

BCS Markets SA (Pty) Ltd Whistleblowing Policy

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1. INTRODUCTION

1.1 BCS Markets SA (Pty) Limited (herewith "BCS", the "Company" or "We") is incorporated under the laws of South Africa and is registered by the Companies and Intellectual Property Commission with registration number 2020/523823/07. BROKSTOCK is a brand operated by BCS Markets SA (Pty) Ltd, a company incorporated and registered under the laws of South Africa and an investment firm regulated by the Financial Sector Conduct Authority ("FSCA") with license number 51404.

1.2 This Policy is recommended for employees of financial institutions, by various bodies, including the Financial Sector Conduct Authority (FSCA) and the South African Reserve Bank (SARB).

1.3 This Whistleblowing Policy ("the Policy") aims to:

- encourage employees to feel confident to raise concerns of illegal, unethical or improper.
- activity that they may be aware of at the earliest possible opportunity and to question and act upon concerns about such activity or practices.
- provide avenues for employees to raise such concerns and receive feedback on any such action taken.
- ensure that employees receive a response to concerns raised and ensure that employees are aware of how to pursue such concerns if he/she is not satisfied with the response or action taken by the Company; and
- reassure employees that they will be protected from possible reprisals or victimisation because of making any disclosures in good faith.

2. POLICY APPLICATION

2.1 This Policy applies to all employees, officers, consultants, representatives and agents of the Company.

3. TO WHO DOES THIS POLICY APPLY

2.23.1 This Policy applies to all employees, officers, consultants and contractors of the Company. In addition, this Policy also applies to all agents, representatives or other third- party intermediaries providing services to the Company.

4. POLICY STATEMENTS

4.1 The Company acknowledges that employees often know when something illegal, unethical or improper is taking place at the Company and may be afraid or hesitant to voicing such concerns and the Company aims to address such concerns in this Policy.

4.2 This Policy encourages persons to speak out and raise concerns in situations where the interests of the Company or the interests of others are at risk or potentially at risk. Such concerns do not need to be handled through the Company's human resources grievance procedures and rather the whistleblowing procedures set out herein should be followed.

4.3 The Company prohibits actions or behaviours posing a real, significant or potentially significant risk to the Company, the employees of the Company and its agents, people working for or on behalf of the Company and the public at large.

4.4 The following is a non-exhaustive list of examples of such prohibited actions and behaviours:

- on-the-job drug or alcohol abuse;
- harassment or discrimination;
- theft or property damage;
- health, safety and environmental issues;
- violations of the Company policies or procedures;
- any other violations of applicable laws and regulations;
- criminal offences or unlawful activity; and
- actions with attempt to conceal any of the above.

4.5 All employees will be protected under the Protected Disclosures Act, 2000 in instances where they make a protected disclosure. These are disclosures of information, whereby the person is of the reasonable belief that they are making a disclosure and can demonstrate any of the following activities:

- a criminal offence has been, is being, or is likely to be committed;
- that a person has failed, is failing or is likely to have failed to comply with any legal obligation to which they are subject;
- a miscarriage of justice has occurred, is occurring or is likely to occur;

- health and safety of an individual has been, is being or is likely to be endangered;
- information relating to the above is being, or is likely to be deliberately concealed; and;
- persons in other territories will be treated by the Company as if such legislation applies to them.

4.6 The Company is, in addition to the above, required to ensure compliance with local laws in the places in which the Company is working or operating.

5. UNAVOIDABLE STEPS

5.1 This Policy encourages the reporting and raising of concerns in good faith. If an employee raises a genuine concern under this Policy he will not be at risk of losing his job or suffering any form of reprisals or victimisation as a result of raising such concern.

5.2 The Company prohibits any retaliation, retribution or victimisation in any form against a person who reports a concern in good faith or who assists with an investigation – even if the report is mistaken and/or the facts later turn out to be inaccurate or do not trigger any further action.

5.3 The Company will take disciplinary action against company representatives who are found to have acted in violation of this Policy and other Company policies. This may lead to dismissal or termination of employment or engagement and/or, if appropriate, the institution of criminal proceedings.

5.4 The Company will terminate any business relationships with any consultant, contractor, agent, third party or representative that violates any provision of this Policy.

6. HOW TO RAISE A CONCERN

6.1 Firstly, the person who has a concern should report or raise a concern with his direct line manager or director. It can be done in-person, in writing or by telephone.

6.2 Where a person feels unable or uncomfortable to report or raise a concern with his line manager or managing director, the person can make a report, in confidence, via email to info@brokstock.co.za or telephonically to 080 022 7672 or +27120019206.

6.3 If these channels have been exhausted and a person still has concerns, or if a person feels that the matter is so serious that it cannot be discussed with any of the above, a person should contact the Compliance Officer at +27 11 568 0925 (Outsourced Compliance Services).

7. HOW CONCERNS WILL BE INVESTIGATED

7.1 Once the person has reported his/her concern, the Company will analyse the facts and carefully assess what action, if any, should be taken. The Company is committed to dealing with all concerns fairly, properly and in a professional manner.

7.2 The Company will treat each concern with the utmost importance, care and priority. However, the Company expects that all persons will use this Policy and investigative process properly and it will not be used for unethical, unjust or immoral purposes or for trivial concerns.

7.3 The action taken by the Company in response to a report or concern under this Policy will depend on the nature of the concern and the findings of the investigations and analysis. Initial enquiries will be made to determine whether an investigation is appropriate and the form that it should take.

7.4 Some concerns may be resolved without the need for investigation. Depending on the nature of the concern raised there may be an internal inquiry or more formal investigation.

7.5 The extent of contact between the complainant and the person or persons investigating the concern will depend on the nature of the concern and the clarity and detail of the information provided. Further information may be sought from or provided to the person reporting the concern.

7.6 It will be determined and communicated with the complainant who is the point of contact, how the complainant can make contact with that person and whether further assistance from the complainant is required.

7.7 Whilst the Company will try to give the complainant as much feedback as possible, the Company may not be able to give full or specific details as this could infringe upon a duty of confidentiality owed by the Company to someone else.

8. ANONYMOUS REPORTS

8.1 The Company can accept and deal with a concern even if the person prefers to remain anonymous but this may however make the investigation of the matter more difficult and will prevent the Company from providing the complainant with feedback.

8.2 This Policy encourages employees to put their names to allegations because appropriate follow-up questions and investigations may not be possible unless the source of the information is identified.

8.3 Where concerns in terms of this Policy cannot be resolved without revealing the identity of the employee raising the concern (e.g. if evidence is required in court), the Company will enter into a dialogue with the employee concerned as to whether and how the Company can proceed. Concerns expressed anonymously will be explored appropriately, but consideration will be given to the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources.

8.4 The Company will keep records of the matters raised in relation to this Policy. All such records will be held in confidence to the extent consistent with carrying out an appropriate investigation under applicable laws.

9. FURTHER INFORMATION

9.1 This Policy applies not only to employees but also to anyone providing services to the Company.

9.2 Questions and feedback regarding this Policy should be submitted to the corporate e-mail info@brokstock.co.za.

9.3 Further, please read other related policies and documents, which can be found on the Company's website or may be requested by them via email at info@brokstock.co.za.

9.4 If there are any questions or comments about this Policy please contact us via e-mail at info@brokstock.co.za.

10. AMENDMENTS TO THIS POLICY

10.1 Amendments to this Policy will take place from time to time subject to the discretion of BCS and pursuant to any changes in the law. Such changes will be brought to the attention of employee's, members and clients where it affects them

11. POLICY REVIEW

11.1 The Key Individual has the authority to make amendments to this Policy. The Key Individual may delegate responsibility to an employee or external party for drafting the amendments.

11.2 If any inadequacy of any element of this Policy is identified, that portion of the Policy can be amended. The Policy should also undergo a full review as deemed necessary.

11.3 The Policy shall be reviewed at least annually, and more frequently.

11.4 Any significant changes in the Policy after each review shall follow a formal approval process.

12. OWNERSHIP OF THIS POLICY

12.1 This Policy is owned by BCS Markets SA (Pty) Ltd, trading as BROKSTOCK, an authorised financial services provider in terms of the Financial Advisory & Intermediary

Services Act (37 of 2002) and subordinate legislation, with FSP number 51404.

12.2 The Key Individual of BCS Markets SA (Pty) Ltd hereby confirms the adoption of this Policy on behalf of the governing body of the BCS Markets SA (Pty) Ltd and accepts responsibility for the successful training of employees and implementation of this Policy.

12.3 This document will be updated whenever material changes are made to it.