



GHT (PTY) LTD — SECTION 14 FAIS DEBARMENT POLICY

Entity Registration Number: 2014/254038/07

FSP Category: Category I (Long-term Insurance)

Applicable Legislation: Financial Advisory and Intermediary Services Act, No. 37 of 2002 ("FAIS")

Date of Adoption: 21 August 2026

1. POLICY ADOPTION & STATUTORY MANDATE

In terms of Section 14(1) of the FAIS Act, GHT (Pty) Ltd ("GHT") is legally obligated to debar any Representative or Key Individual who no longer complies with the Fit and Proper requirements (Section 13(2)(a)) or who has materially contravened the provisions of the FAIS Act.

EXECUTIVE ADOPTION DECLARATION

"I, Nicole du Plooy, in my capacity as Chief Executive Officer and Key Individual of GHT (Pty) Ltd, hereby adopt and implement this Section 14 Debarment Policy. This policy establishes the binding standard across all administrative branches, field distribution networks, and supervisory management teams."

Signature: _____

Nicole du Plooy

Chief Executive Officer & Key Individual

GHT (Pty) Ltd

2. PURPOSE & OPERATIONAL SCOPE

GHT markets and administers long-term funeral insurance policies specifically serving vulnerable clients, including Old Age and Permanent Disability SASSA grant recipients.

Given this operational context, GHT enforces zero tolerance for dishonest conduct, deceptive marketing, or abusive sales practices. This policy applies strictly to:

- All natural and juristic Representatives mandated by GHT.
- All field sales agents, direct sales teams, and intermediaries.
- Sales Managers and supervisory personnel managing field agent cohorts.
- All Key Individuals overseeing the rendering of financial services.

3. GROUNDS FOR DEBARMENT

Debarment under Section 14 is reserved strictly for conduct relating to the rendering of financial services and the statutory Fit and Proper requirements.

Prohibited Misuse: GHT will never initiate debarment proceedings for ordinary labor disputes, commercial disagreements, sales target shortfalls, or voluntary employment resignations where no Fit and Proper violation exists.

Operational Triggers for GHT Field Representatives & Managers

- **Honesty, Integrity & Good Standing Breaches:**
 - Forgery or falsification of client signatures on policy application forms or debit order mandates.
 - Capturing unauthorized policy applications or enrolling SASSA beneficiaries without informed consent.
 - Misrepresenting policy benefits, waiting periods, exclusion clauses, or premium deduction mechanisms.
 - Embezzlement, premium theft, or intercepting client cash payments.
- **Supervisory & Management Non-Compliance:**
 - Sales Managers coercing, instructing, or knowingly permitting unaccredited field agents to sell policies.
 - Concealing representative misconduct, forging compliance checklists, or bypassing required customer disclosures.
- **Material Statutory Violations:**
 - Gross non-compliance with the FAIS General Code of Conduct, FICA verification rules, or the Treating Customers Fairly (TCF) outcomes.
 - Disqualification under Section 13(2)(a) (e.g., criminal convictions involving fraud, theft, or dishonesty).

4. PROCEDURAL FAIRNESS & STATUTORY TIMELINES (SECTION 14(3))

To ensure every debarment action is lawful, reasonable, and procedurally fair in terms of Section 14(2) and Section 14(3) of FAIS:

[Step 1: Formal Notice] —► [Step 2: Response Window] —► [Step 3: Formal Determination] —► [Step 4: Notifications]

* Grounds & evidence	* Minimum 14 calendar days	* KI & Compliance Review
* Debarred Person		
* Policy document attached	* Written or oral submission	* Written finding issued
* FSCA (within 5 days)		

4.1 Step 1: Notice of Intention to Debar

Before any debarment decision is made, GHT issues a formal written Notice of Intention to Debar to the representative, containing:

- The precise grounds, reasons, and supporting evidence warranting debarment.

- An attached copy of this GHT Debarment Policy.
- Notice of the representative's right to respond and make representations.
- Measures implemented to protect client interests and manage unconcluded business.

4.2 Step 2: Response Window

- The representative must be granted a minimum of **14 calendar days** from receipt of notice to deliver a written submission or request a formal hearing.
- Where literacy, language, or logistical constraints exist for field agents, GHT facilitates oral representations, transcribed and signed for the record.

4.3 Step 3: Executive Determination & Consideration

- Key Individuals (Nicole du Plooy and the compliance desk) review all evidence, representations, and mitigating factors.
- A formal written determination is drafted detailing whether the representative is debarred or exonerated.

4.4 Step 4: Notification of Decision & Tribunal Rights (Section 14(3)(b))

If debarred, GHT immediately delivers written notice to the representative containing:

- The final decision and detailed reasons.
- Immediate revocation of authority to render financial services on behalf of GHT.
- **Mandatory Statutory Notice:** Clear instruction on the person's right to apply to the **Financial Services Tribunal** for reconsideration under Chapter 15 of the Financial Sector Regulation Act (FSRA), including applicable filing requirements and timeframes (within 60 days of notice).

5. STATUTORY NOTIFICATIONS & FSCA REPORTING

Within **5 business days** of effecting a debarment, GHT must:

- Formally submit the Section 14 Debarment Notification to the Financial Sector Conduct Authority (FSCA) via the prescribed electronic portal.
- Remove the individual's profile from GHT's active Representative Register.
- Secure and transfer all client records, active policy mandates, and ongoing servicing responsibilities to an accredited internal representative to ensure zero prejudice to policyholders.

6. JURISDICTION & TIME LIMITATION

- **6-Month Window:** GHT may initiate debarment proceedings against a former representative provided the misconduct occurred while the person was mandated by GHT, and proceedings commence within **6 months** of the date on which the mandate or employment terminated.