

Sanlam Umbrella Fund

Regulation 37 Compliance form for default investment strategies outside of the Trustee approved range

Applicant:
Investment portfolio:

In terms of The Pension Funds Act, (Section 36(1)(c)), Regulation 37 requires Funds to establish a default investment strategy/portfolio

With the above mentioned investment portfolio being outside of the Sanlam Umbrella Fund Trustee approved range of investments, the Trustees require the questionnaire below to be completed and submitted to the Investment Sub-committee in respect of each investment portfolio.

Consultants are required to ensure and demonstrate to the Fund on request, that - *Default investment portfolio(s) are appropriate for the members who will be automatically enrolled into them*

a) the design of the default investment portfolio, including its

- i. high-level objective;
- ii. underlying asset allocation;
- iii. fees and charges; and
- iv. the expected risks and returns to which it exposes members whose retirement savings in that fund are or will be invested in the default investment portfolio.

Is appropriate to that category of members whose retirement funding contributions and retirement savings are or will be invested in the default investment portfolio(s)?

Requirement	Does the investment strategy/portfolio comply? (Y/N)	Motivate why the investment strategy/portfolio is compliant	Remedial steps if the investment strategy/portfolio is non-compliant
(a)(i)			

Requirement	Does the investment strategy/portfolio comply? (Y/N)	Motivate why the investment strategy/portfolio is compliant	Remedial steps if the investment strategy/portfolio is non-compliant
(a)(ii)			
(a)(iii)			
(a)(iv)			

b) The composition of assets and performance of the default investment portfolio are adequately communicated to members.

The composition of assets and performance of the default investment portfolio(s) and fund returns are communicated to members on a frequency and format which may be prescribed.

Requirement	Does the investment strategy/portfolio comply? (Y/N)	Motivate why the investment strategy/portfolio is compliant	Remedial steps if the investment strategy/portfolio is non-compliant
(b)			

c) Default investment portfolios are reasonably priced and competitive

The fees and charges in respect of the default investment portfolio(s) or the assets held in respect of the default investment portfolio(s) are reasonable and competitive, taking account of the size, asset allocation and other characteristics of the fund.

Requirement	Does the investment strategy/portfolio comply? (Y/N)	Motivate why the investment strategy/portfolio is compliant	Remedial steps if the investment strategy/portfolio is non-compliant
(c)			

d) All fees and charges are disclosed

All fees and charges, whether borne directly or indirectly by the fund, implicit or explicit, are disclosed on a regular basis to boards and the relevant information is appropriately disclosed to members, in a clear and understandable language, and in formats which may be prescribed.

Requirement	Does the investment strategy/portfolio comply? (Y/N)	Motivate why the investment strategy/portfolio is compliant	Remedial steps if the investment strategy/portfolio is non-compliant
(d)			

e) No loyalty bonuses or other complex fee structures

No fees or charges deducted from or amounts credited to members' retirement savings or retirement funding contributions or otherwise paid to members by any service provider in respect of the default investment portfolio may depend on the length of time that a member has been a member of the fund, the number of contributions made by the member or any similar measure.

Requirement	Does the investment strategy/portfolio comply? (Y/N)	Motivate why the investment strategy/portfolio is compliant.	Remedial steps if the investment strategy/portfolio is non-compliant
(e)			

f) Members are not locked into the default investment portfolio

Where member investment choice is provided in the rules, members may, at least once every twelve (1) months, instruct the fund to transfer their retirement savings from the default investment portfolio into any other investment portfolios offered in terms of the investment policy statement, in respect of which transfer the fund may deduct reasonable administration costs.

Requirement	Does the investment strategy/portfolio comply? (Y/N)	Motivate why the investment strategy/portfolio is compliant.	Remedial steps if the investment strategy/portfolio is non-compliant
(f)			

g) The default investment portfolio is reviewed

It reviews the default investment portfolio(s) on a regular basis to ensure that it continues to comply with this regulation.

Requirement	Does the investment strategy/portfolio comply? (Y/N)	Motivate why the investment strategy/portfolio is compliant.	Remedial steps if the investment strategy/portfolio is non-compliant
(g)			

We hereby declare that:

We take full responsibility for the above choices and hereby indemnify and undertake not to hold the Sanlam Umbrella Fund, its Board of Trustees or Sanlam Employee Benefits, its agents, directors, officers and any entity in the Sanlam Group of Companies responsible for any losses or any eventuality that may result from the above.

Signed at on

Signature	
Capacity of signatory:	
Full names of signatory	
Signatory is a representative of (business name):	