually viewed in a serious light, and will encourage employees to report unethical behaviour. It underscores that the Provider has procedures in place for dealing with violations, and that it is enforced, and appropriate rectifying action will be taken.

We have determined that ethics should have a strong independent voice, and monitoring must be performed by the independent compliance officer, who should be counted on to comment on ethical operations on strategic and operational level, with direct access to top management.

We believe that once the ethical policy is firmly embedded in our company culture, wider monitoring must also be performed. We conduct due diligence on new and existing suppliers alike, engaging them in ongoing discussions regarding our standards and contractual expectations. Today's complex and extended supply chain has significant implications for our company's ethical, governance and risk-management policies and practices.

14. OWNERSHIP & ACCOUNTABILITY

This policy is owned by **JORDAN RAY CONSULTING (PTY) LTD**, an authorised financial services provider in terms of the Financial Advisory & Intermediary Services Act (37 of 2002) and subordinate legislation.

As Key Individual of the Provider, I, **MICHELLE RAY**, hereby confirm the adoption of the policy on behalf of the governing body of the Provider.

I hereby accept responsibility for the successful training of employees and successful implementation of the Ethics Policy.

Signature

Date

15. ACKNOWLEDGEMENT AND DECLARATION BY STAFF

I, the undersigned, hereby declare that I have read and thoroughly understand the above policy and my role as an employee or representative to ensure that it is upheld at all times;

I have received adequate training on the TCF Outcomes and objectives as well as this policy and how it impacts practical day-to-day processes and procedures within the Provider's business;

I, of my own personal accord hereby embrace the TCF Outcomes and commit myself and agree to abide by the provisions of this policy;

I am fully aware that failure to comply with this policy may result in possible disciplinary and debarment measures being proceeded against me.

Signed at _____

Date _____

Name _____

Signature _____

Signed at _____

Date _____

Name _____

Signature _____

Signed at _____

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Annexure 1

GUIDELINES FOR EMPLOYEES

Note:

Please also study other policies and procedures in order to obtain the full scope of our company's ethical policies. You should have a good working knowledge of the following policies and procedures :

The FAIS General Code of Conduct

Treating Customers Fairly Policy

JORDAN RAY CONSULTING On Boarding Policy and Procedure / Client Advisory Policy

Human Resources Policy

Training Policy

JORDAN RAY CONSULTING recognizes cultural diversity as well as the fact that moral values can differ fundamentally from person to person.

However, the differences in individual values cannot be used as motivation for each person to act only according to his/her view of what is right and wrong.

- The code of conduct we follow is in line with codes of conduct that are industry specific (i.e. professional organisations like FIA, FPI that we belong to),
- legislated (FAIS act and others) and
- finally specific to company (procedures, policies and general conduct.)

We believe in acting according to these core fundamental moral values.

1. **Fundamental core values to which we subscribe**

- 1.1 To maintain honesty and integrity in all circumstances.
- 1.2 To strive for excellence and high quality of service delivery.
- 1.3 To maintain a policy of transparency and full disclosure.
- 1.4 To be responsible, accountable, loyal and trustworthy in all actions and decisions.
- 1.5 To let fairness and appropriate behavior guide all actions.

2. **Application of core values**

- 2.1 Do your duty, as agreed in your job description and / or as requested from management.
- 2.2 Always strive for the best outcome for all stakeholders (clients, colleagues or insurers), even under difficult circumstances.
- 2.3 Ensure that your behavior is always above reproach by maintaining transparency in your everyday activities and communication. Always disclose all relevant information.

- 2.4 Do not mislead anybody, or allow anybody to mislead you. Measure actions against principals of honesty, integrity, right, wrong.
- 2.5 Treat everybody fairly, courteously, and sensitively with regards to their constitutional rights, and maintain respect for diversity, even if this is not always the way you are treated.
- 2.6 Keep the rules, procedures and regulations prescribed for the company. These are applied for your own protection as well as for the company's future.
- 2.7 Use the information obtained in your workplace only for its intended original purpose. Maintain client confidentiality at all times.
- 2.8 Decline any gifts offered to you in an attempt to influence your decision-making, and likewise avoid gifts to others with intent of influencing them.
- 2.9 Do not make false promises to anybody, or make promises you are unable to deliver on.
- 2.10 Show respect for the property and assets of the company. Manage as you would property purchased with your own money, and use equipment and facilities as if you were paying the accounts regularly.
- 2.11 Ensure that functioning of the company, services provided and products recommended, always align with code of conduct and ethical values of the company. Test regularly.
- 2.12 Challenge colleagues who are acting unethically, report behavior that is not in line with the code of conduct and do not tolerate acts of revenge towards anybody who reports unethical behavior, or take revenge on anybody challenging your behavior.
- 2.13 Avoid conflict of interests.

3. Specific application of core values in JORDAN RAY CONSULTING

- 3.1 Keep to standard procedures and compliance practices. It is worthwhile to note that it is in everybody's interest to stay compliant. If the company should lose its license due to an employee's negligence or casual attitude, we all become unemployed immediately. We all have a duty to behave in such a way as to protect everybody's rights.
- 3.2 Treat your job seriously and approach with diligence. This includes:
 - 3.2.1 Planning, Time Management
 - 3.2.2 Accountability and responsibility
 - 3.2.3 Relationship with management and colleagues
 - 3.2.4 Use of resources / abuse of resources
 - 3.2.5 Duty to curb unnecessary expenses
 - 3.2.6 Confidentiality, and many more.

4. Reporting of unethical behavior

Unethical behavior, or suspicion of unethical behavior, should be reported to management without delay. Matters of ethics must be attended to before it can be rooted. All reports, discussions will be handled in the strictest confidence.

5. Guidelines for making ethically correct decisions

5.1 To act ethically means that you have to choose a direction to follow, or make a decision, in situations where several conflicting alternatives exist.

5.2 Steps to ethical solutions include:

- analyzing the situation
- weighing options for each possible outcome
- asking fundamental questions
- and realizing the sensitive nature of ethical situations.

5.3 Questions to ask when analyzing the situation:

- Who / what caused the problem?
- What needs to be decided and who has to decide?
- What will implications of the decision be for all concerned?
- Do I know where to find the code of conduct and other policies concerned with ethics?
- Can the matter be accommodated within the existing standards and organisational values?
- Would a colleague agree with the final ethical decision?

5.4 Questions to ask when considering outcomes:

- Which outcome would be the most ethically preferred one?
- Which choice made would be the best method of damage control?
- Which choice complies best with the FSP's ethical values?
- Which choice best supports the rights of the parties involved?

5.5 Fundamental questions to ask:

- Would my decision / action in any way be in contravention of rules / regulations / acts?
- Would I view the decision as fair if I stood on the other side?
- Would my colleagues view my decision as appropriate, fair and honest?
- Would my decision still be viewed as fair in 10 years' time?

5.6 Sensitivity issues:

- Would anybody be hurt by my decision, or be helped by it?
- How can parties be helped that will be hurt by my decision?
- Would I be proud to let my family know about my decisions and actions?
- Would I mind if my decisions were disclosed or published in a newspaper?
- Am I mature enough to stand by ethically correct decisions despite the personal consequences?

5.7 Warnings Signs: You're on Thin Ethical Ice When You Hear...

- "Well, maybe just this once..."
- "No one will ever know..."
- "It doesn't matter how it gets done as long as it gets done."
- "It sounds too good to be true."
- "Everyone does it."
- "Shred that document."
- "We can hide it."
- "No one will get hurt."
- "What's in it for me?"

- "We didn't have this conversation."
- And many more!

6. **Non-Compliance**

Ethical behavior by all associated with **JORDAN RAY CONSULTING** is viewed in a very serious light. Employees and management are expected to comply with the Code of Conduct and to maintain the highest ethical behavior at all times, despite bad ethical examples set by authority figures outside the company.

RESULTS OF NON-COMPLIANCE WITH CODE OF CONDUCT.

6.1 Certain instances of non-compliance may result in instant dismissal/debarment (as per employee letter of appointment)

- Theft
- Dishonesty: cheating, lying
- Sexual harassment / fraternizing
- Selling confidential company information

6.2 Willful non-compliance with the code of conduct results in an immediate hearing, which could have dismissal as consequence.

6.3 Complaints from clients and / or colleagues about unethical behavior:

- Written warning
- Opportunity to defend the complaint
- Remedial training
- Future Assessment

6.4 Should no remedial action on part of an employee be taken:

- A second written warning, and
- Dismissal, with option of a hearing to defend the dismissal.
- Should the employee be re-employed after the hearing, he / she must agree to undergo compulsory training on ethical behavior.

7. **Training**

All employees will receive training on ethics and ethical behaviour during the **JORDAN RAY CONSULTING** recruitment and induction phase, and at least annually thereafter.

Ethics training is however ongoing as it forms part of our company culture. Regular training sessions will be conducted by your supervisor where practical ethical issues are discussed, and ethical considerations are also built into performance reviews.

All employees are expected to demonstrate their ability to act ethically.

8. **Reporting**

Management has an open door policy for the reporting of ethical breaches. All staff are expected to whistle blow ethical non-compliance and it will be dealt with swiftly and decisively. The running of an ethical business is paramount in our success, and unethical behaviour will not be tolerated. Reports will be dealt with in strict confidence and employees are assured that there will be no retribution against reportees.

Please note that employees may also make use of an anonymous reporting facility .

FAIS Act Compliance

1. GENERAL

1.1 *"Financial Services must at all times be rendered honestly, fairly, with due skill, care and diligence, and in the interest of clients and the integrity of the financial services industry."*

THINK: Consumer Protection!

- Advice must at all times be sufficient to allow clients to make informed decisions.
- Don't advise on products / services for which you are not skilled / trained.
- Disclose everything required by the General Code of Conduct.
- Follow Procedure!
- Never lie or make false promises.
- Protect the image of the practice at all times.
- Keep complete records of all dealings with clients.

NEVER:

- visit a client without a Sec 13 Letter of authority and FAIS Disclosure Document on hand to provide to a client PRIOR to the rendering of any financial services to such client, as well as other required documentation. (e.g. Broker's appointment, fact find sheet, ROA, minutes of meeting, etc.)
- correspond with clients on unofficial stationery.
- make promises to clients that can't be kept.
- advise clients without confirmed information as back – up.
- ignore formal compliance procedures.
- ignore client complaints / queries.

1.2 OTHER:

- Consider the client's convenience at all times.
- Be aware of the Fairness Outcomes and apply them consistently!
- Always explain the purpose of calls / visits fully.
- ALWAYS record all dealings with clients in writing.
- Provide clients with a summary of discussions in plain language.

- Act fairly and reasonable – never force anything on client.
- Promote client trust and confidence.
- Always provide clear and full information.
- Disclose all charges and fees associated with products being discussed.
- Always gather enough information to clearly assess the client's needs and objectives, and the financial implication of new products for the client.
- Comply with the regulations for promotional material.
- Deal with complaints immediately in accordance with the Provider's complaint resolution procedures.
- Never request or induce a client to waive any rights or benefits.
- Disclose full information on the nature of products, material and special terms and conditions, restrictions, etc.
- Disclose full information on yourself and the Provider.
- Confirm that full information is provided to clients in respect of product suppliers, in writing.
- Ensure that original agreements / contracts are delivered to clients.
- At all times respect and maintain client confidentiality and privacy.

Ensure continual adherence to fit and proper requirements.

Annexure 2

DUE DILLIGENCE QUESTIONNAIRE FOR THIRD PARTIES

1	Does your organisation have an ethical statement/code of conduct/code of ethics? If yes, does it reflect your professional obligations?	
2	Does your organisation currently communicate its ethical business practices and commitment to responsible business? If yes, how?	
3	Are your statements for responsible business monitored and verified? If yes, how and by whom?	
4	Does your organisation include a session on ethics and responsible business in its induction programme for all staff?	
5	Is this featured in ongoing training?	
6	Are you aware of what categories of ethical information are gathered in your organisation? If yes, are there any omissions?	
7	Do you know who in your management team uses ethical data? Who else might benefit from using ethical data, and how do you work together?	
8	Does your board/CEO/CFO take responsibility for ethical performance? Explain.	
9	Are staff rewarded/disciplined in relation to ethical performance?	
10	Is someone in the organisation responsible for gathering or analysing ethical performance information?	
11	Does ethical data gathered within your organization help inform business decisions and business success? Explain.	
12	Does your organisation have an anti-bribery policy? If yes, is your anti-bribery policy promoted/enforced? How?	
13	Does your organisation have a whistle-blower/speak-up line? If yes, how is it communicated, and how are reports acted upon?	
14	Does your organisation have an open-door policy between management and other employees to promote openness and transparency?	
15	Do you feel confident that you and your team can maintain objectivity and integrity as well as avoid conflicts of interest? What steps can you take to ensure you do?	
16	Would you know what steps to take if you were asked to do something that challenges your ethical standards?	
17	Have you undertaken professional development to improve your skills in gathering, understanding and using non-financial information to benefit your organisation? If yes, what other professional development in regard to ethical performance would you benefit from?	