



STANLIB
Gifts Policy



STANLIB

1. Purpose

The purpose of this policy is to ensure a uniform set of standards are maintained by all STANLIB employees when receiving or offering gifts from or to customers / service providers, third parties [as contemplated in the Financial Advisory and Intermediary Services Act, 2002 ("the FAIS Act")] General Code of Conduct for Authorised Financial Service Providers ("FSPs"). It is therefore important to read the policy in conjunction with our FAIS Conflict of Interest Policy.

2. Scope

The Policy is applicable to all STANLIB entities and staff.

3. Definitions

Third Parties:

Include other FSPs, product suppliers, associates of product suppliers or other FSPs, distribution channel as contemplated in the General Code of Conduct for Authorised FSPs, investment banks, collective investment scheme managers, linked investment service providers, vendors, price sources and any other general suppliers.

Security Issuers:

Include all issuers of financial instruments (including but not limited to ordinary shares, preference shares, money market securities, fixed interest securities, inflation-linked securities, loan stock, convertible securities and derivatives), whether listed or unlisted, that may be eligible for inclusion in any of STANLIB's investment portfolios.

Gifts:

Any item from which the recipient may derive benefit, including, but not limited to wine, pens, clocks, discounts, vouchers, etc.

Benefits:

Include tickets to concerts, sporting or other events, golf days, travel / holidays and any similar type of activity.

4. References

STANLIB Code of Ethics.

The Association for Investment Management and Research's Code of Ethics.

5. Policy

- 5.1 Any gifts or benefits received from or offered to a third party or security issuer must be disclosed in the gift register maintained by the Business unit.
- 5.2 All gifts received or offered in excess of R1000 must be approved by the Business unit Head or Key Individual of the Business unit.
- 5.3 Clause 5.2 above does not apply to all FAIS registered Representatives and Key individuals.
- 5.4 All FAIS registered representatives and Key individuals must declare all gifts received from and offered to a third party or security issuer.
- 5.5 Where the gift is not approved, one of the following options will be followed:
 - » The gift will be returned to the donor together with a thank you letter explaining why the gift cannot be accepted.
 - » Where the gift cannot be declined without causing offence, another arrangement will be made, for example, the gift will be donated to charity.
- 5.6 Each matter must be considered on a case by case basis, taking into account the particular party involved and all the relevant facts and circumstances.
- 5.7 Under exceptional circumstances the Line Manager,], may approve the receipt of gifts or benefits exceeding the threshold, except where the gift is received or offered by a FAIS registered representative or Key individual. In such a case the following will inter alia be considered:
 - » Current relationship with the supplier / security issuer / entity / person
 - » Importance of the supplier / security issuer / entity / person to the business
 - » Advantages to STANLIB's clients of accepting the gift / benefit.

Version Control

Version	Date	Changed By
1.0	1 May 2007	Bernard Pieterse
1.1	8 September 2015	Diketso Mashigo
1.2	7 September 2017	Njabulo Duma