The Code of Ethics

Employees and consultants must:

- Act with integrity, competence, diligence, respect, and in an ethical manner with the public, clients, prospective clients, employers, employees, colleagues in the investment profession, and other participants in the global capital markets.
- Place the integrity of the investment profession and the interests of clients above their own personal interests.
- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities.
- Practice and encourage others to practice in a professional and ethical manner that will reflect credit on themselves and the profession.
- Promote the integrity of, and uphold the rules governing, capital markets.
- Maintain and improve their professional competence and strive to maintain and improve the competence of other investment professionals.

Standards of Professional Conduct

1. PROFESSIONALISM

1.1. Knowledge of the Law.

Employees and consultants must understand and comply with all applicable laws, rules, and regulations of any government, regulatory organization, licensing agency, or professional association governing their professional activities. In the event of conflict, employees and consultants must not knowingly participate or assist in and must dissociate from any violation of such laws, rules or regulations.

1.2. Independence and Objectivity.

Employees and consultants must use reasonable care and judgment to achieve and maintain independence and objectivity in their professional activities. Employees and consultants must not offer, solicit, or accept any gift, benefit, compensation, or consideration that reasonably could be expected to compromise their own or another's independence and objectivity.

1.3. Misrepresentation.

Employees and consultants must not knowingly make any misrepresentations relating to investment analysis, recommendations, actions, or other professional activities.

Capstone 293 (Pty) Ltd Reg.No. 2001/023109/07 Unit 2 Constantia View Office Park 2 Hogsback Avenue Quellerina Gauteng
PO Box 6098 Weltevreden Park 1715 Tel (011) 477 0062 www.cstone.co.za

Director – W Smith, CFA CFP

1.4. Misconduct.

Employees and consultants must not engage in any professional conduct involving dishonesty, fraud, or deceit or commit any act that reflects adversely on their professional reputation, integrity, or competence.

2. INTEGRITY OF CAPITAL MARKETS

2.1. Material Nonpublic Information.

Employees and consultants who possess material nonpublic information that could affect the value of a investment must not act or cause others to act on the information.

2.2. Market Manipulation.

Employees and consultants must not engage in practices that distort prices or artificially inflate trading volume with the intent to mislead market participants.

3. DUTIES TO CLIENTS

3.1. Loyalty, Prudence and Care.

Employees and consultants have a duty of loyalty to their clients and must act with reasonable care and exercise prudent judgment. Employees and consultants must act for the benefit of their clients and place their clients' interests before their employer's or their own interests. In relationships with client, employees and consultants must determine applicable fiduciary duty and must comply with such duty to persons and interests to whom it is owed.

3.2. Fair Dealing.

Employees and consultants must deal fairly and objectively with all clients when providing investment analysis, making investment recommendations, taking investment action, or engaging in other professional activities.

3.3. Suitability.

3.3.1. When employees and consultants are in an advisory relationship with a client, they must:

3.3.1.1. Make a reasonable inquiry into a client's or prospective client's investment experience, risk and return objectives, and financial constraints prior to making any investment recommendation or taking investment action and must reassess and update this information regularly.

3.3.1.2. Determine that an investment is suitable to the client's financial situation and consistent with the client's written objectives, mandates, and constraints before making an investment recommendation or taking investment action.

3.3.1.3. Judge the suitability of investments in the context of the client's total portfolio.

Capstone 293 (Pty) Ltd Reg.No. 2001/023109/07 Unit 2 Constantia View Office Park 2 Hogsback Avenue Quellerina Gauteng
PO Box 6098 Weltevreden Park 1715 Tel (011) 477 0062 www.cstone.co.za

Director – W Smith, CFA CFP

3.3.2. When employees and consultants are responsible for managing a portfolio to a specific mandate, strategy, or style, they must only make investment recommendations or take investment actions that are consistent with the stated objectives and constraints of the portfolio.

3.4. Performance Presentation.

When communicating investment performance information, employees and consultants must take reasonable efforts to ensure that it is fair, accurate, and complete.

3.5. Preservation of Confidentiality.

Employees and consultants must keep information about current, former, and prospective clients confidential unless:

3.5.1. The information concerns illegal activities on the part of the client or prospective client,

3.5.2. Disclosure is required by law, or

3.5.3. The client or prospective client permits disclosure of the information.

4. DUTIES TO EMPLOYERS

4.1. Loyalty.

In matters related to their employment, employees and consultants must act for the benefit of their employer and not deprive their employer of the advantage of their skills and abilities, divulge confidential information, or otherwise cause harm to their employer.

4.2. Additional Compensation Arrangements.

Employees and consultants must not accept gifts, benefits, compensation, or consideration that competes with, or might reasonably be expected to create a conflict of interest with, their employer's interest unless they obtain written consent from all parties involved.

4.3. Responsibilities of Supervisors.

Employees and consultants must make reasonable efforts to detect and prevent violations of applicable laws, rules, regulations, and the Code and Standards by anyone subject to their supervision or authority.

5. INVESTMENT ANALYSIS, RECOMMENDATIONS, AND ACTIONS

5.1. Diligence and Reasonable Basis. Employees and consultants must:

5.1.1. Exercise diligence, independence, and thoroughness in analyzing investments, making investment recommendations, and taking investment actions.

Capstone 293 (Pty) Ltd Reg.No. 2001/023109/07 Unit 2 Constantia View Office Park 2 Hogsback Avenue Quellerina Gauteng
PO Box 6098 Weltevreden Park 1715 Tel (011) 477 0062 www.cstone.co.za

Director – W Smith, CFA CFP

5.1.2. Have a reasonable and adequate basis, supported by appropriate research and investigation, for any investment analysis, recommendation, or action.

5.2. Communication with Clients and Prospective Clients. Employees and consultants must:

5.2.1. Disclose to clients and prospective clients the basic format and general principles of the investment processes used to analyze investments, select securities, and construct portfolios and must promptly disclose any changes that might materially affect those processes.

5.2.2. Use reasonable judgment in identifying which factors are important to their investment analyses, recommendations, or actions and include those factors in communications with clients.

5.2.3. Distinguish between fact and opinion in the presentation of investment analysis and recommendations.

5.3. Record Retention.

Employees and consultants must develop and maintain appropriate records to support their investment analysis, recommendations, actions, and other investment-related communications with clients and prospective clients.

6. CONFLICTS OF INTEREST

6.1. Disclosure of Conflicts.

Employees and consultants must make full and fair disclosure of all matters that could reasonably be expected to impair their independence and objectivity or interfere with respective duties to their clients, prospective clients, and employer. Employees and consultants must ensure that such disclosures are prominent, are delivered in plain language, and communicate the relevant information effectively.

6.2. Priority of Transactions.

Investment transactions for clients and employers must have priority over investment transactions in which an employee or consultant is the beneficial owner.

6.3. Referral Fees.

Employees and consultants must disclose to their employer, clients, and prospective clients, as appropriate, any compensation, consideration, or benefit received from, or paid to, others for the recommendation of products or services.

6.4. Role of Compliance.

6.4.1. Compli-Serve, as compliance officers of Capstone, are in a position to assist Capstone in facilitating the handling of any identified conflict relating to the company. This may involve

Capstone 293 (Pty) Ltd Reg.No. 2001/023109/07 Unit 2 Constantia View Office Park 2 Hogsback Avenue Quellerina Gauteng
PO Box 6098 Weltevreden Park 1715 Tel (011) 477 0062 www.cstone.co.za

Director – W Smith, CFA CFP

assessing and evaluating the conflict with the company, and decide upon, and implement, an appropriate response to the conflict.

6.4.2. Compli-Serve to assist with the implementation of conflict-monitoring procedures within the company and highlight areas of ensure that any non-compliance with the company's conflicts management arrangements are identified and appropriately acted on.

6.4.3. As part of the conflict management arrangements Compli-Serve will monitor agreed conflicts documentation as part of its wider scale monitoring program within Capstone.

6.5. Role of all Employees of the Company.

All employees of Capstone are obliged to report actual, perceived or potential conflicts of interest. The failure of employees to notify management to the potential conflict of interest may result in disciplinary action being taken against the affected individual/s.

6.6. Role of all Senior Management.

Individuals responsible for the internal oversight function have responsibilities to implement appropriate processes and procedures for the effective risk management of conflicts of interest and other risks arising within their organizations. It is the responsibility of senior management to implement arrangements, policies and procedures to manage conflicts effectively. There is no 'one size fits all' that can effectively address the full range of conflicts of interest that arise in the business of the company.

7. THE REPORTING PROCEDURE

7.1. The "Conflicts Officer" will advise all relevant staff of:

7.1.1. The definition of "conflict of interest;"

7.1.2. The main features and,

7.1.3. Examples or possible conflicts of interest that may emerge.

7.2. At the same time the Conflicts Officer will co-ordinate a questionnaire (annual) of directors and relevant staff, requiring them to assess all aspects of their responsibilities and their business relationships, with a view to identifying actual or potential conflicts (and circumstances that might be perceived as conflicts). Directors, managers and internal legal and compliance officers should attempt to identify conflicts across the business, while other staff will focus on their individual circumstances.

7.3. Even when individuals completing the questionnaire are confident that objective financial advice will be provided, despite a potential conflict, they should report the conflict: clients and regulators may not easily be persuaded that advice was objective.

Capstone 293 (Pty) Ltd Reg.No. 2001/023109/07 Unit 2 Constantia View Office Park 2 Hogsback Avenue Quellerina Gauteng
PO Box 6098 Weltevreden Park 1715 Tel (011) 477 0062 www.cstone.co.za

Director – W Smith, CFA CFP

7.4. The “conflicts Officer” together with compliance will assess the seriousness (with compliance) of identified possible conflicts and will determine (in consultation with senior management) how the conflict should be managed. Typically, this may involve:

7.4.1. If current disclosure constitutes adequate management what further disclosures would constitute adequate management?

7.4.2. Can disclosure alone adequately manage the conflict?

7.4.3. Where it cannot, all stakeholders can decide how the conflict should be avoided, or whether the conflict should be referred for prompt board consideration.

7.5. The Conflicts Officer will keep adequate records of the controls management process, from identification through to effective resolution of the conflict.

7.6. The Compliance officer will prepare a report on the management of conflicts of interest, for the Board to consider at intervals appropriate to the business.

7.7. Conflicts of interest are a standing agenda item for Board meetings.

7.8. Procedures are drafted and adopted by the Board to form part of the compliance documentation, addressing the above steps and responsibilities.

7.9. The COI procedures and their efficacy in operation will be reviewed by senior management of Capstone in conjunction with compliance.

Capstone 293 (Pty) Ltd Reg.No. 2001/023109/07 Unit 2 Constantia View Office Park 2 Hogsback Avenue Quellerina Gauteng
PO Box 6098 Weltevreden Park 1715 Tel (011) 477 0062 www.cstone.co.za

Director – W Smith, CFA CFP