



HEWETT WEALTH (PTY) LTD
FSP 46645

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| Title | Code of Ethics |
| Version | 10022016 |
| Approval | Board Meeting – 4 April 2016 |
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| Revised Date: | Not applicable |

Code of Ethics

Scope

Maintaining the trust and confidence of all our stakeholders is the responsibility of every employee. In all of our actions, the values and associated behaviours must be applied to guide and direct the way we conduct ourselves.

Purpose

The purpose of this Code of Ethics Policy is to guide Hewett Wealth and its employees to display the highest standards of ethical conduct. The Ethics Policy outlines our core ethical values, ideals and principles.

Background

Ethics involve applying moral standards – standards of good, right and fair conduct – which are supported by values that shape the decisions and actions of individuals within the organization in the pursuit of our business objectives.

Policy

Hewett Wealth commits itself to maintaining the highest standards of competence, integrity and ethical behaviour, thereby ensuring that its reputation is beyond reproach in all its actions and activities.

We recognise our obligations to all our stakeholders – particularly shareholders, clients, employees, business partners, the authorities and the wider community and has therefore adopted principles described below.

Hewett Wealth will monitor ethical performance continuously in order to ensure that irregular or unethical business practices are eliminated.

This Ethics Policy is supported by other company policies and procedures relating to specific issues, processes and situations.

Core Values and Principles

Client Centricity - we are committed to deliver customer value and placing our client's interests first.

Integrity entails acting consistently with our values, i.e. to be honest, trustworthy and open, and to always act in accordance with the highest ethical standards. All employees are therefore expected to act with the highest integrity.

Accountability means that we must be prepared to take responsibility for our work, make commitments, find solutions and be held accountable for delivery and results.

Fairness - requires providing clients with what they have been lead to expect, before, during and after a transaction is concluded. It involves disclosure of material conflicts of interest, and managing one's own feelings, prejudices and desires to achieve a proper balance of interests. Fairness is treating others as you would want to be treated.

Professionalism means that we must be honest and act transparently. We must render services of the highest standard, and act with skill, care and diligence and we must understand and comply with all applicable law, rules and regulations and the codes of conduct issued by the regulatory authorities that govern us.

Competence – mean that we will maintain the abilities, skills and knowledge necessary to provide competent professional services.

Confidentiality –requires client and other personal information we may come across be protected and maintained in such a way that access is only allowed to those who are authorised or entitled, according to the laws of the Republic of South Africa.

Consequences of Non-Adherence

Any contravention of the Code is grounds for disciplinary action. In the interpretation of the Code, a zero-tolerance approach to fraud and corruption will be taken.

Training and Awareness

All staff will be given access to our code of ethics on employment and commit themselves to abide by this policy when becoming an employee of Hewett Wealth..

Review

This policy will be reviewed as and when required, but at least annually.