



## IMPORTANT INFORMATION

SANNE Management Company (RF) Proprietary Limited ("SANNE") is approved as a manager in terms of the Collective Investment Schemes Control Act 45 of 2002 ("CISCA").

Please complete all the relevant sections on the form. Please initial any amendments or changes and initial the bottom of each page. In addition, please complete the following forms, available for download from our website and on request from the manager:

1. Dividend Withholding Tax ("DWT") Declaration
2. FATCA and OECD Common Reporting Standards ("CRS") Tax Residency Self-declaration

All questions relating to the completion of the DWT, FATCA and CRS forms should be directed to your tax advisor.

The cut-off time for submitting an instruction is 14:00 on any business day for all investment options apart from the Ngwedi Money Market SNN Fund, where the cut-off time is 10:00. Instructions received after the cut-off time will be processed on the following business day.

The completed form, proof of payment, Financial Intelligence Centre Act 38 of 2001 ("FICA") and verification documentation and confirmation of banking details should be emailed to [Ngwedi@sannegroup.com](mailto:Ngwedi@sannegroup.com).

*Please note that the responsibility of ensuring that the instruction has been received and actioned by SANNE, will lie with the investor and/or financial advisor.*

### Contact Information

- SANNE Investor Services Department: (+27) 21 402 1600 or [Investor\\_Services@sannegroup.com](mailto:Investor_Services@sannegroup.com)
- Ngwedi Investment Managers: (+27) 21 000 1900 or [info@ngwedi.com](mailto:info@ngwedi.com)



## SECTION A: INVESTOR DETAILS

### Natural Person

Title:		Surname:	
First Name(s):			
Landline:		Cell:	
Nationality:			
Identity or Passport Number:			
Occupation:			
Income Tax Number/s:			
Place of Birth:		Date of Birth:	<input type="text" value="d"/> <input type="text" value="d"/> <input type="text" value="m"/> <input type="text" value="m"/> <input type="text" value="y"/> <input type="text" value="y"/> <input type="text" value="y"/> <input type="text" value="y"/>
Marital status:	Married ICOP	Married OCOP (with accrual)	Married OCOP (without accrual)
	Single	Other (please specify)	

### Individual Acting on Behalf of Investor

For parent/guardian or person with power of attorney

Title:		Surname:	
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First Name(s):			
Nationality:			
Relationship:		Income Tax Number/s:	

Please note that the parent/guardian's tax number should only be provided if the source of funds is linked to the parent/guardian. If not, the minor's tax number should be provided. All questions relating to this should be directed to your tax advisor.

### Companies and Other Legal Entities

Entity Name:					
Trading Name:					
Entity Type:	Private Co.	Listed Co.	CC.	Partnership	Other Entities
Other Entities (please specify):					
Registration Number:					
VAT Registration Number:					

### Individual Acting on Behalf of Entity

Title:		Surname:	
First Name (s):			
Nationality:			
Identity or Passport Number:			
Capacity:		Relationship:	

### Trusts

Name of Trust:			
Trust Registration Number:			

### Contact Details

Physical Address:			
		Code:	
Postal Address:			
		Code:	
Title:		Surname:	
First Name (s):			
Landline:		Cell:	
Email:			
Nationality:			

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### Communication Preferences

Please confirm your preferred method of communication.

Post:

Email:

Where no choice is made, all investor communications will be sent by email where an email address is supplied.

### For Institutional Investors Only

#### SARB Classification

Are you registered with the SARB Financial Surveillance Department?

Yes

No

Type of Business:

CIS

Retirement Fund

LT Insurer

LISP

Investment Manager

Other (please specify)

#### FAIS Entity Classification (Assets Under Management)

CIS

Retirement Fund

LT Insurer

FoHF

ST Insurer

Other

## SECTION B: INVESTMENT OPTIONS

➤ You must invest a lump sum of at least R10 000 and/or commit to at least R500 per month.

Name of Portfolio	Class	Management Fee (excl. VAT)	Investment Amount (Rand)		Income Distribution	
			Lump Sum	Monthly	Re-Invest	Pay-Out
Ngwedi Money Market SNN Fund						
Ngwedi Active Income SNN Fund						

### Special Management Fee Instructions

Please indicate any special management fee instructions below. Special instructions will require sign-off by Ngwedi Investment Managers. If applicable, please seek this sign-off prior to submitting this application form to SANNE.

#### Special Management Fee Instructions

#### Sign-Off by Ngwedi Investment Managers

Authorised Signature:

Name of Signatory:

Capacity:

Date:

d

d

m

m

y

y

y

y

Place:

### Method of Payment

#### Lump Sum

➤ Lump sum investments will be accepted via Electronic Funds Transfer ("EFT") into the designated portfolio subscription accounts shown in the table below.

- Payments must reach the account by no later than 14:00 of the business day (10:00 for the Ngwedi Money Market SNN Fund), together with all supporting documentation including the proof of payment.

### Monthly

- We suggest setting up an automated monthly EFT payment, as we do not facilitate debit orders at this stage.

Account Name	Account Number	Bank	Branch Code
Ngwedi Money Market SNN Fund	62814008878	First National Bank	204109
Ngwedi Active Income SNN Fund	62814008703	First National Bank	204109

### Banking Details

- Please complete the below banking details and provide a cancelled cheque or a certified copy of your bank statement of no less than three months old, with this application.
- If you have chosen to have your income distributions paid out, your distributions will be paid to this account.

Name of Account Holder:			
Bank:		Branch Code:	
Account Number:		Account Type:	

### Source of Wealth

The activities that have generated the total net worth of the client:

Salary		Savings		Sale of Assets		Inheritance	
Other (please specify):							

### Source of Funds

The origin of the funds involved in a business relationship or single transaction, and includes both the activity that generated the funds as well as the means through which the funds were transferred:

Salary		Savings		Sale of Assets		Inheritance	
Other (please specify):							

*SANNE reserves the right to request proof of the source of funds.*



## SECTION C: FINANCIAL ADVISOR

This section is to be completed by the Financial Advisor

### Contact Details

Name of Financial Advisor:			
Institution Name:			
VAT Number (if applicable):			
Address:			Code:
FSP Licence Number:			
Licence Category:	Cat I	Cat II	Cat II A

### Declaration

I/ We declare, in respect of the relevant South African laws, regulations, industry guidelines that:

- /We are licensed to render services in respect of this product and to act as the client's appointed Financial Advisor in terms of the Financial Advisory and Intermediary Services Act No. 37 of 2002 ("FAIS").
- I/We have made the necessary disclosures under the CISCA and FAIS, and I/we have provided the client with the necessary Key Investor Information Documents ("KIID").
- I/We have read the application form and the terms and conditions of this investment and have explained them to the client. To the extent they apply to me, I/we agree to be bound by the contents of this application form.
- I/We will forward any and all client documents to the client as soon as I/we receive them.
- I/We have explained all fees relating to the investment to the client and I/we acknowledge that the client may instruct SANNE to cease paying the ongoing advisor fee at any time.

Signature of Financial Advisor:			
Name of Signatory:			
Place:		Date:	d d m m y y y y



## SECTION D: FINANCIAL ADVISOR FEES

This section is to be completed by the Investor or Authorised Representative

I/ We hereby confirm that the Financial Advisor whose details are recorded in Section C above is my appointed Financial Advisor and I/we agree to the payment of the following fees:

<b>Initial Advice Fee</b> <i>(applied to each contribution received exclusive of VAT)</i>	%
<b>Ongoing Advice Fee</b> <i>(per annum of the market value of the portfolio, charged by means of unit reduction and paid to the Financial Advisor monthly in arrears, exclusive of VAT)</i>	%

I/We may instruct SANNE to cease paying the ongoing advisor fee at any time.

*Should you be investing in more than one portfolio with differing fees having been agreed with your Advisor, please submit a signed letter detailing this, together with your application.*

Authorised Signature:	
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Name of Signatory:	
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Capacity:		Date:	d	d	m	m	y	y	y	y
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Place:	
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Authorised Signature:	
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Name of Signatory:	
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Capacity:		Date:	d	d	m	m	y	y	y	y
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Place:	
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## SECTION E: SHAREHOLDING DETAILS

Information pertaining to authorised persons, founders, trustees, beneficiaries and shareholders holdings 25% or more of the voting rights at a general meeting.

### Natural Person/s

The below needs to be completed by all authorised persons, founders of trusts, trustees, beneficiaries and individuals holding 25% or more of the voting rights at a general meeting of a company. Please duplicate as required.

#### Details of Natural Person:

Title:		Surname:	
First Name(s):			
Landline:		Cell:	
Identity or Passport Number:		Date of Birth:	d d m m y y y y
Nationality:			
Designation:			
Residential Address:			
		Code:	
Email:			

#### Details of Natural Person:

Title:		Surname:	
First Name(s):			
Landline:		Cell:	
Identity or Passport Number:		Date of Birth:	d d m m y y y y
Nationality:			
Designation:			
Residential Address:			
		Code:	
Email:			

**Legal Person/s**

The below needs to be completed by all legal persons including persons holding 25% or more of the voting rights at a general meeting of a company, acting as founders of trusts, trustees or beneficiaries. Please duplicate as required.

**Details of Legal Person:**

Registered Name:			
Registered Number:			
Registered Address:			Code:
Trading Name:			

**Details of Legal Person:**

Registered Name:			
Registered Number:			
Registered Address:			Code:
Trading Name:			

**Details of Legal Person:**

Registered Name:			
Registered Number:			
Registered Address:			Code:
Trading Name:			

**Details of Legal Person:**

Registered Name:			
Registered Number:			
Registered Address:			Code:
Trading Name:			

**Details of Legal Person:**

Registered Name:			
Registered Number:			
Registered Address:			Code:
Trading Name:			

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## SECTION F: TERMS AND CONDITIONS

1. SANNE provides access to many portfolios offered by the market. Should you require any financial planning assistance, please consult your financial advisor as SANNE may not provide financial advice in respect of any investment.
2. This application form together with the Main Deed and Supplemental Deed will form the legal agreement between the investor and SANNE. The agreement will be administered in terms of CISCA.
3. Participatory interests are calculated on a NAV basis by determining the total market value of all assets in the portfolio, including any income accruals, less any permissible deductions from the portfolio. Participatory interests on investor statements are thus net of all fees.
4. Participatory interests will be purchased and repurchased by the manager at the NAV calculated in accordance with the requirements of CISCA and the relevant deeds.
5. Quarterly reports are available for download from the SANNE Website. SANNE will email monthly statements and contract notes on execution of transactions. Tax certificates are generated and distributed annually.
6. SANNE may, at its discretion, close portfolios to new investors and existing investors to enable the portfolios to be managed in accordance with their mandates.
7. SANNE reserves the right to terminate this contract by giving a calendar months' notice to the investor. Participatory interest shall be repurchased on the first business day of the following month after notification of termination at the ruling price of the last NAV. Any proceeds from the termination shall be paid to the investor recorded in this application form.
8. Commission and incentives may be paid and if so, would be included in the overall costs.
9. The responsibility of ensuring that the instruction has been received and actioned by SANNE will lie with the instructor (investor or financial advisor).
10. No cash payments will be accepted and a proof of payment to accompany all EFT payments.
11. SANNE will not be liable for any damages or losses of whatsoever nature arising out of SANNE's failure to action this instruction due to occurrences beyond the control of SANNE, nor will SANNE be liable for any loss incurred due to incorrect information being supplied by the investor or his/her financial advisor.
12. Copies of all verification documentation requested in this application form and a proof of payment must accompany this application form. SANNE will not be obliged to process this application form until it has received the verification documentation and SANNE will not be liable for any loss or damage of whatsoever nature arising from the inability of SANNE to process this application form due to the fact that the requirements of the FICA have not been complied with.
13. The investor indemnifies and holds SANNE harmless against any loss or damage which the investor may suffer as a result of any commission or omission by SANNE, which is a result of an obligation imposed on SANNE by FICA. Deposits awaiting allocation may earn interest in line with the SANNE's Section 104 Bank Account Interest Policy. SANNE reserves the right to recoup the bank charges charged on the section 104 bank account from the interest earned in line with SANNE's Section 104 Interest Policy.



## SECTION G: INVESTOR DECLARATION

I/We understand and agree to be bound by the provisions of this application form. If on the date of signature of this application form an updated application form exists and the fees are different on that form, the fees on the updated application form will apply. I/We understand and/or confirm that:

- The information contained herein is correct, and that if this application form is signed in a representative capacity, I/we have the necessary authority to do so and that this transaction is within my/our powers.
- I/We am/are acting for my/our own account and that I/we have made my/our decisions to enter into the investment and as to whether the investment is appropriate for me/us independently, based upon my/our own judgment, and upon advice from such advisors as I/we may deem necessary.
- I/We declare that I am/we are not relying on any communication from SANNE, whether written, oral or implied as investment advice or as a recommendation to enter into the investment.
- I/We understand that information and explanations relating to the terms of an investment shall not be considered investment advice or a recommendation to enter into the investment.
- SANNE will only be able to process investments on receipt of funds into the appropriate bank account, proof of deposit, and all relevant FICA documentation.
- I/ We will notify SANNE immediately if my/our tax residency or FATCA or equivalent classification changes in the future.
- SANNE will not be responsible for any failure, malfunction or delay of any networks, electronic or mechanical device or any other form of communication used in the submission, acceptance and processing of applications and/or transactions. Sanne will not be liable to make good or compensate any investor or third party for any damages, losses, claims or expenses resulting there from.
- I/we have read, understand and acknowledge the Terms of Conditions (as outlined in Section F).

I/We indemnify SANNE accordingly.

Authorised Signature:										
Name of Signatory:										
Capacity:		Date:	d	d	m	m	y	y	y	y
Place										
Authorised Signature:										
Name of Signatory:										
Capacity:		Date:	d	d	m	m	y	y	y	y
Place										



## SECTION H: MANDATORY DISCLOSURE

Collective Investment Schemes are generally medium to long-term investments. The value of participatory interests may go down as well as up. Past performance is not necessarily a guide to future performance. Collective investments are traded at ruling prices and can engage in scrip lending and borrowing. A schedule of fees, charges and maximum commissions, as well as a detailed description of how performance fees are calculated and applied, is available on request from SANNE.

SANNE does not provide any guarantee in respect of the capital or the return of the portfolio. Excessive withdrawals from the fund may place the fund under liquidity pressure and in such circumstances, a process of ring-fencing of withdrawal instructions and managed pay-outs over time may be followed. Commission and incentives may be paid, and if so, are included in the overall costs. Portfolios may be closed. Prices are published daily on our website and local media. Additional information, including Key Investor Information Documents, Minimum Disclosure Document, as well as other information relating to the portfolio is available, free of charge, on request from the manager.

SANNE is registered and approved under CISCA. Ngwedi Investment Managers (Pty) Ltd is an authorised Financial Services Provider (FSP Number: 46668) under the FAIS Act to render investment management services. Rand Merchant Bank Trustee is the appointed trustee and can be contacted on 087 736 1732.

### Complaints

SANNE takes your concerns and queries very seriously. If you are unsatisfied with the investment or the services received from SANNE, please contact our compliance officer.

#### SANNE

The Compliance Officer, SANNE Management Company (RF) Proprietary Limited

Post: PO Box 24, Cape Town, 8000.

Tel: (+27) 21 202 8282

Email: [complaints@sannegroup.com](mailto:complaints@sannegroup.com)

*If any investor is not satisfied with the response from SANNE, he/she has the right to address his/her complaint in writing to the Ombud of the Financial Services Providers at the address below. The Ombud is legally empowered to investigate and adjudicate complaints in a procedurally fair, economical and expeditious manner.*

#### FAIS Ombud

Website: [www.faisombud.co.za](http://www.faisombud.co.za)

Email: [info@faisombud.co.za](mailto:info@faisombud.co.za)

Post: FAIS Ombudsman

P.O. Box 74571

Lynnwood Ridge

0040



## SECTION I: FICA ONBOARDING CHECKLIST

In terms of the Financial Intelligence Centre Amendment Act, Act No 1 of 2017 "FICA" and the regulations thereto, SANNE is required to identify and verify the identity of all investors and third parties acting on behalf of an individual or entity. Please attach certified copies of the original documents to the completed application form and tick the applicable sections below.

Where an entity acts in any representative capacity on behalf of another entity, the FICA requirements will apply in full to that entity that acts in such a representative capacity.

Please select the relevant FICA documentation that corresponds to the updates being provided, or where the documentation is different to that which was provided with your original application:

### 1. South African Citizens and Residents (Natural Persons)

- Clear and duly certified copy of an official ID document containing a photo, full names, date of birth and ID number (a passport containing the above information will only be considered with legitimate written substantiation and with a reasonable time period remaining before the passport expires).
- Clear and duly certified copy of a minor's birth certificate (if relevant).
- Duly certified copy of a proof of physical address (not older than three months).
- Duly certified copy of the proof of bank account details not older than three months (This should be on a bank letterhead. Internet bank statements will not be accepted).
- Proof of the income tax number on the issuing tax authority's letterhead i.e. SARS.

### 2. Foreign Nationals (Natural Persons)

- Clear and duly certified copy of a passport, with a reasonable period remaining before the passport expires, containing a photo, full names, date of birth and passport number.
- Duly certified copy of a proof of physical address (not older than three months).
- Duly certified copy of the proof of bank account details (This should be on a bank letterhead. Internet bank statements will not be accepted).
- Proof of the income tax number on the issuing tax authority's letterhead i.e. SARS or other country's tax authority.

### 3. Third Party Representing another Individual/Power of Attorney (Natural Person)

- Clear and duly certified copy of an official ID document containing a photo, full names, date of birth and ID number (a passport containing the above information will only be considered with legitimate written substantiation and with a reasonable time period remaining before the passport expires) of the third party/representative individual.
- Duly certified copy of a proof of physical address (not older than three months) of the third party/representative.
- Proof of authority to act, e.g. power of attorney, mandate, resolution or court order.
- Documentation as set out under the South African Citizens and Residents (Natural Persons) and Foreign Nationals (Natural Persons) sections above of the person on whose behalf the third party/representative individual is acting on.

### 4. South African Companies

- Duly certified copy of the Certificate of Incorporation (CM1/Cor 14.3) and Notice of Registered Office and Postal Address (CM22/Cor 21.1) containing the Registrar's stamp.
- Duly certified copy of a document less than three months old containing trade name and the physical business address (for example a utility bill).

- Duly certified copy of the proof of the company's bank account details not older than three months (This should be on a bank letterhead. Internet bank statements will not be accepted).
- Proof of the company's income tax number on the issuing tax authority's letterhead i.e. SARS.
- For each natural person that exercises executive control and/or holds 25%\* or more of the voting rights at an annual general meeting –
  - a. Duly certified copies of the ID documents or passports (foreign nationals);
  - b. Duly certified copy of a proof of physical address (not older than three months); and
  - c. A resolution for all natural persons that exercises executive control that is not a director.
- A duly certified copy of a standard FICA pack for all corporate vehicles, partnerships or trusts exercising executive control and/or holding 25%\* or more of the voting rights at an annual general meeting.

## 5. South African Close Corporations

- Duly certified copy of the Founding Statement and Certificate of Incorporation (CK1) and the Amended Founding Statement (CK2) if applicable, containing the stamp of the Registrar of Close Corporations and signed by an authorized representative/employee.
- Duly certified copy of a document less than three months old containing trade name and the physical business address (for example a utility bill).
- Duly certified copy of the proof of the close corporations' bank account details not older than three months (This should be on a bank letterhead. Internet bank statements will not be accepted).
- Proof of the income tax number on the issuing tax authority's letterhead i.e. SARS.
- For each natural person that exercises executive control and/or holds 25% or more of the voting rights at an annual general meeting –
  - a. Duly certified copies of the ID documents or passports (foreign nationals);
  - b. Duly certified copy of a proof of physical address (not older than three months); and
  - c. A resolution for all natural persons that exercises executive control that is not a director.
- A copy of the most recent share registry.
- A duly certified copy of a standard FICA pack for all corporate vehicles, partnerships or trusts exercising executive control and/or holding 25%\* or more of the voting rights at an annual general meeting.

## 6. Foreign Companies

- Duly certified copy of an official document issued by a foreign regulator witnessing incorporation, bearing name, number and address.
- Duly certified copy of a document less than three months old containing trade name and the physical business address (for example a utility bill).
- Duly certified copy of the proof of the company's bank account details not older than three months (This should be on a bank letterhead. Internet bank statements will not be accepted).
- Proof of the company's income tax number on the issuing tax authority's letterhead i.e. SARS.
- For each natural person that exercises executive control and/or holds 25% or more of the voting rights at an annual general meeting –
  - a. Duly certified copies of the ID documents or passports (foreign nationals);
  - b. Duly certified copy of a proof of physical address (not older than three months); and
  - c. A resolution for all natural persons that exercises executive control that is not a director.

- A duly certified copy of a standard FICA pack for all corporate vehicles, partnerships or trusts exercising executive control and/or holding 25%\* or more of the voting rights at an annual general meeting.

## 7. Listed Companies

- Duly certified copy of an official document from the relevant securities exchange reflecting the current listing status;
- A reliance letter;
- Duly certified copy of the proof of the company's bank account details not older than three months (This should be on a bank letterhead. Internet bank statements will not be accepted).
- Proof of the company's income tax number on the issuing tax authority's letterhead i.e. SARS.
- Resolution confirming the authorized signatories; and
- For each authorized signatory –
  - a. Duly certified copies of the ID documents or passports (foreign nationals); and
  - b. Duly certified copy of a proof of physical address (not older than three months).

## 8. Trust

- Duly certified copy of the Trust Deed.
- Duly certified copy of the Master of the High Court's Letter of Authority.
- A document which confirms the address of the Master of the High Court; where the trust is registered.
- Duly certified copy of the proof of the trust's bank account details not older than three months (This should be on a bank letterhead. Internet bank statements will not be accepted).
- Proof of the trust's income tax number on the issuing tax authority's letterhead i.e. SARS.
- A resolution for all persons that exercises executive control that is not a founder or trustee.
- For each natural person that is the founder, trustee, authorized signatory and/or an identified beneficiary –
  - a. Duly certified copies of the ID documents or passports (foreign nationals);
  - b. Duly certified copy of a proof of physical address (not older than three months); and
  - c. Contact particulars.
- A duly certified copy of a standard FICA pack for all corporate vehicles, partnerships or trusts that is a founder, trustee, authorized signatory and/or identified as a beneficiary.

## 9. Partnership

- Duly certified copy of the partnership agreement.
- Duly certified copy of the proof of the partnership's bank account details not older than three months (This should be on a bank letterhead. Internet bank statements will not be accepted).
- For each natural person that exercises executive control and/or holds 25% or more of the voting rights at an annual general meeting –
  - a. Duly certified copies of the ID documents or passports (foreign nationals);
  - b. Duly certified copy of a proof of physical address (not older than three months); and
  - c. A resolution for all natural persons that exercises executive control that is not a partner.
- A duly certified copy of a standard FICA pack for all corporate vehicles, partnerships or trusts exercising executive control and/or holding 25%\* or more of the voting rights at an annual general meeting.

## 10. Regulated Portfolio

- Duly certified copy of the FSCA approved supplemental deed.
- Duly certified copy of the Management Company's standard FICA pack (refer South African Companies section above).
- For each natural person that exercises executive control that is not a director of the Management company –
  - a. Duly certified copies of the ID documents or passports (foreign nationals);
  - b. Duly certified copy of a proof of physical address (not older than three months); and
  - c. A resolution for all natural persons that exercises executive control.
- Duly certified copy of the proof of the bank account details not older than three months (This should be on a bank letterhead. Internet bank statements will not be accepted).
- Proof of the income tax number on the issuing tax authority's letterhead i.e. SARS (if applicable).

## 11. Unregulated Fund

- Duly certified copy of the Investment Manager's standard FICA pack (refer South African Companies section above).
- For each natural person that exercises executive control that is not a director of the Investment Manager –
  - a. Duly certified copies of the ID documents or passports (foreign nationals);
  - b. Duly certified copy of a proof of physical address (not older than three months); and
  - c. A resolution for all natural persons that exercises executive control.
- Duly certified copy of the proof of the bank account details not older than three months (This should be on a bank letterhead. Internet bank statements will not be accepted).
- Proof of the income tax number on the issuing tax authority's letterhead i.e. SARS (if applicable).

## 12. Pension Fund

- Duly certified copy of a document confirming FSCA approval.
- Duly certified copy of a proof of physical address (not older than three months).
- For each natural person that exercises executive control –
  - d. Duly certified copies of the ID documents or passports (foreign nationals);
  - e. Duly certified copy of a proof of physical address (not older than three months); and
  - f. A resolution for all natural persons that exercises executive control.
- Duly certified copy of the proof of the bank account details not older than three months (This should be on a bank letterhead. Internet bank statements will not be accepted).
- Proof of the income tax number on the issuing tax authority's letterhead i.e. SARS (if applicable).

\*All clients are screened against the United Nations sanctions list and depending on the outcome of the screening and all information readily available at SANNE's disposal SANNE will rate its clients as low, moderate or high risk. If any client has been categorised as high risk SANNE reserves the right to request the on-boarding verification documentation of all parties holding 10% or more of the voting rights at an annual general meeting.