




DMA Group Whistleblowing Policy

(the “Policy”)

1. Policy approval and information

Policy Drafter	Peter Johnson
Policy reviewer	Peter Johnson
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Approver's signature	
Approved by (this version)	Peter Johnson obo Board of Directors

2. Introduction

This Policy applies to the DMA Group. The DMA Group includes SCM DMA (Pty) Ltd, SCM DMA (Mauritius) Limited, Direct Market Access UK Limited, SCMSA Nominees (Pty) Ltd as well as any subsidiaries and affiliates of those entities, collectively ("DMA"). DMA is committed to conducting business responsibly and in accordance with the highest legal and ethical standards. Following our policies and procedures is not optional, and failure to do so can result in severe consequences for DMA and the individuals concerned.

This Policy covers situations where an individual (both external and internal to DMA – anyone may raise an alert) raises a concern about a risk, malpractice or wrongdoing that affects members of the firm, in the following areas:

- Financial and accounting,
- Bribery and corruption,
- Anti-competitive practises,
- Danger to health and safety,
- Danger to the environment,
- Discrimination and harassment,

(hereafter all referred to as "malpractice").

This Policy does not cover concerns or complaints about personal employment positions at DMA. Any such concerns or complaints should be raised through Human Resources. This Policy also does not concern risk, malpractice or wrongdoing in any other area than those listed above and/or that affect persons that are not members of DMA or its subsidiaries, parent company, business partners, associates, employees or suppliers.

The Policy references the following policies/procedures:

- DMA HR Manual (regional specific); and

- Bribery & Corruption Policy (group).

3. Protection under this policy

The whistleblowing procedure is discretionary, and a DMA employee liability or breach shall never be triggered for not having raised a whistleblowing alert.

You are not required to prove any matters raised under this Policy. An honest and reasonable suspicion that malpractice has been or is likely to be committed is sufficient.

Subject to the provisions of Section "Personal Liability", if a DMA employee raises a concern under this Policy, they will not be at risk of losing their job or suffering any form of retribution as a result. Provided you are acting honestly and reasonably, it does not matter if you are mistaken about your concern.

DMA will not tolerate the victimisation or harassment of employees that have raised a concern under this Policy. All allegations of such treatment will be taken seriously and if well founded will usually be investigated under the firm's disciplinary procedures as potential gross misconduct (see DMA HR Manual). Anyone found to have treated a colleague in this way may be dismissed without notice or pay in lieu of notice.

4. Personal liability

Maliciously making a false allegation under this Policy constitutes gross misconduct and is likely to trigger disciplinary sanctions and/or legal prosecution.

5. What to do if you have a concern

If you have any concerns about Malpractice, you can raise it confidentially by emailing whistle@dmamu.com. The email inbox is not accessible to any department within the DMA Group other than the DMA Group Head of Legal & Compliance and any submissions made under this Policy shall be retained in the strictest confidence in terms hereof.

Please provide all available information within your knowledge to investigate, whether you may deem it immaterial or not. The more information the better.

The DMA Group Head of Legal & Compliance will investigate and liaise, only where necessary, with other senior management. Please note that persons involved in the processing and/or investigation of Whistleblowing alerts are subject to confidentiality undertakings.

It is vital that any person wishing to submit an alert feels that they are able to do so without fear of reprisal; therefore, allegations of victimisation in such situations will be taken very seriously and disciplinary action taken against any personnel found guilty of such behaviour.

6. Confidentiality

Any concern raised under this Policy will remain confidential between the person who raises the concern, the DMA Group Head of Legal & Compliance and, to the extent needed, any other member who would have communication of the alert; thus, any information you provide under this procedure will also remain confidential, including your identity.

In this respect, please note that concerns cannot be raised anonymously and you must provide information on your identity. Your identity will remain confidential in terms hereof and will never be communicated to the member who is the subject of the alert.

Depending on the nature of the matter you have raised, DMA may be required by law to disclose some or all of the information to a third party. You will be informed if such disclosures are made.

Whilst investigating the matter, the DMA Group Head of Legal & Compliance may require you to provide further information. Your co-operation after you have raised a matter is essential for the proper investigation of your concern.

Once the matter has been investigated you will be provided with a report of the findings. If you have raised a concern which proves to be well founded, appropriate action will be taken.

Please note, there must be a reasonable basis for submitting an alert. You are protected for raising a reasonable and honest alert.; however, the systems should not be abused for malicious purposes. The making of malicious allegations will constitute gross misconduct and may lead to dismissal without notice or pay in lieu of notice. Further, employees of DMA should make alerts internally for reasonable investigation first and only alert external persons once DMA has had a reasonable opportunity to investigate the alert and provide a finding, where possible. Where not possible, in emergency circumstances, employees may alert external persons but should then take all reasonable steps to alert DMA via whistle@dmamu.com or the DMA Group Head of Legal & Compliance in person.

7. Record keeping

A central record of all alerts will be held by the DMA Group Head of Legal & Compliance who will report on the outcome of investigations to the Board of Directors or the relevant DMA Group entity.

Alerts that do not fall into the scope of this Policy will be shortly destroyed or recorded in a separate system. Those that fall into the scope of this Policy but do not result in disciplinary or judicial proceedings will not be kept more than 2 months after the investigation is closed. Those that result in disciplinary or judicial proceedings will be kept until the termination of the proceedings.

DMA uses all appropriate security measures to ensure the protection of the information collected in the context of this Policy and in compliance with all applicable regulations.

8. Right of access and modification

You have a right of access, opposition and correction of data that concerns you and to ask for their modification or deletion if data is incorrect, incomplete or obsolete, in accordance with the applicable data protection regulations. Contact whistle@dmamu.com.



Please help us combat any of the listed malpractices by raising an alert when necessary.