

1. INTRODUCTION

The aim of the Conflict of Interest Management Policy is to ensure that the provider and its employees comply with Notice 58 of 2010 of the FAIS Act which deals with the General Code of Conduct in terms of Conflict of Interest compliance.

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:

- a. Influence the objective performance of his, her or its obligations to that client; or
- b. Prevent a provider or representative from rendering an unbiased and fair financial service to that client, or from acting in the interest of that client.

2. APPLICATION OF THIS POLICY

This policy applies to all employees, associates, appointed representatives and key individuals and to those whom any business activity may be outsourced. This policy is applicable to Dotport (Pty) Ltd (FSP 725) and to Dotport Capital (Pty) Ltd (FSP 15250).

3. CONFLICT OF INTEREST MANAGEMENT POLICY

- 3.1 All employees, including representatives, key individuals and directors:
 - 3.1.1 Familiarised themselves with the content of the General Code of Conduct in terms of Conflict of Interest regulations.
 - 3.1.2 Familiarised themselves with the content of this Conflict of Interest Management Policy in order to comply with the regulations.
 - 3.1.3 Confirmed in writing that they will adhere to the General Code of Conduct in terms of Conflict of Interest and this Conflict of Interest Management Policy.
 - 3.1.4 Confirmed in writing that they are aware that non-compliance to the General Code of Conduct in terms of Conflict of Interest might lead to dismissal and/or debarment.
- 3.2 All the employees maintain an "Immaterial Financial Interest" register in order to document immaterial financial interests received or provided.
- 3.3 All the administrative employees of the FSP are remunerated by means of a remuneration based on position, level of qualifications,

- experience, general competency and an annual performance appraisal.
- 3.4 Representatives are remunerated according to a percentage of fees and commissions earned from product suppliers.
 - 3.5 It is the responsibility of all employees to report a possible conflict of interest or an actual conflict of interest to the relevant key individual.
 - 3.6 All possible and actual conflict of interest are being dealt with by management (including directors and key individuals) by following the next steps:
 - 3.6.1 Arrange a meeting as soon as possible.
 - 3.6.2 Determination whether the conflict of interest can be avoided.
 - 3.6.3 Implementation of avoidance measures. Continue with step 4.4.4 if avoidance was not possible.
 - 3.6.4 Document in writing reasons why the avoidance of conflict of interest is not possible.
 - 3.6.5 Implementation of disclosures of the conflict of interest according to Section 3(c)(i) of the General Code of Conduct.
 - 3.7 It is documented in the official "Introductory Letter" that this Conflict of Interest Management Policy is available on request to anybody by means of a fax, email, posted letter or hand delivered printed document.
 - 3.8 It is the policy of this provider to receive or offer financial interest from or to a third party according to Section 3A(1)(a) and 3A(1)(b) of the General Code of Conduct.
 - 3.9 A monthly Conflict of Interest meeting is attended by representatives, key individuals and the directors in order to:
 - 3.9.1 Review all service level agreements with third parties in order to verify, maintain and monitor compliance to this conflict of interest management policy.
 - 3.9.2 Review the Immaterial Financial Register in order to verify, maintain and monitor compliance with regards to the limitations imposed by the General Code of Conduct in terms of conflict of interest.
 - 3.9.3 Update their knowledge with regards to conflict of interest by attending and/or presenting training sessions.

4. GENERAL DISCLOSURES

- 4.1 MvA Struwig (ID 6907095250080)
 - Director of Dotport Capital (Pty) Ltd.
 - Director, Key Individual and Representative of Dotport (Pty) Ltd.
 - Director of Dotvest (Pty) Ltd.
 - Married to MA Struwig (ID 7701240026084).
- 4.2 MA Struwig (ID 7701240026084)
 - Director, Key Individual and Representative of Dotport Capital (Pty) Ltd.
 - Married to MvA Struwig (ID 6907095250080)
- 4.3 Dotvest (Pty) Ltd, owns 100% of the issued share capital of Dotport Capital (Pty) Ltd (FSP 15250), a category I FSP.
- 4.4 Dotvest (Pty) Ltd, owns 100% of the issued share capital of Dotport (Pty) Ltd (FSP 725), a category II FSP.

CONFLICT OF INTEREST DISCLOSURES

- 5.1 Dotvest (Pty) Ltd owns 100% of the share capital of Dotport Capital (Pty) Ltd and Dotport (Pty) Ltd.

Background:

- 5.1.1 Dotport (Pty) Ltd manages five collective investment funds, white labeled by BCI, on a discretionary basis.
- 5.1.2 Dotport Capital (Pty) Ltd renders advice and intermediary services to its clients.
- 5.1.3 Dotport Capital (Pty) Ltd can or might advise existing and/or new potential clients to invest their monies into one or more of the funds managed by Dotport (Pty) Ltd.

Avoidance of Conflict of Interest

- 5.1.4 Due to the ownership structure referred to above under Section 4 (General Disclosures) it was determined by the management that conflict of interest could not be avoided.

Mitigation of Conflict of Interest

- 5.1.5 Representatives of Dotport Capital (Pty) Ltd are under no obligation to advise clients to invest their monies into one or more of the fund of funds managed by Dotport (Pty) Ltd.
- 5.1.6 Dotport Capital (Pty) Ltd do not receive any fees, benefits or incentive if clients invest their monies into one or more of the fund of funds managed by Dotport (Pty) Ltd.
- 5.1.7 Representatives of Dotport Capital (Pty) Ltd do not receive any fees, benefits or incentive if they advise clients to invest their monies into one or more of the fund of funds managed by Dotport (Pty) Ltd.
- 5.1.8 All the fees earned by Dotport (Pty) Ltd for managing the funds are disclosed on the official fund fact sheets.
- 5.1.9 Fees earned by Dotport Capital (Pty) Ltd for rendering advisory and intermediary services to the client will be negotiated and disclosed in the Record of Advice.
- 5.1.10 Representatives of Dotport Capital (Pty) Ltd must disclose the following in the Record of Advice when advising clients to invest monies in the fund of funds managed by Dotport (Pty) Ltd: "Dotport Capital (Pty) Ltd (FSP 1520) and Dotport (Pty) Ltd (FSP 725) are wholly owned subsidiaries of Dotvest (Pty) Ltd. Fees earned by Dotport (Pty) Ltd are disclosed in the official fund fact sheet and fees earned by Dotport Capital (Pty) Ltd are disclosed in the official quotation."