



SYGNIA GROUP

FINANCIAL ADVISORY AND INTERMEDIARY SERVICES
ACT 37 of 2002 (FAIS) DISCLOSURE

November 2017

TABLE OF CONTENTS

1.	INTRODUCTION	3
2.	SCOPE	3
3.	DEFINITIONS	3
4.	FINANCIAL SERVICE PROVIDERS IN THE GROUP	5
5.	SYGNIA GROUP CONTACT DETAILS	6
6.	AUTHORISED KEY INDIVIDUALS AND REPRESENTATIVES	7
7.	CONFLICTS OF INTEREST	7
8.	REMUNERATION	7
9.	PROFESSIONAL INDEMNITY AND FIDELITY INSURANCE	8
10.	COMPLAINTS PROCEDURES	8

1. INTRODUCTION

Sygnia is a specialist financial services group headquartered in South Africa focusing on the provision of investment management and administration solutions to institutional and retail clients predominantly located in South Africa. The main services provided by Sygnia include Multi-Manager investment solutions, index-tracking investment solutions, customised/bespoke investment strategy management, transition management and investment administration/platform services. The primary institutional clients span both the private and public sector and include retirement funds, umbrella funds, life insurers, third party multi-managers, endowments and other special purpose funds.

The primary retail clients include individual members and beneficiaries of retirement funds, as well as the wider individual savings market. Sygnia's principal geographic focus is South Africa, where it has been operating in its current form since November 2006.

2. SCOPE

This document applies to all the registered financial services providers in the Sygnia Group.

3. DEFINITIONS

For the purposes of this Policy/Procedure, the following definitions apply:

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 – <ul style="list-style-type: none"> a) Influence the objective performance of his, her or its obligations to that client; o r b) Prevent a provider or representative from rendering an unbiased and fair financial service to that client, or from acting in the interests of that client, including but not limited to – <ul style="list-style-type: none"> i) A financial interest; ii) An ownership interest; iii) Any relationship with a third party.
PROVIDER	Means an authorised financial services provider, and includes a representative
SYGNIA	Refers to the Sygnia Group
THE BOARD	Means the Board of Directors of the Company
THE COMPANY	Refers to the Sygnia Group
THE SYGNIA GROUP	Sygnia Limited and its respective subsidiary companies, collectively.
THIRD PARTY	Means: <ul style="list-style-type: none"> a) A product supplier; b) Another provider; c) An associate of a product supplier or a provider; d) A distribution channel; e) Any person who in terms of an agreement or arrangement with a person referred to in paragraphs (a) to (d) above provides a financial interest to a provider or its representatives.

4. FINANCIAL SERVICE PROVIDERS IN THE GROUP

The Sygnia Group comprises of the following Financial Service Providers (FSP's), collectively referred to as Sygnia:

Sygnia Asset Management (Pty) Limited is a Category II/IIA FSP (registration no. 873):

An asset management company providing the following services and products to institutional and retail clients:

- Multi-Manager investment products;
- Specialist and balanced index-tracking products;
- Management and administration of custom-designed investment strategies;
- Transition management; and
- Investment administration services.

Sygnia Life Limited is a Category I and II/IIA FSP (registration no. 2935):

A life insurance company with a licence limited to issuing linked investment policies, used for the purposes of structuring pooled, unitized investment portfolios for institutional and retail clients, and issuing of sinking fund policies and living annuities to individual investors.

Sygnia Financial Services (Pty) Limited is a Category I, II and III linked investment services provider (LISP) and approved Section 13B Administrator (registration no. 44426):

A LISP offering investment administration services and savings products (retirement annuities, living annuities, preservation funds) to the retail market.

Sygnia Securities (Pty) Limited is a Category I FSP and member of the Johannesburg Stock Exchange (registration no. 45818):

An execution-only stockbroker used for cost-effective trading of Sygnia's index-tracking funds and/or transition management programmes.

Gallet Group Employee Benefits and Subsidiaries:

An employee-benefits administration company that offers liability administration and consulting services to institutional investors, as well as sponsoring the Sygnia Umbrella Retirement Fund ("SURF") offered by the Sygnia Group to the institutional market.

- Gallet Retirement Fund Administration (Pty) Limited is a Category I FSP and approved Section 13B Administrator (registration no. 873);
- Gallet EB Support Services (Pty) Limited is a Category I FSP (registration no. 5667);
- Gallet Asset Admin (Pty) Limited is a Category I FSP (registration no. 41129);
- Gallet Risk Admin (Pty) Limited is a Category I FSP (registration no. 43189).

5. SYGNIA GROUP CONTACT DETAILS

Physical Address:

7th Floor

The Foundry

Cardiff Street

Green Point

Cape Town

8001

Postal Address:

P O Box 51592

V & A Waterfront

8000

Tel: +27 21 446 4940

Fax: +21 21 446 4950

Email: info@sygnia.co.za

Web: www.sygnia.co.za

6. AUTHORISED KEY INDIVIDUALS AND REPRESENTATIVES

Sygnia's appointed key individuals and representatives are listed on the Financial Services Board's website at www.fsb.co.za.

While representatives and key individuals may change from time to time, Sygnia has the necessary controls and procedures in place as to ensure that they comply with the prescribed FAIS Fit and Proper Requirements (this includes experience, qualifications, regulatory examinations and honesty and integrity requirements). Sygnia accepts legal responsibility for those authorised activities that representatives may perform within the scope of implementing their employment contract or mandate.

7. CONFLICTS OF INTEREST

Sygnia Group has the following policies that aim to prevent any situation that could create an impression of conflict with a client's interest or compromise the company's independence from third parties:

- Gift and Hospitality Policy
- Conflicts of Interest Policy
- Anti-Bribery and Anti-Corruption Policy

In adherence to the principles of Treating Customers Fairly (TCF) and the General Code of Conduct for Authorised Financial Service Providers and Representatives, all employees must act in the best interests of clients and render unbiased and fair financial services at all times.

8. REMUNERATION

From time to time, clients may be referred to other products or specialised services offered by affiliated companies within the Sygnia Group. Sygnia representatives do not receive any commission or incentives for such introductions or recommendations.

No employee of Sygnia shall be remunerated in any way as an incentive for that employee the effect of which will be the creation of a Conflict of Interest with the best interests of any client.

Sygnia further does not pay any remuneration to any Financial Services Provider or to a representative (either its

own or that of a third party Financial Services Provider) other than what is permissible in accordance with the legislation applicable from time to time.

9. PROFESSIONAL INDEMNITY AND FIDELITY INSURANCE

Sygnia Group has Professional and Fidelity Insurance for all subsidiaries in the Group.

10. COMPLAINTS PROCEDURES

Should you wish to complain about the services that you have received from Sygnia, please direct your complaints in writing to the Head of Compliance:

Niki Giles

Tel: 021 446 4955

Fax: 021 446 4950

Email: ngiles@sygnia.co.za

Sygnia will conduct the required investigation into your complaint and will revert to you with a written response to your complaint within a maximum of 20 business days from the date on which your complaint had been received, provided that, where circumstances make it impossible for Sygnia to fully investigate your complaint within the allowed time frame, Sygnia may, supported by the reasons why it is unable to investigate your complaint in the time frame allowed, communicate an extended time frame to you.

Please note that, for Sygnia to fully and comprehensively investigate any complaint, it may require additional information from you. Should you be unable to provide such information within the time frames required by Sygnia, it may take longer than the stated 20 business days to complete the investigation of the complaint.

If you are not satisfied with the reply to your complaint or the outcome of the investigation into your complaint, or in the event that Sygnia is unable to resolve your complaint, you may direct your complaint to the Office of the Ombud for Financial Service Providers, whose contact details are:

PO Box 745714

Lynnwood Road

0040

Tel: 0860 324 766

Fax: 012 348 3447

Email: info@faisombud.co.za