Capitec Bank Holdings Limited ("Capitec") 1999/025903/06

And subsidiaries

"the group"

Capitec Fraud Policy Statement

Definition

For this statement, fraud is defined as any dishonest activity which may result in damage to Capitec. Fraud can be perpetrated either internally by employees, clients or external third parties.

2. Policy Statement

1.1 Capitec does not tolerate any fraudulent activity.

1.2 The bank requires all employees:

- · to always act honestly and with integrity, and
- to safeguard the resources, tangible and intangible assets of our clients and the bank

1.3 The bank will:

- take appropriate action against any employee involved in, or who assists with, committing or attempted fraud,
- actively seek legal recourse against all parties involved in fraudulent or dishonest acts, and
- actively assist all clients affected by fraud to the best of the bank's ability.

3. Reporting

3.1 Capitec Clients

Capitec Clients who suspect that they have fallen victim to fraud should immediately report the incident to the South African Police Service ("SAPS") and the Capitec Client Contact centre at +27 21 941 1377 or 0860 10 20 43.

3.2 Employees

All employees have a duty to immediately report any suspected or detected fraud. Any such activity must be reported initially to line management, except

where line management itself is suspected of involvement. In such a case the fraud must be reported directly to Forensic Services or via Tip-offs Anonymous on 0800 004 836 or capitecbank@tip-offs.com.

Line management is responsible for reporting all instances of suspected or discovered fraud to Forensic Services. Failure to report suspected fraud to Forensic Services may be considered as a serious offence.

The bank respects the right of an individual to retain their anonymity when reporting fraud. Individuals must make use of the bank's fraud hotline, Tip-offs Anonymous, should they wish to retain their anonymity.

Any employee reporting suspected or known fraud in good faith will be protected from any form of internal persecution or victimisation (by the bank) resulting from their tip-off.

4. Creation of policies, principles, methodologies, processes, and systems

Capitec will introduce risk-based policies, principles, methodologies, processes, and systems to ensure compliance with the relevant Fraud and Financial Crime legislations, regulations, and subordinate instruments such as guidance notes and directives.