

# Business Rules for SanlamConnect Intermediaries: Advisers

## June 2021 (Version 1.010621)

### TABLE OF CONTENTS

1. GENERAL/INTRODUCTION	Page	Par		Page
1.1 Purpose of these Business Rules	3	1.6	Important note about the SA Retail Affluent Conflict of Interest Policy / Sanlam Life FAIS Code of Conduct Conflict of Interest Policy	5
1.2 Applicability of this document	3	1.6.1	SA Retail Affluent Conflict of Interest Policy	5
1.3 Impact of these Business Rules	4	1.6.2	FAIS Conflict of Interest Policy for the Sanlam Group	5
1.4 Approvals for exceptions in terms of these rules	4	1.7	Transgression of these rules	5
1.5 Alignment with other Governance policies in Sanlam Group	5	1.8	Updating these rules	5
<b>2. OVERARCHING RULES</b>				
2.1 Involvement in other external financial products, financial services providers, investment schemes, etc. ( <i>"external" has the meaning of falling outside of the Sanlam Group. and does, for instance, not include Succession Financial Planning which falls within the Sanlam Group.</i> )	6	2.4	Branding (signage, logos, letterheads, webpages, etc.)	7
2.2 Rules with regard to involvement in External FSPs	6	2.4.1	General (applies to all)	7
2.2.1 Being registered as Representative or Key individual with/for another FSP	6	2.4.2	Particular rules pertaining to Blue Star and MO businesses	7
2.2.2 Holding a financial interest in an external FSP	7	2.4.3	Branding rules relevant to Short Term business	8
2.2.3 Abusing the privilege of an outside FSP	7	2.5	Social Media Policy	8
2.3 Accreditation rules and other business rules from time to time	7			
<b>3 PERMISSIBLE BUSINESS AND SPECIFIC BUSINESS RULES PERTAINING TO IT</b>				
3.1 Products & services provided by the Sanlam Group	9	3.4	Fiduciary business	12
3.2 Products from external Long-term Insurance Product Providers	9	3.5	Banking business	12
3.3 Investment business	10	3.6	Short-term insurance	12
3.3.1 General	10	3.7	Health Care Service/ Benefit Business	13
3.3.2 Investments involving the GEPP	10	3.8	Pension/Group business in terms of the Long-term Insurance Act and the Pension Fund Act (also known as Employee Benefits (EB) business, Including Umbrella Funds and voluntary Group schemes.)	13
3.3.3 Stockbrokers	10			
3.3.4 Investment in terms of funds and/or fund managers that are not on the List of Approved Funds for Advisers.	11	3.8.1	No external products and no direct EB-business allowed	13
3.3.5 Rendering financial services in terms of FAIS Category 1.8 (Shares)	11	3.8.2	Operating in any way as a "front office"	13
<b>4 SPECIFIC PRACTICES THAT ARE FORBIDDEN</b>				
4.1 Reproducing signatures of clients	14	4.4.2	No policy on the life of a client or another adviser with the adviser as premium payer	14
4.2 Requesting clients to sign blank or incomplete forms	14	4.5	Unjustified replacement or effecting any replacement not in accordance with FAIS rules and the ASISA Code of Conduct	14
4.3 Inducing clients to do business or to maintain/lapse business	14	4.6	Advisers acting in another professional capacity and advisers acting as Commissioners of Oaths (CFP in an ex officio capacity)	14
4.4 Accepting cession or nomination as beneficiary on policies or wills of clients, or taking out policies on the life of client or another adviser with the adviser as premium payer	14	4.7	Acting as Tax Practitioners on terms and conditions not officially allowed for	15
4.4.1 No cessions of policies and no nominations as beneficiaries	14	4.8	Borrowing money by means of loans from clients or entering into business ventures with clients	15

***Business Rules for SanlamConnect Intermediaries: Advisers***  
**June 2021 (Version 1.010621)**

<b>4.9</b>	<b>Giving advice on stocks, shares, securities, capital market instruments and derivatives / hedge funds</b>	<b>15</b>	<b>4.15</b>	<b>Advisers presenting themselves as independent brokers</b>	<b>17</b>
<b>4.10</b>	<b>Unauthorised financial advice or intermediary services</b>	<b>15</b>	<b>4.16</b>	<b>Charging fees/compensation for advice and/or services that are not approved</b>	<b>17</b>
4.10.1	Unauthorised investments, financial products, money-making schemes, etc.	15	<b>4.17</b>	<b>Receiving money from and/or keeping money for a client or not adhering to procedures when dealing with cash</b>	<b>17</b>
4.10.2	Trading of client policies	15	<b>4.18</b>	<b>Inducing clients to waive rights</b>	<b>17</b>
4.10.3	Outsourcing or sub-delegation of any activity or part thereof relating to the rendering of financial services (advice and/or intermediary service) that that adviser performs on behalf of Sanlam	15	<b>4.19</b>	<b>Writing of own business by Managers/Leadership and Specialists in <i>SanlamConnect Intermediaries</i></b>	<b>18</b>
4.10.4	Engaging in “front office” type activities (outside of the group scheme context)	16	<b>4.20</b>	<b>Admitting liability to a client or assisting a client in a dispute with Sanlam or compensating a client on own accord</b>	<b>18</b>
<b>4.11</b>	<b>Submitting external business with an external provider directly</b>	<b>16</b>	4.20.1	Admitting personal liability or liability on behalf of Sanlam	18
<b>4.12</b>	<b>Unauthorised access to and/or use of confidential client information</b>	<b>16</b>	4.20.2	Assisting clients in disputes against another Sanlam member or intermediary	18
<b>4.13</b>	<b>Effecting policies on the life of an adviser him-/herself or his/her direct family without approval</b>	<b>17</b>	4.20.3	Paying compensation to clients or paying premiums for clients	18
<b>4.14</b>	<b>Restructuring of salary packages</b>	<b>17</b>			
<b>5.</b>	<b>Rules with respect to conducting business as separate FSPs</b>	<b>19</b>			
<b>6.</b>	<b>List of supporting documents</b>	<b>20</b>			

# **Business Rules for SanlamConnect Intermediaries: Advisers**

## **June 2021 (Version 1.010621)**

<b>1</b>	<b>GENERAL/INTRODUCTION</b>																									
<b>1.1</b>	<b>Purpose of these Business Rules</b>																									
	<p>The purpose of these rules is to provide necessary rules and guidelines that have the objective to ensure that clients of Sanlam are treated fairly, with integrity and with their best interests in mind at all times by the financial advisers of Sanlam Life Insurance Limited (SL) in <i>SanlamConnect Intermediaries</i>, without creating undue risk for Sanlam in the process. It is not possible to make rules for each and every contingency that may occur, but the overarching objective that these rules wish to achieve is to provide clients with a satisfactory outcome after each and every intervention with a financial adviser of <i>SanlamConnect Intermediaries</i> and that the intervention itself is carried out within the approved mandate of the adviser and within all relevant rules and pre-requisites in terms of the process.</p> <p>Therefore, the purpose in more detail is:</p> <ul style="list-style-type: none"> <li>• To provide rules to be complied with by all tied advisers and associate advisers, groups of tied advisers operating within approved BlueStar, MO and SCS MO-businesses (including the authorised principals of such businesses) and who are contracted or employed by Sanlam life Insurance Limited to provide intermediary services as financial advisers to clients of SL and on behalf of SL through <i>SanlamConnect Intermediaries</i>.</li> <li>• To provide particular rules to be complied with by all individuals who are employed within <i>SanlamConnect Intermediaries</i> to provide direct management or direct specialist support functions to tied advisers or groups of tied advisers as specified above.</li> <li>• To meet legal requirements (including those of FAIS / TCF / COFI / Long term Insurance Act / Short Term Insurance Act/Insurance Act), as well as other applicable legislation and thereby limiting any legal risk that SL is exposed to when providing financial services to clients through its tied adviser force.</li> <li>• To set out the parameters of acceptable conduct to be followed in <i>SanlamConnect Intermediaries</i>.</li> </ul>																									
<b>1.2</b>	<b>Applicability of this document.</b>																									
	<p>This document applies to:</p> <p><b>A. The following types of tied advisers of Sanlam Limited operating in SanlamConnect Intermediaries</b></p> <table border="1"> <thead> <tr> <th></th><th>Type</th><th>Description</th></tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td><td>Sanlam Key Solutions Advisers</td><td>Managed by Business Managers in the RGM structures per region</td></tr> <tr> <td style="text-align: center;">2</td><td>Advisers in Blue Star Businesses</td><td>Managed by RGM's in the regional structures</td></tr> <tr> <td style="text-align: center;">3</td><td>Advisers in other types of Blue Star businesses and MO Businesses</td><td>Managed by Entity Business Managers in the regional RE structures</td></tr> <tr> <td style="text-align: center;">4</td><td>Advisers operating as authorised principals</td><td>Managed and coordinated with Enterprises</td></tr> <tr> <td style="text-align: center;">5</td><td>Sanlam Advisers</td><td>These are all the tied advisers and associate advisers of Sanlam operating in <i>SanlamConnect Intermediaries</i> who are not of Types 1, 2, 3, or 4 above and include all short term advisers and short term associate advisers operating under the Sanlam FSP 2759.</td></tr> <tr> <td style="text-align: center;">6</td><td>Associate Advisers and Para-planner advisers</td><td>Tied advisers appointed in terms of the 1020 contract and for whom the Principal Adviser takes co-responsibility.</td></tr> <tr> <td style="text-align: center;">7</td><td><i>SanlamConnect</i> management and specialists who have received permission in terms of 4.22 below to write business for own account.</td><td>These are Managers and/or specialists who have been given this concession either by the previous SFA Board or in terms of their contracts, but under strict terms and conditions.</td></tr> </tbody> </table> <p>Any reference to “advisers” further on in this document will have the meaning of including all individuals from any of the types mentioned above.</p>		Type	Description	1	Sanlam Key Solutions Advisers	Managed by Business Managers in the RGM structures per region	2	Advisers in Blue Star Businesses	Managed by RGM's in the regional structures	3	Advisers in other types of Blue Star businesses and MO Businesses	Managed by Entity Business Managers in the regional RE structures	4	Advisers operating as authorised principals	Managed and coordinated with Enterprises	5	Sanlam Advisers	These are all the tied advisers and associate advisers of Sanlam operating in <i>SanlamConnect Intermediaries</i> who are not of Types 1, 2, 3, or 4 above and include all short term advisers and short term associate advisers operating under the Sanlam FSP 2759.	6	Associate Advisers and Para-planner advisers	Tied advisers appointed in terms of the 1020 contract and for whom the Principal Adviser takes co-responsibility.	7	<i>SanlamConnect</i> management and specialists who have received permission in terms of 4.22 below to write business for own account.	These are Managers and/or specialists who have been given this concession either by the previous SFA Board or in terms of their contracts, but under strict terms and conditions.	
	Type	Description																								
1	Sanlam Key Solutions Advisers	Managed by Business Managers in the RGM structures per region																								
2	Advisers in Blue Star Businesses	Managed by RGM's in the regional structures																								
3	Advisers in other types of Blue Star businesses and MO Businesses	Managed by Entity Business Managers in the regional RE structures																								
4	Advisers operating as authorised principals	Managed and coordinated with Enterprises																								
5	Sanlam Advisers	These are all the tied advisers and associate advisers of Sanlam operating in <i>SanlamConnect Intermediaries</i> who are not of Types 1, 2, 3, or 4 above and include all short term advisers and short term associate advisers operating under the Sanlam FSP 2759.																								
6	Associate Advisers and Para-planner advisers	Tied advisers appointed in terms of the 1020 contract and for whom the Principal Adviser takes co-responsibility.																								
7	<i>SanlamConnect</i> management and specialists who have received permission in terms of 4.22 below to write business for own account.	These are Managers and/or specialists who have been given this concession either by the previous SFA Board or in terms of their contracts, but under strict terms and conditions.																								

# Business Rules for SanlamConnect Intermediaries: Advisers

## June 2021 (Version 1.010621)

	<p><b>B. The following management and specialist support roles:</b></p> <table><tr><td>Management within <i>SanlamConnect Intermediaries</i>, Management of SCS, as well as Specialists and Support Personnel managing, supporting, guiding or training tied advisers in <i>SanlamConnect Intermediaries</i>, as mentioned in “A” above.</td><td>This includes but is not limited to : the General Manager: Intermediaries; Regional Executives; Regional General Managers; Business Managers (advisers); Business Managers (BD) insofar as their functions relating to AFP advisers are concerned and Hybrid Business Managers; Senior Manager Enterprise Development; (Regional) Development Managers; Sales Managers; Sales Consultants; the General Manager: Enterprises; Head of Outsourced Business and Blue Stars; Enterprise Business Managers, Enterprise Business Consultants and Manager Enterprise Partnership; Authorised Principals of Blue Stars and Independent Consultants.</td></tr></table> <p>The group of individuals and entities defined above in (A) and (B) are collectively referred to as “members of <i>SanlamConnect Intermediaries</i>”. Natural individuals within the group are referred to as “member” or “person”. Also, words referring to one gender also include the other gender.</p> <p><b>All advisers as well as principals of all variants of BlueStar and MO businesses must note that they are responsible and liable for the actions of their administrative staff and/or back-offices, whether they operate under the SL FSP licence or not.</b></p>	Management within <i>SanlamConnect Intermediaries</i> , Management of SCS, as well as Specialists and Support Personnel managing, supporting, guiding or training tied advisers in <i>SanlamConnect Intermediaries</i> , as mentioned in “A” above.	This includes but is not limited to : the General Manager: Intermediaries; Regional Executives; Regional General Managers; Business Managers (advisers); Business Managers (BD) insofar as their functions relating to AFP advisers are concerned and Hybrid Business Managers; Senior Manager Enterprise Development; (Regional) Development Managers; Sales Managers; Sales Consultants; the General Manager: Enterprises; Head of Outsourced Business and Blue Stars; Enterprise Business Managers, Enterprise Business Consultants and Manager Enterprise Partnership; Authorised Principals of Blue Stars and Independent Consultants.											
Management within <i>SanlamConnect Intermediaries</i> , Management of SCS, as well as Specialists and Support Personnel managing, supporting, guiding or training tied advisers in <i>SanlamConnect Intermediaries</i> , as mentioned in “A” above.	This includes but is not limited to : the General Manager: Intermediaries; Regional Executives; Regional General Managers; Business Managers (advisers); Business Managers (BD) insofar as their functions relating to AFP advisers are concerned and Hybrid Business Managers; Senior Manager Enterprise Development; (Regional) Development Managers; Sales Managers; Sales Consultants; the General Manager: Enterprises; Head of Outsourced Business and Blue Stars; Enterprise Business Managers, Enterprise Business Consultants and Manager Enterprise Partnership; Authorised Principals of Blue Stars and Independent Consultants.													
1.3	<b>Impact of these Business Rules</b>													
	<ul style="list-style-type: none"><li>• Insofar as advisers are concerned, this document is part of the <i>Information Book for Advisers</i> and the BlueStar Information Book and is therefore part of the contract between Sanlam Life and advisers and associate advisers of Sanlam Life in <i>SanlamConnect Intermediaries</i>. A breach of any of these rules therefore comes down to a breach of contract.<ul style="list-style-type: none"><li>◦ Should there be misalignment between the Business Rules contained in the respective Information Books and the version of the Business Rules on Sanport, it should be only temporary of nature and in this period, the Business Rules on Sanport must be regarded as the applicable document.</li></ul></li><li>• As far as management and specialist support roles in <i>SanlamConnect Intermediaries</i> are concerned, these rules are not part of employment contracts but any wilful breach of these rules will be viewed in a very serious light which could invoke disciplinary measures.</li></ul>	See respective Information Books on Sanport (Doc’s B1 and B4)												
1.4	<b>Approvals for exceptions in terms of these rules</b>													
	<p>Exceptions to the business rules in this document may be allowed by Senior Management (see below). All motivations for exceptions and/or approvals in terms of this document must be done in writing and provided to the person who is authorised to provide the necessary approval. Only the following Senior Management roles in <i>SanlamConnect</i> may approve exceptions in terms of this document and will in this document be referred to as <b>Relevant Authority</b> for the specific area of approval in question.</p> <p>Any member of <i>SanlamConnect Intermediaries</i> requiring such an exception and/or approval, must forward the request and motivation in written format to his/her direct manager who will engage the authorised <b>Relevant Authority</b>.</p> <table><tr><th>Role</th><th>Area of Approval</th></tr><tr><td>General Manager: <i>SanlamConnect Intermediaries</i></td><td>All advisers, all management and specialists; all business types</td></tr><tr><td>Regional Executive</td><td>All advisers, management and specialists in the region, including BlueStar and MO Businesses.</td></tr><tr><td>Regional General Manager</td><td>Advisers in BlueStar businesses or standalone; all reporting management and specialists</td></tr><tr><td>General Manager: <i>SanlamConnect Enterprises</i></td><td>All authorised principals including management and specialists</td></tr><tr><td>Head of Bluestar and Outsourced Business</td><td>Same as GM: <i>SanlamConnect Enterprises</i></td></tr></table>		Role	Area of Approval	General Manager: <i>SanlamConnect Intermediaries</i>	All advisers, all management and specialists; all business types	Regional Executive	All advisers, management and specialists in the region, including BlueStar and MO Businesses.	Regional General Manager	Advisers in BlueStar businesses or standalone; all reporting management and specialists	General Manager: <i>SanlamConnect Enterprises</i>	All authorised principals including management and specialists	Head of Bluestar and Outsourced Business	Same as GM: <i>SanlamConnect Enterprises</i>
Role	Area of Approval													
General Manager: <i>SanlamConnect Intermediaries</i>	All advisers, all management and specialists; all business types													
Regional Executive	All advisers, management and specialists in the region, including BlueStar and MO Businesses.													
Regional General Manager	Advisers in BlueStar businesses or standalone; all reporting management and specialists													
General Manager: <i>SanlamConnect Enterprises</i>	All authorised principals including management and specialists													
Head of Bluestar and Outsourced Business	Same as GM: <i>SanlamConnect Enterprises</i>													

# Business Rules for SanlamConnect Intermediaries: Advisers

## June 2021 (Version 1.010621)

<b>1.5</b>	<b>Alignment with other Governance policies in Sanlam</b>	
	<p><b>These rules must be read in conjunction with the following:</b></p> <ol style="list-style-type: none"> <li>Code of Ethical Conduct for the Sanlam Group</li> <li>Treating Customers Fairly – Sanlam Group</li> <li>FAIS Conflict of Interest Policy for the Sanlam Group (June 2020 FINAL)</li> <li>Sanlam Group Conflict of Interest Policy</li> <li>Group Data Privacy Policy</li> <li>Sanlam Group Policy_Giving and Receipt of Gratifications</li> <li>Sanlam Group Financial Crime Combating Policy</li> <li>Sanlam Group_Anti-Money Laundering &amp; (Countering of the) Financing of Terrorism Policy</li> <li>Sanlam Group_Zero Tolerance Approach (to Financial Crime and Unlawful Conduct_</li> <li>Sanlam Group_Digital Behaviour Policy</li> <li>Sanlam Group_Social Media for Individuals Policy</li> </ol>	<p><b>Refer Source Doc's on Sanport: A1 to A11</b></p>
<b>1.6</b>	<b>Important note about the SA RETAIL AFFLUENT Conflict of Interest Policy / Sanlam Life FAIS Code of Conduct Conflict of Interest Policy</b>	
1.6.1	<p><b><u>SPF Conflict of Interest Policy:</u></b> The <i>SPF (now SA Retail Affluent)</i> Conflict of Interest Policy is applicable to all natural persons who are members of <i>SanlamConnect Intermediaries</i> as defined above. Members must follow the correct processes to declare a Conflict of Interest. Members are obliged to make such declaration <i>Initially</i> (on joining), <i>Annually</i> (in the annual Declaration event which will involve all members) <i>as well as Ad-hoc</i> (if and when a Conflict of Interest should arise). Important is that even if there is NO Conflict of Interest (initially or at the time of the annual Declaration event) a member must declare that he/she in fact has NO Conflict of Interest. Failure to be transparent about Conflict of Interest situations, will be regarded as a transgression of the Sanlam Group Code of Ethical Conduct and as a violation of the rules contained in this document and will subject the person to disciplinary procedures. Members must take care to study the policy and adhere to the rules.</p>	<p><b>Refer doc. B2, plus process doc's B2.1, B2.2 B2.3 On Sanport</b></p>
1.6.2	<p><b><u>FAIS Conflict of Interest Policy for the Sanlam Group</u></b> (the policy applicable to Sanlam Life is being updated currently and will be added to the list of supplementary documentation as soon as it is finished.) The objective of the policy is to provide a framework within which to address areas where conflicts of interest may arise from a FAIS perspective. It aims to establish broad principles and guidance, and it prescribes processes that are essential to ensuring compliance with the Code of Ethical Conduct applicable to SL as well as other regulatory measures (e.g. the FAIS Act). In conjunction with the Code of Ethical Conduct, this policy aims to promote transparency and fairness in the interest of consumers, employees, providers and SL. The policy defines how conflicts of interest are to be managed, that is, to identify potential conflicts, to avoid conflicts where possible and, how to disclose. In order to live up to the expectations that have been set out in this policy, regular annual training on the content of this policy will be done.</p>	<p><b>Refer doc. A3 on Sanport</b></p>
<b>1.7</b>	<b>Transgression of these rules</b>	
	<p>Not adhering to the rules contained in this document will be viewed as a transgression and will be subject to disciplinary steps that could lead to appropriate disciplinary measures which may in serious cases even result in the termination of a contract. In certain circumstances non-compliance with these rules may also result in personal liability. SL reserves the right to take disciplinary action in respect of any transgression of the rules set out in this document (whether such transgression is specifically identified or may reasonably be inferred from the content and context of this document).</p>	
<b>1.8</b>	<b>Updating these rules</b>	
	<ul style="list-style-type: none"> <li>This document may be amended from time to time. Any amendment(s) to these rules will be communicated to all relevant parties through e-mail and once the amended version is placed on SanPort (with a unique version number), a general broadcast will be done to confirm that the adjusted version has been loaded. This notification will be regarded as sufficient confirmation that all members of <i>SanlamConnect Intermediaries</i> have been duly informed of the amendment and therefore also accept that they are bound by the new rules.</li> <li>In addition, all members of <i>SanlamConnect Intermediaries</i> as mentioned in 1.2 A and B above will <u>annually</u> by way of declaration be required to accept and confirm in writing that they are familiar with, understand and subject themselves to these rules (the relevant version at the time).</li> </ul>	

# Business Rules for SanlamConnect Intermediaries: Advisers

## June 2021 (Version 1.010621)

<b>2</b>	<b>OVERARCHING RULES</b>	
2.1	<p><b><i>Involvement in other EXTERNAL financial products, financial services providers, investment schemes, property syndications, pyramid schemes, Ponzi-type schemes, cryptocurrencies, etc. ("external" has the meaning of falling outside of the Sanlam Group and does, for instance, not include Succession Financial Planning which falls within the Sanlam Group.)</i></b></p> <p>The purpose of this particular rule is to prohibit any involvement in any way whatsoever that could directly or indirectly involve or implicate the Sanlam Group, its clients or members of <i>SanlamConnect Intermediaries</i>, with/in/through any financial product, financial services provider, investment scheme, or other type of money-making or money-accumulating scheme, which is not expressly approved within this document or which has not been disclosed and pre-approved by the <b>Relevant Authority</b>.</p>	
	<p>No person is allowed to -</p> <ul style="list-style-type: none"> <li>(i) <u>Unless allowed in terms of an official agreement (see (c) below)</u>, refer clients whether in return for any compensation/fee or without any compensation/fee to,</li> <li>(ii) give advice with respect to,</li> <li>(iii) provide information with respect to,</li> <li>(iv) act as agent or "runner" for,</li> <li>(v) render any financial service with respect to,</li> <li>(vi) directly or indirectly use Sanlam premises or infrastructure to facilitate (i) to (v) above to</li> </ul> <p><b>any</b> external Financial Services Provider or entity offering a financial service or product, including, but not limited to: financial product providers; health care service/benefit providers; broking firms; stock brokers; asset managers; investment managers; property syndications or any other syndication and/or scheme, <b>UNLESS</b> it is either:</p> <ul style="list-style-type: none"> <li>(a) expressly approved in this document, or</li> <li>(b) allowed in one of the Lists of Approved Investment Funds for Advisers (documents on SanPort), or</li> <li>(c) done in terms of an official existing referral arrangement (e.g. with Succession Financial Planning), or</li> <li>(d) pre-approved in writing by the <b>Relevant Authority</b>.</li> </ul> <p><b>This rule applies even if a client insists on any of these investments, products or schemes.</b></p>	<p><b>See lists of Approved Investment Funds for Advisers on Sanport (doc's grouped under B10)</b></p> <p><b>The Approved lists will be updated from time to time.</b></p>
<b>2.2</b>	<b>Rules with regard to involvement in External FSPs</b>	
2.2.1	<p><b><u>Being registered as Representative or Key individual with/for another FSP</u></b></p> <p>No person is allowed to operate or be registered with the FSCA as "representative" or "Key Individual" of a Financial Services Provider <b>OTHER</b> than:</p> <ol style="list-style-type: none"> <li>1. Sanlam Life, or</li> <li>2. Santam, or</li> <li>3. Sanlam Private Wealth (SPW),</li> </ol> <p><b>UNLESS -</b></p> <ol style="list-style-type: none"> <li>a) it is for the sole purpose of short-term insurance, and/or</li> <li>b) written application has been made to and written approval has been obtained from the <b>Relevant Authority</b> (note –this must happen prior to any registration and thereafter on an annual basis), and</li> <li>c) the FSP operates strictly in accordance with the terms and conditions contained in the document "<b>Rules with regard to external FSPs</b>" contained in point 5 further on in this document.</li> </ol>	<p><b>See Point 5 further on in this document</b></p>

# **Business Rules for SanlamConnect Intermediaries: Advisers**

## **June 2021 (Version 1.010621)**

2.2.2	<p><b><u>Holding a financial interest in an external FSP</u></b></p> <p>No member of <i>SanlamConnect Intermediaries</i> may hold a financial interest (equity or otherwise) in an external FSP unless the interest is fully declared to and approved by the <b>Relevant Authority</b>. (This situation is also a potential Conflict of Interest with Sanlam and therefore the COI processes described in point 1.6.1 above are applicable to this situation.) Such a potential Conflict of interest must also be approved by the Chief Executive Officer of <i>SanlamConnect</i>.</p>	
2.2.3	<p><b><u>Abusing the privilege of an outside FSP</u></b></p> <p>Using a legal entity or FSP that has been approved for a particular purpose in terms of point 2.2.1 above, for any form of business other than that for what it has been approved for, constitutes a transgression of the rules set out in this document. See the document “<b>Rules with regard to external FSP’s</b>” for the rules.</p>	Point 5 of this document
<b>2.3</b>	<b><i>Accreditation rules and other business rules from time to time</i></b>	
	<ul style="list-style-type: none"> <li>• If there are formal rules in <i>Sanlam Life/SA Retail Affluent/SanlamConnect Intermediaries</i> governing certain business processes that hinge on accreditation, investment status, adviser grouping or specific indication, or other requirement(s), then affected members of <i>SanlamConnect Intermediaries</i> are compelled to abide by such rules.</li> <li>• SL, <i>SA Retail Affluent</i> or <i>SanlamConnect Intermediaries</i> may from time to time issue business rules with regard to specific processes, practices and conduct that may be regarded as imperative for the business. When this happens, all members of <i>SanlamConnect Intermediaries</i> who are affected by the rule must comply with these rules at all times.</li> <li>• All advisers mentioned in 1.2A above, must ensure that they are duly accredited and that their accreditations align with the information on their permit. Particular attention is drawn to the fact that it will be regarded as an offence in terms of these rules, if an adviser should become involved in any financial advice transaction or intermediary service for which he is not duly accredited and/or mandated, which mandate is stated on his permit. If this is not the case, the prescribed processes governing such an intervention must be followed (e.g. an Investment Generalist advising on investment funds that are not approved for Generalists). Failure to do so will be viewed as an offence.</li> </ul>	
<b>2.4</b>	<b><i>Branding (signage, logos, letterheads, webpages, etc.)</i></b>	
2.4.1	<p><b>General (applies to all)</b></p> <p>Sanlam makes use of approved suppliers as procured by Sanlam Group Sourcing &amp; Procurement. In keeping with this, the rules with respect to signage, logos, letterheads, business cards, etc. and processes as specified in the <i>Information Book (Part 1)</i> must be followed to ensure that the appropriate suppliers are used and that brand guidelines are adhered to.</p> <p>To protect Sanlam’s brand and FSP licence, no adviser in <i>SanlamConnect Intermediaries</i> may host an <b>individual</b> website on the internet to advertise his/her service and products.</p>	Doc B1 on Sanport
2.4.2	<p><b>Particular rules pertaining to Blue Star and MO businesses</b></p> <ul style="list-style-type: none"> <li>• The documents: <b>BlueStar Branding Rules, BlueStar Website Content Template and BlueStar Information Book</b>, form part of the rules set out in this document and members of <i>SanlamConnect Intermediaries</i> are advised that a transgression of any of these rules will imply a direct transgression of these Business Rules. The document <b>Blue Star Branding Rules</b> details the rules with respect to signage, logos, letterheads, business cards, etc. and the <b>BlueStar Website Content</b> document contains the website templates to be used by all variants of BlueStar and MO businesses, their advisers, associates and staff members/employees.</li> </ul>	Doc’s B4 – B6 on Sanport

***Business Rules for SanlamConnect Intermediaries: Advisers***  
**June 2021 (Version 1.010621)**

2.4.3	<p><b>Branding rules relevant to Short Term business</b></p> <p>The same rules that apply to Sanlam apply to short-term business as they operate under the Sanlam license.</p> <p>Advisers who have completed the Product Specific Training and is accredited for product category 1.2 Personal Lines and/or 1.6 Commercial Lines may use Santam's approved signage on their building or office.</p> <p>The Santam signage may however not be used on business cards, letterheads or e-mail signatures. Reference to the accreditation of selling solutions of this provider may be made in text at the back of business cards under the "Professional Advice section".</p>	
<b>2.5</b>	<p><b>Social Media Policy</b></p> <p>The <i>Sanlam Group Policy: Social Media for Individuals</i> and <i>SanlamConnect Social Media Policy</i> outline the general application of social media and include guidelines focused on the business use of social media. Not adhering to the rules and procedures contained in these documents and as accepted during the sign-up process when deciding to make use of social media, will be viewed as a transgression of these Business Rules.</p>	

***Refer doc's A11  
and B9 on  
Sanport***



# Business Rules for SanlamConnect Intermediaries: Advisers

## June 2021 (Version 1.010621)

<b>3</b>	<b>PERMISSIBLE BUSINESS AND SPECIFIC BUSINESS RULES PERTAINING TO IT.</b> <i>No person may render financial services with respect to any product and/or product provider that are not expressly allowed in this document. Rendering financial services in relation to financial products and/or product providers that are not specifically authorised in this document - whether directly or indirectly – is a transgression of the rules set out in this document.</i>	
<b>3.1</b>	<b>Products &amp; services provided by the Sanlam Group</b>	
	<p>All financial products offered by the Sanlam Group are allowed in principle. However, a person is <b>NOT</b> authorised by default to provide financial services in relation to all such financial products, but <b>only</b> those products for which the conditions below are true/fully met:</p> <ul style="list-style-type: none"> <li>• SL has declared the person fully competent (accredited) to provide financial services (advice and/or intermediary services) with regard to them according to the rules and criteria that SL and/or <i>SanlamConnect Intermediaries</i> may have imposed in this regard, and the approval/accreditation is still valid;</li> <li>• The person is registered by SL with the Financial Services Conducting Authority (FSCA) as a “representative” of SL for the specific financial product category linked to the relevant product(s);</li> <li>• such authorisation is indicated on the person’s permit (SL disclosure document);</li> <li>• the person’s contract with SL allows such involvement with respect to the specific product(s);</li> <li>• the person is not prohibited in terms of any business rule in SL, <i>SA Retail Affluent</i> or <i>SanlamConnect Intermediaries</i> in particular, which would apply to the person directly or to the type of adviser group to which he/she belongs (see point 1.2 (A) above).</li> </ul> <p>If any of these conditions are not met, the person may not provide financial services (advice and/or intermediary service) with respect to that product.</p>	
<b>3.2</b>	<b>Products from external Long-term Insurance Product Providers (“external” again has the meaning of falling outside of the Sanlam group).</b>	
	<p>It is expressly forbidden by law from 1 January 2018 for any tied representative (adviser in Sanlam terms) of a life insurer to <u>sell</u> any new policy/product that is provided by an <u>external</u> Long Term Product Provider, to a client, whether an existing client or a new client.</p> <p><b>This is therefore applicable to all advisers mentioned in 1.2A above. Failure to uphold this law is a serious transgression and will be harshly treated.</b></p> <p><b><u>Particular provisions:</u></b></p> <p>Some advisers who had been Sanlam IFA’s (in the previous SFA) are currently still allowed under specific conditions to provide intermediary services with respect to particular external policies of clients of theirs. These services include “up-selling” with respect to those particular policies and they may receive commission/remuneration for that. The conditions are:</p> <ul style="list-style-type: none"> <li>• the policy(ies) must have been written by that adviser under, and strictly in terms of, the <b>previous official IFA arrangement<sup>1</sup></b> that Sanlam had with certain external long term product providers (see below), and</li> <li>• the particular policy(ies) were already in existence at 31 December 2017, and</li> <li>• the policy number of the policy is not changed due to the service intervention or transaction forth-flowing from this, and</li> <li>• the adviser has signed the official contractual addendum stipulating the terms and conditions for performing these services towards such defined external long term policies, and these terms and conditions are strictly met.</li> </ul> <p>If any one of these conditions is not met, the adviser is not allowed to perform any “up-selling” transaction or any transaction that would typically have generated commission/remuneration with respect to that policy.</p> <p><b><i>It is again stated pertinently that since 1 January 2018, NO Sanlam adviser is allowed to sell any external long term policy to a client.</i></b></p>	

## ***Business Rules for SanlamConnect Intermediaries: Advisers***

### **June 2021 (Version 1.010621)**

	<b>Note 1:</b> The previous IFA agreement allowed selected advisers to write pure individual Risk policies with Old Mutual, Liberty Life, Hollard and PPS, and it also allowed selected advisers to sell certain products of PPS Invest. They had to be duly accredited to sell these products.	
<b>3.3</b>	<b><i>Investment business</i></b>	
3.3.1	<p><b><u>General</u></b></p> <ul style="list-style-type: none"> <li>For the purposes of providing financial services on investments (advice and/or intermediary services), a distinction is made between the following: <ul style="list-style-type: none"> <li>a) <i>Advisers</i> - Advisers in <i>SanlamConnect Intermediaries</i> who have completed the course Investment Planning Fundamentals (previous FP2) or Partially Vested Adviser Programme (PVAP) or Experienced Adviser Vesting Programme (EAVP), but who are not Investment Generalists,</li> <li>b) <i>Investment Generalists</i>,</li> <li>c) <i>Investment Specialists</i>,</li> <li>d) <i>Investment Professionals</i></li> <li>e) Advisers in <i>SanlamConnect Intermediaries</i> who do not belong to any of (a), (b), (c) or (d) above – these advisers may not become involved with investment transactions</li> </ul> </li> </ul> <p>Refer to SanPort for more information regarding criteria for and definitions of these groups for purposes of investment (refer the document “SanlamConnect-Investment Advice framework for advisers”).</p> <ul style="list-style-type: none"> <li>Subject to their classification/status as set out above, advisers in <i>SanlamConnect Intermediaries</i> are only allowed to become involved in Investment business according to the conditions and rules set out in the document. No-one is allowed to operate outside of any of these rules.</li> <li>The approved funds appear in the “<b>List of Approved Funds for Advisers</b>”, which is updated on a regular basis. Advisers must operate according to the latest version. No one is allowed to render advice on or become involved with, any fund not listed unless specific approval has been granted by the <b>Investment Committee for Advisers</b> at Head Office.</li> <li>Advisers may not render advice on investment funds and/or investment amounts which do not align with their investment accreditation and their investment mandate in terms of the classifications above. The rules of the SanlamConnect Investment Advice Framework for Advisers must be followed strictly in order to render the transaction legitimate in terms of the Business Rules. <ul style="list-style-type: none"> <li>In the event of effecting switches within a client’s Glacier portfolio, the prescribed process for this transaction has to be followed (refer the document “<i>SanlamConnect Investment Advice framework for Advisers</i> par. 8.1”)</li> </ul> </li> <li>Again, it will be regarded as an offence if such a transaction is concluded without the required process having been followed.</li> </ul>	<ul style="list-style-type: none"> <li>Refer doc B10, as well as the respective Lists of Approved Funds (grouped under B10) on Sanport</li> <li>The Approved lists will be updated from time to time.</li> </ul>
3.3.2	<p><b><u>Investments involving the GEPP</u></b></p> <p>Accreditation in terms of the GEPP and its particular rules is required for advisers who deal with clients that are members or immediate ex-members of the GEPP wishing to invest GEPP money.</p>	
3.3.3	<p><b><u>Stockbrokers</u></b></p> <ul style="list-style-type: none"> <li>All <b>new</b> stockbroker referrals must be referred to Sanlam Private Wealth (SPW).</li> <li>In cases of <b>existing stockbroking relationships</b> (other than with SPW) at the time that an adviser joins Sanlam (e.g. ex-brokers or ex-advisers from competitors), the following will apply: <ul style="list-style-type: none"> <li><u>In the case of stockbrokers that are accessible on the Glacier platform:</u> <ul style="list-style-type: none"> <li>If it could be confirmed in writing by the particular stock brokerage that they accept liability for advice to the client (the same as is the case with SPW) and our (experienced) adviser only provided a referral to the stock brokerage and merely performed intermediary services in respect of the client, the adviser would be allowed to continue to service the client but within the parameters of our Compliance processes and the</li> </ul> </li> </ul> </li> </ul>	

**Business Rules for SanlamConnect Intermediaries: Advisers**  
**June 2021 (Version 1.010621)**

	<p>prescribed documentation. This must be done in full disclosure to the <b>Relevant Authority</b> and with his/her written consent. <u>However, all new referrals must go to SPW.</u></p> <p>b) If such confirmation could not be obtained, the adviser must relinquish ties with the client within a specified period that is approved by the <b>Relevant Authority</b>.</p> <p>o In the case of stockbrokers who are not accessible on the Glacier platform, the adviser must sever ties with the client, or the portfolio must be transferred to SPW. The strategy must be disclosed to and approved by the <b>Relevant Authority</b>.</p> <p>If exceptions have been granted by the <b>Relevant Authority</b>, such approvals and subjecting conditions must be provided to the Office Manager of such Relevant Authority who approved in order to be documented/filed. Unfiled exceptions will be viewed as non-legitimate transactions in terms of these rules.</p>	
3.3.4	<p><b><u>Investment in terms of funds and/or fund managers that are not on the List of Approved Funds for Advisers.</u></b></p> <p>The conditions and terms contained in the SanlamConnect Investment Advice Framework for Advisers as well as <b>Overarching rule 2.1</b> above are applicable in the first instance, but the following rules are particularly highlighted without derogating any of these two sets of rules:</p> <ul style="list-style-type: none"> <li>Fund managers that are not hosted on the Glacier platform are prohibited from an investment perspective and investments with them are not allowed.</li> <li>No other LISP provider is allowed, only Glacier.</li> <li>If/when a client insists on an investment fund falling totally outside any of the Lists of <b>Approved Funds for Advisers</b>, but which is hosted on Glacier, the rules with regard to <b>the Indemnity Process</b> which are detailed in the <i>SanlamConnect Investment Advice Framework for Advisers</i> must be adhered to strictly. In particular it must be abundantly clear that the client was not led or directed by the adviser into the specific proposed investment but came to this decision from own accord.</li> <li>New Sanlam advisers who join <i>SanlamConnect Intermediaries</i> with industry experience who wish to service clients in terms of funds and/or fund managers not on the <b>List of Approved Funds for Advisers</b> but accessible on the Glacier platform, may do so under the following conditions: <ul style="list-style-type: none"> <li>Non-approved funds and/or fund managers to be 1<sup>st</sup> examined / investigated by Glacier's team of specialists from a "risk-for-Sanlam" perspective. If acceptable, the new adviser would be allowed to continue servicing the client, but within the parameters of our Compliance processes and the prescribed documentation, where applicable. A period will be set within which the adviser must "migrate" the clients to an approved fund or combination of approved funds. This must be done in full disclosure to the <b>Relevant Authority</b> and with his/her written consent.</li> <li>No new business may be placed under these funds.</li> <li>If the Glacier team felt that the risk was not acceptable, the new adviser must relinquish ties with the client within an acceptable period, or construct equitable portfolios for them within the approved <i>SanlamConnect Intermediaries</i> parameters. The strategy must be disclosed to and approved by the <b>Relevant Authority</b>.</li> </ul> </li> </ul> <p>If exceptions have been granted by the Relevant Authority, such approvals and subjecting conditions must be provided to the Office Manager of such Relevant Authority in order to be documented/filed. Unfiled exceptions will be viewed as non-legitimate transactions in terms of these rules.</p>	<p><b>Refer doc B10 and the Lists of Approved Funds on Sanport</b></p> <p><b>(All Investment doc's grouped under B10)</b></p>
3.3.5	<p><b><u>Rendering financial services in terms of FAIS Category 1.8 (Shares)</u></b></p> <ul style="list-style-type: none"> <li>Advising or providing intermediary service on shares, securities, stocks, etc. is not allowed.</li> <li>However, certain selected advisers have been given permission to be registered as representatives under the FAIS license of Sanlam Private Wealth (SPW; FSP 3743) and in terms of this may provide advisory services in terms of specific "model portfolios" that have been constructed and are managed by SPW experts. (Advising on or providing intermediary service on specific underlying shares, securities, stocks, etc. is, however, not allowed.) <ul style="list-style-type: none"> <li>This happens in a very controlled environment and under supervision of SPW.</li> </ul> </li> </ul>	

## ***Business Rules for SanlamConnect Intermediaries: Advisers***

### **June 2021 (Version 1.010621)**

	<ul style="list-style-type: none"> <li>The adviser will be allowed to recommend investment in an SPW model portfolio that is appropriately aligned with the client's investment risk profile, and must have undergone the relevant product specific training and class of business training before rendering a financial service in Shares.</li> <li>In order to act as representatives of SPW for this purpose, the selected advisers have signed a special addendum which is part of their contracts and have to abide at all times to the terms and conditions in terms of the addendum.</li> <li>This arrangement can be unilaterally withdrawn by <i>SanlamConnect Intermediaries</i> if legislation requires such; if management feels that risk is unduly created for Sanlam in the process; if the adviser does not meet fit and proper requirements; or if there is evidence that the adviser is not abiding to the letter and/or spirit of this mandate or any other mandate from SPW or <i>SA Retail Affluent</i> or <i>SanlamConnect Intermediaries</i>.</li> <li>Advisers who have not been selected and been granted this permission, may not provide advice in terms of Cat 1.8 (Shares, etc.) in any form or capacity and may only pass referrals to SPW who will render advice to clients. Advising a client to liquidate part or all of his shares to re-invest in another product or any other reason (e.g. to realise capital gains losses), is also regarded as advice in terms of shares and is therefore not allowed.</li> </ul>	
<b>3.4</b>	<b><i>Fiduciary business</i></b>	
	<p>The rules relating to fiduciary business are described in detail in the document "<b><i>Fiduciary Policy for advisers in SanlamConnect Intermediaries</i></b>". These rules form part of the rules set out in this document. Of particular importance is the document <b><i>Sanlam Trust Business Rules applicable to SanTrust Will Wizard and other Wills and published in terms of the Fiduciary Policy for Advisers in SanlamConnect: Intermediaries (Par. 3)</i></b> which as the title indicates, forms part of the Fiduciary policy and must be adhered to.</p> <p>Some of the main rules in this regard are as follows:</p> <p><i>An adviser may not –</i></p> <ol style="list-style-type: none"> <li>draft a Will or change an existing Will unless he/she makes use of the San Trust wills software Will;</li> <li>be named, with his/her knowledge, as a beneficiary in the Will of a client unless the client is a direct family member of the adviser, nor may a direct family member of the adviser be named as such in the Will of a client with the adviser's knowledge. This also includes receiving such benefit through a legal entity such as a company, close corporation or a trust;</li> <li>act as an executor or administrator of a deceased estate, trustee of a trust or administrator of a trust;</li> <li>charge any fee other than, or in excess of, the fees detailed in the "<b><i>Fiduciary Policy for advisers in SanlamConnect Intermediaries</i></b>" document;</li> <li>allow a client to use an electronic signature to sign a will, as legislation prescribes that the testator and witnesses need to physically sign the actual document in the presence of each other</li> </ol> <p>Exceptions to the rules contained in the "<b><i>Fiduciary Policy for advisers in SanlamConnect Intermediaries</i></b>" are allowed but only if done according to the process described in the Policy document and if documented according to the instructions.</p>	<p><b>Refer source documents on Sanport:</b></p> <ul style="list-style-type: none"> <li><b>B11 SanlamConnect Intermediaries_ Fiduciary Policy for Advisers</b></li> <li><b>B11.1 Business rules for SanlamConnect iro Wills</b></li> </ul>
<b>3.5</b>	<b><i>Banking business</i></b>	
	In cases where the need is for bank deposits, bank deposits placed with <b>Absa Bank, Standard Bank, First National Bank, Capitec Bank</b> and the <b>Nedbank</b> group are allowed.	
<b>3.6</b>	<b><i>Short-term insurance</i></b>	
	<ol style="list-style-type: none"> <li>From as far back as 17 March 2010 no member of <i>SanlamConnect Intermediaries</i> (as defined in point 1.2 above) is allowed to form, or become for the first time part of in any way, an external FSP for the purposes of marketing short-term insurance products. <ul style="list-style-type: none"> <li>Members who fall foul of this rule, must declare this to their <b>Relevant Authority</b> and seek their written prior approval according to the terms detailed in the document <b><i>Rules with regard to external FSPs</i></b> for continuance of the situation.</li> </ul> </li> <li>FSPs that existed prior to 17 March 2010 for the purpose of short-term insurance or who gained approval in terms of (a) above, may continue to conduct such business, but subject to <b>par 2.2 and 2.3</b> above as well as the terms and conditions in the document <b><i>Rules with regard to external FSPs</i></b>.</li> </ol>	<b>See point 5; Rules with regard to external FSPs</b>

## ***Business Rules for SanlamConnect Intermediaries: Advisers***

### **June 2021 (Version 1.010621)**

	<p>c) FSPs that existed for the purpose of short-term insurance prior to related adviser joining Sanlam as MO businesses and who gained approval, may continue to conduct such business, but subject to <b>par 2.2</b> and <b>2.3</b> above as well as the terms and conditions in the document <b><i>Rules with regard to external FSPs</i></b>.</p> <p>d) Advisers wishing to do short-term insurance business may accredit themselves through the prescribed accreditation processes for the purposes of advising clients on the products of Santam and/or approved external providers. If not duly accredited, advisers may in no way provide any financial service with regard to short-term insurance products.</p> <p>e) Persons who are not so accredited may register for referrals to the Short Term Agency Distribution or the Sanlam Referral Advice Centre. They may then only give referrals to this centre, or to an accredited colleague, but may not be involved at all in the rendering of financial services to clients in respect of short-term insurance products.</p> <p>f) The prescribed processes for doing short-term business (in particular Compliance processes) must be strictly adhered to. Information is available from the Santam Business Development Managers, the Operation team and the Short Term Quality and Risk team.</p>	
<b>3.7</b>	<b><i>Health Care Service/ Benefit Business</i></b>	
	<ul style="list-style-type: none"> <li>As from 01/01/2010 no member of <i>SanlamConnect Intermediaries</i> (as defined in point 1.2 above) is allowed to form, or become for the first time part of, an external FSP for the purposes of marketing health care services &amp; benefits.</li> <li>FSPs that existed prior to 01/01/2010 for the purpose of healthcare benefits have since been closed for any such business.</li> <li>Sanlam Life has been registered as a Financial Services Provider (FSP) for health products under the category “Health Service Benefits” at the Financial Sector Conduct Authority (FSCA) and has been accredited by the Council for Medical Schemes in terms of the Medical Schemes Act (ORG4416). Advisers wishing to do health care/benefit business may accredit themselves for the purposes of advising clients on Sanlam’s preferred medical schemes (FedHealth &amp; Bonitas) and will thereafter be allowed to market such business, but only through the prescribed processes involving Sanlam Health Consultants (SHC).</li> <li>Where advice is necessary on medical schemes or product providers other than the selected medical schemes, advisers may refer the clients to Simeka Health Pty Ltd.</li> <li>If not duly accredited, advisers may in no way provide any financial service with regard to health care benefit products, and may only give referrals to Sanlam Healthcare Consultants or Simeka Health Pty Ltd., where other than aligned schemes are required. (Group medical referrals.).</li> </ul>	<b>Information Book: Advisers: Part 14K</b>
<b>3.8</b>	<b><i>Pension/Group business in terms of the Long-term Insurance Act and the Pension Fund Act (also known as Employee Benefits (EB) business, Including Umbrella Funds and voluntary Group schemes.)</i></b>	
3.8.1	<p><b><u>No external products and no direct EB-business allowed</u></b></p> <ul style="list-style-type: none"> <li>No external product is allowed, in other words only the products of Sanlam Employee Benefits (now called Sanlam Corporate) and Sanlam Life are allowed.</li> <li>No adviser may transact any Pension / Group business, Umbrella Fund business or Group scheme business. All such business must be done via and in partnership with the EB-BlueStar business through referrals to them. Advisers must also not service any such type of business without the collaboration of EB-BlueStar.</li> </ul>	
3.8.2	<p><b><u>Operating in any way as a “front office”</u></b></p> <ul style="list-style-type: none"> <li>Advisers may not become involved at all in the services normally associated with so called “front offices”, e.g. administration of client premiums/contributions/payments, or with other administrative functions normally related to group schemes.</li> </ul>	

## **Business Rules for SanlamConnect Intermediaries: Advisers**

### **June 2021 (Version 1.010621)**

4	SPECIFIC PRACTICES THAT ARE FORBIDDEN		
4.1	Reproducing signatures of clients		See document: B12 Guidelines for use of electronic signatures
	The reproducing of clients' signatures, with or without the client's knowledge / consent, on any document or more than once on the same document, by advisers and/or their staff is strictly prohibited and regarded as a serious offence. Reproducing of clients' signatures refers to, inter alia, acts such as: copying a client's signature which is then pasted or superimposed onto another document; copying a document signed by a client and using it for different transactions; storing an electronic signature of a client on a device which is then used more than once or for future use; forging a client's signature.  Sanlam does in most cases allow electronic signatures, <u>except for the signing of a will, where the legislation prescribes that the testator and witnesses need to physically sign the actual document in the presence of each other.</u> All rules applicable to a normal signature are also applicable in instances where electronic signatures are allowed. The use of electronic signatures must always meet the guidelines at stated in the document "Guidelines for use of electronic signatures."		
4.2	Requesting clients to sign blank or incomplete forms		
	Clients may not be requested to sign any blank form or a form that is not fully completed. This is against the law. Again, advisers must take note of their liability and accountability with respect to the actions of their own staff.		
4.3	Inducing clients to do business or to maintain/lapse business		
	It is strictly prohibited to provide, or offer to provide, directly or indirectly, in money or in kind, any valuable consideration as an inducement to a person to enter into, continue, vary or cancel any financial transaction/business (e.g. vary a policy, cancel a policy, etc.) that falls within the mandate that <i>SL/SA Retail Affluent</i> or <i>SanlamConnect Intermediaries</i> may reasonably expect from the adviser.  Examples of specific actions that are prohibited, are the following: <ul style="list-style-type: none"><li>the payment of any premium on a policy or investment by the adviser on behalf of the client;</li><li>referral agreements with kickbacks (fee-sharing), or any other arrangement where the successful referral of a client is being rewarded by the adviser;</li><li>an advertisement initiated by an adviser of any nature where a reward is offered for the successful conclusion of a financial transaction.</li></ul>		Also refer Sec 45 of the Long Term Insurance Act (52 of 1998).
4.4	Accepting cession or nomination as beneficiary on policies or wills of clients, or taking out policies on the life of client or another adviser with the adviser as premium payer		
4.4.1	No cessions of policies and no nominations as beneficiaries <ul style="list-style-type: none"><li>Advisers may not accept cession of policies from clients, or knowingly be nominated as beneficiary on policies or in the wills of clients where the client is not a direct family member. This also includes receiving such benefit through a legal entity such as a company, close corporation or a trust.</li></ul>		
4.4.2	No policy on the life of a client or another adviser with the adviser as premium payer <ul style="list-style-type: none"><li>It is also not allowed to take out a policy on the life of a client (if the latter is not a direct family member) or on the life of another adviser, and the adviser is the premium payer. All such transactions must be declared to the <b>Relevant Authority</b> beforehand and his/her written approval must be obtained.</li></ul>		
4.5	Unjustified replacement of a client's business or effecting any replacement not in accordance with FSCA requirements, FAIS rules and the ASISA Code of Conduct		
	While not all replacements are to the detriment of a client, replacing financial products of clients or effecting any business with a client while knowingly not disclosing important and relevant facts that could in all probability have influenced the client's decision, and/or purposefully not completing the relevant replacement advice record or application documents including Rule 19 of the PPR regarding Risk Replacements) fully and correctly, is prohibited and constitutes a transgression of the rules set out in this document.		
4.6	Advisers acting in another professional capacity and advisers acting as Commissioners of Oaths (CFP in an ex officio capacity)		
	Acting in any professional capacity to clients other than in the capacity of Sanlam financial adviser is prohibited (e.g. advisers with a legal qualification also acting as attorneys).		

## ***Business Rules for SanlamConnect Intermediaries: Advisers***

### **June 2021 (Version 1.010621)**

	<ul style="list-style-type: none"> <li>• <i>SanlamConnect Intermediaries</i> members who are Commissioners of Oaths by virtue of being a CFP, is allowed to execute such function according to the guidelines laid down by the Financial Planning Institute and the relevant Legislation. This function is not executed in his/her capacity as a member of <i>SanlamConnect Intermediaries</i>.</li> </ul>	<b>See B13: FPI_Commissioner of Oaths.</b>
<b>4.7</b>	<b><i>Acting as Tax Practitioners on terms and conditions not officially allowed for</i></b>	
	Advisers are allowed to give tax advice to clients. Furthermore, advisers who are registered with the SARS as tax practitioners are allowed to charge a fee for such tax advice on condition that this business is conducted strictly on the terms and conditions described in the document " <b>SanlamConnect Advisers Acting as TAX PRACTITIONERS</b> " on SanPort.	<b>See doc B14 on Sanport</b>
<b>4.8</b>	<b><i>Borrowing money by means of loans from clients or entering into business ventures with clients</i></b>	
	<ul style="list-style-type: none"> <li>• Advisers may not obtain monetary loans for themselves or their family members or a business/venture in which they have an interest, from their clients</li> <li>• Advisers may also not get involved in business transactions with their clients, unless appropriately declared through the Conflict of Interest process and approval has been gained.</li> </ul>	<b>See Conflict of Interest in par.1.6.1 above.</b>
<b>4.9</b>	<b><i>Giving advice on stocks, shares, securities, capital market instruments and derivatives / hedge funds</i></b>	
	<ul style="list-style-type: none"> <li>• Advisers are not allowed to provide advice or intermediary services on these investment vehicles,</li> <li>• However, in specific instances, certain identified advisers may be mandated to provide <b>intermediary services</b> in relation to financial products managed by SIM (SPW). However, advisers who do not have such a mandate may not do it. For all <b>advice</b> on such financial products, clients must be referred to SIM and/or SPW.</li> </ul>	<b>(also refer par. 3.3.5 above)</b>
<b>4.10</b>	<b><i>Unauthorised financial advice or intermediary services</i></b>	
4.10.1	<p><b><u>Unauthorised investments, financial products, money-making schemes, etc.</u></b></p> <ul style="list-style-type: none"> <li>• Rendering advice or intermediary services or becoming involved in any way at all in any investment, financial product, investment scheme, or money-making scheme not mentioned and approved in this document, is expressly prohibited (see also <b>Part 2</b> in this regard). <ul style="list-style-type: none"> <li>○ <b>Examples of such forbidden investment, financial product, investment scheme or other scheme are:</b> Forex trading schemes, deposit-taking schemes, pyramid schemes (some may exist in a disguised form), micro-lending schemes, property syndications, crypto-currencies, investment funds and the like. <u>These are just examples and the list is not comprehensive.</u> Investments can only be authorised through this document and advisers may not even provide information relating to unauthorised financial services or unlawful schemes to clients and must distance themselves in clear terms with clients from such schemes/services, even if the client insists on them. <u>Also note</u> that the GM of <i>SanlamConnect Intermediaries</i> may at any time and upon his/her sole discretion, declare any particular investment, scheme, etc. as undesirable and prohibit members/advisers of <i>SanlamConnect Intermediaries</i> to become involved therewith. The prohibition will be valid from the date of the formal communication announcing the prohibition.</li> </ul> </li> </ul>	<b>Also see Part 2, par 2.1 above</b>
4.10.2	<p><b><u>Trading of client policies</u></b></p> <ul style="list-style-type: none"> <li>• It is not allowed for an adviser to become involved with, either directly or indirectly, in the trading of a client's policy. This includes referring a client to individuals or organisations that might be willing to accept trade of the client's policy.</li> </ul>	
4.10.3	<p><b><u>Outsourcing or sub-delegation of any activity or part thereof relating to the rendering of financial services (advice and/or intermediary service) that that adviser performs on behalf of Sanlam</u></b></p> <p>An adviser may not outsource or sub-delegate his/ her responsibilities in respect of the rendering of financial services or any part thereof to any other party who is not registered as a Sanlam representative with the FSCA.</p>	



# Business Rules for SanlamConnect Intermediaries: Advisers

## June 2021 (Version 1.010621)

4.10.4	<p><b><u>Engaging in “front office” type activities (outside of the group scheme context)</u></b></p> <ul style="list-style-type: none"> <li>See 3.8.2 above for this forbidden practice in the context of group schemes. This practice is however also forbidden in a wider context. Advisers may not become involved at all in activities normally associated with so called “front offices”, particularly the receiving or the administration of client premiums/contributions/payments. (Also see par. 4.17 below.)</li> </ul>	
4.11	<p><b><u>Submitting external business with an external provider directly</u></b></p> <ul style="list-style-type: none"> <li><b><u>Individual business in terms of the Long-term Insurance Act.</u></b> The submission of external new business (new policies/contracts) for any individual insurance written in terms of the Long-term Insurance Act directly to the other company’s consultant or directly to the company itself, is expressly prohibited (also see <b>Part 3, par.3.2</b> above.). <ul style="list-style-type: none"> <li>The only external Long-Term Insurance Act business that is allowed, is business in terms of servicing and/or upselling on the basis of existing business as described in Par 3.2 above. No other external LTIA business is allowed. All such allowed business must be submitted to the SL gatekeeper for processing and monitoring. In all such cases the adviser is required to complete the necessary documents required by FAIS in relation to such products (in these cases the Servicing ROA must be completed).</li> </ul> </li> <li><b><u>Business in terms of the Short-term Insurance Act.</u></b> A limited number of advisers who have not signed the tied short term contracts, are for the time being allowed to sell short term business (other than Santam) with companies with whom Sanlam have short term intermediary agreements in place. No other advisers are allowed to do this. Also, no new contracts of this nature will be allowed.</li> <li><b><u>External investments (in addition to Par. 3.3 above).</u></b> Subject to exceptions mentioned in Part 3 above, no business can be placed directly with an outside LISP Provider or external Asset Manager.</li> <li><b><u>Health providers other than Sanlam Health Care and Simeka Health.</u></b> Advisers of <i>SanlamConnect Intermediaries</i> who are accredited through Sanlam Health Care Consultants are limited to the providers on offer. All advisers of <i>SanlamConnect Intermediaries</i> can however refer a client to Sanlam Health Care Consultants and will be entitled to share in commission. If the client wants a different provider than those offered by Sanlam, such referral will be sent to Simeka Health. Commission may once again be payable for such referral.</li> <li><b><u>Fiduciary business.</u></b> In terms of the Fiduciary Policy for Advisers in <i>SanlamConnect Intermediaries</i>, an adviser may not advise clients to make use of an attorney or any other trust company than Sanlam Trust for the drafting of Wills, <u>unless specific approval for exception has been granted in writing by the Relevant Authority.</u></li> <li><b><u>EB and/or Group business (Pension Funds, Umbrella Funds, Group schemes).</u></b> With the exception of a few advisers who have remained as the Contracted Benefit Consultant to a few funds (written prior August 2014), all advisers must refer all new employee benefits fund business to the Employee Benefits BlueStar (EB B*). Even though an adviser may be actively involved in the sales process, the EB B* will attend to implementation, as well as all servicing, governance and compliance requirements.</li> <li><b><u>Group-RA’s.</u></b> Even though RA’s play a very important role in financial planning, this product may not be marketed by advisers of <i>SanlamConnect Intermediaries</i> as a group solution. Where this is being considered, Advisers <u>must</u> involve EB B*.</li> </ul>	See Part 3, par. 3.2 above
4.12	<p><b><u>Unauthorised access to and/or use of confidential client information</u></b></p> <ul style="list-style-type: none"> <li>Gaining access to the confidential information of clients without a valid and authentic mandate from the client is expressly forbidden. This prohibition includes the gaining of client information via Astute without the written mandate of a client.</li> <li>All client information is strictly confidential and may under no circumstances be shared with or provided to any third party which is not officially a staff member of Sanlam or another adviser, manager or specialist of <i>SanlamConnect Intermediaries</i>, and where the sharing of information is exclusively used to ensure the best possible outcome for the client within the Sanlam context.</li> <li>The Protection of Personal Information Act (POPIA) is South Africa’s data protection legislation and gives effect to all South Africans constitutional right to privacy. As members of <i>SanlamConnect Intermediaries</i> members may have access to a wide range of personal information of clients and prospective clients (for example name, home and e-mail address, ID number, physical characteristics, sexual orientation, religion, education, contact details, income and medical history), it is imperative that all members of <i>SanlamConnect Intermediaries</i> strictly adhere to the requirements of POPIA as well as instructions or guidelines issued by Sanlam from time to time.</li> </ul>	Also refer Doc. A5 on Sanport (Group Data Privacy Policy)



## ***Business Rules for SanlamConnect Intermediaries: Advisers***

### **June 2021 (Version 1.010621)**

<b>4.13</b>	<b><i>Effecting policies on the life of an adviser him-/herself or his/her direct family without approval</i></b>	
	Effecting policies on the life of the adviser him-/herself or his/her direct family (husband, wife, life partner, parents, parents-in-law, brothers, sisters, children) or the placing of any other business in respect of any of these parties, is prohibited unless such insurance/business is declared up front to his/her line manager and written approval has been obtained from the <b>Relevant Authority</b> . Also, such transactions will not generate any credits/score for competition purposes if transacted in the months of November or December of any year. Specific and alternative financing arrangements may also be imposed at the discretion of the manager.	
<b>4.14</b>	<b><i>Restructuring of salary packages</i></b>	
	Advisers may not become involved with employers in the restructuring of salary packages of their employees and the implementation of financial plans on the back of this. This is a highly specialised environment and contains extremely high risks for Sanlam if done wrongly. Advisers are therefore prohibited from becoming involved.	
<b>4.15</b>	<b><i>Advisers presenting themselves as independent brokers</i></b>	
	<ul style="list-style-type: none"> <li>Advisers may not present themselves to the public as, or create the impression with them that they are, independent brokers. Office signage, business cards, promotion material, letterheads, etc. must clearly indicate that the adviser is an adviser of SL.</li> <li>In particular, it is stated that advisers may not use their FSPs (if applicable and allowed in terms of these rules), as a front to create the perception with the client that the adviser is an independent broker also for long-term insurance or other types of business (see also <b>Part 5</b>).</li> </ul>	<b>See Part 5 (Rules with respect to conducting business as separate FSPs.)</b>
<b>4.16</b>	<b><i>Charging fees/compensation for advice and/or services that are not approved</i></b>	
	<p>No member of <i>SanlamConnect Intermediaries</i> is allowed to charge clients any fee and/or compensation for any service and/or advice he/she has rendered to clients, unless such fee/compensation is:</p> <ul style="list-style-type: none"> <li>(a) formally approved within this document, or</li> <li>(b) is an inherent part of the product structure, which products have been approved and for which the adviser has received a mandate to sell (accredited), and</li> <li>(c) the extent of the fee/compensation complies with the rules, and</li> <li>(d) the fee/compensation is paid via the Sanlam commission payment system.</li> </ul> <p>The only exceptions to this rule are:</p> <ul style="list-style-type: none"> <li>(i) fees for administration with regard to short-term insurance practices; such fees must be approved by the senior management of <i>SanlamConnect Intermediaries</i>: (STA) in conjunction with Compliance;</li> <li>(ii) service fees paid by Sanlam Life to advisers for services to clients</li> <li>(iii) referral fees which are approved/acknowledged within this document</li> </ul>	
<b>4.17</b>	<b><i>Receiving money from and/or keeping money for a client, or not adhering to procedures when dealing with cash</i></b>	
	<ul style="list-style-type: none"> <li>Advisers must in general not accept cash premiums from clients. However, it is acknowledged that there are circumstances when this may be necessary. When it is, advisers must adhere strictly to the procedures and processes prescribed in this regard. Refer to the <b>Information Book (Part 13)</b> in this regard.</li> <li>Furthermore, an adviser is expressly not allowed to receive money and/or keep any money on behalf of a client (in cash or a bank account or otherwise) whether such money is intended for the finalisation of a transaction with Sanlam or any other institution, or not. (See also the reference to “front offices” elsewhere in the rules.)</li> </ul>	<b>See IB Part 13</b>
<b>4.18</b>	<b><i>Inducing clients to waive rights</i></b>	
	Advisers may not request or induce a policyholder to waive any right or benefit conferred on the policyholder in terms of the PPR (Policy Protection Rules) written in terms of the LTIA.	

***Business Rules for SanlamConnect Intermediaries: Advisers***  
**June 2021 (Version 1.010621)**

<b>4.19</b>	<b>Writing of own business by Managers/Leadership and Specialists in <i>SanlamConnect Intermediaries</i></b>	
	<ul style="list-style-type: none"> <li>• In general, the writing of business (whether Long-term or Short term or any other) for own account by any member of Management/Leadership or Specialists of <i>SanlamConnect Intermediaries</i> is not allowed.</li> <li>• However, a small number of managers/leadership &amp; specialists were granted the concession, either at the discretion of the previous SFA Board or in terms of their contracts, to write own business. This concession to this limited number of individuals is however subject to strict terms and conditions and only if the conditions for the concession had been accepted in writing by the individual concerned. <ul style="list-style-type: none"> <li>○ Non-adherence to the terms and conditions will be viewed as transgression of these rules.</li> </ul> </li> </ul>	
<b>4.20</b>	<b><i>Admitting liability to a client or assisting a client in a dispute with Sanlam or compensating a client on own accord</i></b>	
4.20.1	<b><u>Admitting personal liability or liability on behalf of Sanlam</u></b> <ul style="list-style-type: none"> <li>• Where a client has a complaint against an adviser (e.g. for inappropriate or bad advice) or against Sanlam which may result in either financial liability for Sanlam or reputational damage, the adviser is not allowed to admit personal liability or liability on behalf of Sanlam to the client or any other third party.</li> <li>• In terms of FAIS, Sanlam is required to maintain a complaints resolution system and complaints must be addressed and resolved via this system.</li> </ul>	
4.20.2	<b><u>Assisting clients in disputes against another Sanlam member or intermediary</u></b> <ul style="list-style-type: none"> <li>• Advisers may not become involved in assisting a client against another Sanlam adviser or other broker/intermediary.</li> </ul>	
4.20.3	<b><u>Paying compensation to clients or paying premiums for clients</u></b> <ul style="list-style-type: none"> <li>• Advisers may not undertake to pay or pay a client compensation for any perceived loss or inconvenience suffered.</li> </ul>	

# **Business Rules for SanlamConnect Intermediaries: Advisers**

## **June 2021 (Version 1.010621)**

5	<b>RULES WITH RESPECT TO CONDUCTING BUSINESS AS SEPARATE FSPs</b>
	<p>1. <b>Declaring and disclosing facts about the FSP.</b> In the detailed motivation for approval by the RGM/RE/GM (see <b>Part 2, Par. 2.2</b>), the following must be declared in precise terms:</p> <ul style="list-style-type: none"> <li>a) the purpose of the FSP and the business that it will conduct;</li> <li>b) if an existing FSP, the registered name and FAIS registration number</li> <li>c) details of the financial service that will be rendered and the products that will be provided;</li> <li>d) the product providers of/for the FSP;</li> <li>e) all the stakeholders and role players within the FSP, and</li> <li>f) the interest and role of the member with respect to the FSP.</li> </ul> <p>2. <b>Declaring that the member accepts the rules and conditions of Sanlam Life (SL) with respect to the FSP.</b> These rules include the following:</p> <ul style="list-style-type: none"> <li>a) The member must seek approval from the RGM/RE/GM on an <b>ANNUAL</b> basis.</li> <li>b) If a change takes place in any of the information provided in 1 above, the member must declare this to the RGM/RE/GM at the earliest possible opportunity and seek new approval in order to be involved with the FSP.</li> <li>c) Sanlam will bear no costs in relation to registering or maintaining the legality of the FSP.</li> <li>d) The FSP must have a valid licence with the FSCA and the member must provide proof to SL of such a licence when requested.</li> <li>e) The FSP must strictly abide by the requirements of the Financial Sector Conduct Authority (FSCA) in relation to FSPs (e.g. file annual FAIS reports and pay annual FSCA and FAIS Ombud levies). SL may request proof of this from time to time.</li> <li>f) SL will accept no financial or other liability in relation to the actions or non-actions of such an FSP.</li> <li>g) If SL issues instructions with regard to any matter concerning the FSP or FSPs in general, the member of <i>SanlamConnect Intermediaries</i> to whom this concession has been granted must see to it that such instructions are carried out diligently and thoroughly.</li> <li>h) SL wants to be assured that the FSP is compliant in respect of FAIS and other regulatory requirements and therefore requires that a copy of the annual FAIS Compliance Report as completed by the designated Compliance Officer of the FSP, also be provided to SL Compliance when submitted to the FSB.</li> <li>i) When dealing with clients on behalf of the FSP and not on behalf of SL, it is imperative that the client clearly understands that SL is not involved. SL therefore requires that in all such dealings with clients, the client signs a declaration that he/she is aware that the service (which includes any advice given) is rendered under the licence of that particular FSP and that the legal liability for that service lies with the FSP and not with SL. <b><i>This is a vital business rule and non-adherence will be regarded as a serious offence.</i></b></li> <li>j) In the event of a subsequent dispute with a client where this issue (<b>par. (i) above</b>) might be important, the relevant member of <i>SanlamConnect Intermediaries</i> will be required to provide SL with copies of this signed declaration. Failure to provide such proof will leave SL no other option than to assume this vital rule had not been adhered to, which will subject the member to disciplinary steps that in turn may/could lead to termination of contract due to the risk to which the member has subjected SL, depending on the circumstances.</li> <li>k) <b><i>Indemnity insurance.</i></b> SL needs to be assured that the member of <i>SanlamConnect Intermediaries</i> is adequately and suitably covered in terms of Professional Indemnity Insurance with respect to the business of the FSP. PI cover of at least R750 000 (or such higher amount determined by the FSCA from time to time) is required and SL will demand proof of such cover on an annual basis. Failure to provide this proof will be viewed as a serious disregard for these rules.</li> <li>l) <b><i>It is pertinently pointed out that SL regards it a serious transgression if advisers and/or associate advisers of SanlamConnect Intermediaries misuse such FSPs in such a way that clients are given the impression that such persons are independent brokers with respect to any financial product also offered by SL.</i></b></li> </ul> <p>3. Granting approval to operate such an FSP is a concession and may be withdrawn at the discretion of the RGM/RE/GM at any time he/she finds compelling reasons to do so.</p> <p>4. <i>SL reserves the right to review and change this policy or even terminate it altogether if experience leads SL to believe that it is being exposed to too much risk.</i></p>

**Business Rules for SanlamConnect Intermediaries: Advisers**  
**June 2021 (Version 1.010621)**

	List of supporting documents	Parts /paragraph
<b>A</b>	<b>Policies of the Sanlam Group</b>	
1	Code of Ethical Conduct for the Sanlam Group	1.5
2	Treating Customers Fairly – Sanlam Group	1.5
3	FAIS Conflict of Interest Policy for the Sanlam Group	1.5; 1.6.1
4	Sanlam Group Conflict of Interest Policy	1.5; 1.6.2
5	Group Data Privacy Policy	1.5
6	Sanlam Group Policy_ Giving and Receipt of Gratifications	1.5
7	Sanlam Group Financial Crime Combating Policy	1.5
8	Sanlam Group_ Anti-Money Laundering & (Countering of the) Financing of Terrorism Policy	1.5
9	Sanlam Group_ Zero Tolerance Approach (to Financial Crime and Unlawful Conduct)	1.5
10	Sanlam Group_ Digital Behaviour Policy	1.5
11	Sanlam Group_ Social Media for Individuals Policy	1.5; 2.5
<b>B</b>	<b>Specific SA Retail Affluent and/or SanlamConnect Intermediaries Policies</b>	
1	Information Book for Advisers	1.3; 2.4.1; 3.7; 4.17
2	SPF Conflict of Interest Policy	1.6.1; 4.8
2.1	Declaring a Conflict of Interest SanlamConnect Intermediaries-Advisers	1.6.1
2.2	Declaring a Conflict of Interest (COI) SanlamConnect Intermediaries-Management	1.6.1
2.3	Declaration of Conflict of Interest (COI) SanlamConnect Intermediaries	1.6.1
4	BlueStar Information Book	2.4.2
5	BlueStar Branding Rules	2.4.2
6	BlueStar Website Content	2.4.2
9	SanlamConnect Social Media policy	2.5
10	SanlamConnect Investment Advice Framework for Advisers	Part 3.3
10.1	Appendix A-Investment funds and products for Advisers	Part 3.3
10.2	Appendix B-Investment Funds for Generalists	Part 3.3
10.3	Appendix C-Approved Fund list for Generalists(Glacier)	Part 3.3
10.4	Appendix D-Approved Fund List Specialists (Glacier)	Part 3.3
10.5	Appendix E-Investment funds for Specialists	Part 3.3
10.6	Approved Fund List for Specialists	Part 3.3
10.7	Background on the Fund lists plus the Gen & Spec lists	Part 3.3
10.8	Acknowledgement and indemnity form	Part 3.3
10.9	Various Approved lists over periods of time (10.9.1, etc)	Part 3.3
11	SanlamConnect Intermediaries_ Fiduciary Policy for Advisers	Part 3.4
11.1	Business rules for SanlamConnect iro Wills	Part 3.4
12	Guidelines-for-use-of-electronic-signaturesv10	4.1
13	Commissioner of Oath_ stamp templates	4.6
14	SanlamConnect_ Advisers acting as Tax Practitioners	4.7