

PROVIDER AND REPRESENTATIVE DISCLOSURES IN TERMS OF THE FINANCIAL ADVISORY AND INTERMEDIARY SERVICES ACT (FAIS)

As a client you have the right to the following information:

1. YOUR FINANCIAL SERVICES PROVIDER, TRUFFLE ASSET MANAGEMENT (PTY) LTD

Name	Truffle Asset Management (Pty) Ltd
FSP Number	36584
Physical address	Ground Floor, Lancaster Gate Building, Hyde Park Lane Business Complex, Hyde Lane, Corner William Nicol and Jan Smuts, Hyde Park, Sandton, 2196
Postal address	P.O. Box 535, Pinegowrie, 2124
Tel	+27 11 325 0030
Fax	+27 11 325 0331
Email	Louis@truffle.co.za or Hannes@truffle.co.za
Web	www.truffle.co.za

2. LEGAL STATUS OF PROVIDER

Truffle Asset Management (Pty) Ltd (“Truffle Asset Management”) is a private company that was established in 2008. As a licensed Financial Services Provider in terms of the FAIS Act, Truffle Asset Management accepts responsibility for its representatives acting within their mandates, in rendering services defined by FAIS. Our key individuals meet the fit and proper requirements as prescribed by FAIS, to assist you in a professional manner with your financial requirements.

3. DETAILS OF KEY INDIVIDUALS

Name	Mr. Hannes van der Westhuyzen
Office Address	Ground Floor, Lancaster Gate Building, Hyde Park Lane Business Complex, Hyde Lane, Corner William Nicol and Jan Smuts, Hyde Park, Sandton, 2196
Postal address	P.O. Box 535, Pinegowrie, 2124
Tel	+27 11 325 0030

Fax +27 11 325 0331
Email Hannes@truffle.co.za

Name **Mr. Louis van der Merwe**
Office Address Ground Floor, Lancaster Gate Building,
Hyde Park Lane Business Complex, Hyde Lane,
Corner William Nicol and Jan Smuts, Hyde Park, Sandton, 2196
Postal address P.O. Box 535, Pinegowrie, 2124
Tel +27 11 325 0030
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Email Louis@truffle.co.za

4. DETAILS OF REPRESENTATIVES

Name **Mr. Charles Booth**
Office Address Ground Floor, Lancaster Gate Building,
Hyde Park Lane Business Complex, Hyde Lane,
Corner William Nicol and Jan Smuts, Hyde Park, Sandton, 2196
Postal address P.O. Box 535, Pinegowrie, 2124
Tel +27 11 325 0030
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Email Charles@truffle.co.za

Name **Mr. Braam van Heerden**

Office Address Ground Floor, Lancaster Gate Building,
Hyde Park Lane Business Complex, Hyde Lane,
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Postal address P.O. Box 535, Pinegowrie, 2124

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Email braamj@truffle.co.za

Name **Mr. Iain Power**

Office Address Ground Floor, Lancaster Gate Building,
Hyde Park Lane Business Complex, Hyde Lane,
Corner William Nicol and Jan Smuts, Hyde Park, Sandton, 2196

Postal address P.O. Box 535, Pinegowrie, 2124

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Email iain@truffle.co.za

Name **Mr. Jonathan du Toit**

Office Address Ground Floor, Lancaster Gate Building,
Hyde Park Lane Business Complex, Hyde Lane,
Corner William Nicol and Jan Smuts, Hyde Park, Sandton, 2196

Postal address P.O. Box 535, Pinegowrie, 2124

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Email jonathan@truffle.co.za

Name **Mr. Theuns Lategan**

Office Address Ground Floor, Lancaster Gate Building,
Hyde Park Lane Business Complex, Hyde Lane,
Corner William Nicol and Jan Smuts, Hyde Park, Sandton, 2196

Postal address P.O. Box 535, Pinegowrie, 2124

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Email theuns@truffle.co.za

Name **Mrs. Alma Slabber**

Office Address Ground Floor, Lancaster Gate Building,
Hyde Park Lane Business Complex, Hyde Lane,
Corner William Nicol and Jan Smuts, Hyde Park, Sandton, 2196

Postal address P.O. Box 535, Pinegowrie, 2124

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Email alma@truffle.co.za

Name **Mr. Etienne Roux (under supervision)**

Office Address Ground Floor, Lancaster Gate Building,
Hyde Park Lane Business Complex, Hyde Lane,
Corner William Nicol and Jan Smuts, Hyde Park, Sandton, 2196

Postal address P.O. Box 535, Pinegowrie, 2124

Tel +27 11 325 0030

Fax +27 11 325 0331

Email etienne@truffle.co.za

6. TRUFFLE ASSET MANGEMENT COMPLIANCE AND COMPLAINTS DEPARTMENT

FAIS Compliance is outsourced to an independent service provider - Independent Compliance Services (Pty) Ltd and the Compliance Officer is Stephen Gerber.

If you have a compliance complaint or related query, please contact us directly or contact our compliance officer. Contact details are:

Mr Stephen Gerber on 082 801 8777 or ics@complianceservices.co.za

Truffle Asset Management (Pty) Ltd has adopted a Conflict of Interest Policy as required by the FAIS Act and the General Code of Conduct. A copy of this policy is available at the end of this document.

Furthermore, the company has adequate Professional Indemnity and Fidelity Insurance cover, as required in terms of the FAIS Act.

7. FAIS OMBUD

Should a complaint not be resolved to your satisfaction, you may forward such a complaint to the office of the Ombud for Financial Service Providers, whose contact details are:

Telephone: +27 12 470 9080

Facsimile: +27 12 348 3447

E-mail Address: info@faisombud.co.za

Website: www.faisombud.co.za

8. OTHER MATTERS OF IMPORTANCE

- 8.1 Do not sign any blank or partially completed application form or agreements
- 8.2 Complete all forms in ink
- 8.3 Keep all documents handed to you
- 8.4 In terms of the Financial Intelligence Centre Act, Truffle Asset Management is obliged to report any suspicious and unusual transaction that may facilitate money laundering.
- 8.5 It is important that you are absolutely sure that the product or transaction meets your needs and that you feel you have all the information you need before making a decision.

9. FINANCIAL SERVICES PRODUCTS

As an authorized Financial Services Provider, Truffle Asset Management and its representatives has been licensed by the Financial Services Board in terms of the FAIS Act, to render advice and intermediary services in respect of the following financial products with various product suppliers:

CATEGORY I

Retail Pension Benefits

Pension Fund Benefits (excluding Retail)

Securities and Instruments: Shares

Securities and Instruments: Money market instruments

Securities and Instruments: Debentures and securitized debt

Securities and Instruments: Warrants, certificates and other instruments

Securities and Instruments: Bonds

Securities and Instruments: Derivative instruments

Participatory interests in Collective Investment Schemes

Deposits Defined in the Banks Act – exceeding 12 months

Deposits defined in the Banks Act – 12 months or less

CATEGORY II – Discretionary FSP – INTERMEDIARY SERVICES

Securities and Instruments: Shares

Securities and Instruments: Money market instruments

Securities and Instruments: Debentures and securitized debt

Securities and Instruments: Warrants, certificates and other instruments

Securities and Instruments: Bonds

Securities and Instruments: Derivative instruments

Participatory interests in Collective Investment Schemes

CATEGORY IIA – Hedge Fund FSP

Truffle Asset Management (Pty) Ltd is also a licensed Pension Fund Administrator in terms of Section 13B of the Pension Funds Act 24 of 1956.

CONFLICT OF INTERESTS POLICY

Directors, and employees of the company must never permit their personal interests to conflict, or appear to conflict, with the interests of the company or its clients. This may include but is not exclusive to:

- Real or perceived financial gain resulting from recommendations to our clients at a cost to the client.
- An outcome in service delivery or a transaction executed that may differ from the real interest of the client.
- Any non-cash incentives that may be received by the business from affecting any predetermined transaction and / or product.
- Effecting a transaction and / or product that may result in a benefit to another party other than the client.

Directors and employees must be particularly careful to avoid representing the company in any transaction with others with whom there is any outside business affiliation or relationship. Directors and employees shall avoid using their company contacts to advance their private business or personal interests at the expense of the company, its clients or affiliates.

Officers, directors and employees will refrain from gathering competitor intelligence by illegitimate means and refrain from acting on knowledge which has been gathered in such a manner. The officers, directors and employees of the company will seek to avoid exaggerating or disparaging comparisons of the services and competence of their competitors.

Violation of this Code can result in disciplinary action being taken against the person, including possible termination of services. The degree of discipline relates in part to whether there was a voluntary disclosure of any ethical violation and whether or not the violator cooperated in any subsequent investigation.

Management of conflicts

Lesser conflicts

When any staff member of the company suspects a potential conflict of interest, that member shall be obliged to discuss the matter with Louis van der Merwe and Hannes van der Westhuizen. The content of the discussion as well as any decision made must be minuted. In assessing whether a conflict is material or of a lesser nature, regard must be had to the impact that such a conflict will have on the company's reputation, financial loss and internal erosion of ethical standards.

Material conflicts

Material conflicts must be discussed with Louis van der Merwe and Hannes van der Westhuizen before any decision is made. Only they can make the final decision regarding a material conflict.

Management and mitigation

The Shareholders of the company will review all conflicts on a quarterly basis and make recommendations regarding steps to avoid a recurrence of those aspects. Louis van der Merwe and Hannes van der Westhuizen will accept responsibility for the implementation of all steps necessary. Notice of the attention paid to conflict of interest must be contained in the minutes of the meetings of the Shareholders committee and the relevant extracts of the minutes must be made available to the company's compliance officer on request, the purpose of which is to enable the compliance officer to report on compliance with this policy.

Where a conflict is identified and a decision made, the nature of the decision must be communicated to the third party in writing as soon as possible. This applies regardless of whether the decision was made to cease doing business or continue with the business at hand despite the existence of the conflict. It is important for the preservation of the corporate integrity that these disclosures are made at all times.