
ETHICS POLICY

1. INTRODUCTION

At Lima Mbeu Investment Managers (Pty) Ltd, our ethics policy is designed to promote a culture of integrity, transparency, and accountability in our business practices. Our ethics policy includes the following key elements:

- 1.1. **Compliance with Laws and Regulations:** We are committed to complying with all applicable laws and regulations, including those related to securities laws, anti-money laundering, and anti-bribery and corruption.
- 1.2. **Conflicts of Interest:** We are committed to identifying and managing potential conflicts of interest that may arise in our business activities. We maintain a conflicts of interest policy that outlines our procedures for identifying and managing conflicts of interest.
- 1.3. **Confidentiality:** We are committed to maintaining the confidentiality of our clients' information and other confidential information that we may possess. We maintain strict confidentiality policies and procedures to ensure that confidential information is protected from unauthorized disclosure.
- 1.4. **Personal Trading:** We maintain a personal trading policy that sets out our procedures for personal trading by our employees. We require our employees to comply with our personal trading policy and to obtain prior approval before making personal trades.
- 1.5. **Gifts and Entertainment:** We maintain a gifts and entertainment policy that sets out our procedures for accepting or offering gifts and entertainment. We require our employees to comply with our gifts and entertainment policy and to obtain prior approval before accepting or offering gifts or entertainment.
- 1.6. **Whistleblower Policy:** We encourage our employees to report any suspected unethical behavior or violations of our ethics policy. We take all reports of suspected misconduct seriously, and we will investigate each report thoroughly and promptly. We will also take steps to protect whistleblowers from retaliation, up to and including disciplinary action against any employee found to have engaged in retaliation.
- 1.7. **Training and Education:** We provide regular training and education to our employees on our ethics policy and the importance of maintaining a culture of integrity in our business practices.

2. RESPONSIBILITY AND APPROVAL

The person responsible for the execution of this policy shall be the Chief Investment Officer and any variation to the Policy must be approved by the Board.