

Investa Financial Services (Pty) Ltd, FSP 24958

Code of Conduct

1. Professionalism

Investa is committed to maintain the highest and distinctive professional standards in the financial services market.

All stakeholders (Shareholders, Directors, Key Individuals, Financial Advisers, Staff, Associates, Referral Financial Service Providers (FSP's) and Other Service Providers) must meet strict obligations for participation.

We aim to differentiate Investa and our standards are higher than the requirements of the FAIS act and related legislation.

Highly qualified people must provide the client with appropriate and quality advice and disclose all relevant information, which will then enable the client to make an informed decision before purchasing a product. The service and solution and business ethics must differentiate Investa.

In addition to the Fit and Proper requirements in terms of FAIS (par 4) staff and advisers are selected who are self motivated, prefer an environment where they can work independently, take responsibility for their own development and success and is a "natural" supporter of our business philosophy and Code of Conduct.

Our recruitment standards/selection criteria is the cornerstone of success (See par 4)

Interaction with product suppliers, other FSP's and industry role players will always be based on ethical business conduct in all instances.

2. General Code of Conduct

Investa requires high standard of adherence to the FAIS General Codes of Conduct

The **information** that advisers must give the client about the financial service, including providing a financial needs analyses and certain disclosures, about themselves and about the product supplier
(See par 2 below and "Investa Staff and Training Policy" and "Investa Compliance policy and process")

The **operational ability** of Investa to manage financial records, maintain internal controls, keep client records and deal with client funds
(See "Investa Compliance Policy and process")

Proper conduct for **advertising** and marketing
(“Investa Staff and Training Policy”)

How advisers should **contact clients**
(See “Investa Staff and Training Policy”)

The **complaints** procedure
(See “Investa Complaints policy and process”)

How advisers should manage their **risk**, including taking out indemnity insurance
(See “Investa Compliance Policy and process”)

3. **Disclosures and communication**

Investa promotes transparency and insist on full disclosure for clients to make informed decisions. Their needs must be suitably satisfied . The solution must be appropriate and our approach must develop confidence and trust and lead to repeat business and a long term relationship.

All communication must be factually correct, avoid uncertainty/confusion, not misleading and in plain language.

It must also be appropriate, provided timeously and in accordance with contractual relationships and requests of clients.

Execution must exceed client expectations and always have client interests in mind

Disclosures must include:

Provision of a Financial Needs Analysis

Disclosures relating to Investa and relevant Product Providers

Existence of any personal interest, incentives,etc

Any potential conflict of interest

4. **Fit and proper requirements (F&P)**

Investa is committed at all times to render financial services honestly, fairly, with due skill, care and diligence, and in the interests of clients and the financial services industry.

Investa shall ensure that the F&P requirements are applied but advisers must meet higher standards than the FAIS stipulations in respect of :

Personal qualities of honesty and integrity

Not to be found guilty of :

Civil or criminal proceedings

Dishonesty, negligence, incompetence, mismanagement

Any indication in respect of the above shall disqualify an adviser candidate and be grounds for dismissal. In addition any staff member/adviser must have and maintain a record of ethical business conduct

Appropriate competency and qualification levels

The required competency levels per product type must be exceeded. Only those staff who meet the Investa requirements shall continue to sell or supervise the selling of that particular product type.

Experience

Investa appoints experienced staff/advisers who exceed the knowledge, skills and expertise requirements of FAIS and while providing services improve their skills through practical on-the-job training

Refer to “Investa Staff and Training policy” for more details