



Untraceable Investors Policy

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1. INTRODUCTION

Ittransact Fund Managers (RF) (Pty) Ltd ("IFM"), in its commitment to Good Business Practice, Treating of Customers Fairly and transparency when dealing with investor's assets has adopted the Untraceable Investors Policy.

The policy is applicable in the event that IFM becomes unable to make successful contact with the client using conventional communication methods. This document sets out the IFM policy in accordance with Good Business Practice.

2. SCOPE

This policy applies to all divisions, sub-divisions and employees within IFM, as well as all information sources created and received by IFM and its employees, regardless of the format or media type.

3. REFERENCES

- Collective Investment Schemes Control Act 45 of 2002
- ISO/IEC 27001:2022 Information Security, Cybersecurity and Privacy Protection — Information Security Management Systems
- ISO9001:2015 Quality Management system (QMS)
- ASISA Standard on Unclaimed Assets (2024)

4. PURPOSE

The purpose of this policy is to outline IFM's standard procedure for tracing clients, who still have assets held by IFM and have not been successfully contacted using conventional communication methods.

5. OBJECTIVES

The aim of this policy is:

- to ensure that the client's right to the investment remains intact until the client has been found / located;
- to enhance tracing procedures as to keep untraceable clients at a minimum level as far as possible;
- to enhance disclosure to clients in respect of the treatment of untraceable clients; and
- to achieve consistent treatment, as far as practically possible, of untraceable clients.

6. TRACING

Where the client has been identified as untraceable, a standard minimum tracing process is applicable, within set timeframes. IFM's standard tracing process is as follows:

6.1. WITHIN THE FIRST 6 MONTHS

- Attempt to contact the investor to advise them about the available assets.
- If unsuccessful in contact, determine last known contact information and address of the customer with reference to the IFM database.
- Compare internal database with an external database.

6.2. BLOCK THE UNITS AND TERMINATE ALL FURTHER TRANSACTING UNTIL THE CLIENT HAS BEEN FOUND WITHIN 3 YEARS

- Repeat the "Within the first 6 months" process.
- If contact has been made and the client informed of the claim within the 3 years, but the client has not acted, no further attempts will be made to obtain the documentation and the units will remain blocked.

6.3. WITHIN 10 YEARS

- Repeat the "Within 3 years" process.
- If the client cannot be contacted then consideration needs to be given to using an external tracing company to trace the client, unless an external tracing company has been utilised prior to this check.

IFM will take all reasonable steps, including but not limited to a thorough search of all internal client databases as well as utilising the information and services provided by external databases or tracing agencies, where appropriate, to contact the client.

7. ADMINISTRATION COSTS

Any reasonable direct administrative and tracing costs are to be incurred by IFM. The costs will not be charged against the portfolio. The costs may be recovered from the client by a deduction from the value of the investment, but only once the client has been located.

Tracing of the owner of an investment may cease where the value of the investment is less than R1,000 and if the cost of tracing exceeds the benefit of tracing.

8. RETAINING OF RECORDS

IFM will retain records that will allow the tracing process to be audited and verified by the company's internal compliance function. These records will also be made available on request, to the client in the event they re-establish contact, a third party with an interest to the assets and the Regulator.

9. DISCLOSURE

9.1. NEW BUSINESS STAGE

- The IFM new business terms and conditions must include appropriate information on untraceable clients.
- It must be clear that the client is and will remain responsible for ensuring that their contact information is kept up to date.
- IFM will disclose the actions to be taken to trace a client in the event of the existing contact information being outdated.
- IFM will expressly indicate that all reasonable direct administrative, tracing and management costs associated with the tracing of the investor, will be recovered by a deduction from the value of the investment once the customer has been located.
- IFM will obtain the client's consent to use the client's available personal information to facilitate tracing where required in the future. Such consent must allow for sharing of personal information and ensure compliance with the Protection of Personal Information legislation.

9.2. ONGOING – EXISTING CUSTOMERS

- Annual communication to clients will include appropriate information on untraceable clients.
- The disclosure needs to make it clear that the client is and remains responsible for ensuring that their contact information is kept up to date.
- Disclosures need to include a reference to the costs applicable to the tracing of unidentified investors.

10. CLIENT EDUCATION

Appropriate information must be made available to clients, including the process to be followed to update personal contact information, on the IFM website.

11. POLICY OVERSIGHT RESPONSIBILITIES

The IFM Managing Director is the ultimate responsible person for the application of this policy, and to review this policy on a regular basis to ensure that it continues to comply with the legislative requirements for untraceable investors. Senior Management is responsible to communicate the company's policy to all employees, officers, directors, representatives and advisors of IFM.

All staff have a responsibility to create and maintain full and accurate records of activities, transactions, and decisions carried out during the course of daily business activity, and to comply with the organisation's documented untraceable investors policies and procedures.

12. VALIDITY AND DOCUMENT MANAGEMENT

This document will be valid from the date of signature until it has been superseded by another document of the same name and later version number or it is removed from circulation.

The responsibility for the review of this document lies with the Managing Director, who is to perform an update/review of this document at least once a year.

13. APPROVAL AND SIGN OFF OF THE POLICY

The Board of Directors of IFM approves the Untraceable Investors Policy for implementation.

APPROVED BY:

Mr CM Gill

DATE: 26/03/2026