

RELATED PARTIES TRANSACTIONS POLICY

This policy refers to transactions, either local or cross-border, involving related parties to SCI Wealth (Pty) Ltd where there is common control, significant influence, ownership or beneficial interest between the third party and SCI Wealth, known as Related Party Transactions (RPTs).

RPTs which are not in the ordinary course of business or not at arm's length or are material RPTs (currently those in excess of P200,000) require approval of the board of directors.

RPTs must comply with applicable set limits and dealings must be conducted at arms-length basis.

DISCLOSURE OF RELATED PARTIES TRANSACTIONS

Related Parties, including group companies incorporated outside Botswana are responsible for disclosing Related Party Transactions to the Board of Directors and Shareholders about the material interests that they or an immediate family member may have on such transactions.

ACTION ON RELATED PARTIES TRANSACTIONS

If a material RPT has been identified, the management of SCI Wealth shall

- ▶ Identify individual transactions involving the Related Party
- ▶ Monitor the total amount of such transactions subject to a written process
- ▶ Manage and monitor members of staff from benefiting from the RPT
- ▶ Report details of the RPT to the internal auditor on a quarterly basis
- ▶ Disclose any deviation to NBFIRA within 5 business days
- ▶ Give notice and adequate information of any potential RPT in advance to the Board to provide adequate time to consider and review the proposed transaction

If a material RPT has been identified, the Compliance Officer shall

- ▶ keep a record of all Related Parties and RPTs
- ▶ certify that service providers do not have a conflict of interest with the company
- ▶ submit to NBFIRA details of all transactions in securities relating to SCI Wealth by Directors, CEO, Principal Officer or Company Secretary
- ▶ report any Related Party exposures to NBFIRA on a quarterly basis

SCI Wealth shall

- ▶ Disclose this policy and any RPTs to its shareholders at annual general meetings.
- ▶ Disclose this policy and any RPTs in the Notes to the Annual Financial Statements.

GENERAL CONFLICTS OF INTEREST

SCI Wealth is an Investment Advisor and shall not hold any investment on behalf of its clients. Nonetheless, any director, key personnel or staff who deals in investments held by SCI Wealth on behalf of clients is required to disclose such dealing to SCI Wealth by 1700hrs on the trade date.

CONTACT DETAILS

POST SCI Wealth (Pty) Ltd, P.O.Box 89 AAH, Gaborone, Botswana

PHYSICALLY SCI Group, 129 Kgale Court, Gaborone International Finance Park, Gaborone

EMAIL compliance@scifinancial.com