



**GROOM INVESTMENT CONSULTING CC**  
Principal Member - Mr Brian Leonard Ivan Groom  
B.ECON (STEL) 1986, ADV DIP INT'L TAX (IAS) 1997, AFP (FPI)

Member - Mrs Margaret Anne Groom  
BA (UCT) 1983, HDE POST GRAD PRIM (UCT) 1984, POST GRAD SEC DIP (CAPE TECHNIKON) 1986

## **CLIENT DISCLOSURE LETTER**

Date:

Dear

As a prospective client of Groom Investment Consulting cc you have a right to information relating to our professional services as required in terms of the FAIS Act. Please note that this is an important document and is to be read carefully. You will be asked to sign an acknowledgement of receipt and understanding of this document.

Groom Investment Consulting cc is a close corporation registered with the registrar of companies South Africa REG. NO. CK 1999 018575/23, VAT. NO. 4440182154, TAX. REF. NO. 9341/718/03/0. Groom Investment Consulting cc is involved in giving advice relating to the management of non-discretionary investment portfolios and is registered with the Financial Services Board as a financial services provider, FSP no. 13262.

This typically involves the review of existing portfolios in relation to the objectives, risk tolerance level, preferences and degree of sophistication of the investor. It also involves the construction, in consultation with the investor, of an appropriate portfolio, taking into consideration the appropriate currency, asset allocation and geographic requirements of the investor. Once the portfolio has been created it is then discussed and reviewed with the investor on an ongoing basis in order to achieve the agreed-upon objectives.

## 1. Authorised Representatives

Groom Investment Consulting cc has duly authorized the individual below to render advice and intermediary services as defined in terms of the FAIS Act in respect of the following FAIS Product Categories:

### Key Individual

Brian Groom; his license categories are:

Long Term Insurance: Sub-Category A  
Long Term Insurance: Sub-Category B1  
Long Term Insurance: Sub-Category B1-A  
Long Term Insurance: Sub-Category B2  
Long Term Insurance: Sub-Category B2-A  
Long Term Insurance: Category C  
Retail Pension Benefits  
Pension Fund Benefits  
Money Market Instruments  
Participatory Interests in Collective Investment Schemes

Groom Investment Consulting cc has the necessary controls and procedures in place to ensure that the Key Individuals and Representatives comply with the prescribed FAIS Fit and Proper Requirements (including qualifications, experience, having passed all required regulatory exams as well as all Honesty and Integrity requirements).

Groom Investment Consulting cc accepts legal responsibility for the rendering of the services by the said representative.

We, the owners of Groom Investment Consulting cc, confirm that none of our representatives are rendering services under supervision as defined by the Determination of Fit and Proper requirements.

## 2. Exemptions

No specific exemption was granted to Groom Investment Consulting cc by the registrar of financial services providers.

## 3. Financial Services and Products

Groom Investment Consulting cc is authorised to render advice and to recommend financial products in respect of the types below:

Linked Life Annuities  
Local Collective Investment Schemes  
Direct Local Unit Trusts  
Offshore Collective Investment Schemes  
Direct Offshore Unit Trusts

Brian Groom has also satisfied all requirements of and pledged to abide by The Financial Planning Institute of South Africa's Code of Conduct and practise standards and has been accepted as an associate of the Financial Planning Institute of South Africa (FPI).

#### 4. Contracts with Product Suppliers

We offer financial products from a variety of product suppliers. Please see the list of suppliers and their contact details below:

Local:

Allan Gray Unit Trust Management Limited	<a href="http://www.allangray.co.za">www.allangray.co.za</a>
Coronation Fund Managers	<a href="http://www.coronation.co.za">www.coronation.co.za</a>
Foord	<a href="http://www.foord.co.za">www.foord.co.za</a>
Glacier by Sanlam	<a href="http://www.glacier.co.za">www.glacier.co.za</a>
Marriott	<a href="http://www.theincomespecialists.co.za">www.theincomespecialists.co.za</a>
Ninety One	<a href="http://www.ninetyone.co.za">www.ninetyone.co.za</a>
Nedgroup Investments	<a href="http://www.nedgroupinvestments.co.za">www.nedgroupinvestments.co.za</a>
RECM	<a href="http://www.recm.co.za">www.recm.co.za</a>

Offshore:

Ashburton	<a href="http://www.ashburton.com">www.ashburton.com</a>
Coronation	<a href="http://www.coronation.com">www.coronation.com</a>
Franklin Templeton Investments	<a href="http://www.franklintempleton.co.za">www.franklintempleton.co.za</a>
Glacier International	<a href="http://www.glacierinternational.com">www.glacierinternational.com</a>
Ninety One	<a href="http://www.ninetyone.co.za">www.ninetyone.co.za</a>
Marriott	<a href="http://www.marriott.co.za">www.marriott.co.za</a>
Nedgroup Investments (IOM) Limited	<a href="http://www.nedgroupinvestments.com">www.nedgroupinvestments.com</a>
Orbis	<a href="http://www.orbisfunds.com">www.orbisfunds.com</a>
Sarasin	<a href="http://www.sarasin.co.uk">www.sarasin.co.uk</a>
Standard Bank Offshore Services	<a href="http://www.sboff.com">www.sboff.com</a>

None of our product suppliers have imposed any conditions or restrictions with regard to the type of financial products or services that we may provide.

#### 5. What will you have to pay for our services?

We will tell you how we get paid as well as the amount, before we conclude any business with you.

**Commission** – Groom Investment Consulting cc receives commission from various product providers with whom we interact on your behalf.

**Fees** – Groom Investment Consulting cc reserves the right to charge you a fee for analysing your financial circumstances, needs and objectives. Consultation fees are R1.000-00 + VAT per hour. The first consultation shall not attract a fee.

Fees may also be levied for the maintenance and servicing of your financial affairs with us. A full schedule of our current fees is available on request.

#### 6. Compliance with the Financial Advisory and Intermediary Services Act “FAIS”

Compliance with the FAIS Act is monitored by Masthead (Pty) Ltd, a Compliance Practice approved by the Financial Services Board. Their postal address is P O Box 765, Howard Place, 7450. Their contact numbers are 021 6863588(T) and 021 6863589(F).

## 7. Confidentiality

All information will be kept by Groom Investment Consulting cc on a confidential basis and will not be made available to third parties by Groom Investment Consulting cc unless so authorised by the client beforehand or if required to divulge such information in the public interest or under any law.

Please click [here](#) to view our privacy policy.

## 8. Conflicts of Interest

In accordance with Groom Investment Consulting cc's conflicts management policy, Groom Investment Consulting cc places a high priority on its clients' interests. As conflicts of interest affecting clients could undermine the integrity and professionalism of our business, any instances of potential conflict of interest must be identified as soon as possible. If conflict situations cannot be avoided, they must be managed equitably and in the client's interest. Detecting potential or recognized conflicts of interest that could compromise the interest of our clients and managing and limiting the impact of conflicts of interest therefore constitute an integral part of Groom Investment Consulting cc's duties and obligations.

Potential conflicts of interest are inherent in any business and therefore it is not the aim of Groom Investment Consulting cc to avoid all conflicts of interest but to rather take steps to identify and manage them to ensure that our clients are not unduly prejudiced by them.

Groom Investment Consulting cc maintains an active Conflicts of Interest Management Policy which can be obtained from the key individuals.

There are currently no conflicts of interest.

Currently Allan Gray pays Groom Investment Consulting cc roughly 30% of its recurring commission.

Groom Investment Consulting cc has no shareholding in any of our product suppliers.

## 9. Complaints

In the event of your being dissatisfied with any aspect of our service you may contact our offices at the address shown on the front page of this letter. Should you wish to pursue a complaint against an authorised representative of Groom Investment Consulting cc, you should address your complaint in writing to Brian Groom, the registered key individual of Groom Investment Consulting cc, again at the address on the front page of this letter.

If you cannot settle your complaint with us, you are entitled to refer it to the FAIS Ombud. The Ombud's office has been created to provide you with a redress mechanism for any inappropriate financial advice that may have been given to you. The Ombud's contact details are: PO Box 74571, Lynnwood Ridge 0040,

Tel 012 470 9080, Fax 012 348 3447, [info@faisombud.co.za](mailto:info@faisombud.co.za) [www.faisombud.co.za](http://www.faisombud.co.za)

**10. Professional Indemnity – Fidelity Insurance or Guarantees**

Groom Investment Consulting cc holds professional indemnity insurance underwritten by Camargue Specialised Liability Management.

**11. Basis of Advice**

In order for us to provide you with appropriate advice and financial products it is important that you give us sufficient particulars of your financial affairs. Failure to make a full disclosure could result in our advice being compromised and may result in you thus making a financial commitment to a product that is inappropriate to your needs and objectives.

In order to help ensure that you make a financial commitment to a product that is appropriate to your needs you are strongly advised to ensure that you have all the necessary documentation and information that you require from your advisor before you make a final decision.

**12. Advice Documentation**

You are hereby advised and cautioned that, unless otherwise agreed, any advice, quotation, recommendation or variation thereof that you receive in writing from Groom Investment Consulting cc or its representatives, "the Advice Documentation" is given to you on the understanding that it shall not be used as a basis of advice subsequently concluded with another Financial Services Provider.

In the event that you elect to present the Advice Documentation to another Financial Services Provider, Groom Investment Consulting cc takes no responsibility for the appropriateness of the final advice offered by any subsequent advisor to your financial needs and circumstances.

**13. Financial Intelligence Centre Act (FICA)**

Please note that in terms of the Financial Intelligence Centre Act (FICA), Groom Investment Consulting cc is obliged to report suspicious and unusual transactions that may facilitate money laundering to the authorities.

**CLIENT ACKNOWLEDGEMENT**

I/We .....the undersigned hereby acknowledge receipt of this Disclosure Notice from Groom Investment Consulting cc and have read and understand the terms contained herein.

Signed at \_\_\_\_\_ this \_\_\_\_ day of \_\_\_\_\_ 202\_.

Client Signature: \_\_\_\_\_

