GREENPOINT

STATUTORY DISCLOSURES

FINANCIAL ADVISORY & INTERMEDIARY SREVICES ACT NO 37 OF 2002 (“FAIS”)

The purpose of this Annexure is to make the necessary Statutory Disclosures as required by the Financial Advisory and Intermediary Services Act, “FAIS” (Act No. 37 of 2002).

Greenpoint Capital (Pty) Ltd (“Greenpoint”) is an Authorised Financial Services Provider and holds a Category 1 and Category 2 FSP license.

BUSINESS DETAILS

Name of FSP:	Greenpoint Capital (Pty) Ltd
FSP License No.:	32488
Registration No. :	2007/015289/07
Business Address:	4th Floor, The Terraces, 25 Protea Road, Claremont, Cape Town, 7708
Postal Address	4th Floor, The Terraces, 25 Protea Road, Claremont, Cape Town, 7708
Telephone	076 024 0510
Email	info@greenpointcapital.co.za
Website	www.greenpointcapital.co.za

LICENSE INFORMATION

	Category II Financial Services	Category I Financial Services	Category I Financial Services
Financial Product		Advice	Intermediary
Shares	✓	✓	✓
Money Market Instruments	✓	✓	✓
Debentures and Securitised Debt	✓	✓	✓
Bonds	✓	✓	✓
Derivative Instruments	✓	✓	✓
Participatory Interests in CIS	✓	✓	✓
Long term Deposits	✓		
Short term Deposits	✓		

REPRESENTATIVE INFORMATION

	Category I		Category II	
	Key Individual	Authorised Representative	Key Individual	Authorised Representative
Ryan Wood-Collier	✓	✓	✓	✓
Nic van Zyl		✓		✓ *
Andrea Benci		✓		✓
Jason Frank		✓		✓ *
Shayne Groenewald		✓		✓ *
Ivor Tavernor		✓		✓ *
Marubini Tshivenga		✓ *		✓ *
Michael Pooler		✓ *		✓ *

* denotes 'Under Supervision'

Greenpoint has a signed mandate with each representative and has the necessary controls in place to ensure that its Key Individuals and Representatives are Fit and Proper at all times. Greenpoint accepts full responsibility for the lawful rendering of financial services by all authorised representatives, whether directly or under supervision, as contemplated under FAIS Section 13(1)(b).

CONFLICTS OF INTEREST

Potential conflicts of interest are inherent in any business. Greenpoint will however take the necessary steps to identify and manage conflicts of interests to ensure that clients are not prejudiced. Detecting potential or recognised conflicts of interest constitutes an integral part of the duties and obligations of Greenpoint Capital (Pty) Ltd and maintains an active Conflicts of Interest Management Policy that is available on request by contacting our offices.

Greenpoint advises Greenpoint Specialised Lending on a variety of investment opportunities and no investment opportunity equals more than 30% of the total investments advised on.

Greenpoint shareholders include Stellar Capital Partners (Pty) Ltd, WCA Investments (Pty) Ltd and TMI Investments (Pty) Ltd.

Any other material conflict of interest will be disclosed.

PROFESSIONAL INDEMNITY INSURANCE

Greenpoint holds Enhanced Crime & Civil Liability Cover of R50m underwritten by SHA Risk Specialists, a division of Santam Ltd.

FINANCIAL SOUNDNESS

Greenpoint submits annual audited financial statements to the FSCA, to ensure it complies with the financial soundness requirements.

COMPLAINTS

Greenpoint is committed to good ethical standards and strive to provide services of good quality to clients. If you have any compliments or complaints in respect of our services provided, we urge you to bring it to our attention in writing.

Should you feel that your rights have been prejudiced or that you have been aggrieved in any way and want to complain about the financial services provided, you have the right to lodge a complaint with the FAIS Ombud. Before doing so, please contact Greenpoint first at the FSP contact details provided below. A copy of the Complaints Policy & Process is available on our website.

FSP contact details:

Contact Person	Ryan Wood-Collier
Contact No.:	076 024 0510
Email Address:	ryan@greenpointcapital.co.za
Physical Address	4th Floor, The Terraces, 25 Protea Road, Claremont, Cape Town, 7708
Website	www.greenpointcapital.co.za

FAIS Ombud:

Contact No.:	012 762 5000
Email Address:	info@faisombud.co.za
Physical Address	125 Dallas Avenue, Menlyn Central, Waterkloof Glen, Pretoria 0010.
Website	www.faisombud.co.za

CONFIDENTIALITY

At Greenpoint, Client confidentiality is of paramount importance and a core principle of our financial services.

In compliance with the Protection of Personal Information Act (POPIA), all Personal Information (PI) shared with us remains confidential unless:

- Explicit, written consent is provided by the Client; or
- Disclosure is required by law; or
- Disclosure is deemed necessary in the public interest.

In such cases, Greenpoint is required to consider the rights of the parties concerned.

Use of Personal Information:

A Client's PI is used strictly for the purpose of delivering suitable Financial Services to the Client in accordance with the Financial Advisory and Intermediary Services Act (FAIS).

Where a Client acts on behalf of another person, the Client warrants that they have the necessary authority to provide that person's PI to Greenpoint.

Disclosure to Third Parties

Greenpoint may disclose PI to select third parties where necessary to provide suitable Financial Services to the Client and/or to give effect to the financial transaction entered into by the Client. These Parties include:

1. Outsourced Service Providers:

    - Oakridge Consulting: Provisioning of accounting services to support Greenpoint's financial services delivery;

2. Essential Services Providers, including but not limited to:

    - Compliance Providers:

        i. Compli-Serve (SA) (Pty) Ltd and associated companies – as required in terms of FAIS;

    - Regulatory Bodies:

        i. Financial Sector Conduct Authority ("FSCA");

        ii. Information Regulator ("IR");

        iii. Financial Intelligence Centre ("FIC") etc.

    - External Auditors:

        i. BDO: Provision of statutory auditing requirements under FAIS;

    - Information Technology Service Providers:

        i. IEIT Cyberlogic: to ensure safekeeping and protection of PI;

Any other third party disclosures not listed above will be communicated to the Client in advance and will require the Clients explicit consent.

Client Obligations and Rights:

The Client warrants that the PI submitted is true, correct and complete, Any changes must be communicated to Greenpoint promptly.

Greenpoint has implemented a PAIA and POPIA Manual which outlines our protocols for managing, updating and deleting PI. This document is available on our website at www.greenpointcapital.co.za or on request by e-mailing the Information Officer at info@greenpointcapital.co.za.

Access Requests and Breaches:

- Greenpoint may not disclose PI to any unauthorised parties.

- Should a third party seek access to a Client's PI, they must follow the procedures outlined in our PAIA and POPIA Manual.

- Unauthorised disclosure of PI may constitute a breach by Greenpoint which may be reportable to the Information Regulator (IR).

- For further information, or to report a complaint, please visit www.justice.gov.za or contact the IR directly at complaints.IR@justice.gov.za.

COMPLIANCE

Greenpoint conducts ongoing internal compliance monitoring and annual file reviews in partnership with its external compliance officer. Compliance by Greenpoint with the FAIS Act is monitored by Compli-Serve (SA) (Pty) Ltd with Compliance Practice no. CO 194:

Contact Person	James George
Contact No.:	087 897 6970
Email Address:	info@compliserve.co.za
Postal Address:	PO Box 2358, Clareinch, 7740
Website:	www.compliserve.co.za

FINANCIAL INTELLIGENCE CENTRE ACT no. 38 of 2001 (“FICA”)

Greenpoint is an Accountable Institution in terms of FICA and registered with the Financial Intelligence Centre (“FIC”). It is therefore obliged to identify and verify clients, to report any cash transactions, terrorist properties and activities and any suspicious & unusual transactions or activities that may facilitate money laundering.