



KANAAN TRUST

Land of milk and honey

"Commit to the lord whatever you do and your plans will succeed." (Proverb 16:3)

An Authorized Financial Service Provider

CODE OF CONDUCT

1. Objective

The Code of Conduct of Kanaan Trust aims to set a professional standard of client interaction in the financial services industry. This code combines the values and processes that will guide financial service providers and their representatives to interact with clients professionally.

2. Preamble

Kanaan Trust will at all times interact with clients in the following manner:

- Honestly
- Fairly
- With care
- In the interests of the client
- With integrity
- With due skill
- With diligence
- To enhance the integrity of the financial services industry

Kanaan Trust will at all times employ the resources, procedures and appropriate technological systems that can reasonably be expected to render continuous quality service to clients.

Kanaan Trust will at all times act within the scope and spirit of the Acts of Parliament governing the specific business/product segment.

3. The Kanaan Trust Interaction Process:

Step 1 – A comprehensive and professional introduction to clients

Kanaan Trust will disclose in a comprehensive and professional manner to any prospective client who they are, who they represent and what services they are licensed or mandated to render.

Step 2 – Gather client information

Kanaan Trust will, before making recommendations of a financial nature to any client, obtain appropriate client information and seek to understand the client's financial position, needs and objectives. In cases where clients request or instruct providers to render a particular financial service, Kanaan Trust will obtain appropriate client information to ensure that the request of instruction is implemented correctly.

Step 3 – Enter into a service agreement with the client

Kanaan Trust will, on acceptance of a client request or instruction to offer any recommendation of a financial nature to a client, enter into a recorded client request, instruction or service agreement.

Step 4 – Conduct and analysis and prepare a client proposal

Kanaan Trust will, before making any recommendation of a financial nature to a client, conduct an analysis and prepare a proposal or quotation that is appropriate in the circumstances and aimed at addressing the clients' needs or objectives whilst taking into account the client's risk profile.

Step 5 – Present the proposal to the client

Kanaan Trust will, when presenting a proposal or quotation to a client, take reasonable steps to ensure that the client understands it and that he/she is in a position to make an informed decision.

Step 6 – Enter into a Financial Service agreement with the client

Kanaan Trust will, on acceptance by the client of any financial advice and/or intermediary service proposal, enter into a recorded contract with the client and ensure that the client is provided with a copy of such a contract.

Step 7 – Implement the agreement

Kanaan Trust will, on acceptance of the financial service proposal, submit the product application/client instruction to the product supplier for acceptance and fulfilment of the contractual obligations. Kanaan Trust will ensure timeous confirmation of such instruction and ensure that the client is provided with written contractual documentation.

Step 8 – Render continuous advice and/or intermediary services to the client

Kanaan Trust will continue to render ongoing advice and intermediary services in accordance with any contractual arrangement between the parties and to ensure that all enquiries, instructions or complaints are handled timeously and in a fair and professional manner. In the event that an agreement is terminated between a provider and client, Kanaan Trust will record it in a fair and professional manner.

4. Preservation and Confidentiality

Kanaan Trust will keep information about current, former and prospective client confidential unless:

1. The information concerns illegal activities on the part of the client or prospective client
2. Disclosure is required by law
3. The client or prospective client permits disclosure of the information.

5. Investment Analysis, Recommendations and Actions

1. Diligence and Reasonable Basis

Kanaan Trust will:

1. Exercise diligence, independence and thoroughness in analysing investments, making investment recommendations and taking investment actions.

2. Have a reasonable and adequate basis, supported by appropriate research and investigation, for any investment analysis, recommendation or action.

2. Communication with clients and prospective clients

Kanaan Trust will:

1. Disclose to clients and prospective clients the basic format and general principles of the investment processes they use to analyse investment, select securities, and construct portfolios and must promptly disclose any changes that might materially affect those processes.
2. Use reasonable judgement in identifying which factors are important to their investment analyses recommendations, or actions and include such factors in communications with client and prospective clients
3. Distinguish between fact and opinion in the presentation of the investment analysis and recommendations.

3. Record Intention

Kanaan Trust will develop and maintain appropriate records to support their investment analyses, recommendations, actions and other investment related communications with clients and prospective clients.

6. Conflict of Interest

1. Disclosure of conflict of interest

Kanaan Trust will make full and fair disclosure of all matters that could reasonably be expected to impair their independence and objectivity or interfere with respective duties to their clients, prospective clients, and employer. Kanaan Trust will ensure that such disclosures are prominent and delivered in plain language, and communicate the relevant information effectively.

2. Priority of transactions

Investment transactions for clients and employers will have priority over investment transactions in which Kanaan Trust is the beneficial owner.

3. Referral Fees

Kanaan Trust will disclose to their employer, clients and prospective clients, as appropriate, any compensation, consideration, or benefit received from or paid to others for the recommendation of products or services.

I here commit myself to adhere to the Kanaan Trust Code of Conduct.

Name: