

# PRESCIENT TREATING CUSTOMERS FAIRLY (“TCF”) POLICY

---

July 2022

**Proprietary statement**

This policy and the information contained within are confidential and are the sole property of Prescient entities. Any reproduction in part or in whole without the written permission of Prescient is strictly prohibited.

Prescient

## Table of Contents

1.	<b>Policy statement</b> .....	3
2.	<b>Policy detail</b> .....	3
3.	<b>Scope</b> .....	4
4.	<b>Policy implementation procedures</b> .....	4
4.1	Culture and Governance – (Outcome 1).....	4
4.1.1	Culture.....	4
4.1.2	Audit.....	5
4.1.3	Reward and Remuneration.....	5
4.1.4	Monitoring.....	5
4.1.5	Risk and Compliance Requirements .....	5
4.2	Product features and services – (Outcome 2).....	6
4.2.1	Procurement.....	7
4.2.2	Due Diligence .....	8
4.3	Disclsoure (Outcome 3).....	8
4.3.1	Marketing and Advertising.....	8
4.4	Suitable Advice (Outcome 4).....	9
4.5	Performance and service in line with expectations (Outcome 5).....	10
4.6	Claims, complaints, and changes (Outcome 6) .....	10
4.6.1	Complaints .....	10
4.6.2	Claims and changes.....	10
5	Non-compliance.....	11
6	References .....	11
7	Review and approval .....	12

Version	Final 2.0 2022
Applicable to	Prescient Holdings (Pty) Ltd and subsidiaries
Owner	Prescient Holdings (Pty) Ltd Board of Directors
Policy Creator	FAIS Compliance Officer
Policy Manager	Head of Governance, Risk and Compliance and FAIS Compliance Officer
Review and Approval Body	Prescient Holdings (Pty) Ltd Audit and Risk Committee Prescient Management Company (RF) (Pty) Ltd Audit and Risk Committee
Available for External Distribution	Yes

## 1. Policy Statement

At Prescient we acknowledge that our clients are at the heart of our business and that the fair treatment of each client is essential to our success. Embedded in our Purpose statement is the care that we have for our clients and their outcomes.

*“Creating value for our clients to help secure their financial future. We care about our clients’ success as much as we do our own”.*

We recognise that our employees, irrespective of their role, are critical to delivering a positive customer experience and ensuring that our customers are treated fairly, and our culture and values encourage and support our staff to this end.

Prescient recognises the importance of the Financial Sector Conduct Authority (FSCA) Treating Customers Fairly (“TCF”) initiative and we strive to embed the desired values and outcomes in our day-to-day activities. The TCF principles are embedded in all facets of the business.

## 2. Policy Detail

TCF delivers the following intermediate outcomes:

- Improved customer confidence
- The supply of appropriate products and services and
- Enhanced transparency and discipline in the industry

TCF OUTCOMES	PRESCIENT OUTCOMES
1 Customers who are confident that they are dealing with companies where the fair treatment of customers is central to the company culture. (Culture and Governance)	TCF is embedded in the overall culture of Prescient. Training is provided to staff and a policy has been created to provide guidance and awareness when dealing with clients.
2 Our products and or services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly. (Product Features and Services)	Customers can be confident that we have a robust, independent, and tested method of assessing customers’ attitude to investment risk and the needs of the customer.
3 Customers are given clear and sufficient information and are kept appropriately informed before, during and after the time of contracting. (Disclosure)	We communicate with our customers at all points of the sale process clearly, transparently, and in a manner that is not misleading or unfair. We are committed to ensuring that all our product material is in plain language prior to and after launching the product.
4 Where customers receive advice, the advice is suitable and takes account of their circumstances. (Suitable Advice)	Customers receive advice from their financial planners. Prescient generally does not give advice. However, where advice is required specifically and given, Prescient ensures that its product information is such that these financial planners are able to keep clients informed of all risks and any potential consequences related to investment.
5 Clients are provided with products that perform as we have led them to expect, and the associated service is both of an acceptable standard and what clients have been led to expect. (Performance and Service in line with expectations)	Customers can be assured that products are carefully monitored to ensure that it performs to the customer’s reasonable expectations.

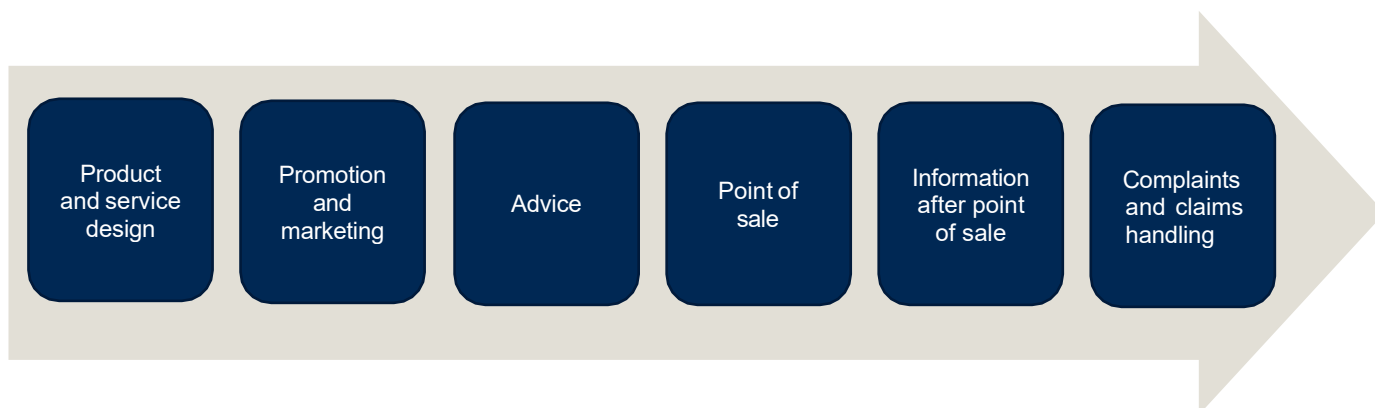
## TCF OUTCOMES

- 6 Clients do not face unreasonable post-sale barriers to change the product, switch provider, submit a claim or lodge a complaint. (Claims, Complaints and Changes)

## PRESCIENT OUTCOMES

We are of the view that service standards should continue well until after the sale process ends. If a customer decides that the product or fund is not suitable for them, we will duly consider the issue and will to the best of our ability - where reasonably possible - look at switching the product or fund. In addition, if clients feel that they have been unfairly treated, they have the right to complain. We therefore employ a dedicated process for handling complaints.

Prescient strives to ensure that TCF outcomes are delivered throughout the product life cycle.



### 3. Scope

This policy applies to employees of all group entities.

### 4. Policy implementation procedures

To achieve the outcomes above, the TCF principles are embedded in our businesses, strategy, governance, and daily processes. This is set out more fully below:

#### 4.1. Culture and Governance – Outcome 1

##### 4.1.1. Culture

Prescient DNA speaks to the TCF outcomes.

At Prescient our culture:

- Inspires our people to go above and beyond. It creates space for them to solve our client's challenges and be innovative enough to remain relevant.
- Attracts self-starters and highly motivated A players – people who love what they do, and who obsessively strive to achieve their personal mastery.
- Engenders trust, which creates congruence with our clients

Our Prescient culture, and ultimately conduct, is shaped by our Prescient DNA and more specifically through the Prescient Values that we have adopted. These values are as follows:

##### Be Exceptional

- Our entrepreneurial spirit drives team excellence
- We trust in your capability and experience to deliver exceptional results. You're not here to be a follower of someone else's narrative; create your own path and yield the results
- Change is inevitable, be resilient and thrive

## Build Trust

- Think about the long term
- Do the groundwork, be thorough
- Our clients trust you to lead them, so lead them with certainty

## Instill Accountability

- Be responsible for your actions
- We are a team. You are accountable to your colleagues and your clients
- Inspire others to get the best out of them

Prescient encourages all employees to act in a professional and ethical manner. Prescient policies speaks to our culture and employees are made aware of what is expected of them through training and the requirement to formally accept the Prescient Policies. The following Compliance and Governance policies and frameworks have been created by Prescient and are monitored accordingly:

- Anti – bribery Corruption Fraud and Theft
- Personal Account Trading
- Complaints Framework
- Culture and Governance Framework
- Conflict of Interest
- Gifts and Entertainment
- Financial Crime
- Protection of personal Information
- Recovery and resolution
- Whistleblowing

### 4.1.2. Governance

Prescient has a robust governance framework that supports the group business. Responsibility for TCF resides at board level and implementation is delegated to various sub committees, executive committees, and management. As a regulated entity, Prescient has regular engagement with the various regulatory bodies under which we are licenced. We also play an active role in shaping the regulatory environment in South Africa through our membership of the Association for Savings and Investments of South Africa (ASISA).

### 4.1.3. Reward and Remuneration

Prescient adopts a performance management strategy. The growth and development of the business is dependent on the effectiveness of the employees of the entity. The performance management process is detailed in our Group's Human Resources Manual. Prescient has a Remuneration Committee (REMCO) who reviews the Group's policy for determining remuneration. REMCO also provides oversight of the establishment of the remuneration policy that will promote the achievement of strategic objectives and encourage the individual performance. The objective includes that Prescient offers services to clients that promote efficiency, professionalism, and fairness.

The performance of an employee is measured against the value of service provided to the client. Our remuneration philosophy strives to align the interests of all our staff and stakeholders.

### 4.1.4. Monitoring

Each Prescient entity has their own dedicated Compliance Officer to monitor and provide guidance to the relevant business unit. The Group Head of Governance, Risk and Compliance ("GRC") oversees Governance, Risk and Compliance across all the Prescient entities, allowing for centralised oversight where required.

The Compliance Officers also report into the Group Compliance Committee meeting that is held monthly.

### 4.1.5. Risk and Compliance Requirements

#### FAIS Fit and Proper Requirements

This applies directly to Prescient Investment Management, Prescient Fund Services, Prescient Securities as well as their juristic representatives.

All FAIS representatives are monitored in accordance with Board Notice 194 of 2017. Fit and Proper requirements include but are not limited to:

- Personal character qualities of honesty, integrity, and good standing
- Competence
- Continuous professional development
- Operational ability and
- Financial soundness

Representatives that do not meet one or more of the requirements above, are placed under supervision and monitored accordingly to ensure that the representative receives the relevant skill, knowledge, and experience.

TCF training is provided to all representatives.

A FAIS Compliance Guideline document has been created and made available on the Intranet.

#### Prescient Management Company (RF) (Pty) Ltd (“PMANCO”)

PMANCO is required to adhere to the Fit and Proper Requirements and Conditions for Managers of Collective Investment Schemes as determined in Notice 910 of 2010. These requirements include:

- Requirements for appointment to board of directors;
- Fit and Proper requirements for directors;
- Operational requirements for managers;
- Financial soundness of a manager;
- Management and supervision by a manager;
- Risk management by the manager;
- Complaint resolution by a manager;

PMANCO is required to submit a compliance report on an annual basis to the Regulator, confirming compliance with Notice 910 of 2010.

#### Prescient Fund Services (Ireland) Ltd (“PFSI”)

The Fitness and Probity Regime was introduced by the Central Bank of Ireland under the Central Bank Reform Act 2010 (the **2010 Act**). It is critical to the protection of the public interest and to ensuring there is public trust and confidence in the financial system.

The core function of the Fitness and Probity Regime is to ensure that individuals in key and customer facing positions (referred to in the legislation as Controlled Functions (**CFs**) and Pre-Approval Controlled Functions (**PCFs**) within a Regulated Financial Service Provider (Regulated Firm) are competent and capable, honest, ethical and of integrity and also financially sound.

## 4.2. Product Features and Services – Outcome 2

#### Prescient Investment Management (Pty) Ltd (“PIM”)

PIM manages money on behalf of individuals, retirement funds, medical aid schemes, corporate entities, and trusts. Services include Discretionary segregated mandates and Collective Investment Schemes and other Pooled Vehicles.

PIM is regulated under FAIS and is licensed as a CAT I (advisory and intermediary) and CAT II (discretionary) financial services provider. PIM is a signatory to the United Nations Principles of Responsible Investing (“UNPRI”) and pledged to the Codes of Responsible Investing in South Africa (“CRISA”).

PIM has an approved mandate for each client and has processes in place to ensure adherence to these mandates.

The appointed accountant is responsible for ensuring that the correct fees in terms of the mandate are charged to client.

The PIM operations team and the appointed administrator is responsible for the administration and client reporting. Reporting deadlines are agreed with clients. The team will ensure that the client reporting deadlines are met and that the reporting is in the manner that the client has requested.

The Investment Compliance Officer is responsible for monitoring the limits set out by the client in the mandate. When there is a breach the Compliance officer will send it to the Portfolio Manager to advise. Should the breach be advertent, the Portfolio Manager must immediately correct it and notify the client. If, as a result, the fund suffered a loss, the fund must be placed in the position it would have been, had the breach not occurred.

Clients are allocated a Client Relationship Manager, who will communicate with the client and address any concerns in an ethical, efficient, and professional manner.

### Prescient Investment Management China Limited (“PIMCL”)

PIMCL is registered under Article 9 of the Financial Services (Jersey) law 1998. PIMCL is a quantitative, researched based, asset management company focused solely on the Chinese market. PIMCL provides a technical distribution service for PIM.

PIMCL is a juristic representative on PIM FSP license.

### Prescient Online (Pty) Ltd

Prescient Online is a digital, direct investment solution. Prescient Online is a juristic representative on PIM FSP license.

### Prescient Fund Services (Pty) Ltd (“PFS”)

PFS is a fund administration company. PFS offers portfolio administration, fund accounting, transfer agency / investor services, front office system integration, alternative fund administration, policy holder administration and benefit administration.

PFS is regulated under FAIS and is licensed as a CAT I (intermediary) financial services provider. PFS is an approved benefit administrator in terms of Section 13B of the Pension Funds Act.

PFS has an approved SLA with each client. The SLA details what administration services will be provided.

PFS do not market their services in the retail market, although they perform services on behalf of FSPs or other product providers that do.

### Prescient Structured Product Advisory (PSPA)

PSPA is an independent boutique advisory firm that provides consulting and related services to issuers on Specialist Securities listed in terms of Section 19 of the Johannesburg Stock Exchange (JSE) listing requirements. PSPA ensures that when providing a financial service of an intermediary nature that it is in line with the TCF principles set out in this document.

PSPA is a juristic representative on PFS FSP license.

### Prescient Analytics (Pty) Ltd (“PA”)

PA provides investment data analytics, compliance and reporting services to the financial services industry. PA is a juristic representative on PFS FSP license.

### Prescient Securities (Pty) Ltd (“PSEC”)

PSEC is an agency-only, full-service, premium-rated JSE stockbroking member focusing on the Institutional, Hedge Fund & Pension Fund markets. PSEC provides clients with best execution and rated research across the following asset classes: Local & International Equity, Fixed Income, Currencies, and their respective Derivatives. PSEC also offers a Corporate Notes unit which raises substantial capital at competitive rates for listed companies on a private placement basis from large institutions.

PSEC is regulated by the Johannesburg Stock Exchange (JSE), A2X as well as FAIS and is licensed as a CAT I (advisory and intermediary) and CAT II (discretionary) financial services provider.

### Prescient Management Company (RF) (Pty) Ltd (“PMANCO”)

PMANCO is an approved management company in terms of the Collective Investment Schemes Control Act (“CISCA”).

### Prescient Fund Services (Ireland) Ltd (“PFSI”)

PFSI is authorised by the Central Bank of Ireland as a management company and administrator pursuant to the UCITS Regulations and as an alternative investment fund manager under the AIFMD Regulations.

### Prescient Private Fund Management (Shanghai) Limited (“PSH”)

PSH is a private investment fund manager supervised by the China Securities Regulatory Commission, and self-regulated by the Asset Management Association of China.

## 4.2.1 Procurement

Prescient ensures an efficient procurement process. The procurement process applies to all employees. Procurement must be:

- Transparent: able to demonstrate the process followed and approvals obtained
- Competitive and economical: market based and tested (compare prices, obtain sufficient quotes)
- Fair: no provider given undue favour
- Accountable: the purchasing decision made is defensible and at arm's length
- Carried out with due consideration to BBBEE principles

The procurement process must be carried out with integrity at all times and potential and real conflicts should be declared and managed. Where an Employee wishes to refer a supplier or service provider that is associated to that Employee (i.e., family and friends/ associates), the Employee should declare this association and recuse themselves from the decision making. Failure to do so may have disciplinary consequences.

The Chief Executive Officer of the relevant operating entity is responsible for the procurement spend of that entity and contracts must be signed in accordance with the delegated authorities i.e., two A signatories. Where multiple operating entities are impacted, relevant CEO approval must be sought prior to incurring the spend.

#### **4.2.2. Due Diligence**

The Prescient Group, through PFS and PMANCO provide platforms for other FSPs and product providers (retirement and life) to sell their products or services to the retail market. Before taking on another FSP, a due diligence is performed on these FSPs, and an important aspect is obtaining and reviewing their TCF policy as well as other areas of market conduct. Ongoing due diligences are also performed on all PMANCO FSPs.

### **4.3. Disclosure – Outcome 3**

#### **4.3.1. Marketing and Advertising**

##### **Prescient Investment Management and Prescient Fund Services**

All marketing material is reviewed by Compliance in line with the FAIS General Code of Conduct. We keep clients informed of our investment process, information, and fund performance.

##### **Prescient Online (Pty) Ltd**

All marketing material made available on the Prescient Online portal is sent to Compliance for vetting and submission to the FSCA. All disclosures are vetted by the FAIS Compliance Officer and Compliance Marketing team.

##### **Prescient Management Company (RF) (Pty) Ltd (“PMANCO”)**

PMANCO is required to comply with Board Notice 92 of 2014: Advertising, Marketing, and Information Disclosure Requirements for Collective Investment Schemes under the Collective Investment Schemes Control Act 45 of 2002 (“Board Notice 92”), which sets out advertising, marketing and information disclosure requirements, which applies to all collective investment schemes, including foreign collective investment schemes, and where the collective investment schemes are listed, the JSE Equity Rules also apply. The BN92 specialist team reviews all marketing and advertising material to ensure compliance with BN92.

The purpose of BN92 is to inter alia, provide a legal framework within which managers of collective investment schemes may advertise and market products in a manner which ensures that investors base their decision on full, accurate and comprehensive information, protect investors from deceptive, misleading, unfair or fraudulent conduct and promotes the fair treatment of investors. Once the marketing and advertising material has been reviewed to the satisfaction of the BN92 specialist team, the document will be submitted to the FSCA, which will then be available for distribution to retail customers.

PMANCO must produce a minimum disclosure document for each portfolio, including third-party-named portfolio and is used for purposes of disclosing information to an investor prior to entering into a transaction with the investor, (“MDD”). The MDD must set out the essential characteristics of a portfolio which will enable an investor to understand the nature and the risks of the portfolio and to make informed investment decisions.

Clients are exposed to the following information during and after point of sale:

- A MDD which has been reviewed and signed off by the BN92 specialist team.
- PMANCO sends welcome letters to each direct investor.
- PMANCO sends out monthly investor statements to each investor.



- All investors are also made aware of the complaints procedure and contact details should they wish to lodge a complaint.

#### Prescient Securities (Pty) Ltd

- We use clear explanations of the products when talking to our clients.
- We guide clients about the information required by product suppliers
- In terms of section 7 of the FAIS ACT, the General Code of Conduct we must provide a reasonable and appropriate general explanation of the nature and material terms of the relevant contract or transaction to a client, and generally make full and frank disclosure of any information that would reasonably be expected to enable the client to make an informed decision. We disclose information in terms of this section in the form of our discretionary mandate.
- We consider the end client when we develop marketing and product disclosure material.
- The JSE and A2X Compliance Officer reviews the quality and accuracy of material before it is sent to clients.
- Should we discover misrepresentation of our products/services, a full review and due diligence process would again be undertaken – where need be partnerships with the offending parties would be discontinued.
- We are highly accessible to end clients who may need information on our products.
- We have controls in place to ensure our product/service information remains current.

#### Prescient Fund Services (Ireland) Ltd

In order to ensure a consistent level of protection for customers regardless of the financial service provider they choose the Consumer Protection Code (the Code) was introduced in Ireland in August 2006. The provisions of the Code are binding on regulated entities and must, at all times, be complied with when providing financial services.

- Firms must act honestly, fairly and professionally and must not mislead customers about the advantages or disadvantages of any product or service.
- Advertisements must clearly represent what the advertiser is offering to the customer
- Under the Code, advertising for financial products and services must make sure that: Information is clear, accurate, up to date and written in plain English
- Promotional materials and advertisements are clear, fair and accurate and do not mislead customers.
- Key information is not hidden in the small print

#### Prescient Private Fund Management (Shanghai) Limited (“PSH”)

According to the rules published by Asset Management Association of China in 2016, institutions should adopt a proportionate approach to informing investors about private funds, disclosing investment risks and ensuring that the relevant content of promotional material is clear and made available. The content of private fund promotional material should be consistent with the material content of the private fund contract and should not contain any false records, misleading statements or material omissions. Any inconsistency should be specifically explained to investors.

### 4.4. Suitable Advice – Outcome 4

Prescient does not provide advice in the normal course of its business. However, should advice be required the following steps must be followed:

- Establishing and defining the professional relationship
- Gathering of relevant information and the determination of needs and goals
- Analysis and evaluation of the client’s financial status
- Development and submission of a Financial Plan with recommendations and alternative proposals, where necessary
- Implementation of the proposed recommendations
- Monitoring of the recommendations and revision of the plan

Prescient ensures that its product information is such that those financial planners/ or fund managers who are providing independent advice on Prescient products are able to keep clients informed of all risks and any potential consequences related to the investment. Prescient Investment Management ensures that Product Specific Training (“PST”) is made available to all registered advisors before rendering advice on Prescient products. The PST is available on our website.

## 4.5. Performance and Service in line with expectations – Outcome 5

### Prescient Investment Management (Pty) Ltd (“PIM”)

PIM's investment process is purely systematic, therefore, there are never any biases towards individual views or individual portfolios. Processes and views are applied consistently and informed by quantitative models. Models provide signals which are never overruled; instead, their predictive power is checked and improved if necessary.

PIM's systematic, data driven, evidence-based process allows it to update its views on a daily basis, in real-time. Information is therefore available in a very timely fashion, and the portfolio managers are always able to implement PIMs views immediately and consistently across all portfolios.

### Prescient Management Company (RF) (Pty) Ltd (“PMANCO”)

PMANCO conducts an appropriate level of due diligence on any fund manager before dealing with them, to satisfy itself that TCF principles are adhered to and that the products and / or service levels meet the requirement of the investors. PMANCO has full and unrestricted access to information held by the fund manager in relation to the investor to ensure that all expectations have been met by the investor.

### Prescient Securities (Pty) Ltd

- We check Exchange traded products performance and perform our own analysis before we offer these to our clients.
- Employees need to provide customers with ongoing relevant information to enable them to monitor whether the product or service continues to meet their needs and expectations and provide acceptable levels of service for post-sale transactions or enquiries.
- Employees must also monitor and respond to changes in the wider environment that may affect products and impact on groups of customers.
- We have adequate service liaison structures in place to ensure the end client receives reasonable service.
- We consider the client service standards of those who market or distribute our products.
- Errors are dealt with at the highest leadership capacity possible. The COO and CEO would become directly involved when and where necessary.
- Accountability in terms of this outcome clearly defined in the value chain.

### Prescient Ireland Fund Services (Ireland) Ltd (“PFSI”)

PFSI has put in place mechanisms for collecting information with a view to evaluating and reviewing products, and for checking whether the products are continuing to meet the general needs of the target customers.

### Prescient Private Fund Management (Shanghai) Limited (“PSH”)

PSH exercises due diligence and prudence when dealing with clients. PSH performs investor suitability qualifications and risk assessments. Risks are fully disclosed to all clients.

## 4.6. Claims, Complaints and Changes – Outcome 6

### 4.6.1. Complaints

Prescient has adopted a Complaints framework and procedure document. Prescient takes complaints seriously and ensures that all complaints are dealt with in a fair manner. The Complaints procedure is made available on our website.

The TCF principles are embedded in our Complaints Framework and procedure.

### 4.6.2. Claims and Changes

#### Prescient Management Company (RF) (Pty) Ltd (“PMANCO”)

PMANCO and/or the fund managers will inform all investors in a timeous manner if there are any changes to the products offered. Procedures are put in place to ensure that no product change is made without the approval of PMANCO as stipulated in the relevant agreements. PMANCO has clear service standards in place for processing switches, redemptions, and additional

investments. Investor application forms are available on the Prescient and any co-named manager's web page. The application forms clearly state contact details and procedures that must be followed to action these transactions to ensure that the investor does not face any unreasonable barriers.

#### Prescient Investment Management (Pty) Ltd and Prescient Fund Services (Pty) Ltd

Any changes to a client's mandate will go through a formal process. The change to the mandate will be drafted by our Legal department and will be circulated to all relevant departments to be reviewed and to ensure that the relevant systems are updated, including those related to compliance monitoring.

#### Prescient Securities (Pty) Ltd

- When we provide after-sales services, it is easy for clients to contact us for assistance.
- We make it a priority to assist clients who have complaints.
- If an IFA contacts us on behalf of a client, we have processes to assist in such a scenario.
- Employees need to honour representations, assurances and promises that lead to legitimate customer expectations.
- Legitimate expectations must not be frustrated by unreasonable post-sale barriers. There is a requirement for fair and consistent handling of claims and a mechanism to deal with complaints timeously and fairly.
- Employees should undertake to identify common underlying causes of complaints and act to eliminate the root cause.
- We make a point to consider the end client's position when dealing with complaints from others in the value chain.

#### Prescient Fund Services (Ireland) Ltd ("PFSI")

If a customer decides that the product or fund is not suitable for them, we will duly consider the issue and will to the best of our ability - where reasonably possible - look at switching the product or fund.

In addition, if clients feel that they have been unfairly treated, they have the right to complain. PFSI has a formal "Complaints Policy" that is available to clients on our website. PFSI is committed to handling client complaints in a timely and fair manner.

#### Prescient Private Fund Management (Shanghai) Limited ("PSH")

PSH does not make any changes to the fund without consent from the investors. Should any change be to the benefit of the client, PSH will inform the client of the benefit. PSH reserve the right to make changes unilaterally in favour of investors.

## 5. Non-Compliance

Non-compliance with this policy and the procedures described in it may be considered misconduct and employees may be subject to disciplinary action that could lead to dismissal.

## 6. References

The following legislation forms part of South Africa's legal framework governing TCF principles:

- Financial Advisory and Intermediary Services Act, No 37 of 2002
- Collective Investment Schemes Control Act, No 45 of 2002

The following legislation forms part of China's legal framework governing TCF principles:

- Measures for the Suitability Management of Securities and Futures Investors, Order No. 130 of the China Securities Regulatory Commission
- Interim Measures for the Supervision and Administration of Privately Offered Investment Funds, Order No. 105 of the China Securities Regulatory Commission

The following legislation forms part of Ireland's legal framework

- Consumer Protection Code 2021

## 7. Review and Approval

The following persons have reviewed and approved this, Policy.

REVIEW	DATE	REVIEW/ APPROVAL BY
Review	July 2022	FAIS Compliance Officer
Review	24 <sup>th</sup> Jan 2023	PFSI Senior Compliance Officer
Review	01 Feb 2023	Prescient China Compliance Officer
Review	03 Feb 2023	Prescient Manco Compliance Officer
Review	22 Dec 2022	Head: Governance, Risk and Compliance
Review	06 Feb 2023	Head of Legal (South Africa)
Review	08 Mar 2023	CEOs of Operational Entities
Approval	20 Mar 2023	Prescient Holdings (Pty) Ltd & Prescient Management Company (RF) (Pty) Ltd Audit and Risk Committee
Approval	20 Mar 2023	Prescient Holdings (Pty) Ltd Board of Directors

#### **Disclaimer**

This document is for information purposes only and does not constitute or form part of any offer to issue or sell or any solicitation of any offer to subscribe for or purchase any particular investments. Opinions expressed in this document may be changed without notice at any time after publication. We therefore disclaim any liability for any loss, liability, damage (whether direct or consequential) or expense of any nature whatsoever which may be suffered as a result of or which may be attributable directly or indirectly to the use of or reliance upon the information. There are risks involved in buying or selling any financial product.