



ALUWANI
CAPITAL PARTNERS

ALUWANI ESG Policy

2020

Our Responsible Investing Policy

"In undertaking its investment activities, ALUWANI Capital Partners will comply with the requirements of all applicable regulation. Aluwani endorses the United Nations Principles for Responsible Investing (UNPRI) and the Code for Responsible Investing in South Africa (CRISA). In line with these codes and best practice, Aluwani will:

1. *Perform reasonable due diligence (including an assessment of environmental, social and governance risks (including Broad Based Black Economic Empowerment (BBBEE)), where these may have a material impact on the investment theses) so as to take into account the risks relevant to the underlying investment before making a decision on whether to invest or not.*
 2. *Whilst invested in a company:*
 - *Perform a reasonable level of due diligence on the investee company over the lifetime of the investment. At a minimum, this will be conducted once in every 12-month period, or more frequently at the discretion of the Aluwani Portfolio Manager;*
 - *Practice active ownership, by exercising shareholder voting rights in line with our client's proxy voting policies (or where no such client policy exists, in line with Aluwani's Proxy Voting Policy) and proactively engaging with companies where due diligence assessments indicate areas of risk or underperformance;*
 - *Ensure that Aluwani (and its employees, management and Board) is prevented from receiving price sensitive information, or acting on any such information, in a manner which may constitute insider trading, in line with Aluwani's Policy on Insider Trading and Code of Ethics.*
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ALUWANI Capital Partners (Pty) Limited (Reg. No. 2015/112266/07)

The company is an authorised financial services provider, FSP number 46196

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3. *Manage conflicts of interest, through Aluwani's Conflict of Interest Declaration for its employees, management and board and its Code of Ethics.*
 4. *Participate in collaborative efforts to promote the acceptance and implementation of CRISA and the King IV™ Report on Corporate Governance (the King IV™ Code).*
 5. *Exercise transparency in our approach with respect to our ESG process as well as the implementation of all our policies that affect our interaction with our underlying clients and investee companies.*

This policy is hereby approved and adopted by the Chairperson of our Investment Committee Meeting on the 3rd day of November 2020. The policy will be reviewed at least annually or as required and be provided to ALUWANI EXCO for final adoption."
